

BY EMAIL and RESS

June 19, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Marconi:

EB-2024-0111 Enbridge Gas Inc. Rebasing Application Phase II - Building Owners and Managers Association Interrogatories to Applicant

Enclosed are the Interrogatories of the Building Owners and Managers Association (BOMA).

Sincerely,

A handwritten signature in black ink, appearing to read "Clement Li".

Clement Li

Director, Policy & Regulatory Development
Enerlife Consulting Inc.
cli@enerlife.com

EB-2024-0111 Enbridge Gas Inc. 2024 Rebasing and IRM – Phase 2

**Interrogatories to Enbridge Gas Inc. (EGI) on behalf of
the Building Owners and Managers Association (BOMA)**

1.7-BOMA-1

Reference:

1. Phase 2 Exhibit 1, Tab 7, Schedule 1 Plus Attachments Page 2 of 19, paragraph 4
Phase 2 Exhibit 1, Tab 7, Schedule 1 Attachment 1, Page 1 of 1 (EGI OEB Scorecard
2014-2023)
2. EB-2017-0306 Exhibit B Tab 1 pages 38 to 39, Table 5 (filed 2017-11-02)

Preamble:

In the referenced evidence #1, EGI states that its current scorecard was established during the MAADs proceeding (EB-2017-0306), which was approved by the OEB in 2018.

In the referenced evidence #2, EGI (Amalco) stated that:

“Public Policy Responsiveness

Amalco will continue to provide cost effective Demand Side Management programs to all in-franchise customer classes across the former EGD and Union franchises. Amalco will demonstrate its commitment to support Ontario’s Climate Change Action Plan and the associated carbon reduction targets. Through its annual compliance filing under Ontario’s Cap-and-Trade program, Amalco will meet its obligations. Amalco will also demonstrate its commitment to helping customers manage their carbon emissions.....”

Questions:

- A. The current scorecard was established six years ago, in 2018. In light of the recent development in policies on energy transition, demand side management (DSM) and the approval of DSMI (DSM shareholder incentives), did EGI adjust the “Public Policy Responsiveness” target (which measures the total cumulative natural gas saved) accordingly?
 - i) If yes, please list and describe the adjustments and provide the rationale.
 - ii) If not, please provide the rationale.

- B. Has EGI been fulfilling the commitments stated in the reference evidence #2 (for the Public Policy Responsiveness category)?
- i) If yes, please list and describe EGI's activities and provide the rationale.
 - ii) If not, please provide the rationale.

1.7-BOMA-2

Reference:

Phase 2 Exhibit 1, Tab 7, Schedule 1 Plus Attachments Pages 5 to 19

Preamble:

In the referenced evidence, EGI describes its proposal to exclude "inaccessible meters" in the calculation of the meter reading performance metric (MRPM), with its rationale and mitigation plan. In terms of technology improvements, EGI discusses installation of ERT meters and Advanced Metering Infrastructure (AMI) to potentially address the "inaccessible meter" issue.

Questions:

- A. Given that EGI supports cost effective DSM programs and is committed to help customers manage their carbon emissions (see 1.7-BOMA-1 reference#2) and that reliable energy use data is the foundation of successful energy management efforts, did EGI consider using ERT meters and AMI meters to address the "inaccessible meter" issue (i.e. instead of proposing a change in the MRPM)?
- i) If yes, please provide the analysis/comparison and the rationale of the final decision (i.e. proposing a change in the MRPM).
 - ii) If not, please provide the rationale.
- B. As directed by the OEB in the Phase 1 Decision, EGI will file an update on the AMI pilot project in Phase 3 of this proceeding. At the point, can EGI share a status update of the AMI pilot and its preliminary results?

1.10-BOMA-3

Reference:

Phase 2 Exhibit 1, Tab 10, Schedule 7 Pages 1 to 11

Preamble:

In the referenced evidence, EGI provides the rationale and description of the proposed Energy Transition Technology Fund (ETTF).

Questions:

- A. Please provide the governance structure of the proposed ETTF.
- B. Please describe in detail the parameters and criteria used to select and evaluate (e.g. target vs result) the results of ETTF projects.
- C. Are there any plans to share the detailed research findings/data from the ETTF projects to benefit the industry and to avoid duplication?
 - i. If yes, please provide the plan.
 - ii. If not, please provide the rationale.
- D. Are there any plans to partner and collaborate with electric utilities (both distributors and transmitters), district heating network operators, Independent Electricity System Operator, municipal governments and other industry stakeholders?
 - i. If yes, please provide the partnership/collaboration plan for each ETTF project.
 - ii. If not, please provide the rationale.

1.17-BOMA-4

Reference:

Phase 2 Exhibit 1, Tab 17, Schedule 1 Page 7 (paragraph 15) and pages 13 to 17

Preamble:

In the referenced evidence, EGI proposes that capital expenditures related to Asset Life Extension (ALE) alternatives be eligible for recovery via the Incremental Capital Module (ICM). To incent EGI to pursue additional ALE alternatives, in addition to the ALE work already being performed, EGI proposes that ICM eligibility for these projects be

determined in the same manner as any other proposed ICM project, with two adjustments:

- Excluding the requirement that a project be discrete and that a project will have an in-service capital addition of at least \$10 million.

Questions:

- A. Please provide a list of ALE work already performed, the results and quantitative analyses for each project to demonstrate the benefits to rate payers, with different energy transition scenarios and sensitivity analysis.

1.17-BOMA-5

Reference:

Phase 2 Exhibit 1, Tab 17, Schedule 1 Page 16 paragraph 41

Preamble:

In the referenced evidence, EGI stated that it believes pursuing additional ALE alternatives and including them in ICM funding address the OEB's suggestion that Phase 2 of this proceeding provide the opportunity to examine ways in which EGI could be incented to implement economic alternatives to gas infrastructure replacement projects, including ALEs. EGI interprets the Phase 1 Decision to indicate the OEB's expectation that more ALE alternatives be employed where possible in an uncertain energy transition environment.

Question:

- A. Did EGI examine different ways in which EGI could be incented to implement economic alternatives to gas infrastructure replacement projects, other than what is proposed in this proceeding? If yes, please provide the analysis, comparison and the rationale to select what is proposed in this proceeding.

1.17-BOMA-6

Reference:

Phase 2 Exhibit 1, Tab 17, Schedule 1 Pages 17-27

Preamble:

In the referenced evidence, EGI states that it is not submitting a specific system pruning proposal in phase 2. EGI is, instead, proposing to engage the IRP TWG and other relevant stakeholders in a collaborative process to determine if there is a technically and economically feasible system pruning IRP pilot to pursue and, if so, develop, together with the electric sector, a system pruning pilot.

Question:

- A. Please provide a detailed workplan (with schedule/timeline) to finalize EGI's proposed approach to system pruning.
- B. In its evidence, EGI indicates that it plans to engage the IRP TWG and "other relevant stakeholders" in a collaborative process to develop a system pruning pilot.
 - i. Who are these "other relevant stakeholders"?
 - ii. The strategies, methods and market dynamics of the low carbon energy transition in the commercial sector are very different from the residential or industrial sectors. Does EGI have a plan to ensure that the commercial sector is appropriately represented in these stakeholder consultations and the large electrification potential from commercial and institutional buildings will not be neglected or under-utilized? If yes, please provide the plan. If not, please explain why.