

IN THE MATTER OF the *Ontario Energy Board Act 1998*,
Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by Enbridge Gas
Distribution Inc. for an Order or Orders approving the final
balances and for clearance of certain Demand Side Management
Variance Accounts into rates, within the next available QRAM
following the Board's approval.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Ex. B/1/1, p. 62] Please provide a detailed calculation of the DSMIDA of \$5,265,185 for Resource Acquisition Programs for 2012. Please show the calculations of the 92% allocated to volumes, the 4% allocated to Residential Deep Savings, and the 4% allocated to Commercial-Industrial Deep Savings. Please show all calculations of percentage performance for each category relative to target, and DSMIDA impact. Please include the algorithm for calculation of each component of the DSMIDA. Please provide an Excel spreadsheet showing all calculations, and reconciling to Table 15.
2. [B/2/1, P. 15] Please confirm that, of the total audited result of 1,000,860,923 cumulative lifetime m³ for resource acquisition volumes, 806,740,394 cumulative lifetime m³ are the result of custom programs. If this is not the correct number, please provide the correct number, and the calculation from which it is derived, including any Excel spreadsheet supporting that calculation. Please provide a table showing a breakdown of these custom m³ into Industrial, Commercial, New Construction, and Low Income custom projects. If there are any other categories, please identify them and show the volumes in the table.
3. [B/1/1, p. 61] Please confirm that, for every 100 cumulative lifetime m³ in excess of target, and below the maximum, the Applicant is entitled under the formula to an incentive of \$1.73. Please confirm that a 10% reduction in the cumulative lifetime m³ would result in a reduction to the DSMIDA of \$1.735 million. If either of these numbers is not correct, please provide the correct number, together with all calculations from which it is derived, including any Excel spreadsheet supporting those calculations.
4. [B/1/1, p. 78] Please provide the full reports of MMM Group and Building Innovations. Please provide their time dockets for all of the work they did to verify savings and prepare the reports. Please provide a table showing, for each of the projects reviewed by

either of MMM Group or Building Innovations, and for each assumption they used to calculate the cumulative lifetime m3:

- a. The original assumption in the application;
 - b. The assumption used by the CPSV contractor, and, if it was different, the reason why it was different, if known;
 - c. The final assumption approved by the Auditor, and, if it was different from the assumption used by the CPSV contractor, the reason for the difference;
 - d. The process that resulted in each change in assumption or calculation method from the original application, including any input provided by Enbridge related to the change; and
 - e. The impact (in lifetime m3) of each change in assumption or calculation method.
5. [B/1/1, p. 80] Please provide the full report of Byron J. Landry, and their time docket for all of the work they did to verify savings and prepare the report. Please provide a table showing, for each of the projects reviewed by the CPSV contractor, and for each assumption they used to calculate the cumulative lifetime m3:
 - a. The original assumption in the application;
 - b. The assumption used by the CPSV contractor, and, if it was different, the reason why it was different, if known;
 - c. The final assumption approved by the Auditor, and, if it was different from the assumption used by the CPSV contractor, the reason for the difference;
 - d. The process that resulted in each change in assumption or calculation method from the original application, including any input provided by Enbridge related to the change; and
 - e. The impact (in lifetime m3) of each change in assumption or calculation method.
6. [B/2/1, p. 12] Please provide complete details of the oversight and review of the CPSV studies and results, by both the Auditor and the Audit Committee, relating to the 2012 results. Please provide details of all changes that have been made to the process of implementation, oversight and review of CPSV studies of custom projects subsequent to the review of the 2011 results.
7. [B/1] Please confirm that it is Enbridge's policy that a customer will not be solicited for a DSM program if it is already known that they will be a free rider. By way of example, and without limiting the generality of the question, if a customer has already announced or made a commitment to implement an energy conservation measure without any knowledge of the relevant Enbridge DSM program, Enbridge employees will not solicit the customer to participate in that DSM program, nor will Enbridge provide an incentive to that customer.
8. [B/2/1, p. 12 et seq.] Please provide details of how Enbridge reflects in custom project reviews and results the advancement of a measure that would have otherwise been implemented by the customer at a later date. How is advancement treated differently from replacement at the time old equipment fails, for example? How is the baseline

calculated differently depending on whether it is known that a measure would have been implemented, without Enbridge's program, in a subsequent year? What direction is given to CPSV contractors, or the Auditor, with respect to either the treatment of advancement, or the calculation of baselines, for custom projects?

9. [B/2/1, p. 12] Please provide a complete list of all changes that any of the CPSV contractors made to their preliminary views or conclusions subsequent to communications relating to those conclusions with Enbridge employees. In each case where a change occurred, please provide the CPSV contractor's initial opinion, the input from Enbridge, and the final conclusion in their report. Please provide copies of all communications between Enbridge and the CPSV contractor with respect to each such change.

Respectfully submitted on behalf of the School Energy Coalition this 22nd day of November 2013.

Jay Shepherd
Counsel for School Energy Coalition