

August 23, 2024

Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street
P.O. Box 2319
Toronto, Ontario
M4P 1E4

Dear Ms Marconi

EB-2024-0111 – Enbridge Gas Inc. – Rebasing Application 2024-2028 – Phase 2 – Interrogatories for Energy Futures Group from the Consumers Council of Canada

Please find, attached, interrogatories for Energy Futures Group (Exhibit M1) from the Consumers Council of Canada regarding the evidence filed in the above-referenced proceeding.

Please feel free to contact me if you have any questions.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

Enbridge Gas Inc.

2024 Rebasing – Phase 2

**Consumers Council of Canada Interrogatories on Exhibit M1
For Energy Futures Group**

EB-2024-0111

M1-CCC-1

Ref: Ex. M1

Please provide the Terms of Reference for this consulting engagement.

M1-CCC-2

Ref: Ex. M1/ p. 7

The evidence points to “energy efficiency investments that reduce heating loads – e.g. weatherization of homes and businesses” as an example of a “safe bet” that is likely to play a significant role in the energy transition across a variety of plausible future scenarios. Is Energy Futures Group proposing that if the OEB approves the ETTF that energy efficiency investments should be funded through the ETTF? If so, how would this be different than EGI’s DSM spending?

M1-CCC-3

Ref: Ex. M1/ p. 9

EGI specifically identifies carbon capture utilization and storage (CCUS) technologies for both commercial and industrial applications as a potential priority for funding through the ETTF. Is EFG aware of other studies that have addressed CCUS technologies? If so, please identify those studies. Could further research by EGI be considered redundant in light of work that has been done or is currently being done in other jurisdictions?

M1-CCC-4

Ref: Ex. M1/ p. 9

Enbridge has suggested that it has an interest in potentially using ETTF funds to support development of end-use technology, such as residential furnaces and water heaters that can burn methane-hydrogen blends that contain more than 20% (by volume) hydrogen. EGI adds that a significant amount of work is needed to develop the end-use equipment for the residential, commercial and industrial application that would

be compatible with higher blends of hydrogen. Is it EFG's view that such work is not in the best interests of EGI ratepayers?

M1-CCC-5

Ref: Ex. M1/p. 10

EFG refers to an order by the Massachusetts Department of Public Utilities, for its state's gas utilities to invest in pilot projects to test the potential for cost-effective GHG emission reductions through networked geothermal systems. If the OEB approves an ETTF for EGI does EFG propose this type of study would be appropriate? If so, why should EGI natural gas ratepayers fund geothermal studies? Wouldn't it be more appropriate for these types of studies to be undertaken by government entities or funded through the electricity sector?

M1-CCC-6

Ref: Ex. M1/ p. 12

The evidence states that, "With respect to "maintaining customers choice", the ETTF should only invest in technology that is likely to offer customers *better* choices. Please provide examples of technologies that could offer customers better choices in this context.

M1-CCC-7

Ref: Ex. M1/ p. 12

The evidence states, "Since Enbridge is addressing energy efficiency and now some residential and commercial electrification through its DSM efforts, the logical choice for a targeted ETTF would be a low-carbon fuel for high heat industrial processes." Is EFG aware of this type of work being undertaken in other jurisdictions? If so, please identify the studies being undertaken. If so, would further research by EGI be considered redundant in light of work that has been done or is currently being done in other jurisdictions? If EGI undertakes a study or pilot regarding low-carbon fuel for industrial processes how should that work be funded – by all customers groups or by industrial customers consistent with DSM cost allocation?

M1-CCC-8

Ref: Ex. M1/ p. 13

EFG is recommending that the OEB create a stakeholder advisory committee that would be expected to work with Enbridge on both the development of a scoring rubric, the actual scoring of different options and ultimately the selection of project funding priorities. Does EFG have examples of such committees that have been established in other jurisdictions? If so, please provide those examples.

M1-CCC-9**Ref: Ex. M1/pp.14-20**

- a) With respect to the recommendation to “redirect funds to more cost-effective uses” resulting from a reduction to RNG portfolio targets, please discuss how the savings available to be redirected should be calculated.
- b) With respect to the recommendation to “redirect funds to more cost-effective uses” resulting from a reduction to RNG portfolio targets, please advise what finding EFG is asking the OEB to make in the current proceeding (e.g., increase DSM funding by a specified amount calculated based on the savings from reduced RNG procurement relative to proposed or a more generic finding)?
- c) Please further discuss why procuring only new RNG supply and prioritizing the development of Ontario-based RNG maximizes ratepayer benefits. As part of the response, please consider that non-Ontario supply may be cheaper and/or result in greater carbon emission reductions.
- d) Please advise whether carbon charges, as they are calculated currently, would reduce more significantly if conventional natural gas is replaced with RNG with negative carbon intensity relative to RNG with positive carbon intensity.

M1-CCC-10**Ref: Ex. M1/ p. 23**

EFG provides examples of jurisdictions that have undertaken system pruning projects. Please provide examples of projects that EFG considers appropriate and potentially transferable to EGI’s service territory.