



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

January 16, 2023

VIA E-MAIL

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

Dear Ms. Marconi:

Re: EB-2022-0200 Enbridge Gas Inc. (EGI)
2024 Cost of Service distribution, transmission and storage rates
Submission on Draft Issues list of the Vulnerable Energy Consumers Coalition (VECC)

These are the submissions of VECC on the contested issues of the draft issues list filed with the Board on January 13, 2023.

VECC adopts and supports the submissions of the School Energy Coalition (SEC) with respect to the Board's proposed issues 46 and 47. We also concur with SEC that additional evidence with respect to whether to maintain the existing cost-based storage policy or to alter that policy is warranted. We note that the Applicant's own evidence with respect to energy transition and site restoration argues for reviewing storage asset policies.

We also agree with the submissions of the Federation of Rental-housing Providers of Ontario (FRPO) that the merger of the two storage providing entities in Ontario is a material change to the market that warrants the Board's consideration. Furthermore, the Board Staff report and other evidence which formed the basis of NGEIR is now over 17 years old. We also note that if the issue is not examined in this proceeding, then the impact of market failure will be visited upon ratepayers for a prolonged period of time which, we submit, is unreasonable and an abdication of the Board's legislative mandate.

Finally, we disagree with the submissions of Board staff with respect to the addition of issue 59 – recommendations as per SQR measures. We agree with the submissions of IGUA on this issue. As a matter of pragmatics an examination of the issues of SQRs are inevitable in a rate rebasing proceeding. We see no reason why a panel subsequently well informed on that issue would not put forth an opinion as to the merits of undertaking a rule change proceeding. Such an opinion would not be binding on the OEB's CEO. In our view adding this issue is an efficient way of understanding regulatory need. As it would take proportionally very little of the proceedings time and resources the only risk to its inclusion would seem to be the possibility of offending corporate politics.

These are the respectful submissions of VECC on the proposed Board issues list.

Yours truly,

A handwritten signature in black ink, appearing to read "M. Garner".

Mark Garner
Consultants for VECC/PIAC

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