

MICHAEL R. BUONAGURO

Barrister and Solicitor

24 HUMBER TRAIL
TORONTO, ONTARIO, M6S 4C1
P: (416) 767-1666
F: (416) 767-1666
EMAIL: mrb@mrb-law.com

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Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Marconi,

**RE: EB-2024-0111 Enbridge Gas Inc. (EGI) 2024 Cost of Service Application
Phase 2**

These are the interrogatories of the Canadian Biogas Association in the above noted proceeding.

If any further information is required, please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro
Encl.

4.2-CBA-1

Reference: Exhibit 4, Tab 2, Schedule 7, page 6, paragraph 15

Preamble:

Enbridge Gas's proposal to begin procuring RNG for delivery in 2026, with long-term cost recovery certainty on a long-term basis, will ensure all Enbridge Gas customers have an opportunity to access economic RNG supply being produced within the province and potentially across North America.

- a) Please provide an overview of the procurement process that EGI expects to employ when procuring RNG from the market. Please highlight any material differences, if any, between how EGI procures conventional natural gas and how EGI intends to procure RNG.
- b) Please provides details with respect to measures EGI will employ, if any, to ensure that the procurement process is not biased in favour of some RNG producers over others; by way of specific example, how does EGI expect to ensure that any affiliates of EGI that are interested in selling RNG to EGI are not provided preferential treatment over non-EGI affiliated producers?
- c) Please describe the factors that EGI expects to consider when comparing competing offers to sell RNG to EGI; for example, to what extent does EGI expect to consider the cost differential, aside from the cost of the commodity, between RNG producers that are injecting RNG directly into EGI's distribution system and RNG producers whose RNG requires transmission to the EGI franchise area?

4.2-CBA-2**Reference: Exhibit 4, Tab 2, Schedule 7, page 23, paragraph 58****Preamble:**

Enbridge Gas is aware of multiple RNG projects in the planning and construction phase as well as projects in operation. Please see Attachment 3 for supporting documentation from potential RNG suppliers and impacted stakeholders. These documents demonstrate the further development of RNG projects and supply, interest in participating in a competitive bid process should this proposal receive approval, as well as some of the opportunity that RNG provides in both economic development and waste management. Specifically, at page 1 of Attachment 3, one producer states that RNG “presents a remarkable opportunity for rural economic development by promoting the growth of local biogas and agricultural waste-to-energy projects. The development of RNG infrastructure and production facilities can create jobs in rural areas, providing new economic opportunities while also contributing to the diversification of rural economies” Others on page 4, state that Enbridge Gas’s RNG procurement proposal “amplifies market potential for [their] RNG production”. Initial production indications from this group of suppliers point to supply potential of greater than 39 PJ/year.

- a) Please discuss the impact that the creation of demand in Ontario in the amount of up to 4% of EGI’s total gas supply portfolio will have on the development of RNG projects in Ontario, if any.
- b) Please confirm that most, if not all, RNG projects involve developing RNG out of the waste created from other primary products (i.e. the growing of food and the storage of waste) as opposed to being projects developed with the primary purpose of creating RNG.

4.2-CBA-3**Reference: Exhibit 4, Tab 2, Schedule 7, Attachment 2 pages 45-62****Preamble:**

The North American Renewable Natural Gas Market Evaluation provided to EGI by Anew describes several RNG programs and program proposals in Canada and the USA.

- a) Relative to the proposed 4% total annual RNG procurement and maximum \$8 per month bill impact proposed by EGI, what would be the equivalent annual procurement and monthly bill impact were EGI to replicate the most “aggressive” RNG procurement program of those described in the Anew evaluation?