

EB-2015-0049

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Sch. B, as amended;

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 re Enbridge 2015-2020 DSM Plan

Energy Probe Research Foundation

May 30, 2015

Energy Probe Interrogatories to Enbridge Gas Distribution

2015-2020 DSM Plan

2012-2014 DSM Program

Energy Probe IR # 1

Ref.: No Reference

Please map each DSM Sector - Residential, Commercial and Industrial to the EGD Rate classes for the period 2012-2014. Please provide in Excel Spreadsheet Format (where appropriate).

- i) Rate class definition (consumption or other)
- ii) Types of customers in the rate class
- iii) The number of customers in the rate class
- iv) Total annual gas throughput (i.e. consumption) by the rate class
- v) Normalized Average Consumption (NAC) or Average Use per customer
- vi) Total annual expenditure on gas distribution
- vii) Average commodity costs for system supply customers as of December 2014
- viii) The Average Unit rate paid for gas distribution and if applicable, other costs
- ix) Total Gas Bill December 2014 at average use

Energy Probe IR # 2

Ref.: No Reference

Please provide historic DSM Metrics for each DSM Sector 2012-2014. Please provide in Excel Spreadsheet format.

- i) Program Budget
 - ii) Allocated Overhead
 - iii) Allocated LI Budget
 - iv) Allocated MT Budget
 - v) Total Budget
 - vi) Actual Spend
- Scorecard Metrics
- vii) CCM at 100% per Scorecard
 - viii) Actual CCM achieved
 - ix) Shareholder Incentive Actual and % max
 - x) Total Budget and Other Metrics for all sectors and programs

Energy Probe IR # 3

Ref.: Exhibit B, Tab1, Schedule 3

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).

Energy Probe IR # 4

Ref.: Exhibit B, Tab 1, Schedule 3

- a) 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).**
- b) 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.**
- c) For each Sector please calculate Efficiency Metrics by Year for RA/custom programs (Total spend \$/CCM).**
- d) Where Applicable, please provide Efficiency Metrics (\$/CCM) for each DSM Program for each Sector.**
- e) Please Map DSM Sector Efficiency metrics to the Rate classes**
- f) Provide a breakdown of the Spend recovered from each rate class- Programs Overhead, LI shareholder DSMVA, incentive etc.**

2015 "Rollover Year"

Energy Probe IR # 5

Ref.: Exhibit B, Tab 3, Schedule 2, Retrospective Stakeholding.

Preamble: Retrospective/Pre-Application Stakeholding did not reach "consensus" on all matters. However, EGD did reach consensus on several components of the 2015 Scorecards, Targets and Budgets.

Energy Probe has attached the “consensus” 2015 Budget and Rate Class Allocation, noting that this Spreadsheet was not marked “Confidential”. If EGD now claims Confidentiality, or does not accept the term “consensus” all relevant responses should be based on the attachment and if required filed in Confidence.

Please provide the following in Excel Format as applicable:

- a) The “as filed” Scorecards and Budgets for each sector**
- b) A comparison for each Sector and Program of the “As Filed” Rollover Budgets to the “Consensus” Scenario(s) negotiated with Stakeholders.**

Energy Probe IR # 6

Ref.: Exhibit B, Tab 1, Schedule 3, Page 3

Preamble: It should be recognized that Enbridge and intervenors spent a significant amount of time working towards this end. Nearly a dozen sessions were held including a substantial amount of information in respect of its program offers and historical results.

- a) Please provide details and discuss why consensus was/was not agreed for each sector and each program.**
- b) Please explain what were/are the outstanding areas of non-consensus for each sector and program. In particular provide detail with respect to the 2015 Incremental Budget.**

Energy Probe IR # 7

Ref.: Exhibit B, Tab 1, Schedule 3, Page 3 and Tables 1, 2, 3 pages 5-6

Preamble: Enbridge has rolled over its 2014 programs into 2015 and set its budget and targets for 2015 in accordance with the DSM Framework.

- a) Please provide a version of Tables 1, 2 and 3 including 2014 Estimates/Actuals.**
- b) Please provide the 2014 RA/Custom Efficiency Metrics by Sector Program and Rate class \$/CCM.**
- c) Please Provide as filed 2015 RA/custom Efficiency Metrics by Sector, Program and Rate class \$/CCM.**

- d) Please provide the same Metrics for each Sector and Program for the “Consensus Scenario”.

Energy Probe IR # 8

Ref.: Exhibit B, Tab 1, Schedule 3, page 6:

Preamble: Enbridge’s proposed 2015 roll-over budget allocates \$1.873 million residential RA. It also has a target (100%) of just 762 participants in its CER program.

- a) Please indicate how many participants has Enbridge had in the residential Conservation Energy Retrofit program in each month of 2014 and total and up to date in 2015?
- b) Please indicate how much has Enbridge spent on the Residential CER Program in each month of 2014 and in total and in to date in 2015?
- c) Please Indicate Enbridge’s RA achievement for 2015 were the same as 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) Please indicate if Enbridge’s home retrofit program’s 2014 participation levels and spending will exceed the proposed 100% scorecard target and budget for 2015, why did EGD not adopt the “Consensus” Budget and Targets? Please explain why Residential customers should pay for incentives for lower than historic achievement.
- e) Please discuss if EGD continues CER in 2015 or curtails it or scales back marketing to limit budget over-runs?
- f) If the Residential CER is constrained in 2015 is EGD proposing to ramp up the program with increased budget in 2016 and beyond? Please explain the strategy

Low Income Sub-sector

Energy Probe IR # 9

Ref.: Exhibit B, Tab 1, Schedule 3, Tables 4 and 5, Pages 8-9

Preamble: Pre-Application consultation did not reach “consensus” on all matters. However, EGD and stakeholders did reach “consensus” on Low Income 2015 Scorecards, Targets and Budgets.

Energy Probe has attached the “consensus” 2015 Budget and Rate Class Allocation, noting that this Spreadsheet was not marked “Confidential”. If EGD now claims Confidentiality, or does not accept the term “consensus” all relevant responses should be based on the attachment and filed as necessary in Confidence.

- a) Please provide a version of Tables 4 and 5 including 2014 Estimates/Actuals.
- b) Please provide the LI 2014 RA/Custom Efficiency Metrics \$/CCM.
- c) Please confirm the as filed Budget for the 2015 LI Program broken down between RA and MT Program including Overhead and other.
- d) Please provide the LI Scorecard based on the above Budget.
- e) Please provide and compare the “consensus” 2015 LI Budget.
- f) Please provide the as filed Sector and Rate Class allocations of the LI Budget, targets and Incentive (100%).
- g) Please provide the “consensus” Sector and Rate Class allocations of the LI Budget, targets and Incentive (100%)

Energy Probe IR # 10

Ref.: Exhibit B, Tab 1, Schedule 3, Tables 6 and 7, Pages 9-10

- a) Please provide a version of Tables 6 and 7 including 2014 Estimates/Actuals.
- b) Please indicate if the proposed change to the Builders enrolled metric was discussed/approved by the Audit committee and/or DSM Consultative. If not, explain why not.

Energy Probe IR # 11

Ref.: Exhibit B, Tab 1, Schedule 3, Table 10, Pages 13-14 -2015 Incremental Budget

- a) Please indicate which projects are one time (2015) and which may have either carryover or future year funding requirements.**
- b) In the latter case, please indicate the specific provisions included in future year budgets.**
- c) Please explain in detail why the IRP Study cannot be undertaken jointly by EGD and Union at a lower cost at least for the distribution portion of the respective systems.**
- d) Please explain in more detail, who are the partners/ funders of the Collaboration and Innovation Fund projects.**
- e) Please provide details of how projects will be solicited and selected.**

Energy Probe IR # 12

Ref.: Exhibit B, Tab 1, Schedule 6, Page 8

Preamble: The evidence in this Application confirms that the current DSM IT system upon which the tracking, monitoring, evaluation, and verification of DSM program offers and results is dependent, is at the end of its useful life and needs to be replaced. The forecast capital cost for this work is approximately \$5 million, most of which will be incurred in 2015 and 2016.

- a) Why is the IT upgrade not an urgent priority that should properly be funded as part of the Incremental Budget in 2015 and other projects reduced/deferred? Please explain in detail.**
- b) How much of the urgency/cost requirement is due to the Ministry Green Button initiative?**
- c) Is the DSM IT module integrated with the Enterprise IT System, in particular the new Customer Information System (CIS) Module?**
- d) Please provide the Business Plan for the DSM IT Upgrade and discuss the relationship to and cost implications for the CIS. In particular, discuss in detail the On-bill financing IT implications.**

2015-2020 Budgets, Programs and Targets

Energy Probe IR # 13

Ref.: Exhibit B, Tab 1, Schedule 2, Table 1 and Exhibit B, Tab 1, Schedule 4, Page 39 of 41, Table 27: Enbridge's: 2020 Goal and Annual Budgets and CCM Targets

Preamble: Under the LTEP, Targets have been established for Ontario Electricity Distributors. Macro level metrics and comparisons are requested.

- a) Has the Minister, Ministry, Board or Board Staff proposed or commented on the 2020 Targets? If so indicate/provide a copy of these proposals/comments.**
- b) How do the EGD 2020 forecast gas savings (CCM and % of consumption) compare to:**
 - i) those forecast for the electricity sector e.g. % of Electricity consumption,**
 - ii) those forecast for Union Gas e.g. % distribution throughput, and,**
 - iii) those forecast for other Canadian Gas distributors e.g. Fortis, Manitoba Hydro and Gaz Metro? e.g. % distribution throughput.**

Energy Probe IR # 14

Ref.: Exhibit B, Tab 1, Schedule 2 Page 7

Preamble: Enbridge is cognizant that the reasonable rate impact of its DSM programs is to be approximately \$2.00 per month for a typical residential customer and that the total DSM budget cap is approximately \$85 million, inclusive of shareholder incentive, as stated in the DSM Framework.

- a) Please provide the 2014 comparable cost/month per residential customer.**
- b) Please indicate how the Macro level residential customer costs/savings compare on a unit basis \$/CCM to \$/Kwh.**
- c) Please Indicate how the monthly costs per customer compare for Electricity CDM and Gas DSM.**
- d) Please indicate how CDM/DSM costs compare on a typical Residential Bill basis e.g. Toronto Hydro to EGD.**

- e) **Please Provide forecast macro level RA and Custom Efficiency Metrics \$/CCM for each program and each year and total for the 6 year period.**
- f) **Please provide some Macro Scale metrics for the Budgets and the Targets -**
 - e.g. Savings in gas relative to forecast 2015-2016 throughputs (normalized for weather)
 - Costs of the RA and Custom Program relative to Distribution Revenues
 - Others felt to be relevant

Energy Probe IR # 15

**Ref.: Exhibit B, Tab 1, Schedule 2, Page 8 and
Exhibit B, Tab 1, Schedule 2, Page 17**

Preamble: Since its inception, DSM has generated significant bill reductions, environmental benefits, and social assistance. These are key policy objectives of DSM which continue to be relevant under the new DSM Framework and in Enbridge's Multi-Year DSM Plan.

Please provide a qualitative/quantitative analysis and discussion of the following hypothetical Value Cost/Benefit Proposition for a typical Residential customer paying an Annual DSM Cost of \$25/yr e.g.

- a) **General Benefits longer term -all customers**
 - **Bill Reductions-Avoided Cost**
 - **Environmental Greenhouse Gas Reductions**
 - **Social Assistance**
 - **Other**
- b) **Participant Benefits (annual)**
 - **e.g. 12000 Home Retrofits costing \$X per home Participant pays Y**
 - **Bill Savings/home Z +Increased Comfort**
 - **e.g. 12000 Low income housing retrofits. Cost X/home/unit. Participant pays \$0**
 - **Bill Savings/home/unit Z +increased Comfort.**
 - **Other**

Energy Probe IR # 16

Ref.: Exhibit B, Tab 1, Schedule 4, Page 2 and
Exhibit B, Tab 2, Schedule 1

Preamble: Enbridge's DSM portfolio in 2016 and beyond include [inter-alia]- A more balanced portfolio which values the achievement of all cost-effective DSM as opposed to only those opportunities with the highest levels of cost-effectiveness.

- a) **Please describe/discuss at a policy strategic level what *Portfolio* means in this context e.g. Is/are the portfolio(s) sectoral, or as per Table 1 2016 Budget (page 3) Program- RA, LI and MT, or are they otherwise defined e.g. Exhibit B Tab 2 Schedule 1 Page 3**
- b) **Having defined the Portfolio(s) please indicate for each Portfolio what Cost Effective means in quantitative terms at the portfolio level. Please be specific as to which cost effectiveness criteria, tests or metrics should/will be used to develop and measure portfolio Cost Effectiveness.**
- c) **In your responses please provide specific references to the Board DSM Framework and Guidelines and the Ministers Direction.**

Energy Probe IR # 17

Ref.: Exhibit B, Tab 1, Schedule 4, Page 8, Tables 1-5 and Table 7 and pages
15/16

Preamble: As a gas utility with a very significant residential customer base, Enbridge believes a robust DSM offer for the residential market is paramount. It does not seem commensurate however, that high levels of effort and spending in this sector should result in a comparatively lower shareholder incentive. Placing greater value on CCM achieved through small consumers will help to maintain focus on this essential market segment.

- a) **Please map the Residential RA budgets in Tables 1-5 and the Offers in Table 6: 2016 to 2020 to the Residential Rate classes. Clarify what is/is not included in the offers/ budgets.**
- b) **Please provide an equivalent format RA Scorecard for 2015 and compare and discuss the basis of the changes 2016-2020.**
- c) **Please confirm the classes and customers in the Small Volume Customer group and what offers are counted in the 2016-2020 Scorecard.**

- d) Please provide the forecast 2015-2020 annual and cumulative Residential RA M³ savings.
- e) Please provide the responses in live Excel format and please include in the Excel Book a chart/graph showing the Residential RA Budgets, Annual Savings and \$/CCM for the 6 year period.

Energy Probe IR # 18

Ref.: Exhibit B, Tab 2, Schedule 1, page 3

For each of the 22 programs listed, please provide in Excel Format 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)

Energy Probe IR # 19

Ref.: Exhibit B, Tab 1, Schedule 4, pp. 10-14: Tables 8-12

Small volume customer target:

- a) Please explain how each of the lifetime savings targets was developed and provide all mathematical calculations in live Excel spreadsheets.
- b) Please indicate how much of the savings in each year is forecast to come from HEC, adaptable thermostats, Small C&I prescriptive measures as well as other program categories.
- c) Please clarify if the Company is proposing changes to address how savings from new furnaces are estimated – e.g. annual savings, CCM or measure life?
- d) Please provide a chart that shows 2015-2020 small volume CCM, participants and deep savings.

Residential Deep Retrofit targets:

- e) Is the Company proposing to change the current list of measures that would count towards the minimum requirement of two major measures?

[Footnote 2 Number of participants with at least 2 major measures (average annual gas savings across all participants must be at least 15% of combined baseline space heating and water heating usage for any incentives to be earned). If so, provide details and rationale.

Energy Probe IR # 20

Ref.: Exhibit B, Tab 1, Schedule 4, Pages 19-21 - Low Income Budgets and Targets

Single family:

- a) Please explain how each of the lifetime savings targets was developed and provide all mathematical calculations in live Excel spreadsheets.**
- b) Please explain why in 2017 through 2020, the savings stays the same or declines while the budget increases.**
- c) Please provide the efficiency Metric \$/CCM (100%) 2015-2020 (Chart form please)**

Multi-family:

- d) Please explain how each of the lifetime savings targets was developed and provide all mathematical calculations in live Excel spreadsheets.**
- e) Please provide the efficiency Metric \$/CCM (100%) 2015-2020 (Chart form please).**
- f) Please provide a Table that shows forecast Annual Savings and split between social housing vs. market rate multi-family buildings? Clarify if/how many of the latter are/may be eligible under the LI MF Program.**
- g) Please Indicate for each year 2012- 2014, the average Efficiency metric of \$/CCM savings for Social Housing multi-family buildings vs. Private market rate multifamily buildings?**

Energy Probe IR # 21

Ref.: Exhibit B, Tab 2, Schedule 1, Page 48 - Low Income New Construction

- a) Please describe in detail the basis of “# of project applications”.**

- b) Please clarify if the Program applies only to Social Housing or may include other Housing. Please define eligibility criteria.
- c) Please indicate whether to qualify the application will include a formal agreement or commitment to build to a certain performance standard? Please provide this/these requirement(s).
- d) Please Indicate if to qualify clarify if there a minimum requirement for the size of a project (units or square footage).
- e) Provide the analysis of the size of the market that this program is designed to address.
- f) Please indicate how many (potentially eligible) low income new construction projects were built each in Enbridge's service areas in the last 5 years (include Units/square footage).
- g) Please indicate how many potentially eligible low income new construction projects are planned expected to be built in Enbridge's service areas in the next 5 years (include Units/square footage).
- h) Please explain why the Scorecard should not be based on number of units/square footage built to levels below 2012 Building Code.
- i) Please explain in more detail how the efficiency level will be determined for each of SF/Rows and MF e.g. Part 9 HOTCAN.
- j) Please explain why for Part 3 Incentives are Based solely #units rather than Square footage (Units can be 1-3 bedrooms and vary in area.)
- k) Please explain what happens to required levels and incentives under new 2017 Building Code.

Market Transformation Programs Applicable to Residential Sector

Energy Probe IR # 22

Ref.: Exhibit B, Tab 2, Schedule 1, Page 67, Program 15, Residential MHHR

For each metric:

- a) Please explain how MHHR was developed and provide calculations in live Excel spreadsheets.
- b) Please provide the forecast number of participant households in each year.

- c) Please compare the 100% savings target per household to the savings to data in the pilot program?
- d) Please Explain why the budget nearly doubles from 2016 to 2017, but the savings target only goes up by about 25%. Why does it not increase linearly?
- e) Please clarify OPower's historic experience that savings per household increase over time.
- f) If not, please provide references to support a different conclusion.
- g) Please provide EGD's forecast as to OPower savings for a given household change from year 1 to year 2 to year 3 to year 4 of participation?
- h) Please explain why the savings targets for 2018 reduce to 2016 levels even though the budget increases stays constant from 2017 to 2018?
- i) Please explain why the savings targets for 2019 and 2020 decline (~ 25% lower than the 2016 target) even though budgets increase?

Energy Probe IR # 23

Ref.: Exhibit B, Tab 2, Schedule 1, Page 53, Program 12 - Residential Savings by Design

- a) Please indicate approximately how many new single family homes were/are forecast to be built in Enbridge's service area each year 2012-2020?
- b) Please indicate approximately how many of those new homes are built by builders who have already participated in Enbridge's SBD program 2012-2015?
- c) Please explain why achievement metrics go down from 2016 to 2017 when the budget remains Constant (e.g. OBC changes)?

Energy Probe IR # 24

**Ref.: Exhibit B, Tab 1, Schedule 3, Table 9, Page 12 - Home Labelling Scorecard
Exhibit B, Tab 1, Schedule 4, Page 41
Exhibit B Tab 2, Schedule 1, Page 71 - Program 16 - Home Rating**

- a) Please explain in detail why the Scorecard has no numerical metric for Realtor commitments.

- b) Please provide the Shareholder Incentives with the Scorecard as filed (100% and Upper).**
- c) Please provide an analysis of the recent annual listings (new and existing) of SF homes in EGD's Service area. Include a chart/profile of all listings that shows the listings per major realtor and covers the two qualitative levels of 5,000 and 10,000 listings/year.**
- d) Please provide an alternative metric that is based on number of realtors with X (determined by profile) listings enrolled and an appropriate Home Rating.**

Energy Probe IR # 25

Ref.: Exhibit B, Tab 1, Schedule 4, Page 41, TAF Adjustments

Please provide in live Excel format illustrative examples of hypothetical TAF adjustments for Residential and for Low Income RA sub-sectors.

Energy Probe IR # 26

Ref.: Exhibit B, Tab 1, Schedule 5, Page 4, Tables 1-5

- a) Please provide a chart showing the scenarios in Table 2 (RA budgets and CCM).**
- b) Please add lines/bars showing CCM/\$ and the amount/cost recovered from the residential rate classes (Rate 1, 6 separately and total).**
- c) Please provide a chart showing the scenarios in Table 4 (MTEM budgets and CCM).**
- d) Please add lines/bars showing CCM/\$ and the amount/cost recovered from the residential rate classes (Rate 1 and 6 separately and total).**
- e) Please provide Table that shows for each Scenario the Shareholder Incentive broken out between RA and MT (and other).**
- f) Please provide the base rate class budgets and additional Shareholder Incentive i.e. total cost for each rate class.**
- e) Please indicate under each scenario, the Low Income budgets targets and associated allocation to each rate class.**

Energy Probe IR # 27

Ref.: Exhibit B, Tab 1, Schedule 6 - Deferral and Variance Accounts - DSMCEIDA.

Preamble: The Company will then seek Board approval for the amount recorded in the account as part of the annual clearance of DSM accounts application. This approved amount would then be available to the Company to use towards achieving the following year's annual target with the benefit of the additional incremental funds.

- a) Please discuss timing of Board Approval of application relative to clearance of accounts and audit.**
- b) Please explain why the DSMCEIA should apply to the 2015 rollover year, since budgets are formula based.**
- c) Please provide a hypothetical example of the application in 2016 of the DSMCEIA for each of RA Residential and for Low Income Programs. Please be clear regarding assumptions.**
- d) In the above hypothetical examples please provide the Impacts on the shareholder incentive in each year.**

Energy Probe IR # 28

**Ref.: Exhibit B, Tab 1, Schedule 6, Page 8 DSMITCSVA
Exhibit B, Tab 4, Schedule 5**

- a) Please explain why the DSM IT capital should not be considered as a Z factor under the 5 year IRM Plan.**
- b) Assuming a Z factor please provide what criteria would apply (threshold etc.).**
- c) Please provide a copy of the Business Case for the DSM IT upgrade(s).**
- d) Indicate clearly how much of the capital and annual operating costs relate to the Ministry Green Button initiative.**
- e) In particular, please provide the linkages and capital and operating cost implications related to the new CIS and other Enterprise IT Operations.**
- f) Please provide the annual operating costs related to the DSM Program and for other IT solutions such as CIS, billing etc.**

Energy Probe IR # 29

**Ref.: Exhibit B, Tab 2, Schedule 2 - Evaluation Plan
Exhibit B, Tab 3, Schedule 1, pages 3-5-Stakeholdering**

- a) Please provide an Organization Chart for Evaluation etc. showing the Structure, Committees membership, as well as primary functions and roles.**
- b) Please provide an Organization Chart showing EGD's interpretation of the structure, and new/amended membership, primary functions and roles reflecting the Board Report Demand Side Management Framework for Natural Gas Distributors (2015 to 2020) ("DSM Framework") and accompanying Filing Guidelines.**

Energy Probe IR # 30

Ref.: Exhibit B, Tab 2, Schedule 3 - TRC+ and PAC Screening

- a) Please provide Formulas and input assumptions.**
- b) Please provide, preferably in live Excel Format, the 2016 Worksheets for each of RA Low volume and Low Income. Include sources of assumptions and relate data to the respective Budgets and Scorecard metrics.**

Energy Probe IR # 31

Ref.: Exhibit B, Tab 2, Schedule 4, Tables 3 and 4

- a) Please confirm these 2016 Tables are based on 100% achievement of Target.**
- b) Please indicate in detail how EGD interprets the "cap" of \$2/month for a typical Residential customer.**
- c) Is there any corresponding assumption for Rate 6? Please discuss.**
- d) Please provide, preferably in live Excel Format, the Worksheet Calculation of the Shareholder Incentive calculation for each of Rate1 and Rate 6.**
- e) Please provide the same calculation for the other 3 Budget Scenarios (75%, 125% and 150%).**

- f) Please Indicate clearly the assumption(s) regarding the DSMVA and DSMCEIDA and how changing these would affect the result(s).
- g) Please provide a version of Table 4 showing the 4 Scenario Rate class impacts.

Energy Probe IR # 32

**Ref.: Exhibit B, Tab 3, Schedule 3, Page 3
Exhibit C, Tab 1, Schedule 3-IRP**

- a) Please indicate when the IRP study will begin.
- b) Will there be Stakeholder Engagement? Please specify.
- c) The draft scope does not appear to reference to the E.B.O. 188 Guidelines. Please discuss if this is an omission.

Energy Probe IR # 33

Ref.: Exhibit B, Tab 4, Schedule 3, Page 1-On-Bill Financing

- a) Please provide a Summary of the OBF options that are “on the Table”.
- b) Please indicate which options involve EGD financing and which third party financing.
- c) Please indicate which, if any, involve EGD guarantees.
- d) Please provide a copy of the Study re using LIC for OBF (page 2 para 7).

Energy Probe IR # 34

Ref.: Exhibit C, Tab 1, Schedule 1, Pg. 16, Table ES-1; Pgs 113- 116, Tables 5-16, 5-19, 5-20 and 5-22

Preamble: Navigant Study Outlook is to 2024. These questions seek to match the Budgets, Achievable Potential etc. to those filed by EGD (2015-2020) in this Application

- a) Please position the Scenarios in ES-1 and Table 5-19 to that filed by EGD in this Application.

- b) Please explain differences in Budget in Tables ES-1 and Table 5-19.**
- c) Please provide a version of Table 5-20 and highlight the scenario(s) that correspond to the Portfolios filed by EGD in this Application.**
- d) Please provide in the new version the split between RA and MT/other budgets and Savings.**
- e) Please provide a version of Table 5-16 for the Scenario(s) matching the current EGD Application. Please add rows that show the Shareholder incentive.**
- f) Please provide the results of Navigant's analysis of the Shareholder incentive across each of the jurisdictions surveyed.**
- g) Please provide a version of Table 5-22 (peak day demand) for the Scenario corresponding closely to the current EGD application.**

Energy Probe IR # 35

Ref.: No EGD Reference. EB-2015-0029 Union, Exhibit A, Tab 2, Appendix D, Stakeholder Engagement

Please file and provide a Copy of EGD's Stakeholder Engagement Plan equivalent to that filed by Union Gas per reference noted above.

Macro Comparisons EGD and Union Gas 2015-2020 DSM Portfolios

Energy Probe IR # 36

**Ref.: Exhibit B, Tab 1, Schedule 2, Tables 1&2
Exhibit B, Tab 1, Schedule 4, Page 2
Exhibit B, Tab 2, Schedule 1.
EB-2015-0029 Exhibit A, Tab 3, Table 2 and Table 3**

Preamble: Enbridge's DSM portfolio in 2016 and beyond include [inter-alia]- A more balanced portfolio which values the achievement of all cost-effective DSM as opposed to only those opportunities with the highest levels of cost-effectiveness.

- a) Please provide Overview Comparison Tables of EGD and Union Portfolios similar to Table 1 on Page 2 and Table 2 on Page 3 (first Reference).**

- b) Please present in a comparison Table the EGD and Union 2015 and 2016 DSM Portfolios (as filed) preferably on a Sectoral basis, or by the types of Program -RA/Low Income and Market Transformation per Table 1 2015 Budget (page 5) and Table 1 Page 4 Program- RA, LI and MT.
- c) Please provide a Comparison Table showing at 100% the Shareholder incentive resulting from each Scorecard and Total Incentive for EGD and Union for 2015-2020. List any assumptions.

Energy Probe IR# 37

Refs: EGD no Reference, Union EB-2015-0029 Exhibit A, Tab 1, pages 22-23

Preamble: Under Section 14.1 of the Guidelines, the Board requested the following characteristics of EGD and Union distribution systems:

- a) Total natural gas purchases;
- b) Sales by rate class;
- c) Number of customers by rate class; and,
- d) Summaries of sales and number of customer figures for all rate classes within the various customer types (e.g. Residential, Low Income, Commercial, Industrial and Large Volume) that DSM programs will be developed for and offered to.

Please provide a tabulation of the following Benchmarks/Metrics for the Two Utilities for the year 2014:

Utility Metrics

Rate Base

Revenue Requirement

Sales by Rate class

#customers by sector (Residential, Low Income, Commercial and Industrial Throughput (2014) by Sector

DSM Metrics 2015

Total DSM Budget per customer

CCM/Customer and % of throughput

Residential Budget Total and \$ per Residential Customer/yr

RA Cost effectiveness CCM/\$ Residential and Low Income

DSM Metrics 2016

Total DSM Budget per customer

CCM/Customer and % of throughput

Residential Budget Total and \$ per Residential Customer/yr

RA Cost effectiveness CCM/\$ Residential and Low Income

Energy Probe IR # 38

Ref.: Exhibit C, Tab 1, Schedule 1, Pg. 16 Table E-2.

Please provide a version of Figure E-2 from the Navigant Report that shows both EGD and Union Gas based on both 2012 spend and 2016 proposed spend.