

INTERROGAORIES FOR UNON GAS LIMITED
FROM THE CONSUMERS COUNCIL OF CANADA
RE: UNION'S DEMAND SIDE MANAGEMENT PLAN FOR 2012-2014
EB-2011-0327

1. Ex. A is Union seeking approval of all the elements of its DSM Plan for three years? To the extent Union wishes to make changes to its plan during this three-year period what process does it intend to follow in order to obtain Board approval for those changes?
2. Ex. A/p. 17 Union is proposing to allocate the low-income budget to rate classes in proportion to the most recent Board-approved allocation of rate base. Please provide a schedule setting out the allocation in the same format as Table 2 using distribution revenue as the allocator.
3. Ex. A/p. 18 Please explain how Union allocates its DSM costs between R01 and M1. Please explain to what extent there may be differences between the participation levels, and savings per participant between the North and the South. Does the allocation of DSM costs take into account any of these differences?
4. Ex. A/pp. 20 The evidence states that, "Discretionary low-cost retrofit measures, such as showerheads and pre-rinse spray valves, are not considered deep for the purpose of the Plan or scorecard targets." Please explain the extent to which showerheads are still measures which Union includes as part of its DSM Plan. How long does Union intend to include showerheads as a part of its DSM residential program? With respect to the cumulative savings set out on Table 4 please indicate for each year how much of the savings are due to showerheads and faucet aerators.
5. Ex. A/p. 22 The evidence states that, "Should a change to the Market Transformation Programs be required within the term of the Plan Union would consult with its stakeholders and may file revised scorecard targets with the Board for the following year(s) of the plan". Please list all of the circumstances that may trigger Union to revise its scorecard targets.
6. EX. A/p. 30 Please explain why Union is proposing a residential water heater MT program and Enbridge is not. How can the market be transformed in Ontario with only one LDC promoting the product? Is Union aware of any high efficiency water heater programs in North America that have passed the TRC? If so, please provide evidence of those programs.
7. Ex. A/pp. 33-36 What specific approval is Union seeking from the Board with respect to its Market Transformation scorecards? Is Union seeking approval for everything set out in Tables 7-9?

8. EX. A/p. 35 With respect to the High Efficiency Water Heating Education Sessions and Consumer/Industry Shows metric:
- (a) Please indicate for 2009, 2010 and 2011 how many "events" Union led or participated in that would qualify under Union's current metric proposal;
 - (b) Please explain how simply attending a home show qualifies as "market transformation";
 - (c) Please indicate how many potential shows, clinics, or events geared to homeowners are planned for Union's franchise area for 2012;
 - (d) Please indicate how many "industry shows" that are geared towards builders/trades/sales agents are planned for 2012.
9. Ex. A/Appendix A/p. 7 Please indicate, to date, since the inception of the ESK program how many ESKs have been delivered to customers.
10. Ex. A/Appendix A/p. 58 With respect to Union's Low-income Program please explain the extent to which Union is working with, or plans to work with, the Ontario Power Authority on program design and delivery. If Union is not working with the OPA please explain why.