

July 5, 2013

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

Dear Ms. Wall:

RE: EB-2012-0451/EB-2012-0433/EB-2013-0074 Union Gas Limited and Enbridge Gas Distribution Inc. Leave to Construct Proceedings – Parkway West, Brantford to Kirkwall and GTA Reinforcement Projects

Please find, attached, interrogatories from the Consumers Council of Canada for the Green Energy Coalition regarding its evidence L.EGD.GEC1 prepared by Paul Chernick and L.EGD.GEC.2 prepared by Chris Neme and Jim Grevatt.

Yours truly,

Julie Girvan

Julie Girvan
Consultant to the Consumers Council of Canada

Cc: Union Gas Limited
Enbridge Gas Distribution Inc.
GMLP
All intervenors

EXHIBIT L.GEC.EGD.2 – EVIDENCE OF CHRIS NEME AND JIM GREVATT

1. The evidence refers to five other jurisdictions in North America where DSM savings are greater than Enbridge has achieved to date:
 - i) For each of the jurisdictions listed please provide more detail on the type of programs (residential, commercial and industrial), program designs and program budgets relative to EGD's historical experience. How do these compare to EGD's portfolios?;
 - ii) To what extent could the results have been impacted by higher gas prices relative to today's prices?
2. EGD is proposing an in-service date for Segment B of December 2014. Given DSM programs for 2014 have been, planned, agreed to by stakeholders and budgeted for, please explain, in detail, the process EFG is proposing to plan, review, approve (Board approval), and actually implement additional programs sufficient to defer Segment B.
3. Pp. 9-10 – For each of the examples noted regarding residential retrofit programs please provide the cost of the programs and the specific program designs implemented over the periods referred to. Generally what whole house retrofit program design represents the most cost-effective approach from the perspective of EFG?
4. P. 11 - EFG is proposing to ramp up its programs with a focus on residential whole house retrofits. The evidence states that the ramp up EFG is proposing would result in roughly 23,000 peak hour m3 savings in 2014. Please explain how this could be accomplished in 2014 given the fact that whole home retrofits take time. How would GEC ensure that there would be sufficient take up of the programs that would allow for the deferral of Segment B?
5. Please explain your understanding as to why EGD no longer pursues residential programs focused on furnaces or water heaters.
6. What are the most cost-effective residential DSM measures? What are the most cost-effective residential DSM programs?
7. What are EFG's specific proposals regarding program design and budgets that it would consider sufficient to defer Segment B? Would the increased budgets also include increases in the current shareholder incentive mechanisms?
8. From EFG's perspective, if residential programs were ramped up and the overall DSM budgets increased in order to defer the GTA Project how should those costs be recovered from EGD's customer base?

9. How do the rate impacts of EFG's specific proposals compare to the rate impacts of the proposed GTA Project?
10. EGD has cited reasons other than customer growth as justification for its proposed GTA project. These include eliminating distribution system constraints, diversifying gas supply entry points into EGD's distribution system, reducing operational risks and providing improved reliability, risk mitigation and cost savings for upstream gas supply (Ex. A/T2/S1/pp. 1-2). How will EFG's proposed ramp up of EGD's DSM programs address these other considerations?
11. P. 14 - The evidence refers to expanding DSM in order to defer of the GTA Project. From EFG's perspective, for how long could the project be deferred?

EXHIBIT L.GEC.EGD.1 – EVIDENCE OF PAUL CHERNICK

1. P. 14 – The evidence states that Segment B2 and possibly Segment B1 and the Buttonville are potentially avoidable by load reductions. EGD has cited reasons other than customer growth as justification for its proposed GTA project. These include eliminating distribution system constraints, diversifying gas supply entry points into EGD's distribution system, reducing operational risks and providing improved reliability, risk mitigation and cost savings for upstream gas supply (Ex. A/T2/S1/pp. 1-2). How would these other considerations be addressed through load reductions? Are these legitimate considerations from Mr. Chernick's perspective?
2. P. 22 – The evidence proposes options for load reductions concentrated in the area served from the Don Valley line. Has Mr. Chernick evaluated the actual potential for load reductions in that geographical area? Specifically, has Mr. Chernick evaluated the DSM potential? If not, why not? If so, please provide that analysis.
3. P. 23 – Mr. Chernick discusses curtailing supply to the Portlands Energy Centre as a means to achieve system load reduction or offering PEC an interruptible delivery tariff. Has Mr. Chernick or GEC approached PEC to determine whether these options are possible? If not, why not? If so, please provide a synopsis of those discussions.