

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.**

**Application to change its natural gas rates and other  
charges beginning January 1, 2024**

**(PHASE 2) INTERROGATORIES to ENBRIDGE GAS INC.**

**from**

**INDUSTRIAL GAS USERS ASSOCIATION (IGUA)**

**1.10-IGUA-1**

**Reference:** Exhibit 1, Tab 10, Schedule 7, page 6, paragraph 6

**Preamble:**

EGI States that the primary focus of the ETTF will be on technology innovation to drive GHG emissions reduction.

**Question:**

Please explain EGI's position on the basis for the OEB's jurisdiction and mandate to include in gas distribution rates funds to support;

- a. GHG emissions reduction; and/or
- b. technological innovation other than for technology utilized in the distribution of natural gas.

**1.10-IGUA-2**

**Reference:** Exhibit 1, Tab 10, Schedule 7, page 4, paragraph 10

**Preamble:**

EGI references "*Ontario's Energy Transition and GHG emissions reduction goals*".

**Question:**

Please specify these goals with reference to source Ontario government documents.

**1.10-IGUA-3**

**Reference:** Exhibit 1, Tab 10, Schedule 7, page 4, paragraph 11

**Preamble:**

EGI plans to use the proposed ETTF to, *inter alia*, “improve the availability, awareness, accessibility, affordability, and acceptance of low-carbon technologies”.

**Question:**

Please provide further details on the specific activities and actions that EGI plans to take to accomplish each of these objectives/outcomes.

**1.10-IGUA-4**

**Reference:** Exhibit 1, Tab 10, Schedule 7, page 6, paragraph 17

**Preamble:**

EGI identifies as targets for ETTF spending;

- i. “end-use technologies integrated with renewable power generation”; and
- ii. “end-use energy efficiency technologies not covered by DSM funding”.

**Questions:**

- a. Please identify the particular technologies contemplated by each of these descriptions.
- b. In respect of “end-use energy efficiency technologies not covered by DSM funding”, please indicate whether these are the same technologies covered by DSM programming but which require incremental funding, or whether they are distinct technologies not covered by DSM programming.

**1.10-IGUA-5**

**Reference:** Exhibit 1, Tab 10, Schedule 7 in general

The referenced exhibit lays what is, in the context of a \$5 million annual budget, an ambitious range of potential funding initiatives.

**Questions:**

- a. Does EGI have a more particular spending plan for the requested funds? If so please provide it.
- b. Please discuss how EGI plans to accomplish the ambitious range and nature of stated objectives on a \$5 million annual budget.

**1.17-IGUA-6**

Reference: Exhibit 1, Tab 17, Schedule 1, page 7, paragraph 15

**Preamble:**

As part of its proposed more in-depth approach to assessing integrity related alternatives to asset replacement, EGI indicates that it will *“incorporate energy transition sensitivity analysis, which will examine how long the pipeline is expected to be needed under different energy transition scenarios”*.

**Questions:**

- a. Please provide further explanation of the energy transition scenarios that EGI has, or will, develop.
- b. What assumptions regarding government policy in relation to the future of natural gas are, or will be, made in support of such analysis?

**1.17-IGUA-7**

**Reference:** Exhibit 1, Tab 17, Schedule 1, page 10, Table 1

In Table 1 EGI provides a listing of anticipated incremental labour resources that it indicates will be required to support *“the new [asset life extension] analysis”* that it states is contemplated by the OEB’s Phase 1 decision. At paragraph 20 EGI proposes to record O&M costs associated with asset life extension analysis in the DIMP Variance Account.

**Question:**

Please provide EGI’s estimate of incremental (i.e. not already included in 2024 rates) asset life extension program O&M costs during the IRM Plan term. Please break this estimate down between incremental labour resources costs and other component cost categories (disaggregating such other components to the extent available).

## 2.4-IGUA-8

**Reference:** Exhibit 2, Tab 4, Schedule 5, page 4, paragraph 10

**Preamble:**

In its evidence regarding allocation of utility storage injection and withdrawal capability, EGI states:

*Enbridge Gas did not withhold any firm storage withdrawals to serve in-franchise customers and instead, reduced the maximum firm withdrawals available to serve the non-utility market.*

**Question:**

The meaning of this statement is not clear. Could you please further explain this statement, addressing in particular;

- a. the meaning of the term “*withhold*” (i.e. withhold from whom);
- b. the meaning of the term “*non-utility market*” (i.e. does this term have a distinct meaning from the often used term “*ex-franchise market*”, and if so what does it mean).

62698172\1