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March 1, 2010

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Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27<sup>th</sup> floor Toronto, ON M4P 1E4

Dear Ms Walli,

Application by EGD to Establish DSM Deferral Accounts for the Years 2010-2014

**Board File No.:** 

EB-2010-0029

Our File No.:

339583-000062

Please find enclosed the Interrogatories of our client, Canadian Manufacturers & Exporters ("CME").

Please contact me if you require any further information.

Yours yety truly,

Vincent J. DeRose

VJD/kt

Encl.

c.

Paul Clipsham (CME)

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**IN THE MATTER OF** the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, Sched. B, as amended;

**AND IN THE MATTER OF** an Application by Enbridge Gas Distribution Inc. for an accounting order or orders establishing certain Demand Side Management Deferral Accounts for the years 2010-2014

## Interrogatories of Canadian Manufacturers & Exporters ("CME") to Enbridge Gas Distribution Inc. ("EGD")

- 1. At Exhibit A, Tab 1, Schedule 3, page 1 of 13, paragraph 3, Enbridge Gas Distribution Inc. ("EGD") states that the establishment of the deferral accounts will enable it to sign a Contribution Agreement before March 31, 2010 as required by NRCan. Please provide a copy of the Contribution Agreement which NRCan requires EGD to execute.
- 2. At Exhibit A, Tab 1, Schedule 3, page 1 of 13, paragraph 3, EGD confirms that after executing a Contribution Agreement, it will continue to seek funding from "other partners". CME wishes to better understand the relationship EGD has, or anticipates developing, with the "other partners". In this regard, please provide the following:
  - (a) A list of all parties that have agreed to partner with EGD for funding to support the pilot project, along with all Contribution Agreements, or other agreements, executed between those parties and EGD;
  - (b) A list of all potential partners who EGD has approached; and
  - (c) A list of all parties that EGD has identified as potential partners, but to date, has not approached. With respect to this latter category, please explain why these potential partners have not already been approached.
- 3. At Exhibit A, Tab 1, Schedule 3, pages 9 to 10 of 13, EGD confirms that the maximum five-year budget is \$8.5M, of which NRCan will fund a maximum of \$3.975M. Please confirm that if EGD executes the Contribution Agreement, and does not obtain any partners to provide additional funding, its ratepayers will be required to pay a maximum of \$4.502M over the next five years. If this is incorrect, please set out the maximum amount that EGD's ratepayers will fund over the next five years.
- 4. Do any of EGD's affiliates offer solar technologies? If yes, please provide complete details.

- 5. Does EGD, or any of EGD's affiliates, have any ownership interest in technology associated with solar thermal collectors or combined thermal storage alternatives? If yes, please provide complete details.
- 6. Please provide EGD's assessments, if any, of the cost effectiveness of the pilot technologies. If EGD has not undertaken any analysis of the cost effectiveness of the pilot technologies, please explain why it has not done so.
- 7. At Exhibit A, Tab 1, Schedule 3, pages 4 to 7 of 13, EGD describes the pilot project. CME wishes to better understand the impact that the proposed pilot project will have on its members. Please identify the rate classes which will benefit from the pilot technology. Further, if ratepayers were called upon to fund the maximum amount of \$4.502M, please provide the anticipated cost allocation of that amount over the five years by rate class.
- 8. Please describe all communications that EGD has had with its DSM Evaluation and Audit Committee ("EAC") and its DSM Consultative on the proposed pilot project to field test and evaluate different solar thermal collector types and storage technologies in different configurations. If there was no communication with the DSM EAC and the DSM Consultative prior to submitting the proposal to NRCan in September, 2009, please explain why these two groups were not consulted prior to submission of the proposal.

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