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Enbridge Gas Inc.
500 Consumers Road
North York, Ontario
M2J 1P8

VIA RESS and EMAIL

April 25, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2021-0002
Multi-Year Demand Side Management Plan (2022 to 2027)
Undertaking Responses - Updated**

In accordance with the OEB's Decision on Confidentiality issued on April 21, 2022, enclosed please find the unredacted copy of the response to undertaking J1.1.

Also enclosed, please find an update to the response provided in Undertaking J1.3, details of the update are provided below:

Exhibit Reference	Update
J1.3	Added a second chart which excludes avoided carbon costs

Should you have any questions on this matter please contact the undersigned at 416-495-5642.

Sincerely,

Asha Patel
Technical Manager, Regulatory Applications

cc: D. O'Leary, Aird & Berlis
EB-2021-0002 Intervenors

ENBRIDGE GAS INC.

Undertaking Response to Pollution Probe

Undertaking

Tr: 160

To provide the computations and e-mail from Optimal

Response:

Below is an email exchange between Enbridge Gas and National Grid which confirms the participant value quoted by Enbridge Gas of 37,000 during the Oral Hearing. At the request of National Grid, the information to identify the individual has been redacted.

In order to determine what Enbridge Gas and National Grid believe to be a more reasonable lifetime m3 savings/participant, Enbridge Gas utilized the same numerator as identified in the response to 3-EGI-9-OEB.STAFF.2 of 231,757,448 lifetime m3 and replaced the incorrect denominator of 4,810 participants, utilized by Optimal Energy, with the National Grid recommended value of 37,000.

The outcome of this change was that the Optimal Energy calculated lifetime savings per participant of 48,182 m3 was reduced to 6,264 m3, or roughly half of the 12,404 lifetime m3 that Optimal Energy indicated Enbridge Gas was generating from its residential program.

From: Coen, Melanie <Melanie.Coen@nationalgrid.com>
Sent: Monday, April 4, 2022 2:04 PM
To: Scott Hicks <Scott.Hicks@enbridge.com>
Subject: RE: [EXTERNAL] Response to Undertaking JT1.1

Hi Scott,

I reviewed your email and agree with what is stated.

Best,

Melanie Coen

Lead Analyst
Customer Energy Management - MA
[nationalgrid](http://nationalgrid.com)

781-907-2468
melanie.coen@nationalgrid.com
40 Sylvan Rd, Waltham, MA
nationalgrid.com

From: Scott Hicks <Scott.Hicks@enbridge.com>
Sent: Monday, April 4, 2022 1:25 PM
To: Coen, Melanie <Melanie.Coen@nationalgrid.com>
Subject: [EXTERNAL] Response to Undertaking JT1.1

Melanie,

As per our previous discussion, Enbridge has been asked by the Ontario Energy Board to respond to an undertaking concerning our communications regarding the irregularities around the 2019 Residential Coordinated Delivery participant values Enbridge identified in the "**2022-2024 Statewide Data Tables - Gas**" and the subsequent recommended participant values you suggested we use instead.

Could you please reconfirm the following:

- On February 2nd, National Grid confirmed that the participant value of 4,810 as listed in the above-mentioned Data Table, in the 2019 Evaluated row for the Residential Coordinated Delivery Program is in fact a clerical error.
- On February 15th, understanding the clarity Enbridge was looking for, National Grid recommended that Enbridge use 37,000 participants instead, as this is more reflective of the overachievement National Grid realized against its planned target for 2019 of 32,907 participants, however is not a perfect proxy as the estimate does not exclusively represent unique participants.

Could you please confirm this for me in your response?

Again, really appreciate your time and consideration in helping us to provide clarity on this issue.

Scott Hicks
Supervisor, EC Process & Program Strategies
Energy Conservation

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Safety. Integrity. Respect. Inclusion.

ENBRIDGE GAS INC.

Undertaking Response to Environmental Defence

Undertaking

Tr: 176

To calculate the net benefits per tonne of the lifetime CO₂ reductions arising from Enbridge's 2023 program.

Response:

The net benefits per tonne of lifetime CO₂ reductions arising from Enbridge Gas's 2023 programs are calculated below. It should be noted that the net benefits include avoided carbon costs as these benefits were included in the study "Marginal Abatement Cost Curve for Assessment of Natural Gas Utilities' Cap and Trade Activities (EB-2016-0359)" referred to by Mr. Elson.

TRC Plus Net Benefits 2023 (\$)	A	\$364,502,976
Net m3 cumulative gas savings 2023	B	1,732,912,070
TRC Plus Net Benefits \$ / net CCM m3	C = A / B	0.2103
GHG conversion factor kg CO ₂ / m ³	D	1.874
TRC Plus Net Benefits \$ / kg CO ₂	E = C / D	\$0.1122
TRC Plus Net Benefits \$ / tonne CO ₂	F = E * 1000	\$112.24

If avoided carbon costs are excluded the value is significantly lower as shown below.

/u

TRC Plus Net Benefits 2023 (\$)	A	\$157,616,528
Net m3 cumulative gas savings 2023	B	1,732,912,070
TRC Plus Net Benefits \$ / net CCM m3	C = A / B	0.0910
GHG conversion factor kg CO ₂ / m ³	D	1.874
TRC Plus Net Benefits \$ / kg CO ₂	E = C / D	\$0.0485
TRC Plus Net Benefits \$ / tonne CO ₂	F = E * 1000	\$48.54