

ONTARIO ENERGY BOARD

**Enbridge Gas Inc.
2024 Rebasing**

**POLLUTION PROBE INTERROGATORIES
To
GEC/Energy Future Group**

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Consultant for Pollution Probe

M9-PP-1

Reference: Require all new connections to be net-zero greenhouse gas emitting. [GEC-ED_Neme_Evidence_20230511, page 5]

- a) If the OEB was to require all new customers to use biomethane/RNG, what work will the OEB need to undertake to define guidance ensuring the RNG is actually net zero (including that emission credits have not been stripped off the RNG)?
- b) Other jurisdictions (e.g. Fortis BC) do not have access to sufficient RNG and have been purchasing credits or RNG from other jurisdictions such as Ontario. How would those types of constraints impact the ability to Ontario to significantly increase RNG access.
- c) The OEB has undertaken studies (e.g. DSM Potential Study) to provide an objective estimate of potential available to Ontario energy consumers. Would there be value in the OEB undertaking a similar study for RNG achievable potential and related costs to ensure that any related decisions align with actual energy resources available? If not, why not.
- d) Similarly, what work will the OEB need to undertake to define guidance ensuring that any hydrogen allowed in the system is produced from low or zero-GHG emitting processes, and verified as such.

M9-PP-2

The OEB has enabled Enbridge to put forward alternative investments or Integrated Resource Plan (IRP) alternatives [Reference: EB-2020-0091 Decision and related IRP Framework] that would earn shareholder profit and could be capitalized in a manner similar to utility natural gas capital assets. This provides an option for Enbridge to mitigate investment risk for natural gas assets if it were a valid concern. The lack of use for this approach suggests that Enbridge still prefers investing in traditional natural gas assets to alternatives that do not use natural gas.

- a) Mr. Neme is a member of the OEB's IRP TWG. Please describe the level of effort Enbridge has used to implement IRP alternatives since the OEB Decision and IRP Framework was issued in 2021. Please provide any comments on how the OEB could increase use of IRP to mitigate future asset risk.
- b) On May 9, 2023 the OEB indicated that "the OEB expects Enbridge Gas to undertake timely in-depth quantitative and qualitative analyses of alternatives that specifically include IRP impacts in future leave to construct applications" [Reference: EB-2022-0247 dec_order_EGI SSE Kennedy Station Relocation Project_20230509, Page 6]. What other conditions/requirements (if any) are required to accelerate proper IRP analysis and implementation of IRP alternatives over the Rebasing period.

M9-PP-3

Energy Futures Group identified that Guidehouse has assume a 100% coincident peak load factor for incremental electric equipment. Energy Futures Group provided an illustrative diagram to show why that is not a reasonable assumption. If the more accurate load factors were used, please provide an estimate of what the impacts would be on the costs of the Electrified Scenario?