



Lorraine Chiasson  
Regulatory Coordinator  
Regulatory Affairs,

tel 416-495-5499  
fax 416-495-6072  
EGDRegulatoryProceedings@enbridge.com

Enbridge Gas Distribution  
500 Consumers Road  
North York, Ontario M2J 1P8  
Canada

**VIA EMAIL, COURIER and RESS**

March 26, 2018

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

**Re: Enbridge Gas Distribution Inc.  
Cap and Trade Compliance Plan (“Application”)  
Ontario Energy Board (“Board”) File Number EB-2017-0224  
Interrogatories to Environmental Defence and Green Energy Coalition**

In accordance with Procedural Order No. 3, attached please find Enbridge Gas Distribution’s interrogatories on the evidence of Mr. Chris Neme on behalf of Environmental Defence and Green Energy Coalition.

This submission was filed through the Board’s RESS and will be available on the Company’s website at [www.enbridgegas.com/ratecase](http://www.enbridgegas.com/ratecase)

Yours truly,

[original signed]

Lorraine Chiasson  
Regulatory Coordinator

cc: Mr. D. O’Leary, Aird & Berlis LLP  
Mr. D. Stevens, Aird & Berlis LLP  
All Interested Parties EB-2017-0224 (via email)

ENBRIDGE GAS DISTRIBUTION INC.  
INTERROGATORIES FOR NEME'S EVIDENCE ON BEHALF OF GEC AND ED

1. Reference: page 2

Preamble:

Reference to a “new National Standard Practice Manual for cost-effectiveness screening of energy efficiency measures, programs and portfolios, which was published in May 2017”

Request:

- a) Please provide a copy of the document referenced at Section I, page 2, line 20.

2. Reference: page 2

Preamble:

Mr. Neme notes that he was appointed as an expert member on the 2017 Marginal Abatement Cost Curve Study. In other words he was part of the Technical Advisory Group (the “TAG”).

Request:

- a) Please provide all written communications involving GEC, ED and/or Mr. Neme to and from the Board Staff and ICF in respect of development of your evidence. Please also provide all written communications involving GEC, ED and/or Mr. Neme to and from the Board Staff and ICF in respect of the development of the MACC (the TAG process).

3. Reference: page 16 and page 30, Figure 1

Preamble:

Page 30 - The evidence shown in Figure 1: Comparison of Renewable Gas Proposal Cost-Effectiveness Test Results

Request:

- a) Please confirm that the Utility Cost Test (UCT) does not include the incremental cost that a customer must pay for efficiency measures.

4. Reference: page 34

Preamble:

“In ballpark terms, I think that about half of those extra savings (8 million m3) – and therefore about half of the cost savings (\$9 million) – could have been realized by each utility.”

Request:

- a) What are your assumptions and calculations in that assessment?
- b) What part of the \$9 million of forecast savings will directly benefit ratepayers who do not choose to participate in such incremental energy efficiency programs?

5. Reference: page 26, footnote 32

Preamble:

Footnote 32 states that the 1 ½% actual average savings in 2016 of gas utilities in the four states Mr. Neme selects for his paper is a “straight average across the four states”.

Request:

- a) Please provide the report referenced.

6. Reference: Ontario Energy Board's Cap and Trade Framework, page 28 (EB-2015-0363)

Preamble:

Excerpt taken from the Board's Cap and Trade Framework: “The OEB is confident that any potential overlap can be appropriately addressed through the robust EM&V process of the DSM Framework. The DSM Framework also includes a mid-term review provision (to be completed by June 1, 2018) that will provide an appropriate opportunity to assess the DSM Framework in light of the Cap and Trade program.”

Request:

- a) Please confirm GEC and ED's involvement in the development of the Cap and Trade Framework. Please provide copies of all GEC and ED submissions, formal or informal to the Board in this matter.

7. Reference: page 23

Preamble:

Taken from the evidence - "Second, the DSM mid-term review process, at least as currently outlined by the Board, does not allow for meaningful review of utility plans.

Request:

Please provide copies of all, formal or informal submissions to the Board in both the DSM mid-term review (EB-2017-0128) and the 2017 Compliance Plan (EB-2016-0300).