

August 12, 2015

BY COURIER & RESS

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
Suite 2700, 2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli,

**Re: EB-2015-0029 – Union Gas Limited (“Union”) – 2015-2020 DSM Plan  
– Written Follow-Up Questions on Intervenor Evidence**

Please find attached written follow-up questions from Union Gas Limited on the evidence prepared by Mr. Chris Neme, Energy Futures Group submitted on behalf of the Green Energy Coalition.

If you have any questions with respect to this submission please contact me at 519-436-5334.

Yours truly,

*[original signed by]*

Vanessa Innis  
Manager, Regulatory Initiatives

Encl.

c.c.: Lawrie Gluck, Board Staff  
Alex Smith, Torys  
All Intervenors (EB-2015-0029)

**UNION GAS LIMITED**  
**FOLLOW-UP QUESTIONS ON INTERROGATORY RESPONSES PREPARED BY MR. CHRIS NEME,**  
**ENERGY FUTURES GROUP SUBMITTED ON BEHALF OF GREEN ENERGY COALITION**

*References:* Exhibit L.GEC.1 Page 10 Figure 1, Exhibit M.GEC.UNION.1

*Request 1:*

1. Please provide the numerator and denominator used for Vermont, Massachusetts, Rhode Island, and Minnesota's savings as a percent of sales provided in Exhibit L.GEC.1, Page 10, Figure 1. Please point to the figures in Exhibit M.GEC.UNION.1 Page 3, and provide any other information that would help Union understand how GEC developed the figures.
2. In the table provided in Exhibit M.GEC.UNION.1, Page 3, please also include the number of DSM participants by sector (Residential, Commercial, Industrial).
3. For Vermont, Massachusetts, Rhode Island, and Minnesota, please provide a build-up (or references to where the build-up can be found) for each of their 2014 Annual m<sup>3</sup> Savings by sector (Residential, Commercial, Industrial). Please provide it at a measure level, so that it is clear:
  - a. How many of each measure was delivered. For custom projects, please provide the number of projects.
  - b. The amount of gas savings (m<sup>3</sup>) that was claimed for each measure, including the input assumptions used to determine the claimed savings for each measure. For custom projects, please provide the total gas savings (m<sup>3</sup>) and any pertinent input assumptions (including but not limited to free-ridership numbers and EULs)

*Reference:* Exhibit M.GEC.UNION.2

*Request 2:*

In response to part a) ii), GEC states "*Mr. Neme does not have access to the specific incentive levels offered for the years in question. However, Mr. James Hanna, former PG&E staff member and now Technical Director of Energy Solutions, the firm that is providing technical support to PG&E on its upstream programs, indicated that the incentives that were paid to the distributors in the upstream model were identical to the incentives that had been previously paid to the end use customers in the downstream model.*"

1. Please confirm that the incentives were identical to the distributors and end use customers at a measure-level.