

Ms. Nancy Marconi  
OEB Registrar  
Ontario Energy Board  
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September 20, 2023

**EB-2022-0335 Enbridge IRP Pilots  
Pollution Probe Submission on Issues List**

Dear Ms. Marconi:

Pollution Probe is in receipt of Procedural Order No. 1 for the above-noted proceeding and the OEB Staff Submission pertaining to the Issues List. Below are Pollution Probe's submissions pertaining to the Issues List.

The IRP pilots and related proceeding are meant to test innovative IRP options that are not already well understood so that they can be leveraged to achieve IRP objectives on a broader scale, as appropriate. The pilot projects are not meant to replicate, delay or detract from the day-to-day IRP requirements for Capital projects per the OEB IRP Decision and related IRP Framework. The pilots are an opportunity to advance IRP by including as many IRP alternatives as possible (i.e. a holistic approach). If there is uncertainty related to any viable IRP alternative, now is the time to test it in an objective, transparent manner.

Using the Draft Issue List submitted by OEB Staff, below are Pollution Probe's recommendations in edit mode.

**Proposed Issues List**

**Issue 1.0: Project Need**

- 1.1: Will the Pilot Projects assist in understanding and evaluating how IRP can be implemented to avoid, delay or reduce facility projects?
- 1.2 Are objectives developed for each Pilot Project appropriate?
- 1.3: Has the process used to identify and scope each Pilot Project correct?

**2.0: Project Alternatives**

- 2.1: Is Enbridge Gas's IRP pilot project selection process, selection criteria, and decisions to select the Parry Sound and Southern Lake Huron communities appropriate?
- 2.2: Will the Pilot Projects selected give Enbridge Gas the ability to apply learnings to future IRPA design, performance and have the potential for scalability?

### **Issue 3.0: Proposed Project**

- 3.1: For each Pilot Project, has Enbridge Gas appropriately described the identified system need in the Asset Management Plan, and the baseline facility alternative?
- 3.2: Has Enbridge Gas appropriately described how each Pilot Project meets the IRP Framework Guiding Principles?
- 3.3: Are Enbridge Gas's proposed demand-side and supply-side IRPAs for each Pilot Project appropriate?
- 3.4: Is Enbridge Gas's proposed spending appropriately allocated between the IRPAs (e.g., efficiency programs vs. electrification measures vs. advanced technologies) for each Pilot Project?
- 3.5: Are Enbridge Gas's proposed program designs for IRPAs (e.g., measures included, sectors targeted, incentive levels, marketing and outreach strategy, attribution approach between DSM and IRP) appropriate for each Pilot Project?
- 3.6: Are Enbridge Gas's proposed evaluation, measurement, and verification objectives and methodologies appropriate for each Pilot Project? Do they enable Enbridge Gas to determine the effectiveness of IRPAs and to report on the results of the IRP pilot projects?
- 3.7: Is the timeframe for each Pilot Project appropriate?
- 3.8: Is the role of stakeholders and partners (e.g. cost sharing, delivery and monitoring) appropriate for each Pilot Project?

### **Issue 4.0: Project Cost and Economics**

- 4.1: Is Enbridge Gas's proposed budget for each Pilot Project appropriate?
- 4.2: Is Enbridge Gas's economic analysis for each Pilot Project appropriate?
- 4.3: Is Enbridge Gas's proposed approach to cost allocation and cost recovery appropriate and consistent with the intended use of the two OEB approved IRP Operating Cost and Capital Cost Deferral Accounts?
- 4.4: What are the costs and related timing of the Capital projects being avoided or deferred by each of the Pilot Projects and is proposed treatment appropriate?
- 4.5: What is the appropriate treatment for Pilot Projects costs incurred prior to OEB approval?

### **Issue 5.0: Stakeholdering**

- 5.1: Has Enbridge Gas appropriately engaged with stakeholders on each Pilot Project?
- 5.2 Has Enbridge appropriately consulted with the OEB IRP Technical Working group?

**Issue 6.0: Other**

6.1: Are there appropriate milestones/ checkpoints/ metrics in place to ensure Enbridge Gas is monitoring and adjusting the design of a Pilot Project on a timely basis to optimize project performance and achieve the intended project outcomes?

6.2: What is the role of the OEB IRP Technical Working Group during the execution and monitoring of each Pilot Project?

6.3: What timing, frequency and format is appropriate for reporting on each Pilot Projects?

6.4: What are the appropriate Conditions of Approval for each Pilot Project?

Respectfully submitted on behalf of Pollution Probe.



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