



PUBLIC INTEREST ADVOCACY CENTRE

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ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

November 6, 2009

VIA E-MAIL AND COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli

**Re: EB-2009-0154
Enbridge Gas Distribution Inc. Demand Side Management Phase II
Low Income DSM Plan
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

As Counsel to the Vulnerable Energy Consumer's Coalition (VECC), and, as directed in the Board's Procedural Order, I hereby provide the interrogatories of my client VECC to EGDI.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC

Encl.

IN THE MATTER OF the *Ontario Energy Board Act 1998*,
S.O. 1998, c.15, (Schedule B);
AND IN THE MATTER OF an application by Enbridge Gas Distribution Inc. for approval
of its 2010 Natural Gas Demand Side Management Plan.

**PHASE II -2010 LOW INCOME PROGRAM PLAN
INTERROGATORIES OF THE VULNERABLE ENERGY CONSUMERS COALITION
(VECC)**

VECC IR#1

Reference Exhibit D Tab 1Schedule 1Page 2 of 6

Preamble:

“Enbridge has assessed the Board’s direction in relation to low-income DSM for 2010 and has endeavored to provide a balanced portfolio that aligns with customer needs and the changing environment. For this submission the term “status quo” is used to describe what elements would have been proposed for 2010 under the previous budget formula (prior to the approval of the Industrial Sector Support Pilot Program). The status quo low-income plan presented here allocates \$1,526,980 or 20% of the residential DSM budget to low-income programs and 14% of the Market Transformation (“MT”) budget, \$140,000, to low-income MT initiatives.”

- a) Provide a version of Table 1 that shows the detailed calculation (including % metrics) supporting the 2010 LI (“status quo”) base budget compared to the Board- approved 2009 Budget
- b) Provide the calculations incorporating the enhancements related to the Industrial Pilot Program and SHSC Solar Water Heating Program
- c) Compare the budget metrics to those filed by Union Gas for its 2010 LI program.
- d) If the Government Low Income Policy Direction is received prior to or during the 2010 rate year, will EGDI file a revised budget/ program based on its original plan.
- e) If so provide an estimate of the cost and program elements assuming 6 months of implementation

VECC IR#2

Reference Exhibit D Tab 1Schedule 1Page 3/4 of 6

Preamble:

In addition to the \$1,666,980 status quo low-income programs, Enbridge is

proposing an incremental \$1.4 million for its low-income DSM budget to take advantage of a time-sensitive opportunity in the market to install 200 solar thermal water heaters in social housing units at a reduced cost. This will bring the total low-income DSM budget proposed for 2010 to \$3,066,980. Secondly, solar thermal installations in 2010 will also qualify for the Federal Government's ecoENERGY Retrofit – Homes program rebate and the Provincial Government's Home Energy Savings program rebates, which amount to an additional \$2,500 off the installed cost of solar thermal water heating units.

- a) Why would EGDl not budget the SHSC Solar Water Heater Program on a net basis rather than on a gross basis?
- b) If the rebates are received what is the rationale for including the amounts in the DSMVA?
- c) Will the usual TRC/target criteria for using funds in the DSMVA? If not discuss EGDl's proposals.
- d) What will the rebate money be used for:
 - i. Cost overruns
 - ii. More Solar Water Heaters
 - iii. Other Low Income programs
 - iv. General DSM program expenditures

Please provide details of EGDl's Proposal(s).

VECC IR#3

Reference Exhibit D Tab 2 Schedule 1 Page 4 LI Weatherization Program

- a) Provide full details of the assumptions underpinning calculation of natural gas (1134.0 m3) and electricity (165 kWh) savings and costs:
 - i. Measures and individual savings
 - ii. Weighted average savings
 - iii. Break down of costs
 - iv. Sources of assumptions
- b) Provide details of the calculation of average savings and costs.(Page 4)
- c) Compare the assumptions, Savings and costs to those estimated by OPA and electricity distributors.
- d) Comment whether Union and EGDl are using common assumptions. If not highlight the main differences.

VECC IR #4

Reference Exhibit D Tab 2 Schedule 1 Page 4 Market Transformation Program

- a) Provide detailed description of screening/eligibility for participants.
- b) Describe how this initiative relates to Enhanced TAPS.

- c) Describe how this initiative relates to the SHSC programs in terms of target audience and participants.
- d) Why wouldn't implementation of the Scorecard include a survey of the target group(s) before and after, including conservation knowledge and willingness to act? Please explain how verification will be achieved otherwise.