

June 11, 2020

**VIA RESS**

Ms. Christine E. Long  
Registrar and Board Secretary  
**ONTARIO ENERGY BOARD**  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

**Ian A. Mondrow**  
Direct 416-369-4670  
ian.mondrow@gowlingwlg.com

Assistant: Cathy Galler  
Direct: 416-369-4570  
cathy.galler@gowlingwlg.com

T1022476

Dear Ms. Long:

**Re: EB-2020-0091 – Enbridge Gas Inc. (EGI) Integrated Resource Planning (IRP) Proposal.  
Industrial Gas Users Association (IGUA) Comments on Draft Issues List  
Submissions.**

---

We write in response to certain “round 1” submissions filed in respect of OEB Staff’s draft issues list. While IGUA did not have specific concerns with, and thus did not offer initial comments on, the draft issues list, we do wish to address a few of the matters raised in the submissions to date of other parties which we have had the benefit of considering.

**Consideration of Alternative Approaches**

We have had the benefit of reviewing OEB Staff’s “round 2” submissions of even date and agree with Staff’s suggestion that, in light of a number of the submissions already made, the Board might “*provide further clarity that a broad consideration of alternatives to Enbridge Gas’s proposals is within the scope of this proceeding*”. We found SEC’s submissions in this respect to be particularly helpful.

While we agree with EGI that ultimately the Board is being asked to opine on EGI’s IRP proposal, the Board has already indicated (in its April 28, 2020 Notice of Hearing and in EB-2019-0158 Procedural Order No. 1 as referred to in the Notice of Hearing) its view that EGI’s IRP Proposal “*raised issues of broad applicability that are best dealt with outside of the context of a project-specific Leave to Construct proceeding*”. The Notice of Hearing herein also refers to previous OEB consideration of natural gas IRP and contemplates expert evidence on alternatives to natural gas infrastructure to be filed by Board Staff. All of this indicates that the Board’s intention in so structuring this proceeding is to broadly consider alternatives to EGI’s proposals and ultimately provide guidance to EGI and other interested parties within that broader context.

## Consideration of Environmental Policy Goals

We are concerned with suggestions that the Board include in the scope of its review herein consideration of broader environmental policy goals.

OSEA's "round 1" submissions suggested addition of the issue of how EGI's IRP proposal promotes carbon reduction and addresses climate change. GEC's "round 1" submissions included as a specific example of topics for consideration; *"Should externalities be monetized in IRP analysis, and if so, which externalities?"*

IGUA does not believe that it is the function of IRP to promote carbon reduction and address climate change, *per se*. Rather, the appropriate scope of inquiry on these topics in this proceeding is whether the IRP proposal/analysis properly considers avoided carbon/GHG compliance costs in assessment of alternatives. Stand-alone consideration of broader carbon policy is not an appropriate topic for this proceeding.

Yours truly,



Ian A. Mondrow

c: S. Rahbar (IGUA)  
A. Stiers (EGI)  
D. Stevens (Aird & Berlis LLP)  
M. Parkes (Board Staff)  
M. Millar (Board Staff)  
Intervenors of Record

TOR\_LAW\10355237\1