

Enbridge Gas's Feedback on the Proposed Lifecycle Analysis Models and Technical Guideline Updates for the Cleaner Transportation Fuels Regulation

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About Enbridge Gas Inc.

Enbridge Gas is Canada's largest natural gas storage, transmission and distribution company based in Ontario, with more than 170 years of service to customers. The distribution business provides safe, affordable, reliable energy to about 3.8 million homes, businesses and industries and is leading the transition to a clean energy future through net-zero emissions targets and investments in innovative low-carbon energy solutions. The storage and transmission business offers a variety of storage and transportation services to customers at the Dawn Hub, the largest integrated underground storage facility in Canada and one of the largest in North America. Enbridge Gas is owned by Enbridge Inc., a Canadian-based leader in energy transportation and distribution.

Learn more at www.enbridgegas.com.





Introduction

Enbridge Gas Inc. (Enbridge) appreciates the opportunity to submit feedback on the proposed updates to the Technical Guidelines for the Cleaner Transportation Fuels (2021 Version 1.1) and has summarized our comments below.

Harmonization of GHG Lifecycle Models

Enbridge recognizes that GHG lifecycle assessment (LCA) models require revision and updating to reflect the utilization of different feedstocks and potential process changes. Upon the introduction of the Federal Clean Fuel Regulation in 2022, which requires low-carbon fuel producers to establish a carbon intensity using Environment and Climate Change Canada's (ECCC) OpenLCA model, Enbridge suggests that MECP also recognize GHG intensities calculated through the use of ECCC's OpenLCA model to satisfy Part A requirements under the Cleaner Transportation Fuels Regulation. Recognizing GHG intensities calculated from the OpenLCA model is a red-tape reduction opportunity that can reduce the administrative burden, cost, and redundancy for biofuel producers.

Recognize Renewable Energy Deliveries

Enbridge recommends updating Sections 3.10, 3.10.1, and 2.10.2 of the Technical Guideline to replace the terms "directly connected" with "delivered." By revising these terms and recognizing the benefits of renewable energy delivered through a common carrier, the producers of biofuels can support the development of renewable natural gas (RNG) in Ontario and participate in Ontario's soon-to-be-launched Clean Electricity Credit registry.

Conclusion

Enbridge appreciates the opportunity to provide feedback and recommendations to help guide the consultation on the proposed lifecycle analysis models and Technical Guideline updates for the Cleaner Transportation Fuels Regulation. Enbridge requests consideration of the recommendations identified in this document and welcomes the opportunity to meet with you to discuss the consultation and recommendations in further detail. If you have any questions or require additional information, please do not hesitate to contact Islam Elsayed, Government Affairs Specialist (islam.elsayed@enbridge.com).