



Tania Persad
Associate General Counsel,
Regulatory Law
Law EGI

tel 416 495-5891
cell 416 579-3625
tania.persad@enbridge.com
egiregulatoryproceedings@enbridge.com

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

VIA EMAIL

May 13, 2022

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Re: Green Button Implementation - OEB File No. EB-2021-0183
Enbridge Gas Inc. (Enbridge Gas) Request for Extension of Time to Comply

The Green Button Regulation, Ontario Regulation 633/21 (Regulation), requires electricity and gas distributors (collectively, “distributors”) to make available energy usage and account holder information identified in the North American Energy Standards Board (NAESB) Energy Service Provider Interface Model Business Practices (ESPI) standard that the distributors currently collect and make available to customers in the normal course of the distributors’ operations. The statutory reference for this obligation is section 25.35.8(2) of the *Electricity Act* and the activity of implementing this obligation is generally referred to by the OEB as Green Button.

Enbridge Gas is working on implementing Green Button by November 1, 2023, for its approximately 3.8 million natural gas customers, subject to the below extension request and further information about non-distribution customer classes.

Extension Request

Enbridge Gas hereby requests, pursuant to section 5 of the Regulation, an extension of the time period to implement Green Button for its approximately 525 large volume distribution customers (LVDCs) and 5 unbundled customers. Specifically, Enbridge Gas seeks to extend the compliance date from November 1, 2023, to no later than December 31, 2026 for the following reasons:

- 1) Currently, the LVDCs have direct access to their account information (or “energy data”, as defined in the Regulation) through Enerline, which is the existing self-serve system that Enbridge Gas uses for these LVDCs. Enerline also allows LVDCs to provide approval for a third-party to access the LVDC’s account information. Enerline is a secure, self-serve transaction and information tool that provides customers and any third-party they authorize with the ability to connect online and download information in a manner similar to Green Button.

For instance, Enerline provides daily and hourly consumption data. Up to 65 days of historical consumption can be retrieved automatically through Enerline Direct Connect (similar to Green Button's Connect My Data). Additional historical daily data can also be retrieved through Enerline's Distribution Measurement download feature (similar to Green Button's Download My Data).

Approximately 94% of the LVDCs are active users of Enerline. This suggests that the vast majority of LVDCs consider Enerline to be useful for the intended purpose of providing access to account information. For clarity, 100% of LVDCs have access to Enerline, but only 94% have chosen to use it.

- 2) The 5 unbundled customers referenced are primarily power generators, that contract for their own upstream services (gas transportation and supply) and track their own gas consumption on a continuous basis. These customers have direct access to their own daily consumption data because they must balance their supply and consumption on a daily basis.
- 3) Enbridge Gas is planning to replace Enerline and associated systems (for contracting, gas management and billing), including the systems used for the 5 unbundled customers, with new systems, a process that will commence in 2023. These system changes will likely take 2-3 years to implement fully. Enbridge Gas will develop the new systems to ensure Green Button compliance.
- 4) Because Enbridge Gas plans to decommission Enerline and the associated systems in the near term, it would not be prudent for Enbridge Gas to incur incremental costs (that are difficult to estimate but may be up to \$1 million for the 530 customers) to modify the existing systems for Green Button compliance. This is especially true given that these 530 customers already have access to their own consumption information and provide access to third parties.

Enbridge Gas is currently conducting a request for proposals (RFP) to engage one or more vendors to assist with the Green Button technology transition for all of its distribution customers. The RFP timelines contemplate Enbridge Gas negotiating project scopes with vendors starting in early July 2022. In order to support these discussions and efficiency in implementing Green Button by November 1, 2023, Enbridge Gas seeks a final determination from the OEB on this extension request by the end of June 2022.

Out of Scope Services for Green Button

Enbridge Gas has a group of 324 customers, currently, receiving storage and transportation (S&T) services that Enbridge Gas understands to be out of scope for the Regulation. Enbridge Gas is providing the following further information on this customer class to the OEB in order to explain why this is the case.

The S&T market is concerned with the movement of gas flowing into, out of and within Ontario. S&T customers utilize Enbridge Gas S&T services to provide natural gas to markets outside of Enbridge Gas's franchise areas. The Regulation defines a "natural gas distributor" as delivering natural gas by hydrocarbon pipeline to a person or entity who uses, for their own consumption, natural gas that they did not produce. S&T customers are not distribution customers and they do not use natural gas for their own consumption. Because the Regulation applies only to distributors and distribution customers, it does not apply to S&T customers.

In summary, Enbridge Gas seeks an extension of the Green Button implementation timeline for its approximately 525 LVDCs and 5 unbundled customers to no later than December 31, 2026, for the reasons cited above, by the end of June 2022.

Enbridge Gas would be pleased to answer questions about this request or the inapplicability of the Regulation to S&T customers as described above.

We look forward to the OEB's further directions in respect of this matter.

Yours truly,

Tania Persad
Associate General Counsel, Regulatory Law

cc: Eamon O'Riordan, Case Manager, Consumer Protection & Industry Performance, OEB
Tracy Lynch, Director Customer Care Operations, Enbridge Gas
Joan Byng, Director, Large Volume Contracting & Policy, Enbridge Gas