

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

June 11, 2024

**EB-2024-0067 – Enbridge Gas 2024 Annual Update to 5 Year Gas Supply Plan
Pollution Probe Stakeholder Conference Questions**

Dear Ms. Marconi:

In accordance with the direction provided by the OEB for the above-noted proceeding, please find attached Pollution Probe's questions on Enbridge Gas 2024 Updated Gas Supply Plan.

Please note that John DeVenz will attend the Stakeholder Conference July 2 & 3rd on behalf of Pollution Probe. Please include John DeVenz (email: johndevenz@outlook.com) on all information and materials pertaining to the Stakeholder Conference.

Please contact the undersigned should you have any questions.

Respectfully submitted on behalf of Pollution Probe.



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cc: Enbridge Regulatory (via email)
Arturo Lau, OEB Staff (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

EB-2024-0067 2024 Annual Update to 5 Year Gas Supply Plan

Please find below Pollution Probe's Questions for the Stakeholder Conference July 2-3, 2024.

Pollution Probe #1

Please provide a list of all approvals Enbridge is seeking from the OEB in this proceeding.

Pollution Probe #2

Reference: The 5-Year Plan and 2024 Annual Update should be read in conjunction with one another. This update is based on the 2023/24 Gas Supply Plan (Plan) for November 1, 2023, to October 31, 2028, which received internal senior management approval in Q3 2023 and is underpinned by current OEB-approved methodologies. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 3]

Enbridge has indicated that it does a full update annually to its 5 Year Gas Supply Plan. [Multiple references including Transcript EB-2022-0072 Enbridge GSP Stakeholder Conference Day 1, page 63 lines 11-17]

- a) Does the 2024 Gas Supply Plan represent a full update to the 5 Year Gas Supply Plan like done historically. If not, why not?
- b) If the 2024 Update is not a full update to the 5 Year Gas supply Plan, what elements were excluded?
- c) If the 2024 Update is a full update to the 5 Year Gas supply Plan, why is it not a stand-alone document (i.e. requires elements from the 2023 Gas Supply Plan to be read as supplementary to the 2024 Update)?

Pollution Probe #3

Reference: Enbridge indicates that the Rebasing Phase 1 Decision on the Settlement Proposal will be reflected in the next 5-Year Gas Supply Plan. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 4]

- a) Please explain why the gas supply elements from the Phase 1 Settlement Proposal was not included in the 2024 Gas Supply Plan Update.
- b) Does Enbridge expect a material change to the Gas Supply Plan based on the changes noted above? If yes, please explain why.

Pollution Probe #4

Enbridge notes that different Net Zero and related policy drivers in jurisdictions outside Canada affect domestic gas supply plans. [Page 8 - This scenario assumes that global GHG reductions are less aggressive than Canada's, impacting Canada's supply/demand balance through the magnitude of forecast supply exports from Canada]

- a) Please provide any analysis, reports or related material Enbridge has used to determine the impacts on gas supply based on exports to other jurisdictions based on their emissions plans and commitments.
- b) Some jurisdictions neighboring Ontario have announced or implemented natural gas bans (e.g. Quebec and New York). Please provide any materials and analysis Enbridge has used to consider those impacts to the Gas supply Plan.
- c) Please provide the 10 year annual export volumes and annual peak day demand for each of the Ottawa River supply pipelines to Quebec.

Pollution Probe #5

Enbridge has identified the risk from the energy transition on decreased gas demand and a potential 'death spiral' for the regulated utility. Please explain how these trends have been considered and/or included in the Gas Supply Plan. If they have not been explicitly included, why not?

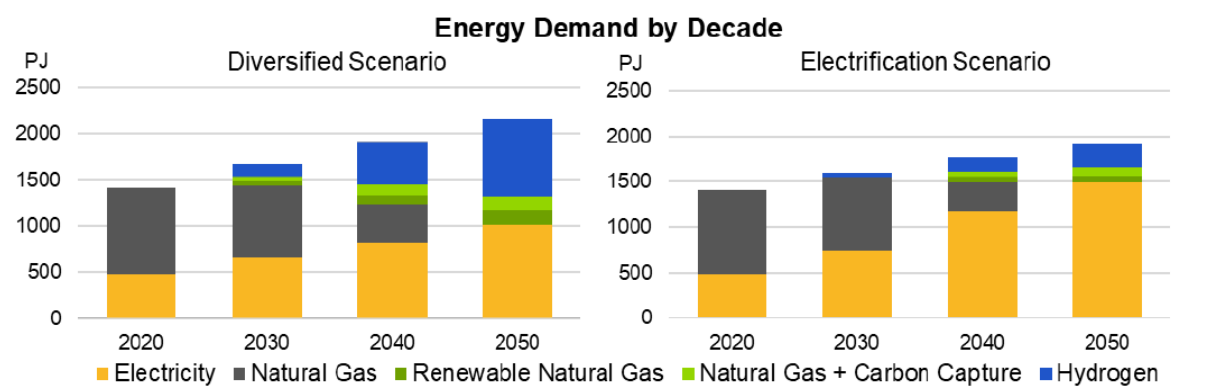
Pollution Probe #6

Reference: EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Table 2 - 2024 Annual Demand Forecast vs 2023 Annual Demand Forecast.

In total, every year (2024-2027) in the 2024 Annual Demand Forecast is lower than the previous 2023 Annual Demand Forecast. Please explain what is driving the current forecasted decrease in natural gas demand compared to the same forecast for 2023.

Pollution Probe #7

Reference: Pathways to Net Zero Emissions for Ontario ¹.



- Please explain how Enbridge's Pathways to Net Zero Emissions for Ontario has been used to inform the Gas Supply Plan.
- Please indicate what has changed in the Gas Supply Plan as a result of the expected decrease in natural gas use forecasted in all scenarios of the Enbridge's Pathways to Net Zero Emissions for Ontario.
- Please provide details on the activities Enbridge has completed or is undertaking to procure, store and transport hydrogen.

Pollution Probe #8

Reference: Table 3 below illustrates the design day demand forecast for each rate zone that was prepared in spring 2023. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 25]

- Please provide the HDD values that related to each zone in Table 3. Please explain how these compare to the Peak Design Day temperatures and related HDDs (i.e. are they higher or lower and why).
- Please confirm that each zone uses a set HDD for all assets in the zone. If that is not correct, please provide information on how the HDDs vary per zone.

¹ EB-2022-0200 Exhibit 1.10.5.2_Pathways to Net-Zero Emissions for Ontario_BLACKLINE_20230421

Pollution Probe #9

Reference: Since the 2023 Annual Update, there have been no impacts on the demand forecast or gas supply portfolio from IRPAs beyond what is already reflected in DSM impacts. . [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 4]

- a) Please confirm that IRP projects and impacts on natural gas demand are delivered and tracked separate from DSM.
- b) Please confirm that there have been no IRPAs implemented to-date. If incorrect, please provide information on what has been delivered and the impact on gas demand.
- c) Please confirm that there are no IRPAs forecasted to occur over the 5 Year Gas Supply Plan period. If incorrect, please provide information on what IRPAs are forecasted to be delivered and the impact on gas demand.
- d) The OEB has requested that Enbridge implement a more aggressive DSM Plan as of 2026 which would result in material net decreases in gas demand. Please indicate how that has been included in the 5 Year Gas Supply Plan.

Pollution Probe #10

Reference: The EGD rate zone demand and supply balance, which identifies Enbridge Gas's design day position, is outlined in Table 8. The forecast shows a shortfall in nearly every year resulting from growth in the Enbridge CDA and Enbridge EDA. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 47].

- a) Please provide details on the annual growth in the Enbridge CDA and Enbridge EDA and how long this trend is expected to continue.
- b) What is driving the growth in the Enbridge CDA and Enbridge EDA forecasted demand over the 5 Year Gas Supply Plan period?
- c) Does Enbridge have any plans to leverage increased curtailment options over the 5 Year Gas Supply Plan period? If not, why not?

Pollution Probe #11

Reference: Enbridge Gas launched a VRNG the program on April 1, 2021³⁶ and as of October 31, 2023, 3,559 customers have enrolled in the program. As of October 31, 2023, Enbridge Gas has made two purchases of RNG as part of the VRNG program, procuring 3,360 GJ in total, with 2,260 GJ procured in the 2022/2023 gas year.

[EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 29]

- a) Please provide details on the source(s) of RNG procured by Enbridge under the VRNG (e.g. landfill gas from a producer in Ontario).
- b) Please provide the GHG emissions certificates and related production lifecycle emissions information for the RNG procured under the VRNG.
- c) Please provide a copy of the contracts with the RNG suppliers for the RNG procured under the VRNG.
- d) Please indicate what happened to the emissions credits associated with the RNG purchased.
- e) Please provide the average costs of RNG procured under the VRNG.

Pollution Probe #12

- a) Has Enbridge conducted an RNG potential assessment? If yes, please provide a copy. If no, please explain why not.
- b) In 2022 the Enbridge Gas Supply Plan indicated that Enbridge was developing a plan to increase the blend of RNG in the gas system. Please provide a copy of that plan (if complete) or provide an update (if not complete). Please also explain how the plan has been integrated into the Gas Supply Plan.

Pollution Probe #13

Reference: RNG is a carbon-neutral fuel that can help fight climate change [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 29]

Please provide the source of information Enbridge referencing to indicate that RNG is carbon neutral (i.e. net zero emissions).

Pollution Probe #14

Reference: The market for conventional natural gas is evolving to include an increased focus and management of the methane emissions released through the production of natural gas. This focus is evident through the continued development of RSG certifications. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 29]

- a) Please explain the process used for the RSG procured in the Gas supply Plan. For example, is there a weighting in the procurement to favour RSG or is it just coincidental that a certain percentage of gas procured comes with RSG certification.
- b) Please provide information and calculations related to the amount (total and percentage of lifecycle emissions) of methane reductions from the RSG referenced in the Gas Supply Plan.
- c) Please provide the certification and related documentation Enbridge has received in relation to the RSG procured.
- d) Please provide a summary of the incremental (internal/external) costs pertaining to RSG procured compared to standard natural gas that does not have an RSG certification.

Pollution Probe #15

Reference: From November 2022 through the end of October 2023, the energy equivalent of hydrogen that has been blended into the system and purchased as part of the Gas Supply Plan is 1,661 GJ. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 30]

- a) Please provide a copy of the certification or equivalent documentation to indicate the lifecycle emissions for the hydrogen purchased.
- b) Please provide the average and maximum percent of hydrogen blending achieved by the Low Carbon Energy Project since commissioning.
- c) Please provide calculations on the greenhouse gas emissions reductions from the Low Carbon Energy Project using lifecycle emissions from the blended hydrogen (1661 GJ) vs. the lifecycle emissions of natural gas avoided (i.e. net emissions reduction based on lifecycle analysis).
- d) When will analysis of the Low Carbon Energy Project be available. If it is available, please provide a copy.

Pollution Probe #16

Is Enbridge aware of any plans to convert existing storage or use incremental storage for hydrogen? If yes, please provide details.

Pollution Probe #17

Reference: Enbridge Gas was also impacted by 161 days of failed supply deliveries and 15 days where a force majeure was called by upstream transportation providers. None of these instances resulted in impacts to deliveries to customers. [EGI_2024 Annual Update Gas Supply Plan_updated 20240327, Page 80].

Please explain how customer demand was not impacted with such a large number of failed supply deliveries.

Pollution Probe #18

Reference: Performance Scorecard [2024 Annual Gas Supply Plan Update, EB-2024-0067, Appendix J]

- a) The metric for 'Percentage of RNG in the portfolio' indicates 0%, but Enbridge has indicated that it has procured RNG. Please provide the actual percentages per year and the calculations to arrive at the percentages.
- b) Enbridge had a target of 5% RNG. If this target has changed, please provide the new target and rationale for the change.
- c) Enbridge has been enabling RNG through connections to the system and related services (e.g. RNG conditioning to pipeline standards). Please provide a summary of those activities.
- d) Would Enbridge be willing to add a metric to the scorecard to track supporting activities for RNG (e.g. support for RNG development in Ontario). If not, why not?
- e) Is Enbridge aware of any of the RNG produced in Ontario being used by Enbridge customers in Ontario or is it still all being exported outside of Ontario?
- f) Please provide the calculations for the Performance Scorecard table values of 'Emissions abated through procurement of RNG and hydrogen (tCO₂e)'.
- g) Please provide the amount (volume and GJ) of hydrogen blended into the Enbridge system for the past 3 years (in line with the years in the scorecard). Please also provide what percentage (i.e. percentage by volume and GJ) the hydrogen represents per year.

Pollution Probe #19

Reference: Performance Scorecard [2024 Annual Gas Supply Plan Update, EB-2024-0067, Appendix J]

- a) Please provide the targets for each metric in the Performance Scorecard.
- b) Based on the three years of results shown in the Performance Scorecard, did Enbridge miss, meet, or exceed its Performance Targets? Please explain.
- c) Please provide any metric targets for the remaining years in the Gas Supply Plan.