

Building Owners and Managers Association, Toronto Interrogatories  
Union Gas Demand Side Management Plan 2012 to 2014  
Board Reference Number: EB-2011-0327

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**Issue 1.0: Budgets – Resource Acquisition Programs, Low-Income, Market Transformation, Research, Evaluation, and Administration**

1. **Reference: Exhibit A, Page 7 of 52:** BOMA is concerned that the Ontario Energy Board's approach to budget setting for natural gas DSM limits the flexibility and innovation afforded to Union Gas to pursue DSM in ways that can increase participation of small and medium side customers across its service territory. Many BOMA members have branch offices, local facilities and satellite offices located in Union Gas territory. If the Union Gas DSM budgets were doubled for each of the three years of the submitted plan, what impact would this have on penetration of its DSM programs for these BOMA members and all small and medium size customers? Has Union Gas considered working with Enbridge Gas Distribution with respect to a key account strategy that addresses multi-location commercial customers across Ontario to increase participation of BOMA members with branch offices, local facilities and satellite offices ?
2. **Reference Exhibit A, Page 17 of 52:** "In Union's view, allocating Low-income DSM costs to in franchise distribution rate classes using rate base is a reasonable approach and is consistent with the intent of the Guidelines." Please confirm that this is consistent with Union's approach to allocating other costs such as low income financial and emergency assistance programs.
3. **Reference: Low-Income Program Eligibility Criteria in DSM Guidelines for Natural Gas Utilities.** BOMA is concerned that the Board's criteria leave out low income gas consumers who are living in private sector rental accommodations, some of which are owned and managed by BOMA members. Does Union Gas have an estimate of how many low income gas consumers are living in buildings not eligible under the Board Guidelines?

**Issue 2.0: Program Targets – Resource Acquisition Programs, Low-Income, Market Transformation**

4. **Reference: Exhibit A Page 31 of 52: New Home Efficiency Program:** In this and other programs that are based on the level of efficiency in the Ontario Building Code, there is a fundamental expectation that all builders fully comply with the OBC and that the performance of the homes and buildings once built and in operation actually achieve the levels anticipated by the Code. Has Union Gas done any research to determine if such assumptions are valid? Is Union Gas aware of any research by any other organization or agency to validate the performance of homes and buildings relative to Code assumptions? If it is the case that homes and buildings are not performing as expected under the Code, would not Union's estimates of the impact of its programs to go beyond Code actually understate the savings achieved?
5. **Reference: Exhibit A Page 32 of 52: Integrated Energy Management System Program.** BOMA fully supports this program approach. Does Union Gas intend to merge its prescriptive programs and custom projects programs to more fully integrate its offerings into the IEMS program? Please clarify how the m<sup>3</sup> savings from IEMS program will be differentiated before the implementation of a more holistic approach from the prescriptive programs and custom projects programs.