

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

June 24, 2022

EB-2022-0141 - Consultation to Review Annual Update to Natural Gas Supply Plan of EPCOR Natural Gas Limited Partnership (ENGLP)
Pollution Probe Interrogatoires

Dear Ms. Marconi:

In accordance with OEB direction, please find attached Pollution Probe's Interrogatories to ENGLP.

Respectfully submitted on behalf of Pollution Probe.



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cc: EPCOR Regulatory (via email)
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Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Consultation to Review 2022 Annual Update to
ENGLP Natural Gas Supply Plans**

POLLUTION PROBE INTERROGATORIES

June 24, 2022

**Submitted by: Michael Brophy
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Consultant for Pollution Probe**

A) Questions related to the ENGLP Aylmer Gas Supply Plan 2020-2024

Pollution Probe #1

Reference: The ENGLP Aylmer Gas Supply Plan identifies three elements that align with the Public Policy requirement, specifically the Federal Carbon Pricing Program, Renewable Natural Gas (RNG), and Community Expansion,

- a) Please provide a list of new (i.e. incremental since the last annual update) public policy objectives that were reviewed as the Gas Supply Plan updates were developed.
- b) Please explain if any of the following policy considerations were considered and if so, please explain how they impacted the plan update.
 - OEB Mandate Letter dated November 15, 2021
 - OEB Gas IRP Decision dated July 22, 2021
 - Government of Ontario's Made-in-Ontario Environment Plan (MOEP)
 - Municipal Energy and Emissions Plans (supported by Provincial policy and program funding)

Pollution Probe #2

ENGLP previously indicated that it would be interested in opportunities provided through the Gas IRP Decision and Framework once complete. This was completed in July 2021 via EB-2020-0091 and provides opportunities to provide more cost-effective energy to prospective customers when IRP alternatives are a better option than incremental gas infrastructure. What plans (if any) does ENGLP have to leverage the benefits of this approach for ENGLP and prospective customers?

Pollution Probe #3

Reference: 7.1. Renewable Natural Gas (RNG)

"In the fall of 2022, ENGLP is expecting to start receiving RNG into it's distribution system"

- a) Please confirm that the incremental RNG supply being facilitated by ENGLP is to meet demand in British Columbia (i.e. Fortis) as previously noted for RNG supplies by ENGLP. If incorrect, please provide an update.

- b) Please confirm the magnitude (directional or figures to the extent possible) of the incremental RNG volumes expected starting fall 2022.
- c) Please confirm the source (e.g. landfill gas) for the incremental RNG supply identified for fall 2022.
- d) Please provide any information related to the GHG (lifecycle) emissions values for generation of the RNG identified as being available in fall 2022. These values would be compared to the fuels (e.g. natural gas) to determine the net GHG reductions provided by use of the RNG.

Pollution Probe #4

- a) Please provide draft details on the DSM programs ENGLP intends to offer (i.e. sector, funding, TRC Plus or cubic metre goals).
- b) Please confirm what year the ENGLP DSM programs will be available to customers.
- c) Has ENGLP consulted with any stakeholders (including customers) on design and implementation of its draft DSM programs? If no, why not. If yes, please provide details.
- d) In the early days of DSM program development and implementation, Enbridge used an OEB endorsed stakeholder Consultative process. Has ENGLP considered leveraging such an approach and if yes, how would stakeholders express interest?

Pollution Probe #5

Please confirm that ENGLP has made no changes to scorecard metrics since the 2021 Gas Supply Plan Update. If in correct, please identify the changes.

B) Questions related to the ENGLP Southern Bruce Gas Supply Plan 2020-2022

Pollution Probe #6

Reference: The ENGLP Southern Bruce Gas Supply Plan identifies three elements that align with the Public Policy requirement, specifically the Federal Carbon Pricing Program, Renewable Natural Gas (RNG), and Community Expansion,

- c) Please provide a list of new (i.e. incremental since the last annual update) public policy objectives that were reviewed as the Gas Supply Plan updates were developed.
- d) Please explain if any of the following policy considerations were considered and if so, please explain how they impacted the plan update.
- OEB Mandate Letter dated November 15, 2021
 - OEB Gas IRP Decision dated July 22, 2021
 - Government of Ontario's Made-in-Ontario Environment Plan (MOEP)
 - Municipal Energy and Emissions Plans (supported by Provincial policy and program funding)

Pollution Probe #7

ENGLP previously indicated that it would be interested in opportunities provided through the Gas IRP Decision and Framework once complete. It was completed in July 2021 via EB-2020-0091 and provides opportunities to provide more cost-effective energy to prospective customers when IRP alternatives are a better option than incremental gas infrastructure. What plans (if any) does ENGLP have to leverage the benefits of this approach for ENGLP and prospective customers?

Pollution Probe #8

Reference: 8.4. Renewable Natural Gas (RNG)

- a) Please identify what opportunity there is to enable incremental RNG production and/or transportation in the Southern Bruce territory? If there is an inventory of RNG production opportunity, please provide a copy.
- b) Please explain what activities ENGLP has undertaken to engage with potential RNG producers in Southern Bruce.

Pollution Probe #9

- a) Please provide draft details on the DSM programs ENGLP intends to offer (i.e. sector, funding, TRC Plus or cubic metre goals).
- b) Please confirm what year the ENGLP DSM programs will be available to customers.
- c) Has ENGLP consulted with any stakeholders (including customers) on design and implementation of its draft DSM programs? If no, why not. If yes, please provide details.
- d) In the early days of DSM program development and implementation, Enbridge used an OEB endorsed stakeholder Consultative process. Has ENGLP considered leveraging such an approach and if yes, how would stakeholders express interest?

Pollution Probe #10

Please confirm that ENGLP has made no changes to scorecard metrics since the 2021 Gas Supply Plan Update. If in correct, please identify the changes.

Pollution Probe #11

The Southern Bruce plan expires in 2022 (i.e. 2020-2022). What term will the next plan cover?