

EB-2022-0200

**Enbridge Gas Inc.
2024 Rebasing**

**POLLUTION PROBE
HEARING COMPENDIUM Part 2**

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DECISION AND ORDER

EB-2021-0002

ENBRIDGE GAS INC.

**Application for Multi-Year Natural Gas Demand Side Management
Plan (2022 to 2027)**

BEFORE: Michael Janigan
Presiding Commissioner

Anthony Zlahtic
Commissioner

Patrick Moran
Commissioner

November 15, 2022

however urge the OEB to not approve the inclusion of incentives for gas-fired measures in Enbridge Gas's DSM plan, particularly for gas-fired furnaces and water heaters as part of the proposed residential whole home program. Parties argued that these measures are not cost-effective and highlighted the long-term impacts of continuing to install gas equipment is continuing to require customers to be reliant on natural gas for the foreseeable future.

Findings

The OEB approves the DSM Policy Framework included in Schedule E. The DSM Policy Framework builds on past guidance and instructions and summarizes the policy guidance from this Decision and Order. This should be used going forward to guide the development of future ratepayer funded DSM activities. The OEB will consider future updates or revisions to the DSM Framework where necessary. The DSM Framework includes guidance related to the OEB's expectations for the current 2023-2025 DSM Plan term, as well as the expectations, stakeholdering and planning processes that should be used to prepare the next DSM Plan, which the OEB expects Enbridge Gas will file in mid-2024.

On the role of natural gas DSM as part of the broader issue related to the electrification of the energy sector, the OEB believes that it is premature for the OEB to impose broad new requirements on Enbridge Gas in the absence of the Ontario Government developing and releasing a comprehensive policy on the topic of electrification. It is likely that any discussions regarding electrification will require the involvement of the IESO and other relevant stakeholders in contributing to those policies.

The OEB finds that providing gas customers with incentives to use natural gas more efficiently through measures such as improved building insulation, or to switch away from natural gas to electricity powered solutions such as heat pumps is consistent with the DSM objectives of reducing natural gas consumption and increasing the efficiency of natural gas usage. This is also consistent with the fundamental economic principle that as demand is reduced, costs are also reduced. For energy efficiency and energy conservation programs, this means that lower overall costs due to these DSM programs may contribute to the reduction in demand for natural gas and result in lower costs for all customers. Such benefits that may accrue to Ontario ratepayers as a result of reduced gas consumption are achieved by those programs that feature efficiency and fuel-switching measures. In this context, the OEB also finds that incentives for gas-fired equipment are inconsistent with these objectives. Natural gas furnaces, boilers and hot water heaters are already subject to high efficiency standards that replacement equipment must meet regardless, and incentives for such equipment do not improve efficiency. Gas-fired heat pumps are not currently commercially available and the cost-



Asha Patel
Technical Manager
Regulatory Applications
Regulatory Affairs

Tel: 416-495-5642
Email: Asha.Patel@enbridge.com
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario
M2J 1P8

November 24, 2022

VIA RESS AND EMAIL

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

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No.: EB-2021-0002
Multi-Year Demand Side Management Plan (2022-2027)
Enbridge Gas and NRCan Agreement**

In accordance with Procedural Order No. 9 in the above noted proceeding, Enbridge Gas has attached the following to this cover letter in unredacted form:

- Attachment 1 – Final Contribution Agreement
- Attachment 2 – Enbridge Gas and CGHG Final Program Details Proposal
- Attachment 3 – Agreement Overview and Q&A

In the event that you have any questions on the above or would like to discuss in more detail, please do not hesitate to contact me.

Sincerely,

Asha Patel
Digitally signed by
Asha Patel
Date: 2022.11.24
11:09:10 -05'00'

Asha Patel
Technical Manager, Regulatory Applications

cc.: D. O'Leary, Aird & Berlis – VIA email

the coordinated delivery of funding. The initiative is administered by Enbridge Gas via a single registration point, allowing for:

- “One-window” program access for all eligible Ontarians
- Consistent and clear rebate levels to avoid confusion in the market and enhance participation.
- The enhanced CGHG will serve all eligible Ontarians by:
 - Aligning criteria for measure rebates to the CGHG level to replace the separate Enbridge Gas Whole Home offering criteria.
 - Aligning measure rebates to at minimum the level of the CGHG and replacing the separate Enbridge Gas Whole Home offering rebate levels.
 - For homes outside of the Enbridge Gas franchise area, or that are within the franchise area that are not customers of the Company or that do not use natural gas as a space heating source, rebates will be at the CGHG level where the home is the owner’s primary residence.
 - For homes in the Enbridge Gas franchise area with natural gas as a space heating fuel in the pre-retrofit home energy assessment and who remain an Enbridge Gas customer at the time of the post-retrofit energy assessment, will provide enhanced rebates for insulation, smart thermostats and enhance the maximum rebate a participant may receive for upgrading efficiency measures throughout their home to \$10,000 to encourage participants to deeper energy savings levels.
 - Aligning most rebates and criteria to the enhanced CGHG offering level for homes that are not the owner’s primary residence in the Enbridge Gas franchise area with natural gas as a heating fuel to provide consistency in the market. These participants are not eligible for Federal Government funding and are out of scope for the Contribution Agreement.
- A single consistent process for contractors and Registered Energy Advisors (“REAs”)
- Economies in applicant processing, program delivery, and rebate payment
- All budgeting, forecasting, and funding allocations between NRCan and Enbridge Gas to occur on the back end, allowing Service Organizations and REA’s to focus on delivery of the initiative

Additional details on the proposed approach to funding from a co-delivered program offering are included in the core requirements section of this proposal.

Proposal Title	Enbridge Gas’s co-funding proposal for delivery of enhanced CGHG initiative to replace pre-existing Whole Home offering of the Company and the Canada Greener Homes Grant initiative in Ontario
Objectives of co-delivering the Canada Greener Homes Grant:	Co-delivery provides the opportunity for Enbridge Gas and NRCan to drive stronger program results more cost effectively for Ontario energy consumers than could be achieved without a coordinated approach. Alignment of the pre-existing Enbridge Gas Home Efficiency Rebate (“HER”) DSM program offering and Canada Greener Homes Grant (“CGHG”) into a single comprehensive program will provide Ontario homeowners and occupants a simple, singular path to optimize energy savings in their homes. Ontarians would have the ability to access incentives through a single program, with clear communications on the program incentives, eligibility criteria and the benefits of energy conservation. This approach avoids both the duplicative costs of administering parallel programs, but also avoids homeowner/occupant and contractor confusion that may inhibit or delay decisions to enhance energy conservation. A single cohesive initiative also enables consistent and accurate reporting of energy and greenhouse gas savings for Ontario.



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DECISION ON SETTLEMENT PROPOSAL AND RATE ORDER

EB-2022-0133

ENBRIDGE GAS INC.

**Application by Enbridge Gas Inc. for natural gas distribution
rates and other charges effective January 1, 2023**

BEFORE: Anthony Zlahtic
Presiding Commissioner

Patrick Moran
Commissioner

November 3, 2022

B-1-1	Rate Setting Mechanism
D-1	Draft Rate Order – EGD Rate Zone
D-2	Draft Rate Order – Union Rate Zones
I.STAFF.3	Staff Interrogatory #3
I.EP.4	Energy Probe Interrogatory #4

6. What is the timing for implementation of the proposed changes to 2023 rates?

Enbridge Gas has prepared draft Rate Orders for the EGD and Union Rate Zones reflecting the implementation of the IRM adjustments and the proposed updates to the capital pass-through and PDO costs. The draft Rate Orders are attached as Appendices “A” and “B” and reflect the impact of updated gas costs based on October 1, 2022 QRAM decision.

All parties agree that it is appropriate to implement the updated rates as of January 1, 2023, in conjunction with the January 1, 2023 QRAM Application for the EGD and Union Rate Zones.

Enbridge Gas is requesting that the OEB review and approve the IRM rate adjustments, including the Rate Order by November 24, 2022, so that the rates can be implemented on a final basis in conjunction with the January 1, 2023 QRAM application.

Evidence: The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
D-1	Draft Rate Order – EGD Rate Zone
D-2	Draft Rate Order – Union Rate Zones
I.STAFF.3	Staff Interrogatory #3
I.EP.4	Energy Probe Interrogatory #4

7. Integrated Resource Planning

As context for the statements below, all parties note that no relief related to Integrated Resource Planning (“IRP”) is being sought in this proceeding.

With that said, Intervenor do wish to express their concerns regarding the status of Enbridge Gas’s compliance with the OEB’s IRP Decision and Framework, and in particular with the impacts on 2023 operating and maintenance costs and capital project planning/implementation.

Enbridge Gas does not agree that it is out of compliance with the OEB’s IRP Decision and Framework.

Evidence: The evidence in relation to this issue includes the following:

I.PP.2 to 7	Pollution Probe Interrogatories #2 to 7
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A Compelling Need to Modernize Planning and Requirements

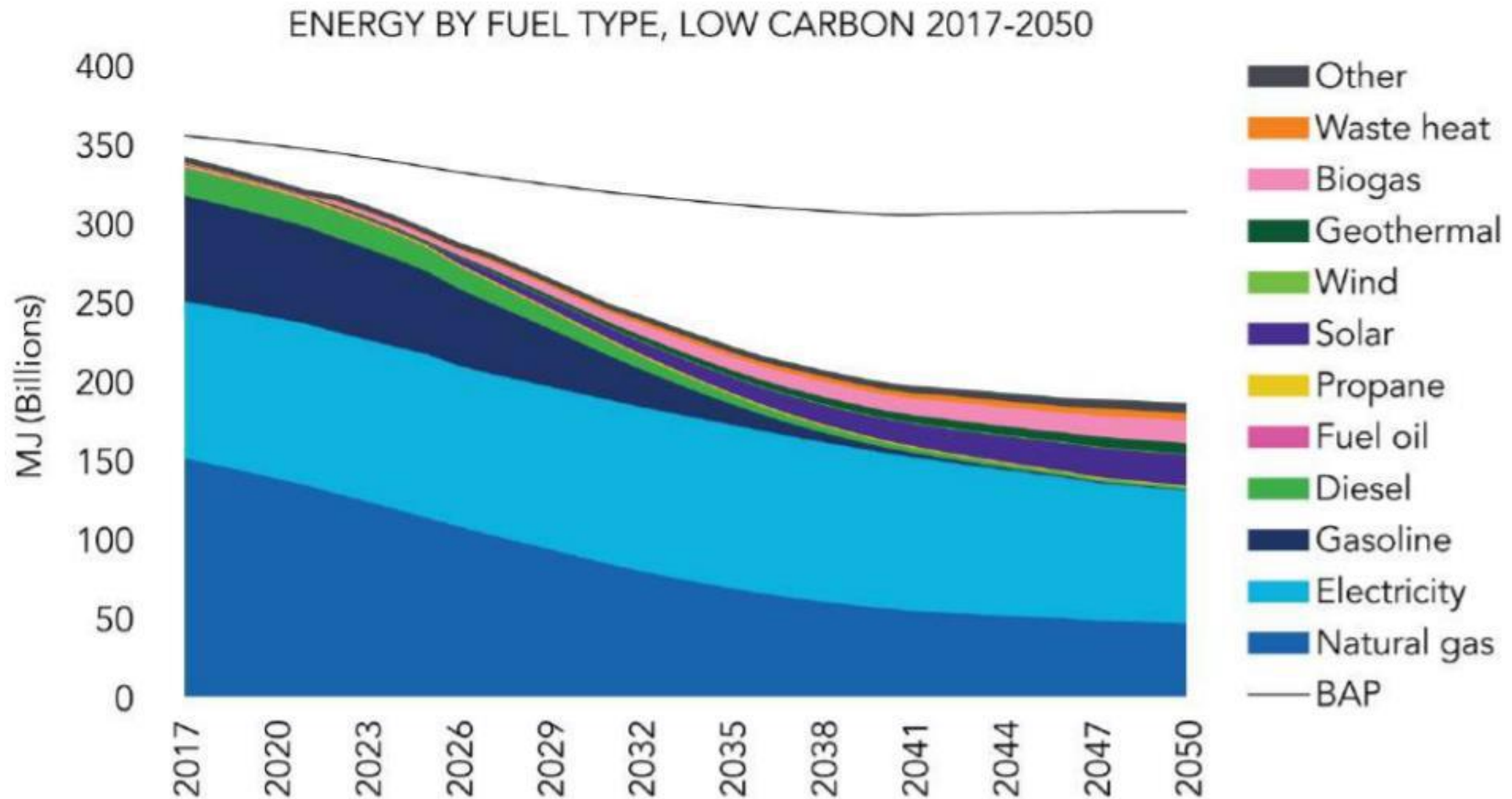
Old Fashioned Paradigm	Modern, Reliable and Sustainable Paradigm
<ul style="list-style-type: none">• Utility-Centric Planning• Siloed planning and processes• Little or no integrated planning• Short-term decision making• Urgent facility applications• Opaque process with little detail of IRP considerations included in OEB applications (e.g. IRP Screenings, DSM analysis, etc.)• Little to no meaningful Stakeholder consultation• Favours pipeline solutions• Puts the burden on the OEB and Intervenor to discover relevant information through the proceeding	<ul style="list-style-type: none">• Consumer-Centric Planning• Includes current and emerging Policy considerations (including energy and emission planning)• Open and transparent Stakeholder communication <u>and</u> input• Long-term decision making• Promotes the best option for Ontario consumers• Requires all relevant information and material in initial filing• Regular transparent continuous improvement process• Transparency, transparency and more transparency

The Value of Case Studies – *If you don't remember the past, you are condemned to repeat it.*

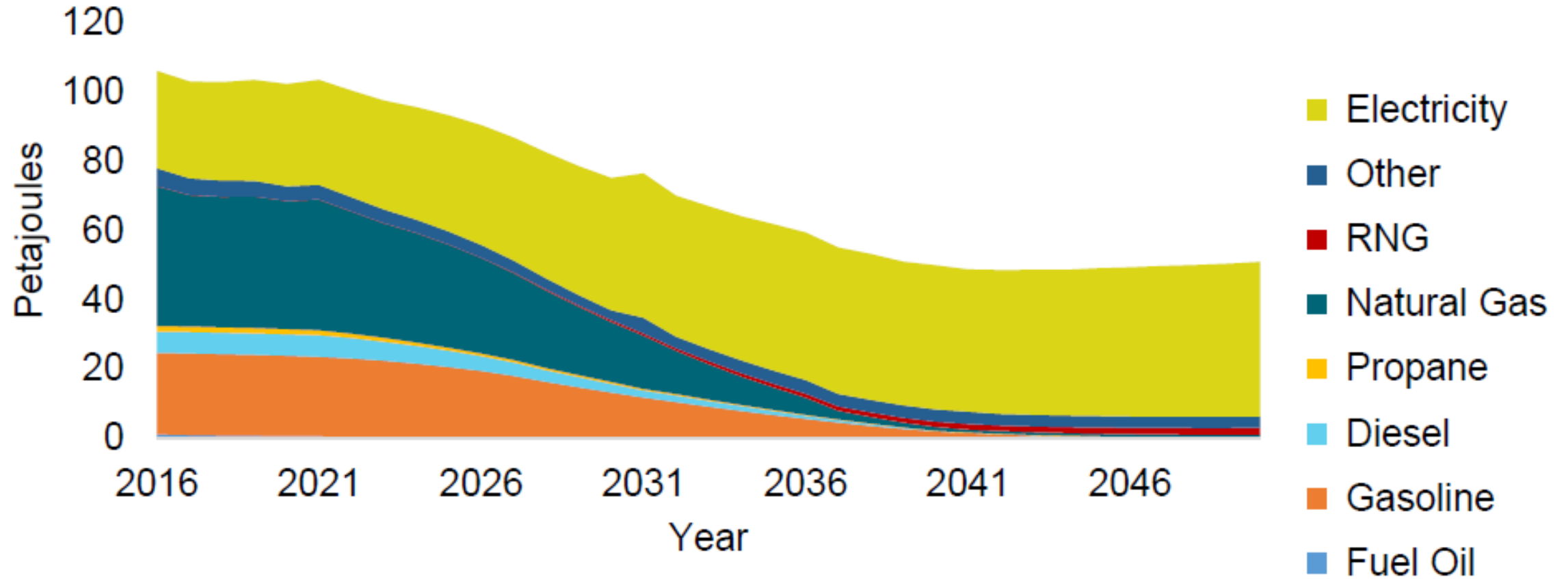
Project	Issues	Outcome
<p>London Line Replacement EB-2020-0192</p> <p>Note: Identified as an exemplar project in EB-2019-0091, Exhibit I.PP.1 (b)</p>	<ul style="list-style-type: none">• Over 90 km of existing pipelines were among the oldest in the system.• Some alternative assessment, but analysis did not align with DSM Framework or OEB's expectations for option assessment.• "The OEB was assisted in its findings by the rigour of the analyses requested by the intervenors ..."• Two existing pipelines downsized by one smaller pipeline.	<ul style="list-style-type: none">• "... the OEB agrees with Environmental Defence that <u>Enbridge Gas has an obligation to conduct a more rigorous Integrated Resource Planning assessment at the preliminary stage of projects development in future cases.</u> As OEB staff also notes <u>the failure to present detailed analyses makes it unlikely that Enbridge Gas would select an alternative including DSM or other non-build project option.</u> <u>The OEB acknowledges that more direction is likely to be provided to Enbridge Gas in future leave to construct projects as part of the ongoing IRP proceeding.</u> In the interim, however, <u>the OEB believes that all parties would be assisted if Enbridge Gas would, in the future, undertake in-depth quantitative and qualitative analyses of alternatives that specifically include the impacts of DSM programs on the need for, or project design of facilities for which Enbridge Gas has applied for leave to construct.</u> " – EB-2020-0192 OEB Decision, Page 20

The Value of Case Studies – *If you don't remember the past, you are condemned to repeat it.*

Project	Issues	Outcome
Dawn-Parkway Expansion EB-2019-0159	<ul style="list-style-type: none"> • IRP options prematurely screened out • OEB set a thorough process to review the proposed project. • Application withdrawn 	<ul style="list-style-type: none"> • Saved over \$200 million in capital costs • Avoided major environmental and socio-economic impacts • OEB process helped to avoid excess capital / stranded assets
Branchton Relocation EB-2020-0065	<ul style="list-style-type: none"> • Project driven by assumption that current pipeline does not meet CSA Z662. Assumption questioned during the proceeding • Potential to set a precedent affecting all existing assets 	<ul style="list-style-type: none"> • Application currently on hold while Enbridge reassesses project need and regulatory requirements
NPS 20 Waterfront Relocation EB-2020-0198	<ul style="list-style-type: none"> • Controversial \$70 million pipeline project • Inadequate stakeholder consultation • Did not consider reasonable options in the study area 	<ul style="list-style-type: none"> • Enbridge requested to withdraw the LtC to reassess options • Conflict with required timing for Don River Flood Project and Port Land development • OEB has asked for input



City of Ottawa Energy Evolution Report, Figure 23



A Sample of Additional Relevant Information and Best Practices

Document	Relevance
<i>IESO Regional Planning Process Review – Straw Man Design (2020)</i>	<ul style="list-style-type: none"> • An examples from IESO on IRP process improvement activities. • IESO considers municipal energy planning and even launched an Indigenous Community Energy Planning Program to compliment the Province of Ontario program. • Final Report released February 3, 2021.
IESO Engagement Principles	<ul style="list-style-type: none"> • Best Practice Consultation with stakeholders – see Appendix. • Effective IRP demands open and effective stakeholder engagement. • Enbridge Gas did not seek direct external stakeholder feedback on its IRP Proposal prior to it being filed with the Board (Exhibit I.PP.3).
Ontario Environment Plan	<ul style="list-style-type: none"> • Policy alignment. • Supports DSM and community energy and emissions planning.
Ontario Municipal Energy Plan - An integrated approach for energy and emissions planning	A municipal energy plan is a comprehensive long-term plan to improve energy efficiency, reduce energy consumption and greenhouse gas emissions, foster green energy solutions and support economic development.

IRP and Community Energy and Emissions Planning

- Energy planning needs to be holistic, community focused, including effective policy consideration.
- Municipal energy plans are required under O. Reg 397/11 and other Provincial requirements.
- Energy and emissions planning is supported through policy and programs including the Municipal Energy Plan Program.
- Municipal energy and emission plans exist for municipalities across Ontario. They are fuel agnostic and integrated from a consumer level.
- Significant public/stakeholder engagement and consultation completed.
- Current planning and OEB applications do not adequately consider these plans.
- OEB requirement that the 5 Year Gas Supply Plan Scorecard include effective Policy metrics - 1/3rd of the scorecard and areas for improvement.

Next Steps for Consideration

- Complete testing of evidence and public input through oral hearing component
- Interim Decision can lay out the foundational elements and key requirements of the IRP Framework Requirements and put in place immediate requirements to make improvements.
- Continue to implement 'common sense' requirements (e.g. London Line Decision)
- OEB should establish an IRP Committee (experts and key stakeholders similar to Vermont System Planning Committee (VSCP) - Exhibit N2.GEC-ED Tab 1, page 2) to guide IRP Framework development and continuous improvement.
- Retain an expert firm to complete a draft IRP Framework document in a consultative manner with interested stakeholders. Leverage all best practices available and ensure best long-term outcomes for Ontario consumers.
- Circulate draft for comments and present to all stakeholders.
- In parallel, identify pilot opportunities for 2021+
- Update related OEB policies and guidelines as required (e.g. EBO 188/134, etc.)
- Continuous improvement approach (e.g. IESO approach)

Elson Advocacy

April 21, 2022

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

Dear Ms. Marconi:

**Re: Enbridge 2022 to 2027 Demand Side Management (“DSM”) Plan
EB-2021-0002**

I am writing to request that Enbridge confirm that the attached job posting and description is for a senior advisor as part of its Municipal Energy Solutions DSM team described in its evidence. If that request is declined, we request an order from the Board to the same effect.

Late yesterday afternoon, I first became aware of the attached Enbridge job posting for a “Senior Advisor, Municipal Energy Solutions.” This position appears to be funded by ratepayers.¹ According to the posting, this senior advisor is required to “[a]dvocate for the continued use of natural gas and its role as a low carbon option in the development of Municipal Energy Plans.” It appears that this advisor is required, in essence, to lobby municipalities to include the continued use of natural gas in their energy plans.

The senior advisor is also required to “[c]ommunicate internally key threats identified through interactions with Municipalities and assist in developing solutions to offset these threats.” The meaning of this is less clear. But read in the context of the document, it appears that the senior advisor is required to use interactions with municipal representatives to collect intelligence about threats to Enbridge’s interests, to share that intelligence with other Enbridge staff, and to develop responses. An energy plan involving electrification of buildings could be considered a threat as it would not involve the continued use of natural gas that the senior advisor is required to promote. The senior advisor would presumably be required to communicate such threats internally and develop responses.

Environmental Defence is deeply concerned about what this may reveal about Enbridge’s use of ratepayer funds to provide advice to municipalities (and to other entities). We will elaborate on those concerns in submissions. In the meantime, we ask that Enbridge confirm whether the

¹ Based on the frequent references to DSM in the job description, this would appear to be part of the \$1.66 million annual municipal engagement funding Enbridge describes Exhibit E, Tab 4, Schedule 1, Pages 3 to 5.

attached job posting and description is for a senior advisor position as part of its \$1.66 million Municipal Energy Solutions DSM programming described at Exhibit E, Tab 4, Schedule 1, Pages 3 to 5.

If Enbridge declines to answer, we ask for an order from the Board to the same effect. Such an order would be warranted under s. 11 of the *OEB Rules of Practice and Procedure*, which allows for the filling of new information by parties and for OEB directions regarding new information. The information is material to the proceeding and we only became aware of it late yesterday afternoon.

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



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About the job

Posting End Date

April 08, 2022

Employee Type

Regular-Full time

Union/Non

This is a non-union position

Mandatory COVID-19 Vaccine or Testing

COVID-19 Measures: Throughout the pandemic, Enbridge has had to make important decisions that impact our team members, and we have done so by keeping the safety of our workforce our first priority. All employees must comply with the Company's COVID-19 Vaccine and Testing Policy which requires employees to provide proof of full vaccination against COVID-19 or undergo COVID-19 testing per Company direction.

Are you skilled at working with numerous internal and external partners to provide an exceptional client experience? We are looking for a dynamic and motivated individual to join us to assist our municipal clients who are leading climate change action at the local level. As part of the Energy Conservation and Marketing group, you will support our municipal clients as they look to develop and implement program offerings that



We offer opportunities for growth, a competitive benefits and pension plan, and generous time off. We'd love to hear from you! Apply today.

What You Will Do

- Lead project-based initiatives including collaboration and partnership with Ontario municipalities
- Work closely with Municipal Energy Solutions Advisors to identify key potential municipal partners for program customizations
- Identify and facilitate material changes and add-ons to existing program offerings, including project management requirements, evaluation and tracking requirements, scenario planning and opportunities to mitigate risk proactively
- Lead ongoing engagement with key internal stakeholder teams including DSM Program Design and Delivery, DSM Strategy & Policy, DSM Tracking & Reporting, DSM Evaluation, Audit and Technology teams to identify audit / regulatory risks and mitigation plans, as well as prioritization and optimization for technical requirements of DSM offerings
- Develop, implement and share a strategic account plan for municipal program customizations.
- Advocate for the continued use of natural gas and its role as a low carbon option in the development of Municipal Energy Plans.
- Develop a strong understanding of all Demand Side Manage Program and work with DSM Program Managers to develop customized solutions which result in increased municipal participation in DSM programs and Business Development offerings.
- Track, record and communicate interactions with municipalities and partners to ensure alignment and awareness.
- Communicate internally key threats identified through interactions with Municipalities and assist in developing solutions to offset these threats.

Who You Are

You have the following education and experience:

- Post-secondary degree in Business, Marketing or related program preferably in business administration.
- Six or more years of experience with additional consideration for combined education and experience in the following areas:
- Marketing strategy, planning, initiative creation and execution in Business-to-Business and Business-to-Consumer markets.
- Managing of internal and external relationships.
- Outstanding project management, organizational and multi-tasking skills.
- Customer and results focused.
- Demonstrated ability to be innovative, strategic and initiate change, work collaboratively, negotiate, influence, facilitate.
- Work independently, highly organized and demonstrated ability to manage multiple priorities and deliver results.
- Passion for upholding Enbridge's core values of Safety, Integrity, Respect, and Inclusion.

Working Conditions

- Some travelling is required for this role (10-15%). Valid G License and responsible driving record is needed.
- Enbridge provides competitive workplace programs that differentiate us and offer flexibility to our team members. Enbridge's FlexWork (Hybrid Work Model) offers eligible employees the opportunity

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Information For Applicants

- Applications can be submitted via our online recruiting system only.
- We appreciate your interest in working with us; however, only those applicants selected for interviews will be contacted.
- Final candidates for this position may be required to undergo a security screening, including a criminal records check.

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