## Ref: Exhibit B, Tab 1, Schedule 3, Page 8 of 19

- For each of the years 2012 to 2014, please provide the actual m3 savings from Part 3 multifamily buildings broken down by:
  - a) Social and Assisted Housing
  - b) Private rental
- 2) Please provide Enbridge's perspective on why the company has not proposed a metric for private rental participation or savings?

## Ref: Exhibit B, Tab 2, Schedule 1, Page 37 of 100

Enbridge evidence states: "The social and assisted housing segment represents approximately 12% of the total multi-residential housing sector within the Enbridge franchise area. Additionally, an estimated 8% of commercial private sector multi-residential buildings are occupied by residents that meet low income thresholds. The majority of multi-residential buildings are small to mid-sized buildings consuming less than 300,000 m3 annually. To date, approximately 42% of social and assisted housing has participated in an Enbridge incentive program."

3) Based upon the foregoing numbers and in comparison to the social and assisted housing, what percentage of private sector multi-residential buildings have participated?

## REF: Exhibit C, Tab 1, Schedule 4, Page 8 of 35

The Navigant report states: "During the initial discovery stage of this assignment, it was concluded that Enbridge's existing avoided cost calculation methodology accurately captures all upstream avoided costs including transmission. The objective was subsequently modified from a study of both transmission and distribution avoided costs to only include the determination of the distribution or downstream avoided costs. Enbridge has calculated avoided transmission costs using a proprietary model (SENDOUT) since 1995, and plans to continue with this approach going forward."

4) Please provide the approach, methodology and underlying assumptions used to calculate the upstream and transmission costs.

5) Please provide the Navigant report and correspondence with the company that reports on Navigant's findings on the Enbridge approach, methodology and underlying assumptions that concludes that Enbridge's existing avoided cost calculation methodology accurately captures all upstream avoided costs including transmission.