

**Kai Millyard Associates**  
**72 Regal Road, Toronto, Ontario, M6H 2K1, 416-651-7141**  
**Fax: 416-651-4659**

May 14, 2015

Ms Kirsten Walli  
Board Secretary  
Ontario Energy Board  
27th floor  
2300 Yonge Street  
PO Box 2319  
Toronto, ON  
M4P 1E4

RE: EB-2015-0049 INTERROGATORIES

Dear Ms Walli,

I enclose 2 copies of interrogatories by GEC to Enbridge on its 2015-2020 DSM Plan evidence. These have also been sent to the utility, and PDF versions are being emailed to you.

Sincerely,

(Mr.) Kai Millyard  
Case Manager for the  
Green Energy Coalition

encl.

Cc: Andrew Mandyam  
Intervenors

## **GEC Interrogatories on Enbridge 2015-2020 DSM Plan**

14-May-15

1. General: For each rate class that is eligible for one or more of Enbridge's DSM offers, please provide the following for each of the last three years:
  - a. The rate class number
  - b. A brief description of the types of customers that are in the rate class
  - c. The number of customers in the rate class
  - d. Total annual gas throughput (i.e. consumption) by all customers in the rate class
  - e. The median annual consumption of customers in the rate class
  - f. Total annual expenditure on gas – including commodity costs – by all customers in the rate class
  - g. The average rate paid for gas, including distribution costs, commodity costs and any other costs
2. General: for rate 1 (residential), please provide the average annual consumption in usage deciles (i.e. for the top 10% of customers, for customers in the 80% to 90% decile, for customers in the 70% to 80% decile, etc.).
3. Exh. B/T1/S2 pp. 9-10: Enbridge states that it developed, "over the past year", a "Comprehensive Energy Management" offering for larger, more complex customers.
  - a. What is the nature of that offer? How is it structured?
  - b. How many of Enbridge's customers have participated to date?
  - c. For those that have participated to date, what is the magnitude of the savings – in both lifetime m3 and annual percent reductions in gas use – that they achieved and/or are planning to achieve?
  - d. Over what time frame will the measures necessary to achieve those reductions be implemented or put in place?
  - e. For participants to date, how much has it cost and/or will it cost Enbridge to provide this service/offer/program to its participating customers? Please provide a breakdown of the costs to Enbridge between incentives, technical support and other (explaining what "other" entails).
  - f. What does Enbridge estimate to be the average savings – both in lifetime m3 and in percent of annual use – from this initiative over the course of its 2015-2020 plan?
  - g. How many customers does Enbridge expect to participate in this offering in each year of the 2015-2020 plan?
  - h. What does Enbridge expect to be its average cost per future participant? Please provide a breakdown between financial incentives, technical support and other.
4. Exh. B/T1/S2 p. 11: With regard to ensuring that gas DSM is considered as an alternative to capital investments in utility infrastructure planning, Enbridge states that it "had been active on this issue" even before the Board's decision in the GTA pipeline case. It further states that more recently it "has formally explored the integration of demand and supply planning processes..."
  - a. Please summarize what Enbridge did on this issue before the Board's decision in the GTA pipeline case? Please provide copies of all reports, memos and other material that documents what it did.

- b. What does the Company mean when it says it has more recently “formally explored the integration of demand and supply planning processes...”?
      - i. What specifically did it explore?
      - ii. What was the formal process it pursued for this exploration?
      - iii. What was the result of its exploration?
      - iv. Please provide copies of all documents that illustrate exactly what Enbridge has done, what its process was and what the results of the process were.
5. Exh. B/T1/S2 p. 11: Enbridge states that it is building the NRCan Portfolio Manager initiative “into its portfolio and long term business practices.” What exactly does that mean? How, specifically, does the Company plan to make use of Portfolio Manager?
6. Exh. B/T1/S2 p. 11: with respect to stakeholder processes related to evaluation work, Enbridge suggests a principle of “heavy weighting on members with objective evaluation expertise, but inclusive of an intervenor(s), the gas utilities and Board Staff.”
  - a. What does the Company mean by “members with objective evaluation expertise”? Does that clause refer to intervenors, utility staff and Board staff, or does it imply the involvement of individuals or firms that are independent of both the utilities and intervenors? If the former, how would Enbridge determine whether an intervenor or utility staff person or Board staff person had “objective evaluation expertise”?
  - b. What is the Company’s view regarding how many intervenor representatives should be involved?
7. Exh. B/T1/S3 p. 6: Enbridge’s proposed roll-over budget has just \$1.873 million allocated to residential resource acquisition. It also has a target (mid-point) of just 762 participants in its residential retrofit program.
  - a. How many participants has Enbridge had in the residential program in each month of 2014 and in each month (to date) of 2015?
  - b. How much has Enbridge spent on the residential program in each month of 2014 and in each month (to date) of 2015?
  - c. If Enbridge’s resource acquisition accomplishments in 2015 were identical to its best current estimates of its 2014 accomplishments, what would be its weighted average score for its 2015 Resource Acquisition Scorecard? How much of the maximum incentive would it earn?
  - d. Given the reality that Enbridge’s home retrofit program’s 2014 participation levels and spending were on the order of six times greater than the proposed middle scorecard target and budget for 2015:
    - i. What is Enbridge planning to do with this program in 2015? Will it continue to offer it throughout the year? Will it stop or scale back marketing to limit budget over-runs? Or will it employ other tactics to minimize spending (and participation) in 2015?
    - ii. If it scales back efforts in 2015, will that make it harder to ramp up the program when increased budget dollars become available in 2016 and beyond? If not, why not?
8. General: please provide in original electronic form a copy of Enbridge’s annual “TRC spreadsheets” (i.e. the annual Excel file which is the companion the Company’s annual evaluation report that documents, program by program and measure by measure, actual

program performance in terms of savings, as well as spending and cost effectiveness screening results) for 2012, 2013 and 2014. For 2014, please provide the most recent and most accurate version (in the event that it is not yet fully adjusted to address audit recommendations).

9. Exh. B/T1/S3: for budget tables 1, 2, 4 and 6, please provide both the Company's budget and actual expenditures for the comparable categories in each table for each of the past three years (2012, 2013 and 2014).
10. Exh. B/T1/S3: for scorecard tables 3, 5, 7, 8, and 9, please provide the comparable actual achievements of each performance metric for each of the past three years (2012, 2013 and 2014). Please provide the historic results whether or not there were comparable performance metrics in all cases for all historic years. For 2014, note whether the results provided reflect the results of CPSV reviews and/or other feedback from the current auditor.
11. Exh. B/T2/S1 p. 3: For each of the 22 programs listed, please provide the following
  - a. The forecast budget, broken down by the following categories for each year from 2016 through 2020:
    - i. Financial incentives
    - ii. Marketing
    - iii. Evaluation
    - iv. Other (explain what this includes)
12. Exh. B/T1/S4: for budget tables 7, 14 and 21, please provide the Company's actual expenditures for the comparable categories in each table for each of the past three years (2012, 2013 and 2014).
13. Exh. B/T1/S4: for scorecard tables 8, 15 and 22, please provide the Company's comparable actual achievements of each performance metric for each of the past three years (2012, 2013 and 2014). Please provide the data whether or not the performance metrics proposed in proposed new plan were metrics in the past.
14. Exh. B/T1/S4 pp. 10-14: Most of the proposed Resource Acquisition performance metrics are not round numbers. They are very precise, to the tenth of a million lifetime m3 saved. Also, the targets do not appear to increase linearly with budget.
  - a. Regarding the large volume customer target:
    - i. Please explain how each of the lifetime savings targets were developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
    - iv. Please explain why the target for 2017 is lower than for 2016 when the budget increased.
  - b. Regarding the small volume customer target:
    - i. Please explain how each of the lifetime savings targets were developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
    - iv. How much of the savings in each year is forecast to come from HEC, adaptable thermostats, small C&I prescriptive measures and other program categories?

- v. Regarding savings from HEC, is the Company proposing any changes to address how savings from new furnaces are estimated – either in annual savings or in assumptions about measure life? If so, please explain.
  - c. Regarding the Residential Deep Retrofit targets:
    - i. Please explain how each of the participant targets were developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
    - iv. Is the Company proposing to change the current list of measures that would count towards the minimum requirement of two major measures? If so, how?
15. Exh. B/T1/S4 pp. 19-21: Most of the proposed Low Income performance metrics are not round numbers. They are very precise, to the tenth of a million lifetime m3 saved. Also, the targets do not appear to increase linearly with budget.
- a. Regarding the single family savings metric:
    - i. Please explain how each of the lifetime savings targets were developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
    - iv. From 2017 through 2020, the savings goal either stays the same or declines slightly while the budget increases slightly. What is the explanation?
  - b. Regarding the multi-family savings metric:
    - i. Please explain how each of the lifetime savings targets were developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
    - iv. What portion of the savings in each year is forecast to come from social housing vs. private market multi-family buildings?
    - v. Historically, what has been Enbridge's average lifetime m3 savings per incentive dollar spent on social housing multi-family buildings vs. private market multi-family buildings?
  - c. Regarding the new metric for low income new construction projects called “# of project applications”.
    - i. Please define, in detail, what this requirement is.
    - ii. Would the application include a formal agreement or commitment to build to a certain performance standard?
    - iii. Is there a minimum requirement for the size of a project in order to count towards the metric? If not, why not?
    - iv. What is the size of the market that this metric is designed to address? How many low income new construction projects which would be eligible to participate in the program are planned and/or built each in Enbridge's service territory?

- v. How did Enbridge select the proposed target levels? Did it perform any analysis? If so, please provide such analyses?
  - vi. The number of applications required to meet the low, middle and high targets is proposed to grow from 2016 through 2018, then declines in 2019 and again in 2020. Why?
- 16. Exh. B/T1/S4 pp. 29-33: Many of the proposed performance metrics are not round numbers. They are very precise, to the tenth of a million lifetime m3 saved. Also, the targets do not appear to increase linearly with budget.
  - a. For each metric:
    - i. Please explain how it was developed.
    - ii. Also, please provide all mathematical calculations used to develop them.
    - iii. To the extent that such calculations were made in Excel spreadsheets or other electronic form, please provide the electronic files in their original format with formulas included.
  - b. Regarding the Home Health Report savings metric:
    - i. What is the forecast number of households participating in each year?
    - ii. How does the savings target (middle) for 2016 compare, on a per household basis, to the savings Enbridge has experienced to date through its pilot program?
    - iii. The budget nearly doubles from 2016 to 2017, but the savings target only goes up by about 25%. Why does it not increase linearly?
    - iv. Isn't it OPower's historic experience in other jurisdictions that savings per household increase over time (e.g. a household will save more in the second year of receiving reports than in the first year)? If not, please provide references to support a different conclusion. If so, by what percent do Opower savings for a given household increase from year 1 to year 2 to year 3 to year 4 of participation?
    - v. Why do the savings targets for 2018 drop back down to nearly the 2016 levels even though the budget increases stays constant from 2017 to 2018?
    - vi. Why do savings targets for 2019 and 2020 decline even further – to the point where the 2020 target is more than 25% lower than the 2016 target – when the proposed budgets continue to grow modestly?
  - c. Regarding the Comprehensive Energy Management metric:
    - i. Would Enbridge agree that CEM is typically a multi-year process and requires a multi-year commitment?
    - ii. If so, are the participant metrics for each year referencing only the number of new commitments to the program, or is the Company expecting to count participant from 2016 which continue to work with the program for several years towards 2017 and future year's targets?
  - d. Regarding the Residential Savings by Design metrics:
    - i. Approximately how many new single family homes are built in Enbridge's service territory each year?
    - ii. Approximately how many of those new homes are built by builders who have already participate in Enbridge's program in the past?

- iii. Why do the metrics go down from 2016 to 2017 when the budget remains constant?
  - e. Regarding the Commercial Savings by Design metric:
    - i. What is Enbridge's estimate of the size of the eligible market? Approximately how many new developments that are of sufficient size to participate in Enbridge's program are initiated each year in its service territory?
    - ii. Why does the number of new enrollments drop in half from 2016 to 2017?
    - iii. Historically, what has been the average size (in square feet, square meters or other relevant metric) of the new developments enrolled in Enbridge's program?
- 17. Exh. B/T1/S4 p. 34: Enbridge suggests that one reason that lifetime savings is "not an ideal metric" for measuring success from Comprehensive Energy Management (CEM) and RiR initiatives is that savings are "typically small when compared to savings achieved through capital projects".
  - a. Is Enbridge limiting its CEM initiative to operational efficiency improvements? If so, why? Isn't it common for the strategic energy management programs run by other utility and non-utility efficiency program administrators to holistically treat all efficiency opportunities, whether related to capital investment or operational or both?
  - b. What is the basis for Enbridge's assertion that CEM will lead to small savings?
    - i. Does the Company have any direct experience with CEM to suggest that will be the case?
    - ii. Can it cite experience from other jurisdictions to support that contention?
    - iii. If not, why treat CEM as likely to have outcomes similar the Company's historic experience with RiR?
- 18. Exh. B/T1/S4 pp. 40-41: Regarding the Company's proposed target adjustment factor (TAF):
  - a. Please identify which of the following input factors is the Company proposing be subject to the TAF and why :
    - i. Prescriptive (TRM) measure savings and measure lifetime assumptions
    - ii. Custom savings estimates
    - iii. Net to gross (or free ridership) assumptions
    - iv. Others (specify)
  - b. Please provide an Excel spreadsheet that shows, for each year, the measure by measure build-up of the Company's proposed savings targets. Please highlight in the spreadsheet the specific assumptions that would be subject to the TAF.
- 19. Exh. B/T1/S5: Regarding the sensitivity scenarios analyzed:
  - a. Please provide a program by program and measure by measure build-up (including annual savings, measure life, net to gross assumptions, and participation level by program and measure), in Excel spreadsheet form (with formulas intact), showing how the different budget levels and different CCM savings levels were achieved for each year from 2016 through 2018.
  - b. If not included in the spreadsheet referenced in "a" above, please provide the NPV of TRC benefits, TRC costs and TRC net benefits achieved for each scenario. In providing such estimates, please identify which programs – if any – the Company did not subject to TRC screening.

- c. Would the Company agree that net to gross ratios are at least significantly a function of or affected by program design, including financial incentive levels? If not, why not? If so, when developing sensitivity scenarios, did the Company adjust program and/or measure net to gross ratios? If not why not?
- 20. Exh. B/T2/S1 pp. 8-11: Regarding the Company's Custom Industrial program:
  - a. For the segmentation by size of industrial customers provided in the table on p. 9, please provide the following:
    - i. The absolute number of customers in each of the three size bins
    - ii. The total annual gas consumption of customers in each of the three size bins
    - iii. The number of unique customers in each of the size bins that have participated in Enbridge's custom industrial program in each of the past five years.
    - iv. The total annual gas consumption of customers who participated in Enbridge's custom industrial program in each of the past five years (please provide separately for each year)
    - v. The number of unique customers in each of the size bins that have participated at least once over the past five years. This will not necessarily be the sum of the annual participation numbers provided in response to "iii" above. For this subpart of the question, customers who participated two or three times over the past five years should only be counted once.
    - vi. The total annual consumption of customers who participate at least once over the past five years.
  - b. For each of the past three years, what portion of Enbridge's program participants had their financial incentive capped (i.e. at the cap of \$100,000 per project)? Please provide this separately for each of the three size bins as well as for all customers in aggregate.
  - c. Why is Enbridge proposing to retain the existing per customer rebate cap of \$100,000, particularly in light of the new tiered incentive structure designed to drive customers towards deeper levels of savings? Won't the cap likely render pointless the offer of higher incentives per m3 of gas saved, at least for larger customers?
  - d. Are the incentive offerings expressed as dollars per first year m3 saved? Assuming so, why use that structure when Enbridge's savings goals are expressed as lifetime m3 saved? Why wouldn't it be more appropriate to express incentives as dollars per lifetime m3 saved?
- 21. Exh. B/T2/S1 pp. 11-14: Regarding the Company's proposed Commercial Custom program:
  - a. For each of the last three years, what portion of Enbridge's Commercial Custom program participants achieved savings commensurate with each of the three savings tiers shown in the table on p. 13? Please provide the response on two ways:
    - i. Portion of customers
    - ii. Sales/Consumption-weighted portion of customers
  - b. For each of the past three years what portion of Enbridge's program participants had their financial incentive capped (i.e. at the cap of \$100,000 per project)? Please provide this separately for each of the three savings range bins as well as for all customers in aggregate.
  - c. Why is Enbridge proposing to retain the existing per customer rebate cap of \$100,000, particularly in light of the new tiered incentive structure designed to drive customers

towards deeper levels of savings? Won't the cap likely render pointless the offer of higher incentives per m3 of gas saved, at least for larger customers?

- d. Are the incentive offerings expressed as dollars per first year m3 saved? Assuming so, why use that structure when Enbridge's savings goals are expressed as lifetime m3 saved? Why wouldn't it be more appropriate to express incentives as dollars per lifetime m3 saved?
22. Exh. B/T2/S1 pp. 17-19: Regarding the Company's proposed C&I prescriptive rebate program:
- a. Please provide a list of the measures included in the program.
  - b. For each measure on the list, please provide
    - i. The number of units the Company rebated in each year from 2012 through 2014.
    - ii. The number of units the Company is forecasting it will rebate in each year from 2015 through 2018.
    - iii. The Company's best estimate of the size of the market in its service territory for the measure. For measures purchased at time of natural replacement, that would be the annual number of units sold when existing equipment in buildings are replaced. For measures that can be retrofit (e.g. demand controls for ventilation), the estimate would be the number of units that could be installed in existing buildings.
    - iv. The Company's best estimate of the baseline market share for each product. For measures purchased at natural time of replacement, percent of all product sales that would be high efficiency absent the Company's program.
23. Exh. B/T2/S1 pp. 22-29: Regarding the Company's proposed HEC program:
- a. The Company has identified several features of homes that it has considered to be the target market for the program for the program in the past (p. 24).
    - i. Does the Company still consider this to be the target market? If not, what has changed?
    - ii. How many still unserved homes does Enbridge estimate are in this target market?
    - iii. Are these the only homes that could potentially benefit from program services? Or do homes with other characteristics (e.g. dwellings built more than 30 years ago) have potential to participate as well? If no homes with different characteristics are likely to be good candidates for the program, please explain why.
  - b. What is the basis for the statement that past federal and provincial incentives reached approximately \$10,000 per home (p. 24)?
  - c. The Company is proposing a three-tiered incentive structure: 1) for savings between 15 and 25%; (2) for savings between 26% and 49%; and (3) for savings of 50% or more. Historically, what portion of the Company's program participants fell into each of these three categories?
  - d. What is the actual average annual consumption of the programs 2014 participants prior to their participation?
24. Exh. B/T2/S1:

- a. Is the Company proposing to use “upstream” or “mid-stream” incentive models – in which financial incentives for efficient equipment are provided to manufacturers, distributors, and/or contractors/retailers/vendors, rather than to consumers – for any of its programs, or even for selected measures (e.g. for one or two C&I prescriptive measures)? If so, which programs and/or measures? If not, why not?
  - b. Did the Company explicitly consider and analyze such options for any measures or programs? If not, why not? If so, please document the research and analysis that the Company performed, providing copies of all documents reviewed and all analyses conducted.
- 25. Exh. B/T2/S1 pp. 91-97: Enbridge states that the CEM program will be target marketed to customers in rate classes 6, 110, 115, 135, 145 and 170 with annual gas consumption of between 340,000 and 5,000,000 m3. Enbridge also states that it expects to have 75 participants in the program over the 2016 to 2020 period.
  - a. Are there any other rate classes whose customers would participate in the program (even if they were not part of the target market to which Enbridge will most heavily promote the program)? If so, which classes?
  - b. For each of the six rate classes listed (as well as any others identified in response to subpart “a” of this question), please provide the following information. If possible, please provide it separately for (A) commercial customers; (B) industrial customers and (C) all C&I customers (i.e. the sum of A and B):
    - i. Number of customers in each of the following consumption bins
      - 1. Less than 75,000 m3 per year
      - 2. 75,000 to 340,000 m3 per year
      - 3. 340,000 to 5,000,000 m3 per year
      - 4. Greater than 5,000,000 m3 per year
      - 5. Total across all bins (i.e. the sum of the above)
    - ii. Total annual sales to (i.e. annual gas consumption of) customers in each of the following bins
      - 1. To customers using less than 75,000 m3 per year
      - 2. To customers using between 75,000 and 340,000 m3 per year
      - 3. To customers using between 340,000 and 5,000,000 m3 per year
      - 4. To customers using greater than 5,000,000 m3 per year
      - 5. Total all customers across all bins (i.e. the sum of the above)
  - c. How did Enbridge choose the target of 75 participants?
  - d. Approximately what portion of the Company’s total C&I sales are likely to be represented by the 75 participants? We understand that the answer may need to be provided as a range of percentages since the Company cannot yet know exactly which customers these will be.
- 26. Exh. B/T2/S2 p. 5:
  - a. Please provide a breakdown of actual evaluation spending in 2013 and 2014 for the categories shown in the Table for 2016-2020.
  - b. How did Enbridge determine how much should be spent on evaluation in aggregate, and individual categories in particular?
- 27. Exh. B/T2/S3:

- a. Please provide a definition of what each of the column headings in Tables 1 through 5 means.
  - b. Please provide the Excel spreadsheets, in native form with formulas intact, that Enbridge used to estimate all of the values shown in Tables 1 through 5.
28. Exh. B/T2/S4: Regarding Tables 2, 4, 6, 8, 10 and 12
- a. Please confirm that the average bill impacts shown in the last three columns are only the impacts from program spending and shareholder incentives.
  - b. Please confirm that the average bill impacts shown in the last three columns do not include the downward pressure on bills resulting from efficiency programs' energy savings.
  - c. Please confirm that the average bill impacts shown in the last three columns do not include the downward pressure on bills resulting from deferred capital investment in gas transmission and/or distribution, price suppression effects, or reduced future costs of complying with carbon dioxide emission regulations.
29. Exh. B/T2/S5, p. 2 (paragraph 4): Enbridge states that it is currently reviewing "an alternative approach to incorporation of a long-term market forecast for natural gas commodity prices into its avoided costs" which "would extend avoided cost estimates for the final 20 years of the program impacts."
- a. What would be extended for the final 20 years that is not currently extended?
  - b. What is the "alternative approach" the company is considering?
30. Exh. B/T2/S5, p. 3:
- a. Are the avoided gas costs presented in the table the values used for cost-effectiveness screening results presented in Exh. B/T2/S3? If not, what values were used for that analysis and why are they different than these?
  - b. Are the avoided gas costs presented in the table in nominal dollars (i.e. including inflation effects) or in real dollars (i.e. net of inflation effects, or with inflation backed out)?
  - c. Do the avoided costs presented include avoided transportation and avoided storage as well as avoided commodity costs? If not, why not?
  - d. Do the avoided costs presented in the table include the 15% non-energy benefits adder?
  - e. Regarding the discount rate was used to produce the NPV values in the table:
    - i. What rate was used?
    - ii. Is it a real discount rate or a nominal discount rate?
    - iii. How was it derived? What is it based on?
  - f. Did Enbridge make any assumptions regarding inflation for the development of the gas avoided costs in the table? If so, what were the assumption? How were they used?
  - g. What methodology was used to derive the gas avoided costs in the table? Please provide all documents that describe the process used.
  - h. Regarding avoided commodity portion of the avoided gas costs presented in the table, what assumption was made regarding how prices will escalate through the year 2044? What were those assumptions based on?
  - i. Please provide all key input assumptions used to develop the gas avoided costs in the table.

- j. Please provide in Excel form, with formulas intact, the analysis conducted to produce the values in the table.
31. Exh. B/T3/S5: The Ontario government has indicated that it favours a cap and trade carbon pricing mechanism and that it will direct a portion of revenues from the sale of emission permits toward efficiency improvement. Should the government apply carbon cap and trade revenues toward energy efficiency, what mechanism does the company propose to consider amendments to the plan's energy savings targets and budgets if the government's mechanism initiation does not happen to align with the three year review?
32. Exh. B/T4/S3: When it refers to on-bill financing (OBF), is Enbridge assuming that the capital for the initiative would come from it (or its ratepayers)? Or is the Company using the term more broadly, to include on-bill repayment of financing that may be provided through the private sector?
33. Exh. C/T1/S4 p. 4 of 35: Navigant states "During the initial discovery stage of this assignment it was determined that Enbridge's upstream or transmission avoided costs are already fully and accurately captured in their existing avoided cost analysis."
- a. What is the basis for this statement? How was this conclusion reached?
  - b. How is the kind of investment envisioned in the recent GTA pipeline case (and/or future needs like it) captured in Enbridge's current avoided cost estimates?