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Our File No. 152806

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli
Board Secretary

Dear Ms. Walli:

**Re: Enbridge Gas Distribution Inc. (EB-2015-0049) and Union Gas Limited (EB-2015-0029)
Multi-Year DSM Plans (2015-2020)**

Please find attached a list of areas/questions that BOMA will pursue with the Board Staff's expert, Synapse, at the Technical Conference on Monday. While there are a number of questions, most can probably be answered briefly.

BOMA would expect it would have about 90 minutes of questions for the Board Staff's expert.

Yours sincerely,

FOGLER, RUBINOEFF LLP

Thomas Brett
TB/dd
Encls.

cc: All Parties (by e-mail)

BOMA's Questions for Technical Conference

With respect to Board Staff Evidence Produced by Synapse Energy Economics Inc

1. *Reference – Report.* For all citations of costs and incentives comparing US and Canadian jurisdictions, please provide the amount in both Canadian and US dollar equivalents. So to for comparisons of costs of fuel, please harmonize on either therms or cubic meters or provide both rather than comparing cost per therm to cost per cubic meter.
2. *Reference - Page 1, Paragraph 1.* Please confirm that Synapse is aware that the original framework for natural gas Demand Side Management (DSM) was established in EBO-169-III in 1993 and both utilities programs since 1995 under a number of different Board frameworks. Has Synapse reviewed the previous frameworks, particularly with respect to the evolution of the shareholder incentive?
3. *Reference – Page 1, Paragraph 1.* Please confirm that Synapse is aware of the Minister's Directive from March 31, 2014 and included direction to achieve all cost effective DSM.
4. *Reference - Page 1 Paragraph 4.* Did Synapse interview any staff of the natural gas utilities, any members of the DSM Consultative (intervenors) or any staff of electric utilities in preparing this evidence?
5. *Reference – Page 1 Paragraph 5.* Please list all of the programs and utilities that Synapse considers representative of best practices in leading jurisdictions. Please identify the criteria that Synapse applied to determine the utilities and programs that they considered to be representative of best practices. Please identify how Synapse determined which are leading jurisdictions. Please indicate which are electric only, gas only or combined. Please include the number of commercial, industrial and residential

customers served by each of these utilities and identify how many continuous years of programming has each utility delivered. Please identify the programs and utilities that failed to meet the criteria that Synapses used to determine best practices or leading jurisdictions.

6. *Reference – Page 1, Paragraph 5.* Please identify how Synapse determined similar situations, markets or processes for its comparisons.
7. *Reference – Page 1, Paragraph 6.* Please provide a list of the sources that were included in your detailed literature review.
8. *Reference – Page 1, Paragraph 6.* Please provide examples of how suboptimal policies hinder energy efficiency growth. When Synapse references policies, does that refer to government policies, or regulatory policies?
9. *Reference – Page 2, Paragraph 3.* Given the Minister's direction to achieve all cost effective DSM, what is the purpose of the "cautious and balanced approach" with respect to the budget? Was this the result of direction from Board Staff? Please file your financial and economic analysis of increased budgets. Please file your estimate of how much program budgets could be decreased if your recommendations were full implemented.
10. *Reference – Page 3, Paragraph 1.* Beyond the statistical customer sector profiles on page 11, please file the analysis of the service territories of Enbridge and Union that led Synapse to suggest that both utilities should offer identical programs.
11. *Reference – Page 4, Paragraph 1.* Did Synapse review the role intervenors play in the Audit Committees for each of the Utilities?
12. *Reference – Page 5, Paragraph 2.* Did Synapse analyse the similarities and differences between the framework for DSM and CDM in Ontario? Please provide Synapse view of

the difficulties inherent in coordinating programs developed under different frameworks and with different regulatory regimes.

13. *Reference – Page 5, Paragraph 3.* Has Synapse reviewed the alternative financing options available to Ontario gas customers?
14. *Reference – Page 8, Paragraph 3.* Please provide Synapse's understanding of the Participant Cost Test. Is Synapse aware of any jurisdictions that approve programs with negative participant cost tests?
15. *Reference – Page 9, Paragraph 2.* Please provide a substantiation (evidence) for your comment: "Generally speaking, benefit costs ratios of 2.0 or greater are considered acceptable."
16. *Reference – Page 9, Paragraph 2.* With respect to the sentence: "Enbridge has greater net benefits (\$654 million) than Union (\$140 million)", has Synapse reviewed why this is the case? In particular, has Synapse reviewed the history of Union's participation in the industrial market under previous frameworks, the role of intervenors like the Industrial Gas Users Association (IGUA) and Association of Power Producers of Ontario (APPRO) or Board direction in an earlier framework with respect to the Union's largest industrial customers?
17. *Reference – Page 11, Paragraph 2.* With respect to the differences in the costs of energy saved in the two low income programs, has Synapse reviewed the geographic dispersion of Union's low income customers or determined how that the size and distance affect costs? Has Synapse reviewed with the availability of DSM contractors across northern Ontario?

18. *Reference – Page 13, Table 12.* Please file the most recent evaluation of Massachusetts National Grid gas weatherization program. Please file population density statistics for the program. Has Synapse analyzed the impact of population density, customer mix, industry mix on the proportional make up of energy savings results for any of the leading jurisdictions?
19. *Reference – Page 13, Paragraph 2.* Please confirm that if customers in your leading jurisdictions use the same amount of natural gas where one is residential and one is commercial, they have different rate structures.
20. *Reference – Page 30, Paragraph 2.* Please file the comparisons of government codes and standards for the equipment listed under Residential Products among your leading jurisdictions and Ontario.
21. *Reference – Page 31, Paragraph 5.* Is Synapse aware that the requirement for two measures was the result of the DSM Consultative proceedings?
22. *Reference – Page 33, Paragraph 5.* Please provide the average savings from a Mass Save insulation project.
23. *Reference – Page 34, Paragraph 3.* Has Synapse reviews the history of showerhead programs in Ontario since 1989 by both gas and electric utilities.
24. *Reference – Page 38, Paragraph 2.* Synapse make many suggestions with respect to harmonization of incentives between Enbridge and Union. However, with respect the incentives for adaptive thermostats, Ontario's electric utilities all offer different incentive levels. Are these programs considered best practices according to Synapse?

25. *Reference – Page 39, Paragraph 2.* Has Synapse reviewed the various documents approved by the Board for cataloguing measure savings which are a precursor to the Technical Reference Manuals?
26. *Reference – Page 66, Paragraph 9.* Regarding Aboriginal Program. Please provide any analysis that Synapse has completed with respect to the location of First Nations communities within the gas service territories. Please note the reference on page 66 is incorrect.
27. *Reference – Page 73, Paragraph 8.* Did Synapse review the documentation for Enbridge's previous efforts with respect to working with realtors with respect to home energy labelling? Has Synapse reviewed the housing market in Ontario, particularly with respect to multiple bids very often over the asking price? Has Synapse reviewed the past and current government initiatives on building labelling?
28. *Reference – Page 81, Paragraph 2.* In Ontario, a government regulation including schools requires all broader public sector agencies to file energy management plans; this data is public. Have any of the jurisdictions considered leading by Synapse established such regulations.
29. *Reference – Page 85, Paragraph 42.* What is about the definitions of the categories that Synapse finds vague?