

STAFF INTERROGATORY #8

INTERROGATORY

Issue 2 – Cost Consequences

Topic: RNG Enabling Program

Ref: Exhibit B / Tab 1 / Schedule 1 / p. 17, #49, p. 18 #53 and p.57, #57, Table 1

Preamble:

Enbridge Gas states that its Upgrading Service will be offered to potential RNG producers as an optional service. Producers choosing this option will contract with Enbridge Gas to plan, design, procure, construct, own, operate and maintain biogas conditioning and upgrading equipment on the producer's premises.

Enbridge Gas also states that it will ensure that the RNG injected into the gas distribution system, at a minimum, meets the requirements of CSA Z662 and other applicable codes and standards as specified in its policies.

Questions:

- a) Please explain how Enbridge Gas developed its expertise in planning, designing, operating and maintaining biogas conditioning and upgrading equipment?
 - i) Is this internal expertise? Please explain.
 1. If so, how many FTEs were trained and what were the costs for training, etc.?
 2. If not, what are costs and resources to hire external expertise? Please explain.
- b) Please explain the circumstances where Enbridge Gas would exceed the requirements of CSA Z662 and other applicable codes and standards as specified in its policies for RNG injected into its gas distribution system.

RESPONSE

- a)
 - i) The conditioning of RNG is an extension of Enbridge's existing knowledge on natural gas as the primary component in biogas gas is methane, which is also the primary component in natural gas. Enbridge has also been investigating biogas clean up technologies with a number of different technology providers over the last few years.

1. There has been no formal training provided to Enbridge's FTEs on RNG conditioning. The existing expertise Enbridge's staff have in terms of planning, design, procurement, and construction will be utilized to build and operating the biogas conditioning facilities.
 2. Please see response to (a)(i)1. above.
- b) Internal standards for the RNG conditioning stations have not been developed. Enbridge will meet or exceed any applicable codes.