

# 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](mailto:mrb@mrb-law.com)

---

August 23, 2024

Ms. Nancy Marconi  
Registrar  
Ontario Energy Board  
P.O. Box 2319  
26<sup>th</sup> 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 on the evidence provided by Energy Future Group 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.

### **M1-CBA-1**

**Reference:** Exhibit M1, page 19.

**Preamble:** *Further, to reduce emissions, RNG procurement needs to be sourced from the development of new capacity, and not merely be repurposed or re-contracted from pre-existing RNG uses.*

- a) Please confirm that the assertion “to reduce emissions, RNG needs to be sourced from the development of new capacity” is an assertion from the perspective of the world at large, and that from the perspective of an individual customer seeking to reduce their emissions to meet their legal obligation and/or personal emission reduction goals, individual customers can reduce their emissions by taking legal ownership of RNG sourced from existing capacity that is repurposed or re-contracted from pre-existing RNG uses.

### **M1-CBA-2**

**Reference:** Exhibit M1, page 19-20.

**Preamble:** *In Vermont, the Clean Heat Standard under final development specifically includes a requirement that Vermont Gas purchase the transmission pathway to its distribution system in Vermont before it can claim any GHG emission reduction from procured RNG.*

- a) Please provide of copy of the most recent version of the Clean Heat Standard referred to in the above excerpt.
- b) Is it the belief of the Energy Future Group that the cost of transmitting RNG from its source to the EGI franchise area to be consumed by EGI customers will not be accounted for by EGI under its proposal when considering the cost of RNG procurement?

### **M1-CBA-3**

**Reference:** Exhibit M1, page 19.

**Preamble:** *To protect ratepayers, we recommend the Company not be allowed to procure RNG with a price higher than \$25.58/GJ, which already represents an extremely high cost per unit of emission reduction.*

- a) Please confirm that Energy Future Group is suggesting a cap of \$25.58/GJ on the purchase of any RNG under all procurement contracts, as opposed to a cap on the weighted average cost of RNG procured by EGI across all RNG purchases.