

BY EMAIL and RESS

June 5, 2024

Mr. Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Mr. Murray:

EB-2025-0064 Enbridge Gas Inc. Rebasing Application Phase 3 - Building Owners and Managers Association Toronto Interrogatories to Applicant

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

Sincerely,

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

Clement Li

Consultant for BOMA Toronto
Director, Policy & Regulatory Development
Enerlife Consulting Inc.
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EB-2025-0064 Enbridge Gas Inc. 2024 Rebasing – Phase 3

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

1.13-BOMA-1

References:

[Phase 3 Ex. 1-13-5 page 24]

"Annually, Enbridge Gas has led IRP regional stakeholder webinar events. Most recently in 2024, Enbridge Gas hosted a regional webinar in November for each of the three main distribution service areas (Southern, Central and Northern & Eastern), shortly after Enbridge Gas filed its 2025 to 2034 Asset Management Plan, to provide an overview of IRP, the system planning process, projects in the region, the stakeholder engagement process and an update on the Southern Lake Huron IRP Pilot Project Application and system pruning. Enbridge Gas sent targeted invitations and conducted a social media campaign to promote the website and drive sign-ups for the webinars."

[EB-2022-0335 - OEB Decision and Order, issued on March 27, 2025 pages 11-12]

"...the OEB requires Enbridge Gas to consult with the IRP TWG on a potential second IRP pilot that explores creative solutions that go beyond enhanced incentives for Enbridge Gas's traditional DSM program offerings. Some examples proposed for consideration in intervenor submissions are supply-side IRPAs and demand-side IRPAs aimed at larger commercial or industrial customers. Some other examples for consideration could include the installation of window heat pumps for larger multiresidential buildings (including social or affordable housing), exploring the use of district energy for new buildings or new neighborhoods, and how to utilize excess and otherwise wasted industrial heat for any neighboring residential customers....."

- a) In the EB-2022-0335 (Integrated Resource Planning Pilot Project Application) Decision and Order, the OEB directed Enbridge Gas to scope out a potential second IRP pilot, considering IRPAs aimed at larger commercial or industrial customers, the use of district energy and wasted industrial heat for neighboring customers.
 - i) Does Enbridge Gas plan to provide an update on IRP (given the new direction provided by the OEB in its EB-2022-0335 Decision and Order) in its annual IRP regional stakeholder webinar event?
 - ii) Please discuss how Enbridge Gas identifies and reaches out to potential commercial customers that may be interested in participating in IRPs.
- b) As part of the process of scoping out the second IRP pilot, has Enbridge Gas considered linking the second IRP pilot with the current AMI POC project?
 - i) If yes, please provide further details.
 - ii) If not, please explain rationale.

2.7-BOMA-2

Reference: [Phase 3 Ex. 2-7-2 page 2]

"AMI technology has become the standard for many natural gas utilities in North America..."

- a) Please list and summarize Enbridge Gas's jurisdictional review of natural gas AMI implementation in North America.

2.7-BOMA-3

Reference: [Phase 3 Ex. 2-7-2 page 5]

"185 AMI-enabled ultrasonic meters were installed across four test areas within the Greater Toronto Area (GTA)."

- a) Please provide a breakdown of these 185 installations by sector (e.g. residential, commercial and industrial), by building type (e.g. residential home, office building...) and by gas consumption.

2.7-BOMA-4

Reference: [Phase 3 Ex. 2-7-2 page 9]

"Key remaining activities include a collaborative pilot with Ontario electric LDCs to determine the feasibility of leveraging existing AMI network infrastructure within the province, which (if feasible) would lower the overall project cost of implementing an AMI solution for Enbridge Gas customers."

- a) Which Ontario electric LDC(s) will be included in this collaborative pilot?

2.7-BOMA-5

References:

[Phase 3 Ex. 2-7-2 page 8]

"Cost-Benefit Analysis: A detailed review of underlying assumptions including the potential capital and operational costs as well as the benefits for Enbridge from the AMI program is underway and will be completed by the end of the POC. This includes an evaluation of the capital and operational costs incurred to deploy and operate AMI at Enbridge, the costs (benefits) that will no longer be incurred with AMI and to assess the qualitative benefits that do not have a monetary value attached but will drive value for Enbridge Gas and our customers."

[Phase 3 Ex. 2-7-2 page 9]

"It is anticipated that the POC will be completed in Q4 2025."

"Once the necessary preparatory investigations and analysis are complete as part of the POC, Enbridge Gas will consider all results and findings in developing a plan for large scale AMI implementation in Ontario."

- a) Does Enbridge Gas plan to report its AMI POC's full results and findings once it is completed in Q4 2025?
 - i) If the answer is yes, please indicate timeline of this full POC report.
 - ii) If the answer is no, please provide rationale.
- b) Given Enbridge Gas plans to complete its detailed review of underlying cost-benefit assumptions by the end of the POC,
 - i) When will the AMI cost-benefit analysis be completed?
 - ii) When does Enbridge Gas plan to finish developing a large-scale AMI implementation plan and seek OEB approval?
- c) Does Enbridge Gas plan to perform its AMI cost-benefit analysis by sector (e.g. residential, commercial and industrial) and by rate class? If not, please provide rationale.
- d) Enbridge Gas states that – part of the cost-benefit assumption review is to assess the qualitative benefits that do not have a monetary value attached but will drive value for Enbridge Gas and its customers. Please provide the metrics of all qualitative benefits and explain how they will be quantified and evaluated.

8.2-BOMA-6

Reference: [Phase 3 Ex. 8-2-3 Attachment 5, page 30]

"Customers' actual demands can be measured directly if they are equipped with meters capable of recording consumption at high-frequency intervals (e.g., 15-minute, hourly, or daily), or that otherwise record peak gas flow through the meter. Actual coincident and/or non-coincident peak demands can be observed directly (retrospectively) up to the meters' recording frequency. For instance, hourly interval metering allows measurement of actual hourly (average) demands as well as demands at lower frequency such as daily."

"In the absence of interval or other demand metering, actual daily (and/or hourly) peak demands would need to be estimated from lower-frequency consumption data derived from meter readings...."

- a) Please describe in detail Enbridge Gas's proposed methodology to estimate customers' SFVD design day demand?
- b) Does Enbridge believe AMI data (which provides consumption at high-frequency interval) will improve the accuracy of estimated customers' design day demand over Enbridge Gas's current proposed estimation methodology?
 - i) If yes, please discuss the advantages in detail.