

September 26, 2023

BY EMAIL AND FILED VIA RESS

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc. (Enbridge Gas, or the Company)
EB-2022-0335 – IRP Pilot Projects
Submissions on draft issues list**

We represent Enbridge Gas.

On September 14, 2023, Ontario Energy Board Staff (OEB staff) filed a submission and draft issues list for the recently filed IRP Pilot Projects. On September 21st, Enbridge Gas provided its written submissions, setting out a small number of suggested changes.

Two other parties filed submissions on the draft issues list: FRPO and Pollution Probe. As permitted by Procedural Order No. 1, these are the responding submissions from Enbridge Gas.

Response to FRPO

FRPO suggests the addition of the following issue: “Would IRP pilot reporting based on milestone project events be appropriate? If so, what milestone timing and content would be appropriate?”

Enbridge Gas does not object to the substance of this proposed issue, but it appears to the Company that this item is already sufficiently covered by Issue 6.1, which reads: “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?”

Response to Pollution Probe

Pollution Probe suggests the addition of 8 additional issues, beyond the 16 issues proposed by OEB staff. In large part, Enbridge Gas does not believe that the proposed additional issues are necessary. The following are the Company’s submissions on each proposed new issue.

- Pollution Probe suggests a new Issue 1.3, asking “: Has the process used to identify and scope each Pilot Project correct?”. Enbridge Gas observes that this item is already addressed in Issue 2.1.

- Pollution Probe’s proposed Issue 3.8 asks “Is the role of stakeholders and partners (e.g. cost sharing, delivery and monitoring) appropriate for each Pilot Project?”. Enbridge Gas submits that stakeholder engagement is already addressed in Issue 5.1, and it’s not clear what is meant by “partners”. To the extent that this proposed issue is addressing delivery of IRPAs by parties other than Enbridge Gas (which is not actually discussed in the Application), then questions can be addressed under Issue 3.5, which addresses IRPA program design.
- Pollution Probe’s proposed Issue 4.4 asks: “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?” Enbridge Gas acknowledges that the first part of this proposed Issue could be relevant in IRP Plan applications, but notes that there is no proposed treatment of avoided costs included in the IRP Pilots. Therefore, Enbridge Gas suggests that the proposed issue be limited to the question of: “What are the costs and related timing of the Capital projects being avoided or deferred by each of the Pilot Projects?”
- Pollution Probe’s proposed Issue 4.5 asks: “What is the appropriate treatment for Pilot Projects costs incurred prior to OEB approval?” It is not clear what is being addressed here, however, it seems to Enbridge Gas that questions about treatment of Pilot Project costs can be addressed under Issue 4.3.
- Pollution Probe’s proposed Issues 5.2 and 6.2 ask whether Enbridge Gas has appropriately consulted with the OEB IRP Technical Working Group (TWG), and what is the role of the TWG during the execution and monitoring of each Pilot Project. The Company does not believe that these additional issues are needed. The question of appropriate engagement with stakeholders (which would include the TWG) is addressed in Issue 5.1. The question of TWG involvement in the execution and monitoring of specific IRP Plans is not contemplated in the IRP Framework or the TWG Terms of Reference.¹ If changes are to be made to the TWG’s role, that is better addressed through changes to the IRP Framework at a later date (not as part of the first Pilot Projects).
- Pollution Probe’s proposed Issue 6.3 asks “What timing, frequency and format is appropriate for reporting on each Pilot Projects?”. Proposed Issue 6.4 asks “What are the appropriate Conditions of Approval for each Pilot Project?” Enbridge Gas does not object to either of these two proposed additional issues.

¹ [IRP Working Group - Terms of Reference \(oeb.ca\)](https://www.oeb.ca/irp-working-group-terms-of-reference)

Please let us know if you have questions about this letter.

Yours truly,

AIRD & BERLIS LLP



David Stevens

DS/

c: All parties registered in EB-2022-0335