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April 14, 2022

VIA E-MAIL

Ms. Nancy Marconi
Acting Registrar (registrar@oeb.ca)
Ontario Energy Board
Toronto, ON

Dear Ms. Marconi:

Re: Enbridge Gas Inc. (EGI) EB-2020-0072
Consultation to Review Enbridge Gas Inc.'s 2022 Annual Update to Natural Gas Supply Plan –
Clarification questions of the Vulnerable Energy Consumers Coalition (VECC)

Please find attached questions of VECC in the above-noted proceeding. We have also directed a copy of the same to EGI.

Yours truly,

Mark Garner
Consultants for VECC/PIAC

Email copy:
Richard Wathy, Technical Manager, Regulatory Applications
EGIRegulatoryProceedings@enbridge.com

For interrogatory clarifications please contact Mark Garner at 647-408-4501 or markgarner@rogers.com

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| REQUESTOR NAME | VECC |
| TO: | Enbridge Gas Inc. (EGI) |
| DATE: | April 14, 2022 |
| CASE NO: | EB-2022-0072 |
| APPLICATION NAME | 2022 Annual Update to 5 Year Gas Supply Plan (Plan) |

VECC-1

Reference: Plan, page 8

- a) Given the relatively large potential impacts of harmonization of weather and design day demand methodologies (2.5-3.7%) is EGI considering any form of phase-in of the (potential) portfolio price increase beginning in the 2024/25 winter season?
- b) In its future application does EGI anticipate providing evidence to show the impacts of both moving to set temperature approach and the probabilistic approach to show the cost/benefits of the alternative methodologies?

VECC-2

Reference: Exhibit B, page 9

The footnote at page 9 reads: *EGI's Gas Supply Plan does not contemplate the balancing needs of the semi-bundled or unbundled customers since those customers are responsible for managing their own load balancing needs.*

- a) What is a "semi-bundled" customer?

VECC-3

Reference: Plan, page 19

In March, the Henry Hub natural gas spot price averaged \$4.90 per million British thermal units (MMBtu), which was up from the February average of \$4.69/MMBtu, as inventory withdrawals slightly outpaced the five-year (2017–2021) average. We expect liquefied natural gas (LNG) exports will increase from March levels, contributing to a Henry Hub price of \$5.95/MMBtu for April. We expect the Henry Hub price will average \$5.68/MMBtu in 2Q22 and

\$5.23/MMBtu for all of 2022. We expect the Henry Hub spot price will average \$4.01/MMBtu in 2023. The forecast drop in prices for 2023 reflects our expectation that storage levels will be higher during 2023 than in 2022
<https://www.eia.gov/outlooks/steo/report/natgas.php>

- a) The last EIA report (and the current Henry Hub spot price) suggests natural gas prices for the remainder of 2022 and 2023 will be above the \$3.37/MMBtu suggested in the ICF forecasts. How will these higher price forecasts impact the 2022/2023 gas supply plan of EGI?

VECC-4

Reference: Plan, page 30 /Appendix A Innovative page 10

Throughout 2021, several certifications have emerged. The Equitable Origins EO100, MiQ, and Project Canary's Trustwell certifications are examples that are actively used by producers to monitor their conformance to specific ESG standards that are different for each certification.

- a) Who pays the costs of these certification companies?
- b) Is it correct that each certification company named above adheres to a different set of standards or different measures of similar standards?
- c) Which of the named certification companies are incorporated in Canada?
- d) In the absence of federal/provincial or regulatory approval of a set of standards why would any particular set of "certifiable" standards be considered of value and priced at a premium to ratepayers who are presumably widely diverse in their own opinion of what should qualify as value for RSG (or "SNG" or any otherwise taggable named gas supply)?

VECC-5

Reference: Plan, page 31

As can be seen in the map below, many large producers have committed to certifying 100% of their production

- a) If it is anticipated that 100% of producers will eventually certify to one or more of the certification companies why should ratepayers pay a premium incremental cost for RSG tagged gas supply?

VECC-6

Reference: Plan, page 35

- a) With respect to the RNG pilot program EGI notes that 835 customers have enrolled so far to pay an incremental \$2.00 monthly charge. Does EGI collect data on the type of customer (e.g., income, occupation etc.) willing to pay additional amounts for RNG gas? Will this information be made available in a public forum by EGI?

VECC- 7

Reference: Plan, page 36

- a) The two recent RNG bio methane projects have contracts with Fortis BC and not EGI. Please explain why and specifically address if there are any regulatory or other impediments (or lack of incentives that may be available in other jurisdictions) which inhibit EGI from purchasing locally produced biogas.
- b) What steps/initiatives might the OEB take to encourage biogas purchases by EGI?

VECC-8

Reference: Plan, Appendix A, page 9

- a) Please provide the definition that was provided to survey respondents for the term “responsibly sourced gas”.

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