

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

June 26, 2023

**EB-2023-0111 - Consultation to Review EPCOR's Natural Gas Supply Plan:
Aylmer's 2023 Annual Update and South Bruce's 2023-2025 Natural Gas Supply Plan
Pollution Probe Interrogatoires**

Dear Ms. Marconi:

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

Respectfully submitted on behalf of Pollution Probe.



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cc: EPCOR Regulatory (via email)
Arturo Lau, OEB Case Manager (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Consultation to Review EPCOR's Natural Gas Supply Plan:
Aylmer's 2023 Annual Update and South Bruce's 2023-2025
Natural Gas Supply Plan**

POLLUTION PROBE INTERROGATORIES

June 26, 2023

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

A) Questions related to the EPCOR's Aylmer 2023 Gas Supply Plan Update

Pollution Probe #1

Reference: "In December 2022, EPCOR finalized the local supply contract with a local RNG producer. The RNG producer is expected to generate approximately 11% to 12% of total system demand by 2024". [Annual Update to the 2020-2024 EPCOR (Aylmer) Gas Supply Plan Filed: 2023-04-28 EB-2023-0111 Page 17 of 48]

- a) Please provide a copy of the agreement with the local RNG provider.
- b) Please explain who is cleaning the RNG to pipeline quality gas and what related equipment is required by the RNG producer, EPCOR or any other relevant parties involved.
- c) Please provide a copy of the standard being used for determining the quality of RNG entering the gas distribution system.

Pollution Probe #2

Reference: OEB Staff Report for ENGLP 2022 GSP. Page 25.

"OEB staff recommends that EPCOR continue to explore opportunities to engage with local suppliers for RNG to identify potential opportunities (including costs and benefits). OEB staff expects that there will be lessons learned from EPCOR Aylmer's experience with the RNG supplier after the fall of 2022. EPCOR Aylmer should provide a summary of any lessons learned with respect to receiving RNG supply in its 2023 GSP Update. EPCOR should also provide an update regarding any RNG-related opportunities it may be considering for the future in the 2023 GSPs."

- a. Please provide a summary of any lessons learned with respect to receiving RNG supply.
- b. Please provide an update regarding any RNG-related opportunities it may be considering for the future
- c. The OEB does not currently have guidelines defining what RNG is or a recognized guideline for calculating net lifecycle emissions of renewable gases for comparison to other fuels such as fossil (natural) gas. Does EPCOR have a protocol that the OEB should consider, or any recommendations on how the OEB should proceed to close these gaps (e.g. consultation, retain an expert etc.)?

Pollution Probe #3

Reference: “The Framework requires that, where appropriate, the Supply Plan supports and is aligned with public policy objectives. This includes the Federal Carbon Pricing Program, Community Expansion, Minister of Energy Letter of Direction, and Canada Green Homes Grant. [Page 5]

- a) Does EPCOR have a more comprehensive list of public policy objectives in addition to examples noted above? If yes, please provide the more comprehensive list.
- b) What policy objectives related to RNG does EPCOR believe are relevant and how does it intent to support them?
- c) What policy objectives related to Net Zero does EPCOR believe are relevant and how does it intent to support them?
- d) Enbridge retained Guidehouse to develop a Pathways to Net-Zero Emissions for Ontario Report. Please indicate whether EPCOR is aware of the report and if yes, please indicate whether EPCOR generally agrees or disagrees with the recommendations in the report. [most recent updated version is EB-2022-0200 Exhibit 1.10.5.2_Pathways to Net-Zero Emissions for Ontario_BLACKLINE_20230421]
- e) Enbridge is requesting the ability to cross-subsidize RNG purchases as part of its gas supply in the 2024 Rebasing proceeding [EB-2022-0200]. Does EPCOR support cross-subsidizing more expensive RNG for blending in the gas network? Please explain the response.

Pollution Probe #4

- a) Per the OEB Staff Report, please confirm that EPCOR is on track to submit DSM program proposals as part of its next cost of service filing for Aylmer. If not, please explain why not.
- b) Please provide an update on the development and stakeholder engagement activities related to EPCOR’s DSM proposal for its next cost of service filing for Aylmer.

Pollution Probe #5

EPCOR indicates that customers in its franchise have access to the Greener Homes Grant program. Also, as outlined in the EB-2021-0002 Decision, Enbridge has an agreement to deliver the Greener Homes Grant Program in Ontario.

- a) Please provide a summary of the communication, outreach and support that Enbridge has provided EPCOR to ensure that its customers have access to the full benefits of the Greener Homes Grant program.
- b) Please provide a summary and any relevant communication materials that EPCOR has used to promote the Greener Homes Grant program to Ontario energy consumers in its franchise area.

Pollution Probe #6

Reference: “The EIA in its latest Annual Energy Outlook (AEO2023) cites in its Reference Case a modest drop of natural gas for power generation to the end of 2030 at the expense of renewables”. [Appendix A Page 29 of 48]

- a) Please provide a web reference for the EIA report referenced.
- b) Please provide the legend for the EIA graphs included in Appendix A or the web reference (per part a above) and related page reference numbers.

Pollution Probe #7

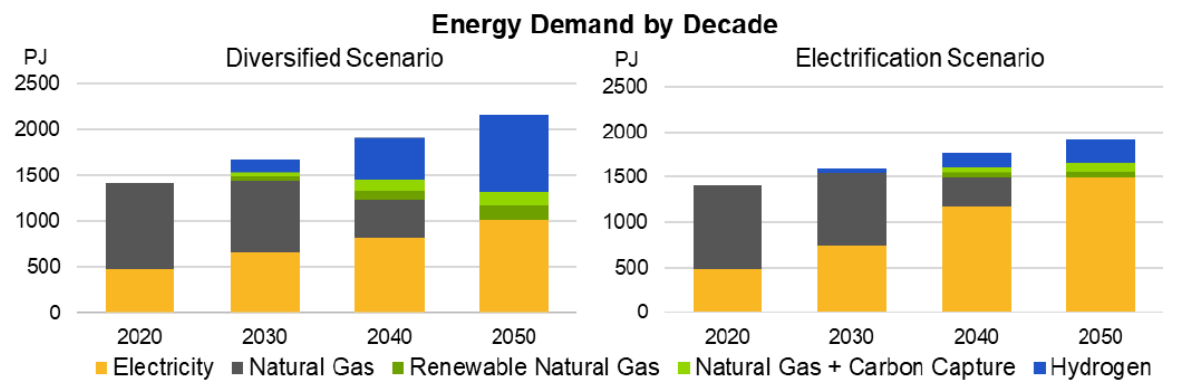
Reference: Appendix F – ENGLP Aylmer Performance Metrics Scorecard

- a) Please provide an explanation of what a “C” indication means for each scorecard metric where it is used (i.e. how is compliance determined).
- b) Please explain the “N/A” score against the RNG Metric and please explain how the metric is measured and what the target outcome is.
- c) Please provide what metrics EPCOR is considering for measurement of the DSM scorecard metric given that the DSM programs are currently being developed. Which year does EPCOR expect to start measuring the DSM metric results?

B) Questions related to the EPCOR's Southern Bruce Gas Supply Plan 2023-2025

Pollution Probe #8

Reference: Figure ES-2, EB-2022-0200 Exhibit 1.10.5.2_Pathways to Net-Zero Emissions for Ontario_BLACKLINE_20230421



- a) Enbridge retained Guidehouse to develop a Pathways to Net-Zero Emissions for Ontario Report. Please indicate whether EPCOR is aware of the report and if yes, please indicate whether EPCOR agrees or disagrees with the report findings and recommendations [most recent updated version is EB-2022-0200 Exhibit 1.10.5.2_Pathways to Net-Zero Emissions for Ontario_BLACKLINE_20230421]
- b) The Guidehouse study noted above has forecasted that natural gas essentially decrease to zero in Enbridge's system between now to 2050 (i.e. no natural gas except potentially in some industrial cases where there is carbon capture to offset emissions). Has EPCOR considered what this scenario would mean to the EPCOR system given that it relies on natural gas from Enbridge? If yes, what are the impacts?

Pollution Probe #9

Reference: OEB Staff Report for ENGLP 2022 GSP. Page 23.

"Recommends that EPCOR provide details regarding its consideration of scorecard improvements (including potentially adding targets) at the time of its next five-year GSP for the Aylmer service area (expected to be filed in 2024), and its next three-year GSP for the South Bruce service area (expected to be filed in 2023)."

Please provide details related to the scorecard improvements outlined in the OEB Staff Report for application to the Gas Supply Plan.

Pollution Probe #10

Reference: “The Framework requires that, where appropriate, the Supply Plan supports and is aligned with public policy objectives. This includes the Federal Carbon Pricing Program, Community Expansion, Minister of Energy Letter of Direction, and Canada Green Homes Grant. [Page 8]

- a) Does EPCOR have a more comprehensive list of public policy objectives in addition to examples noted above? If yes, please provide the more comprehensive list.
- b) What policy objectives related to RNG does EPCOR believe are relevant and how does it intent to support them?
- c) What policy objectives related to Net Zero does EPCOR believe are relevant and how does it intent to support them?

Pollution Probe #11

EPCOR indicates that customers in its franchise has access to the Greener Homes Grants. Also, as outlined in the EB-2021-0002 Decision, Enbridge has an agreement to deliver the Greener Homes Grant Program in Ontario.

- a) Please provide a summary of the communication, outreach and support that Enbridge has provided EPCOR to ensure that its customers have access to the full benefits of the Greener Homes Grant program.
- b) Please provide a summary and any relevant communication materials that EPCOR has used to promote the Greener Homes Grant program to Ontario energy consumers in its franchise area.

Pollution Probe #12

Reference: OEB Staff Report for ENGLP 2022 GSP. Page 25.

“OEB staff recommends that EPCOR continue to explore opportunities to engage with local suppliers for RNG to identify potential opportunities (including costs and benefits). OEB staff expects that there will be lessons learned from EPCOR Aylmer’s experience with the RNG supplier after the fall of 2022. EPCOR Aylmer should provide a summary of any lessons learned with respect to receiving RNG supply in its 2023 GSP Update. EPCOR should also provide an update regarding any RNG-related opportunities it may be considering for the future in the 2023 GSPs.”

Please provide an update regarding any RNG-related opportunities it may be considering for the future.