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June 1, 2015

Reply To: Thomas Brett
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Our File No. 152806

VIA RESS, EMAIL AND COURIER

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, Ontario
M4P 1E4

Attention: Kirsten Walli
Board Secretary

Dear Ms. Walli:

Re: Enbridge Gas Distribution Inc., Multi-Year DSM Plan (2015-2020)
Board File No. EB-2015-0049

Please find attached BOMA's Interrogatories.

Yours truly,

FOGLER, RUBINOFF LLP

Thomas Brett

TB/dd

Encls.

cc: All Parties (*via email*)

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

**AND IN THE MATTER OF an Application by Enbridge
Gas Distribution Inc. pursuant to Section 36(1) of the
Ontario Energy Board Act, 1998, S.O. 1998 for an order or
orders approving its Demand Side Management Plan for
2015-2020**

**INTERROGATORIES OF
BUILDING OWNERS AND MANAGERS ASSOCIATION,
GREATER TORONTO ("BOMA")**

June 1, 2015

Interrogatories

1. Please provide an organizational chart with titles for the unit(s) responsible for the all functions association with Demand Side Management (DSM) at Enbridge including but not limited to: research, pre-program screening and evaluation, program design, program delivery, marketing, customer sales and service, technical services, post program audit and evaluation, as well as the units responsible for planning future gas utility infrastructure.
2. Please provide a description of the interrelationships of the function listed in IR 1 including an outline of where the responsibilities for setting and achieving the company's DSM targets reside.
3. Please describe how the customer sales and service function is organized, particularly with respect to program delivery and implementation in the industrial, commercial and institutional sectors including key or national accounts. Are sales staff incented to achieve DSM results in addition to normal Enbridge incentive structures?
4. For all Enbridge rate classes, please indicate the sector, the consumption ranges and any other differentiating elements. Please provide a listing of typical members of each rate class, the total consumption per class and the average consumption per class.
5. **Reference Exhibit B, Tab 1, Schedule 2, page 7 of 26.** Please provide an estimate of the savings and budget had the Board's DSM Framework allowed for a \$3.00 per month impact for a typical residential customer.

6. **Reference Exhibit B, Tab 1, Schedule 2, page 7 of 26.** When Enbridge talks about pay for performance, does that mean paying the customer for performance, paying the utility for performance or both? From what jurisdictions is the company seeking examples of such programs. Is Enbridge coordinating its jurisdictional review with Union?
7. **Reference Exhibit B, Tab 1, Schedule 2, page 9 of 26.** Please indicate if the institutional sector is included in the commercial or industrial sector?
8. **Reference Exhibit B, Tab 1, Schedule 2, page 11 of 26.** Please detail and describe how and when Enbridge has been active on the matter of considering DSM in gas utility infrastructure planning prior to and leading up to the filing of this application, and file any and all documentation related to this activity.
9. **Reference Exhibit B, Tab 1, Schedule 2, page 14 of 26.**

“Stated differently, although it is relatively straightforward to measure the natural gas reductions and bill savings resulting from capital or low cost/no cost upgrades to a facility (i.e., from technology changes to cleaning filters or adjusting controls), when the human factor and consequential operational and behavioural impacts are included, many additional assumptions must be accounted for. Accounting for these impacts will often, if not always involve the use of engineering calculations or assumptions, diluting the intended value of measuring natural gas reductions through meter infrastructure.”

Please indicate the source for this requirement. In particular, why is it necessary to differentiate the impacts of technology/measure changes from the impacts of behavioral and operational changes? If the net impact of the combined changes is less than the assumed impact of the measure changes as documented in the approved measures list or manufacturers' estimates, should not those assumptions also be challenged?

10. Reference Exhibit B, Tab 1, Schedule 2, page 25/6 of 26. Please confirm if Enbridge is using the term stakeholders to include intervenors but is not limited to intervenors. Does Enbridge compensate non-intervenors for their participation in its stakeholder processes? With respect to intervenor stakeholders, what was the annual cost for their participation in the DSM Consultative, the Audit Committee and the Technical Evaluation Committee from 2010 to 2014.

11. Reference Exhibit B, Tab 1, Schedule 3, page 4 of 19. Given that Enbridge's 2012 update for 2014 and 2015 (EB-2012-0394) had already included an escalation for an anticipated increase in DSM budgets arising from the province's Long Term Energy Plan (LTEP), why did Enbridge include an additional escalation for 2015. Please provide a table illustrating the base budget for 2015, separating the embedded escalation in EB-2012-0394, from the escalation resulting from the guidelines as well as the incremental budget for new initiatives for the DSM Budget and the Shareholder Incentives for 2012, 2013, 2014 and 2015. Please confirm that Enbridge added the 15% suggested in the DSM Framework, to the previously escalated budget for 2015. Please confirm if Enbridge is also assuming that the allowed +15% variance continues.

12. Reference Exhibit B, Tab 1, Schedule 3, page 17 of 19.

"Enbridge is in discussions with a number of Local Distribution Companies ("LDCs") regarding the coordination and integration of electricity CDM with DSM."

How many LDCs is Enbridge in discussion with? How many LDCs approached Enbridge?

How many LDCs did Enbridge approach? What criteria did Enbridge use to determine to accept the approaches of the LDCs and what criteria did Enbridge use to approach LDCs?

13. Reference Exhibit B, Tab 1, Schedule 4, page 6 of 41. In conforming to the Framework direction to not limit efforts only to those activities which are the most cost-effective but to pursue all cost effective opportunities, what cost effective opportunities are not being pursued. Please indicate how the limitations on budgets and typical residential bill impacts limited Enbridge's ability to pursue all cost effective opportunities. Please discuss fully.

14. Reference Exhibit B, Tab 1, Schedule 4, page 15 of 41.

"The Board's direction to pursue all cost-effective DSM and tailor offers to customers with significant barriers to entry (such as small business customers) indicates that smaller consuming markets should be a priority in Enbridge's 2015 to 2020 DSM Plan, regardless of the fact that they are comparatively less cost-effective than offers directed at large commercial and industrial customers. Providing these markets their own CCM target will cement their importance within the Company's DSM portfolio."

Please provide the analyses that indicate that programs for small consuming customer are comparatively less cost effective than offers directed at large customers. Please indicate the free rider rate associated with smaller consuming customers compared to large customers.

When was a free rides study for small consumer customers completed? Please file.

15. Reference Exhibit B, Tab 1, Schedule 4, page 16 of 41.

"The "Large Volume Customer" CCM target listed in Enbridge's scorecards will count results from Enbridge's Custom, Prescriptive, and Direct Install offers. For the purpose of determining whether a customer's natural gas savings should be captured under this metric, Enbridge will evaluate the customer's average gas consumption over the past 3 years (or best available equivalent data) to determine whether their average annual consumption is over 75,000 m3 for a commercial customer or over 340,000 m3 for an industrial customer".

Some segments of the commercial market are made up of numerous multi-location customers where decision making is to some degree centralized such as schools, retail, hotels and motels, etc. Does Enbridge take this into account when applying these size limits?

16. Reference Exhibit B, Tab 1, Schedule 4, page 27 of 41.

“RiR and CEM budgets have been allocated between the Resource Acquisition and MTEM budgets”.

How was the allocation done? How will the costs be tracked? How will this impact the allocation of management and accountability with respect to these two programs? Will the CCM savings be counted in Resource Acquisition?

17. Reference Exhibit B, Tab 1, Schedule 4, page 34 of 41.

“For the purpose of measuring the success of the Company’s School Energy Competition, a school will be considered “enrolled” at the time that energy monitoring begins using the Energy Management Information System (“EMIS”) provided via the offer. At a high level, monitoring is the third of the four steps which comprise the School Energy Competition.”

How will this program improve, alter or make use of the Ministry of Education’s program outlined at <http://edu.gov.on.ca/eng/policyfunding/greenSchools.html>

"Energy Conservation in Ontario's Schools

The government has a long-term strategy to reduce energy consumption in Ontario schools. Below you'll find highlights of projects that are part of the Ministry of Education's Energy Management and Conservation Initiative.

Green Clean Program Resource Guide

Released in March 2010, the guide provides school boards with a comprehensive framework to help them adopt and implement a green clean program that increases the use of environmentally-responsible cleaning products in schools.

Green Schools Resource Guide

The Green Schools Resource Guide: A Practical Resource for Planning and Building Green Schools in Ontario was released in January 2010. It is a one-stop reference manual to help boards plan, design and build an energy efficient green school.

Green Schools Pilot Initiative

The ministry, in partnership with the Ministry of Research and Innovation, is investing over \$20 million to provide school boards with the ability to purchase, test and showcase new and innovative green products and technologies in more than 150 Ontario schools and 40 boards.

This investment will help local businesses — many of them Ontario-based — showcase their innovative technologies while supporting a greener economy.

Energy Efficient Schools Funding

In April 2009, the Ministry announced it would be investing \$550 million over two years to support improved energy efficiency in schools. This includes:

- \$25 million for energy audits, energy controls and thermostats
- \$75 million to install interval meters and new lighting systems
- \$300 million to install new energy efficient heating and cooling systems, windows and roofs
- \$150 million to create permanent spaces in existing schools to replace energy inefficient portables

This builds on the \$2.25 billion in funding to replace major building components through the Good Places to Learn Renewal program of 2005-06 and 2008-09.

Inventory of Green Initiatives in Ontario Schools

The ministry is creating a database of green initiatives — such as photovoltaic cells, windmills and green roofs — that schools have installed. Information on each technology will include initial start-up and maintenance costs, lessons learned, best practices and what effect these projects have had on student learning. Results will be shared with the education sector.

Renewable Energy Funding for Schools

In July 2009, the Ministry announced funding of \$50 million for 2010-11 so schools can install the following five renewable energy technologies: solar photovoltaic, solar air heating, solar water heating, geothermal and small or micro wind.

The ministry is also working with the Ministry of Energy and Infrastructure to develop a list of qualified renewal energy vendors for school boards to use.

Utility Consumption Database

When complete, this database will collect electricity and natural gas data for all of Ontario's approximately 5,000 schools and board buildings. Launched in August 2009, this resource will:

- Allow boards to analyze year-over-year consumption, following weather correction to remove the impact of abnormal or extreme weather conditions, against key indicators such as number of students, total building area, etc.
- Determine average provincial benchmarks for energy consumption based on common facility indicators
- Identify those schools and boards that are the most energy efficient
- Identify schools and boards that need technical advice and support to reduce their energy consumption
- Set annual energy reduction targets for the sector, boards and individual schools

18. Reference Exhibit B, Tab 1, Schedule 4, page 34 of 41.

“Given that RiR involves a 12 month monitoring period, the Company believes that this leading metric is an essential component of ensuring that participant enrollment in RiR continues to grow each year even as natural gas reductions are captured from existing participants who have enrolled in past years”.

Has Enbridge considered setting a target based the percentage of available savings achieved/maintained in each year the participant is enrolled?

19. Reference Exhibit B, Tab 1, Schedule 4, page 36 of 41.

“A home which, as constructed, has features consistent with the builder’s IDP and that make it 25% more efficient than a new home built to the 2012 Ontario Building Code if constructed in 2016, and 15% more efficient than a new home built to the yet to be completed 2017 Ontario Building Code.”

Has Enbridge completed or is Enbridge aware of any studies that determined how homes built to OBC 2012 actually perform relative to the energy modelling results? Has Enbridge completed a comparison of the actual results of a home modelled to be 25% more efficient than OBC 2012 to determine how actual results compare to the modelling results?

20. Reference Exhibit B, Tab 1, Schedule 6, page 9 of 9.

“...the replacement of the DSM IT systems is necessitated by the demands and rigours of the DSM Framework and the resulting significant expansion of the Company’s DSM activities...”

Please describe the planned features and benefits of the new DSM IT system and provide the business case to support the expenditure.

21. Reference Exhibit B, Tab 2, Schedule 1, page 1 of 106. Please confirm that Enbridge is asking for flexibility for its budgets metrics and targets rather than being required to rigidly adhere to the submission.

22. Reference Exhibit B, Tab 2, Schedule 1, page 3 of 100. Regarding the DSM Program Portfolio, please indicate why 22 different programs are needed when the programs are aimed at three main customer sectors: Commercial, Industrial and Residential.

23. Reference Exhibit B, Tab 2, Schedule 1, page 4 of 100.

“Energy efficiency resource acquisition programs are characterized by verified short term energy savings met through financial incentives and technical assistance to end-use customers in an existing market system^{1&2}. Typically this is done using an approach of identification and replacement of a lower efficiency product with a higher efficiency one.”

Why is Enbridge limiting its resource acquisition programs to such a narrow scope of overall conservation and to short term savings?

24. Reference Exhibit B, Tab 2, Schedule 1, page 5 of 100. Please restate the Resource Acquisition Table including a column indicating which customers are eligible for which measures. Please indicate if the incentive levels or key elements have changed since 2014. Are changes anticipated in the years from 2016 – 2020?

25. Reference Exhibit B, Tab 2, Schedule 1, page 9 of 100. What is meant by “maximizing the energy savings **potential** of the industrial sector?”

26. Reference Exhibit B, Tab 2, Schedule 1, page 12 of 100. How does Enbridge account for the interactive effects of multiple measures in a custom project?

27. Reference Exhibit B, Tab 2, Schedule 1, page 12 of 100. How are “resulting natural gas savings accurately projected? How does Enbridge know?”

28. **Reference Exhibit B, Tab 2, Schedule 1, page 12 of 100.** Has Enbridge completed any market research to confirm that industrial customers have a preference for more attractive electricity incentives? If so please provide a copy of the research results.
29. **Reference Exhibit B, Tab 2, Schedule 1, page 4 of 100.** Has Enbridge completed any market research on the proportion of industrial plants where split incentives are a factor? If so please provide a copy of the research results. If not why is this considered a barrier?
30. **Reference Exhibit B, Tab 2, Schedule 1, page 13 of 100.** Has Enbridge completed any market research on the interest in and possible acceptance of tiered incentives a? If so please provide a copy of the research results.
31. **Reference Exhibit B, Tab 2, Schedule 1, page 14 of 100.**

“Enbridge may consider time-limited or enhanced incentives focused on specific opportunities, either technology-based or sector-based, throughout the Multi-Year DSM Plan. Corresponding marketing and outreach efforts are made to support such campaigns. The offer is delivered by ESCs, who work directly with customers, engineering firms, distributors and contractors.”

Has Enbridge developed any criteria to determine when and what with respect to enhanced incentives?

32. **Reference Exhibit B, Tab 2, Schedule 1, page 16 of 100.** Has Enbridge completed any market research to confirm that small commercial customers in Ontario have the same attributes of those in the United States: If so please provide the report?
33. **Reference Exhibit B, Tab 2, Schedule 1, page 18 of 100.** Please provide the number of projects and savings volumes associated with prescriptive incentives in the commercial and industrial sectors since 1995 by product incented.

34. Reference Exhibit B, Tab 2, Schedule 1, page 19 of 100.

“In addition, Enbridge offers quasi-prescriptive incentives for a range of measures where the incentive is determined by a simple calculation based on the equipment installed. Measures include demand control ventilation, infrared heaters, make-up air units, and high efficiency boilers. Quasi-prescriptive incentives are offered and subject to the same process as fixed incentives, retaining all of the advantages that the offer presents to the customer.”

Please provide the simple calculations for each of the measures listed.

35. Reference Exhibit B, Tab 2, Schedule 1, page 19 of 100.

“Higher fixed incentives are necessary in order for the offer to be competitive and relevant to customers, especially in light of low natural gas prices, and the greater incentive levels for electricity conservation offered by LDCs.”

Please provide a comparison of Enbridge incentives to incentives for electricity conservation on a \$ per joules or per BTU basis.

36. Reference Exhibit B, Tab 2, Schedule 1, page 28 of 100. Will Enbridge continue to include programmable thermostats in its residential programs?**37. Reference Exhibit B, Tab 2, Schedule 1, page 28 of 100.** Has Enbridge conducted any market or secondary research with respect to the barriers to adaptive thermostats? If so please provide a copy.**38. Reference Exhibit B, Tab 2, Schedule 1, page 30 of 100.** Since the inception of DAP, please provide the number of new construction projects under both DAP and SBD and the estimated savings per project. How many new construction projects took place in Enbridge service territory during that period?

39. **Reference Exhibit B, Tab 2, Schedule 1, page 32 of 100.** Has Enbridge completed any research on the “increased cost of energy efficiency in a price driven market” given that TD Economics has produced an insightful report on the impact of LEED Certification on the Toronto Condo market? Highlights of the report:

- Leadership in Energy and Environmental Design (LEED) certified, or ‘green’ buildings represent an increasing share of new construction, including the condominium market.
- Limited research exists linking LEED status in residential buildings to market outcomes such as resale price, days on market, maintenance/condo fees, and others.
- Using a novel dataset, we find that LEED certification increases the resale price of Toronto condos by between 5% and 14%. The impact on other metrics, such as time on the market and maintenance fees, is found to be mixed.
- At the same time that the Toronto condo market has been expanding, ‘green’ building design and construction techniques, exemplified by the Leadership in Energy and Environmental Design (LEED) certification process are also becoming increasingly common (Chart 1).
- While LEED has been mainly employed for commercial buildings, the LEED principles are making their way into Toronto’s condo market, with about 1 in every 15 new condo developments in Toronto currently achieving LEED certification.

40. **Reference Exhibit B, Tab 2, Schedule 1, page 38 of 100.** Enbridge has clearly done a thorough job of engaging a wide range of partners in delivering its low income programs. Descriptions of the other programs contain much less information about market allies, delivery partners, etc. Please provide a description of non-customer engagement efforts and results in the commercial (including institutional) and industrial sectors.

41. **Reference Exhibit B, Tab 2, Schedule 1, page 43 of 100.** With respect to low income customers’ fear of government claw backs of incentives, is there any evidence that this is still occurring?

42. Reference Exhibit B, Tab 2, Schedule 1, page 50 of 100, Market Transformation and Energy Management Table. In EB-2012-0451, Environmental Defense provided evidence of the holistic and systematic nature of performance based conservation which looks a great deal like your Comprehensive Energy Management Process for Industrial Customers.:

- Performance based conservation begins with identifying high energy intensity buildings through benchmarking and then works systematically towards identifying and fixing the particular inefficiencies causing the high use in each building.
- The nature of the inefficiencies runs the range of errors in design and construction, through equipment deterioration over time, to changes in use and operation of the building, and poor performance of controls and automation systems. It is the compound effect of these problems that leads to gas use levels in some buildings which is 3 to 5 times what is needed and already achieved by comparable, more efficient buildings.
- Fixing these problems requires a systematic methodology. The work involved in equipment repairs and replacement, right-sizing and rebalancing, refurbishment and re-programming, typically provides relatively short payback periods.

Why has Enbridge broken up this holistic process and offered them to different Commercial customer groups under the program names Compass and Run It Right, Small Commercial and Industrial behavioral, School Energy Competition while offering industrial customers a program called Comprehensive Energy Management?

43. Reference Exhibit B, Tab 2, Schedule 1, page 60 of 100. How many of the 40 projects that have gone through the IDP process been located in Toronto? Has the number increased or decreased since the City of Toronto introduced its Green Standard which is a two-tier set of performance measures for sustainable site and building design? Tier 1 is required for new construction in Toronto and Tier 2 is a higher, voluntary level of performance with a financial incentive. Projects that achieve Tier 2 may be eligible for a partial refund on Development Charges paid to the City. The TGS is complements working with the LEED (Leadership in Energy and Environmental Design) voluntary rating system. Have any of the

IDP projects also received an incentive from the city of Toronto? What is Enbridge's policy on "additional incentives".

44. **Reference Exhibit B, Tab 2, Schedule 1, page 69 of 100.** How was OPower selected as a contractor? Please provide the business case for the pilot project and planned roll out for the rest of the years of the plan. Given that OPower reported a GAAP operating loss of \$9.9 million for the first quarter of this year, compared to an operating loss of \$7.3 million in the first quarter of last year (<http://www.utilitydive.com/news/pge-inks-90m-contract-with-opower/397732/>), does Enbridge have a risk management strategy in place?

45. **Reference Exhibit B, Tab 2, Schedule 1, page 69 of 100.**

***"Delivery of reports:** Targeted households automatically receive one welcome insert to introduce them to the offer followed by four home energy reports annually. These reports provide periodic updates on the energy usage behaviour of a given household, and offer tips for saving energy. In addition to the physical reports mailed out, reports will also be emailed to those that have provided an email address to Enbridge. **Delivery of web portal:** All participants will have access to a web portal that currently resides on the myEnbridge website. This site will enable participants to create a profile, perform an online audit, access energy savings tips, monitor usage over time, and compare usage to neighbours for benchmarking purposes."*

Did Enbridge consider delivery of this data through a mobile application? If not, why not?

46. **Reference Exhibit B, Tab 2, Schedule 1, page 72 of 100.** Has Enbridge discuss the home labelling issue with the Ontario government given that it remains in the Green Energy and Economy Act but is merely not proclaimed?

47. **Reference Exhibit B, Tab 2, Schedule 1, page 79 of 100. School Energy Competition.**
How does this fit with TRCA's Sustainable Schools Program?

- The Sustainable Schools program assists school boards in evaluating their energy performance, monitoring progress, and finding the tools required to make substantial and lasting improvements. Since 2007, Sustainable Schools has been working with hundreds of schools in more than 35 boards across Canada, establishing the magnitude of energy savings potential, and where those savings are to be found.
- Most school boards can save far more energy, money and emissions than they think. The Energy Assessment Service (EAS) uses the latest benchmarking, diagnostics and standards to simply and reliably estimate the conservation potential of individual schools and the board as a whole. This service determines the energy savings potential for a number of representative schools, and extrapolates it to estimate the potential for the whole board. The EAS report assists school boards in identifying specific candidate schools for energy retrofits and operational improvements. It also gives local utility companies a reliable estimate of MW, MWh and M3 reduction potential in the school sector.
- In 2008, we introduced our annual Top Energy Performing Schools Report, which identifies and recognizes some of the most energy efficient schools and boards in North America. Our latest report recognizes the top 20 energy efficient schools and highlights those showing the biggest savings over the last two years. Download the Top Energy Performing Schools reports:
 - [2011 Top Performing Schools](#)
 - [2009 Top Energy Performing Schools](#)
 - [2008 Top Energy Performing Schools](#)

48. **Reference Exhibit B, Tab 2, Schedule 1, page 91 of 100. Comprehensive Energy Management:**

"The primary target market will be composed of industrial customers whose annual gas consumption is between 340,000 m³ and 5,000,000 m³. Larger commercial customers may also be enrolled in this offer. Enbridge intends to work with approximately 75 customers over a five year period."

How does this integrate with the Energy Leaders Program? How will Enbridge determine which commercial customers will be enrolled? What about large university campuses? Given it is similar to Union's Comprehensive Energy Management Offering, is there are any possibility to harmonize the names between the utilities?

49. **Reference Exhibit B, Tab 3, Schedule 2, page 5 of 18.** Regarding the Enbridge Consumer Forum Panel: what types of customers are on the panel; how often is it used by the DSM Function, what are the costs and how are the results collected and used?
50. **Reference Exhibit B, Tab 3, Schedule 4, page 1 of 2.** Please provide the total cost for Navigant to perform the DSM Potential Study.
51. **Reference Exhibit B, Tab 3, Schedule 5, page 1 of 3.** Does the difference in carbon credit ownership between the IESO and Enbridge create issues with respect to working with the LDCs? How important would it be to have harmonized roles on ownership of carbon credits between Enbridge and the IESO?
52. **Reference Exhibit B, Tab 4, Schedule 1, page 2 of 11.** Why was Enbridge's participation in High Performance New Construction ended?
53. **Reference Exhibit B, Tab 4, Schedule 1, page 3 of 11.** What role do Enbridge's Energy Sales Consultants play in the delivery of the Low Income Program?
54. **Reference Exhibit B, Tab 4, Schedule 1, page 10 of 11.** Does Enbridge have sufficient staff to work with LDCs in large scale collaboration? How many LDCs are in Enbridge's service territory?
55. **Reference Exhibit B, Tab 4, Schedule 1, page 11 of 11.**

"The differing methods and standard used for the evaluation and verification of results."

Please explain the different methods and standards used for evaluation and verification of results.

56. Reference Exhibit B, Tab 1, Schedule 3, page 17 of 19.

“By way of example, based on meetings with Ministry of Energy staff, Enbridge believes that the Provincial government has a strong interest in the gas utilities implementing the Green Button initiative. This initiative and its details are relatively new to Enbridge, and the Company does not feel it could confidently forecast a firm estimate of costs, timing or scope at this time. Despite this, Enbridge is confident that undertaking the project is in line with government expectations, and the Company is prepared to take the necessary steps to proceed in 2015.”

Reference Exhibit B, Tab 4, Schedule 4, page 1 - 3 of 3.

How is Green Button available to close to 3 million gas and electric residential and small commercial customers in Ontario as a common data standard? Was Enbridge invited to join the working group in 2012? Did Enbridge initiate the discussions with the Ministry of Energy? Is the Green Button data consumption data only or does it include billing data, i.e. bills? What is the time frame for the completion of Connect my Data Solution?

57. How will Enbridge make use of the broader sector public data on energy consumption required by O Reg 397 in its program delivery?

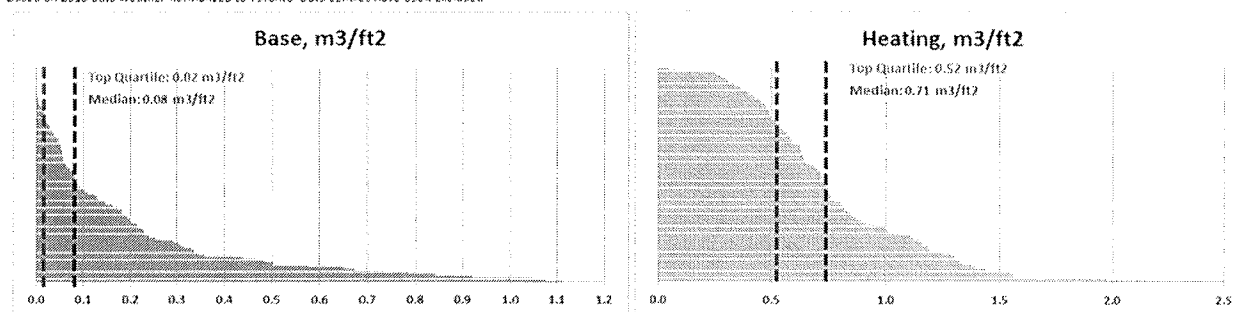
58. “Score Cards” What metrics is Enbridge using for performance based conservation? Has Enbridge considered developing score card metrics based on addressing the lowest quartile of heating load customers and moving them up to the top quartile over a 5 year period or above the median. The diagram below is from EB-2012-0451 illustrating the results of benchmarking for office buildings.

Sector: Office Buildings

Number of buildings: 123

Total building area, ft²: 42,000,827

Gas usage	Savings potential, % at the attainment of	
	Median	Top Quartile
Base	65%	87%
Heating	23%	39%
Total	29%	46%

Based on 2010 data weather-normalized to Toronto. Data centres have been excluded.

59. "Split Incentives in Commercial Sector" Given the research that has been done on this topic, has Enbridge considered providing, or does it provide, a template for the types of clauses in commercial leases that can remove or mitigate the split incentive barrier?
60. **Reference Exhibit B, Tab 1, Schedule 2, page 12.** What research to date has Enbridge done on the use of on-bill financing programs to assist with the uptake of DSM offers?
61. In what ways does Enbridge collaborate with Energy Service Companies ("ESCs") on the delivery of DSM?
62. **Reference Exhibit B, Tab 1, Schedule 4, pages 11-12.** Why are the 2017 targets for large volume customers lower than 2016 targets?
63. **Reference Ibid, page 41.** Please specify the input assumptions that are subject to adjustment.
64. **Reference Exhibit B, Tab 2, Schedule 1.** How many ESCs does Enbridge have? How many customers must each of them cover? Would more ESCs likely result in larger total energy savings because of being able to focus on fewer customers?

65. **Reference Ibid, page 42.** What percentage of stock of social housing in Enbridge's franchise is made up of electric space heating? How many units are involved? Has Union considered a conversion/efficiency initiative for those units? Please discuss.
66. To what extent is Enbridge involved in the policy discussion relating to the 2017 OBC amendments?
67. **Reference Ibid, page 87.** Please provide details on the "training and support" that Enbridge offers under this program. Does the program train energy management professionals?
68. **Reference Ibid, page 94.** Does Enbridge have the internal expertise to conduct the activity or will it utilize third party experts? Please discuss.