

Elson Advocacy

March 23, 2023

Ms. Nancy Marconi

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

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. 2024 to 2028 Rates Application
EB-2022-0200**

I am writing on behalf of Environmental Defence in response to the OEB's letter of March 22, 2023, requesting an update on the discussions between Guidehouse, Enbridge, and interested parties relating to the orders made in Procedural Order #3.

Those discussions have not arrived at a resolution.

Enbridge and Guidehouse continue to decline to provide the model underlying the Guidehouse report, including certain key parts of the model that are excel spreadsheets that could be shared without any technical complications. The Guidehouse report was generated in part with an optimization computer program. That program is fed an "input workbook". However, a great deal of calculations and analysis takes place upstream of the computer program in generating the input workbook. This includes, for example, the calculations regarding the conversion of gas end uses to electricity end uses. These fundamental aspects of the model are contained in a number of spreadsheets. These should be shared. Putting aside for the moment whether the computer program can be shared or access provided thereto, there is no justification to decline to provide the parts of the model that are contained in excel spreadsheets.

Enbridge and Guidehouse has agreed to provide the "input workbook" and the outputs. However, as noted above, that is different from the spreadsheets used to generate the input workbook, which includes key energy-related calculations and analysis.

This is a major information gap. For instance, because we do not have these spreadsheets, we only learned today key information regarding the Guidehouse modeling. For instance, we only learned this morning that Guidehouse applied the electric space heating load shape (which is highly "peaky" and temperature dependent) to all other incremental electric load (which is much less peaky and temperature dependent). This means the electric generation and transmission capacity requirements and costs arising from fuel switching away from gas are greatly overstated. But we have not been provided the specific details and calculations. And we do not know what other issues we might discover if provided with the full spreadsheets.

Environmental Defence would not oppose the issue of disclosure of the computer program being deferred to the motions day. However, our expert would benefit from receiving the portion of the model contained in the spreadsheets noted above as soon as possible. We therefore propose that the steps in Procedural Order #3 be resumed with respect to those clearly sharable portions of the model.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson

cc: Parties to the above proceeding