

Conservation First Framework: Mid-Term Review

Written Comments by Enbridge Gas Distribution Inc.

[February 13th, 2018]



Enbridge Gas Distribution Inc. (“Enbridge”) is pleased at the opportunity to provide written comments on the Conservation First Framework (CFF) Mid-Term Review draft report issued on January 8th, 2018. Enbridge offers a suite of Demand-Side Management (DSM) programs across the Province, as guided by the natural gas DSM Framework. In light of the evolving climate change policy objectives, Enbridge welcomes this mid-term review as an opportunity to check-in on the current and future efficacy of collaboration between the CFF and DSM frameworks. This submission will briefly discuss Enbridge’s position for areas of enhancements to facilitate alignment between the CFF and DSM frameworks to promote greater collaboration, thus improving customer experience and driving results.

Today, customers want an integrated and solutions based approach to energy management. As stated throughout the Conservation First Framework Mid-Term Review report, the energy landscape has evolved from the CFF’s inception, with increasing climate change policies and the introduction of GreenON to implement Climate Change Action Plan (CCAP) goals. To date, the new climate change policies have not been fully integrated into the CFF, or the DSM framework, and due to misalignment of implementation, have in certain areas created customer confusion on how to best approach their energy management needs.

Enbridge is committed to working innovatively, creating value and solutions for customers. This commitment will require that barriers to collaboration within the CFF and DSM frameworks are broken down, enabling meaningful collaboration between the natural gas utilities and the electric utilities, and GreenON. Enbridge believes that an integrated approach, where appropriate, is in the interest of rate payers by realizing cost-efficiencies, meeting customers’ demands for a one-stop shop of gas and electric savings, and driving for deeper participation across the Province. Without greater collaboration, there will be missed opportunities for greater savings.

The table on the following page highlights specific areas of the CFF framework that Enbridge believes will have the most impact on enhancing alignment, thus enabling meaningful collaboration, where appropriate.

TOPIC	COMMENTS
Collaboration Guideline	Enbridge supports a ‘Collaboration Guideline’ to be developed by the IESO and OEB. The Collaboration Guideline should be drafted with input from the natural gas utilities to ensure mechanisms and tools create incentives for utilities to collaborate and provide an integrated approach for the customer.
Climate Change	Enbridge agrees that climate change policies should be integrated into the CFF. Enbridge supports cost-effectiveness tests and tools be updated to consider the avoided Greenhouse Gases (GHG). In light of the natural gas utilities obligation to manage the emissions profile of customers in the Cap and Trade program, aligned cost-effectiveness tests for CFF and DSM will facilitate collaborative programming and pilot development.
Attribution of Savings	Enbridge supports the existing attribution of savings policy where electric utilities claim the kWh savings, and natural gas utilities claim the m3 savings. Enbridge does not support attribution as “savings follows the money” as this policy could dis-incent parties to collaborate by reducing the amount of claimable savings.
Definition of CDM	Enbridge agrees that the definition of CDM must remain flexible to respond to market changes, policy changes, and customer feedback. Enbridge also supports a criterion based approach to the CDM definition to ensure there are no missed opportunities, or delays in pursuing a low carbon technology.
Regional Planning	Enbridge advocates strongly for inclusion in the regional planning among the IESO and LDC’s. Currently, natural gas utilities are not eligible to be a member of the IESO Integrated Regional Resource Planning (IRRP) groups, even though planning efforts could have a direct impact on natural gas infrastructure in these regional areas. Local natural gas utilities, local LDC’s and the IESO must be aligned and in discussions to capture resource planning initiatives, such as an electric demand response program, to ensure that the viability of all energy and resources in the area are being recognized and captured.
Beyond 2020	<p>As stated above, Enbridge does not support the “Savings Attribution follows Spending” between natural gas and electric utilities. The ratepayers are better served by a collaborative agreement whereby natural gas utilities claim gas savings, and electric utilities claim electric savings to ensure all utilities are properly motivated to pursue a collaborative arrangement.</p> <p>Enbridge does not support one “Integrated Framework” for natural gas, electricity, GHG’s, and water. This process would undermine the ability to serve customers if programs are stalled by regulatory changes and challenges. It is better that the appropriate mechanisms within each framework are enhanced to provide better alignment, thus creating an incentive for all utilities to collaborate to benefit of ratepayer.</p>