

FRPO INTERROGATORY #5

INTERROGATORY

Issue 2

REF: EB-2017-0255, Exhibit B.FRPO.1 and EB-2017-0255, Exhibit JT1.24 (attached for ref.)

Preamble: We would like to understand better the company's technical views on the inclusion of human and animal waste as biomass given the scientific view of biomass as emission-neutral as pre-scribed by the new regulations.

Please provide Enbridge's technical view of the inclusion of human and agricultural waste combustion as biomass being emission neutral due to the absorption of CO<sub>2</sub> as the biomass regrows.

- a) Please provide company's technical views how this carbon cycle is sustainable as carbon-neutral with the introduction of human waste-derived RNG being combusted in customers' homes and businesses.

RESPONSE

As per the Ministry of Environment's (MOECC's) Guideline for Quantification, Reporting and Verification of Greenhouse Gas Emissions, standard quantification method number ON.400, all volumes of natural gas derived from biomass are excluded from the quantification of the GHG emissions from the distribution of natural gas. This means that emissions from RNG do not bear a compliance obligation under the Ontario Cap and Trade program.

Furthermore, the value of RNG in assisting the Province in meeting its GHG reduction targets has been recognized through the Province's Climate Change Action Plan (CCAP).<sup>1</sup> In the CCAP, the Province has committed between \$60 million and \$100 million to "encourage the use of cleaner, renewable natural gas in the industrial, transportation and building sectors". As stated on page 28 of the CCAP:

Methane released from sources like landfills, municipal green bin collection, agricultural residues, livestock manure, food and beverage manufacturing waste, sewage treatment plants and forestry waste can be renewed and directly substituted for conventional

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<sup>1</sup> Available at: [http://www.applications.ene.gov.on.ca/ccap/products/CCAP\\_ENGLISH.pdf](http://www.applications.ene.gov.on.ca/ccap/products/CCAP_ENGLISH.pdf)

natural gas. Renewable natural gas is a low-carbon fuel that does not add new carbon to the atmosphere. It is fully interchangeable with conventional natural gas and uses the same infrastructure.

Enbridge's technical view is aligned with the statement above from the CCAP.