



June 13, 2024

**VIA RESS**

Ontario Energy Board  
P.O. Box 2319,  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4  
Attention: Registrar

Dear Ms. Marconi,

**Re: Enbridge Gas Inc. ("EGI")  
2024 Annual Update to 5 Year Gas Supply Plan  
Board File No.: EB-2024-0067**

We are counsel to Three Fires Group Inc. ("**TFG**") and Minogi Corp. ("**Minogi**") in above-noted proceeding. Please find enclosed the written questions of TFG and Minogi pursuant to the Board's letter date April 22, 2024.

Sincerely,

DT Vollmer, Resilient LLP, Counsel for TFG and Minogi

c. Richard Wathy, EGI  
David Stevens, Aird & Berlis LLP, Counsel for EGI  
Reggie George, TFG  
Don Richardson, Minogi

Encl.

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*,  
S.O. 1998, c.15 (Schedule. B);

**AND IN THE MATTER OF** the Ontario Energy Board's  
consultation to review Enbridge Gas Inc. Annual Update to its  
5-year Natural Gas Supply Plan.

**EB-2024-0067**

**INTERROGATORIES**

**OF**

**THREE FIRES GROUP INC.**

**("THREE FIRES")**

**AND**

**MINOGI CORP.**

**("MINOGI")**

**June 13, 2024**

**Question:** TFG/M-1

**Reference:** • 2024 Annual Update to its 5 Year Gas Supply Plan ("**Update**"), p. 3

**Preamble:** Enbridge Gas Inc. ("**EGI**") serves over 3.8 million residential, commercial, and industrial customers across more than 300 municipalities and more than 20 First Nations throughout Ontario.

- a) Please place Enbridge Inc.'s 2022 *Indigenous Reconciliation Action Plan* ("**IRAP**") and *Indigenous Peoples Policy* ("**IPP**") on the record.
- b) Did EGI engage and consult with any First Nations and/or First Nations customers in preparing the Update? If yes, please describe the engagement activities and indicate where the views of First Nations and First Nations customers informed the Update. If no, please explain why not and discuss whether EGI would support increased engagement with First Nations as part of the annual gas supply review process.
- c) Please describe how EGI has applied the principles, policies and commitments set out in the IRAP and IPP to the Update.
- d) Please provide specific comment on how the following items from the IRAP apply in the context of the current Application:
  - Pillar 2 concerning community engagement and relationships;
  - Pillar 3 concerning economic inclusion and partnerships;
  - Pillar 5 and in particular its objectives relating to sustainability; and
  - Pillar 6 concerning governance and leadership.
- e) What are the impacts of the Update on the cost of natural gas to First Nation reserve communities and off-reserve First Nation members?

**Question:**        **TFG/M-2**

Reference:        •    Update, p. 7

Preamble:        EGI notes that the inclusion of publicly available forecasts from the U.S. Energy Information Administration ("**EIA**") and the Canada Energy Regulator ("**CER**") in the Update does not mean that Enbridge Inc. or its affiliates endorse, agree with or support the accuracy of these forecasts.

- a)        Please identify and describe all other data sources relied upon by EGI for its natural gas supply and demand forecasts in addition to any sources provided in the Update.
- b)        Does EGI disagree with the accuracy of the publicly available forecasts from the EIA and/or CER? If yes, what aspects of the forecasts are not consistent with EGI's or its affiliates' forecasts? In your response, please explain why EGI disagrees, and provide details on how EGI's forecasts differ from that of (i) EIA and (ii) CER.

**Question: TFG/M-3**

- Reference:
- Update, pp. 8-11, 14
  - CER Report
  - Electrification and Energy Transition Panel, "[Ontario's Clean Energy Opportunity](#)" (the "**EETP Report**")
  - Three Fires, Intervenor Argument<sup>1</sup>, paras 37-44

Preamble: CER's 2023 Energy Future report (the **CER Report**) provides three scenarios related to the energy transition: (i) current measure scenario; (ii) Canada Net-Zero Scenario; and (iii) Global Net-Zero Scenario.

The CER Report indicates that a portion of the decrease in fossil fuel use is partially replaced by fossil fuels with Carbon Capture and Underground Storage ("**CCUS**") in all scenarios.

EGI "acknowledges that the energy transition is expected to result in lower annual demands for natural gas in the future. However, the extent and timing of the impacts on both annual and design day needs of Enbridge Gas's customers remain uncertain. These impacts will also not likely occur uniformly across the Enbridge franchise area."

In Phase 1 of EGI's 2024 rebasing proceeding (EB-2022-0200), EGI indicated that it was awaiting the release of the EETP Report prior to undertaking any granular scenario analysis related to the energy transition.

- a) What are EGI's views concerning the likelihood of each scenario in the CER Report occurring?
- b) Does EGI agree with CER's wide range for natural gas production from a 24% increase (21.5 Bcf/day) to a 68% decrease (5.5Bcf/day) across the scenarios from 2022 levels provided in the CER Report? If no, please discuss what range EGI believes is more likely and explain why EGI believes its range is more likely.
- c) Has EGI or any of its affiliates explored CCUS capabilities in Ontario, including as an emission reduction technology for its own Scope 1 emissions or as a service to reduce its customers' emissions, such as gas fired generators in Ontario? If yes, has EGI assessed Indigenous participation in providing and/or benefitting from such services? If no, please explain why not.
- d) Do EGI's forecasts related to the replacement of fossil fuel use with CCUS diverge from those of the CER in Ontario? If so, please indicate how EGI's forecasts differ and why.
- e) Has EGI done its own modelling of the energy transition and its impacts on both demand and supply forecasts? If yes, please place all reports prepared and/or

---

<sup>1</sup> EB-2022-0200, Three Fires, Intervenor Argument, online:  
<https://www.rds.oeb.ca/CMWebDrawer/Record/815074/File/document>

commissioned by EGI and its affiliates that model energy transition impacts on natural gas demand and supply in Canada and Ontario that are in addition to the reports provided in EGI's 2024 rebasing application (EB-2022-0200).

- f) Have EGI's views changed or further developed concerning the viability or likelihood of the energy transition pathways that were examined in its 2024 rebasing application (EB-2022-0200)? If yes, how have they changed or further developed? If no, why have they not changed or further developed?
- g) Please discuss how EGI's own modelling of energy transition pathways, as provided in its 2024 rebasing application (EB-2022-0200), informed the Update's supply and demand forecasts. In your response, please provide direct references to the Update and discuss material changes to EGI's supply and demand forecasts for each of years 1 through 5.
- h) Has EGI done any modelling of the likelihood of any of the energy transition pathways provided in the CER Report or any other energy transition pathway scenario analysis performed by EGI as part of this proceeding or EB-2022-0200. If EGI has not done any such modelling, please explain how EGI is able to accurately plan for and forecast gas supply and demand if it is unable to estimate the impacts and probability of various energy transition pathways.
- i) How have EGI's forecasts of the supply of renewable natural gas ("**RNG**") in Canada, the U.S., and Ontario changed over the 5-year gas supply plan period?
- j) Please discuss how EGI incorporated the findings and recommendations of the EETP Report into the Update. If EGI did not incorporate any findings or recommendations from the EETP Report, please explain why not.
- k) Please discuss the impact of the EETP Report on EGI's ability to perform more granular regional level scenario analysis and impacts on EGI's First Nations customers as part of its GSP and the Update.
- l) Please discuss how the EETP Report assisted EGI in engaging in more precise assessments of the risk the company faces as a result of the energy transition as part of the Update. In your response, please indicate whether and/or how this diverges from EGI's assessment of risks pursuant to the scenarios in the CER Report.

**Question:** TFG/M-4

**Reference:** • Update, p. 20

**Preamble:** EGI notes that it anticipates that RNG or hydrogen procured as part of its supply portfolio may include credits under the federal [Clean Fuel Regulations](#) (“CFR”) which would lower the cost of these fuels for ratepayers where CFR credits are sold to entities with a CFR compliance obligation. EGI further notes that the potential availability and value of CFR credits for existing RNG and hydrogen procurement is uncertain.

- a) Please file any and all analysis EGI and/or its affiliates have performed related to the creation and selling of CFR credits. If EGI has not undertaken any such analysis, please explain why no such analysis has been undertaken in light of the potential benefits for ratepayers and stakeholders.
- b) Does EGI intend to obtain CFR credits as part of its supply when it procures RNG and hydrogen? If yes, please describe the mechanisms that EGI will use to obtain and sell CFR credits and how EGI will account for the benefits associated with CFR credits.
- c) Has EGI considered requiring suppliers of RNG and hydrogen to EGI to include CFR credits when it procures such fuels? If no, please explain why not.
- d) Does EGI expect RNG and hydrogen that includes CFR credits to be a premium product demanding a higher price than RNG and hydrogen without associated CFR credits? If yes, please explain how procuring a more expensive supply will lower the cost of these fuels for ratepayers other than the fuels not being subject to the Federal Carbon Charge. If no, please explain why not.

**Question:** TFG/M-5

Reference: 

- Update, p. 29
- Update, Appendix J, p. 2

Preamble: EGI's Voluntary RNG ("**VRNG**") program has had lower than forecasted enrollment from customers.

EGI's 2022/2023 Performance Metrics (the "**Metrics**") state that it has abated 196tCOe of GHG emissions through the procurement of RNG and hydrogen. However, the Metrics also provide that 0% of its portfolio is RNG.

- a) In EGI's opinion, please explain why the VRNG program has had lower than forecasted enrollment from customers?
- b) Is EGI able to provide a breakdown by customer type, geographic region, length in the program, etc. for VRNG participants? If yes, please provide all available and relevant data to enable a better understanding of the demographics of the customer participants in the VRNG program. If not, please provide as much detail as possible regarding the types of customers and their participation in the VRNG program that is reasonably available.
- c) Please provide a summary of all environmental attributes EGI has acquired through its procurement of RNG and hydrogen and how they have been used to the benefit of all customers.
- d) Is the emission abatement noted in the Metrics solely the result of the procurement of hydrogen? If no, please provide the related data of emissions abatement associated separately for (i) RNG and (ii) hydrogen.
- e) Does EGI have any estimates of the anticipated emissions abated through the procurement of RNG and hydrogen for 2023/2024? If yes, please provide EGI's estimates separately for (i) hydrogen and (ii) RNG.
- f) Please discuss whether there are any reasons and/or barriers to EGI separating the performance metrics for RNG and hydrogen. Please include EGI's opinion on whether separately tracking EGI's performance would be helpful for EGI and its stakeholders. If EGI does not believe it would be helpful or useful for EGI and/or stakeholders, please explain why not.



**Question:**            **TFG/M-6**

**Reference:**            •    Update, pp. 29-30

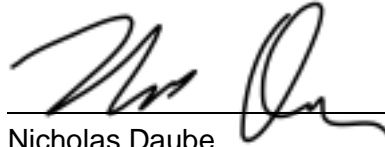
**Preamble:**            EGI indicates that it continues to signal to the market that it is interested in procuring “responsibly sourced gas” (“**RSG**”) with the goal of encouraging more suppliers to implement practices to lower emissions and achieve ESG goals in accordance with RSG certification.

EGI notes that the Equitable Origins EO100, MiQ, and Project Canary’s Trustwell certifications are the certifications that are actively used by producers to monitor their conformance to specific ESG standards.

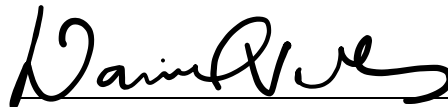
- a)            Please describe and provide details as to how EGI signals to the market it is interested in procuring RSG.
- b)            What is the availability of RSG for EGI’s customers in Ontario?
- c)            Does EGI track requests by its customers for RSG to support their own ESG targets and goals over the 5-year period? If yes, please provide details of number of customers that have requested RSG through the 5-year period, how much RSG has been procured on behalf of or because of customer requests, and the number of customers that actually paid for and received RSG and/or RSG attributes. If no, please discuss whether EGI could create a mechanism to facilitate customer requests and report to interested stakeholders details regarding requests such as amount of requests, types of customers, reason for request etc.
- d)            Please discuss the implications of EGI requiring its entire gas supply to be responsibly sourced?
- e)            What actions is EGI taking to encourage more suppliers to implement practices to lower emissions and achieve ESG goals and have these actions been successful? If yes, please provide details regarding the number of suppliers that have sought certification / quantity of supply that is certified as RSG compared to the previous annual update and the start of EGI’s GSP.
- f)            Has EGI set any targets for procuring RSG from Indigenous-owned suppliers? If yes, please provide details. If no, please discuss why not.
- g)            Are all of the certification frameworks compatible with the IPP and IRAP?
- h)            Do all of the certification frameworks include recognition of Indigenous reconciliation and adhere to the principle of free, prior and informed consent (“**FPIC**”)? If no, please indicate which certificates do not require FPIC and whether EGI would consider procuring RSG certified under such certificate(s).

ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS

13<sup>th</sup> day of June, 2024

A handwritten signature in black ink, appearing to read 'Nick Daube', written over a horizontal line.

Nicholas Daube  
Resilient LLP  
Counsel for Three Fires and Minogi

A handwritten signature in black ink, appearing to read 'Dain Vollmer', written over a horizontal line.

DT Vollmer  
Resilient LLP  
Counsel for Three Fires and Minogi