

UNION GAS LIMITED

2015 – 2020 DEMAND SIDE MANAGEMENT (DSM) PLAN

EB-2015-0029

OEB STAFF INTERROGATORIES

June 2, 2015

Interrogatory #1

Topic: Guiding Principles and OEB Priorities

Ref: Exhibit A / Tab 1 / Appendix B / p.1

EB-2014-0134 / Report of the Board / Section 6.2

Preamble:

At section 6.2 of the DSM Framework, the OEB stated that utilities should strive towards the “development of new and innovative programs, including flexibility to allow for on-bill financing options.” Union noted that it discussed on-bill financing as a potential new program idea with stakeholders and the majority of stakeholders that attended a December 2013 consultation session did not support on-bill financing.

Questions:

- a) Please indicate whether Union completed a jurisdictional review for on-bill financing programs. If yes, please provide the review.
- b) Please file the document titled, “On-Bill Financing for DSM Programs: Research Insights and Findings.”
- c) Please indicate whether zero interest financing was considered as an option for on-bill financing programs. Please provide Union’s views on a zero interest on-bill DSM financing program.
- d) Please discuss Union’s position on implementing a limited pilot program to test the effectiveness of on-bill financing.
- e) Please discuss Union’s position on collaborating with Enbridge on the pilot program.

Interrogatory #2

Topic: DSM Targets

Ref: Exhibit A / Tab 2 / p. 12 / Table 7

Exhibit A / Tab 3 / p. 20 / Table 4

Exhibit A / Tab 3 / p. 26 / Table 5

Exhibit A / Tab 3 / p. 32 / Table 7

Preamble:

In Union's 2015 Resource Acquisition scorecard, the weight allocated to cumulative natural gas savings is 90%. However, in Union's 2016-2020 Resource Acquisition scorecards, the weight allocated to cumulative natural gas savings is 75%.

Questions:

- a) Please provide further rationale for the reduced weighting on cumulative natural gas savings in the 2016-2020 Resource Acquisition scorecards (Exhibit A / Tab 3 / p. 20 / Table 4).
- b) Please provide the amount and the percentage of the cumulative natural gas savings in the Resource Acquisition scorecard that will be evaluated using metered/billing data as opposed to modeled or prescriptive savings (Exhibit A / Tab 3 / p. 20 / Table 4).
- c) Please provide the amount and the percentage of the cumulative natural gas savings in the Low-Income scorecard that will be evaluated using metered/billing data as opposed to modeled or prescriptive savings (Exhibit A / Tab 3 / p. 26 / Table 5).
- d) Please provide the amount and the percentage of the RunSmart savings and Strategic Energy Management savings in the Performance-based scorecard that will be evaluated using metered/billing data as opposed to modeled or prescriptive savings (Exhibit A / Tab 3 / p. 32 / Table 7).

Interrogatory #3

Topic: DSM Targets

Ref: Exhibit A / Tab 2 / p. 12

Question:

- a) Please confirm that the 2015 resource acquisition scorecard, set out in Table 7, is the same as 2014 (with the exception of the noted change to the metric for the Deep Savings Residential category).

Interrogatory #4

Topic: DSM Targets

Ref: Exhibit A / Tab 3 / pp. 17-18

EB-2014-0134 / Report of the Board / Section 5.2

Preamble:

Section 5.2 of the DSM Framework states that targets should be set at three levels of achievement for each metric: 75%, 100% (target) and 150%.

Union proposed to set the upper band of its target at 125% of the target level. Union stated that the upper band multiplier was established with consideration that Union has to achieve a 25% increase above the target with additional funding of only 15% above the approved DSM budget. Union noted that the 125% upper band was approved by the OEB for Union's 2012-2014 DSM Plan.

Questions:

- a) Please provide a more detailed explanation for setting the upper band at 125% of the target in the context of section 5.2 of the DSM Framework that sets the upper band at 150% of the target.
- b) Please confirm that under Union's proposal it would be awarded 40% of the maximum shareholder incentive (\$4.2 million) if it achieves 100% of its performance scorecard and the maximum shareholder incentive (\$10.45 million) if it achieves 125% of its performance scorecard.

Interrogatory #5

Topic: DSM Targets

Ref: Exhibit A / Tab 3 / Section 3.0

Question:

- a) Please provide the scorecards that were in place in 2012, 2013 and 2014.
- b) Please provide the percentage of target level achieved for each metric on each scorecard in 2012, 2013, and 2014.
- c) Please provide the shareholder incentive received related to each scorecard for each year over the 2012-2014 period.
- d) Please provide the total shareholder incentive received for each year over the 2012-2014 period.
- e) Please provide the percentage of maximum shareholder incentive received for each year over the 2012-2014 period.

Interrogatory #6

Topic: DSM Targets

Ref: Exhibit A / Tab 3 / pp. 20-24

Exhibit A / Tab 3 / pp. 26-30

Exhibit A / Tab 3 / Appendix A / p.15, 43, 89

Preamble:

For the 2016 Resource Acquisition and Low-Income scorecards, Union set the cumulative natural gas savings targets using a bottom-up analysis. However, over the 2017 to 2020 period, the targets on both scorecards are adjusted each year, using a formulaic target setting approach, based on the previous year's (i.e. 2016) achieved savings expressed on a $\$/m^3$ basis multiplied by the subject year's (i.e. 2017) promotion and incentive budget (plus a 2% target increase applied in the case of the Resource Acquisition scorecards).

Union also provided program-specific rationale for cumulative natural gas savings targets, where applicable, in Exhibit A / Tab 3 / Appendix A.

Questions:

- a) Please provide Union's position on setting the cumulative natural gas savings targets for the 2017-2020 period, for both of the noted scorecards, using a bottom-up analysis (similar to how Union set the 2016 targets).
- b) Please file proposed cumulative natural gas savings targets for the 2017-2020 period, for both of the noted scorecards, using a bottom-up analysis (similar to how Union set the 2016 targets).
- c) For the Resource Acquisition scorecard, please confirm that these cumulative natural gas savings targets would be calculated by adding the total in Table 6 (Exhibit A / Tab 3 / Appendix A / p.15) and Table 13 (Exhibit A / Tab 3 / Appendix A / p. 43) for each year. For the Low-Income scorecard, please confirm that the cumulative natural gas savings targets calculated, on a bottom-up basis, would reflect the total provided in Table 31 (Exhibit A / Tab 3 / Appendix A / p. 89) for each year.
- d) Please explain why Union provided program-specific rationale for cumulative natural gas savings targets, for the 2016-2020 period, when Union is not proposing to use these targets in the Resource Acquisition and Low-Income scorecards over the 2017-2020 period.
- e) Please explain why it is reasonable to establish 2017-2020 savings using a formulaic target setting mechanism, similar to that used for the 2013-2014 Resource Acquisition scorecards, given the DSM Framework's guiding principle to achieve all cost-effective DSM that results in a reasonable rate impact.
- f) Please explain how Union's proposed target setting approach will result in sufficiently aggressive targets that ensure the prudent use of ratepayer funds.
- g) Please explain why Union is not proposing to apply the same 2% increase to the cumulative natural gas savings targets, used in the 2017-2020 formulaic target setting approach for its Resource Acquisition scorecard, to its Low-Income scorecard.

Interrogatory #7

Topic: DSM Budgets

Ref: Exhibit A / Tab 3 / Appendix E

Questions:

- a) Please provide the bill impacts for each rate class for each year of the DSM plan (2015-2020) at both the target incentive level and the maximum incentive level. Please provide the bill impacts both with and without the Rate M7 proposal applied. Please provide this information in a similar format as it is presented in Exhibit A / Tab 3 / Appendix E / Schedules 2 & 3.
- b) Please provide the same information that is provided in Exhibit A / Tab 3 / Appendix E / Schedule 4 for each year of the DSM Plan. Please provide this information with and without the Rate M7 proposal applied.

Interrogatory #8

Topic: DSM Budgets

Ref: Exhibit A / Tab 3 / p. 6

Question:

- a) Please expand Table 2 to include the DSM budgets for the years 2012 to 2015.

Interrogatory #9

Topic: DSM Budgets

Ref: Exhibit A / Tab 3 / p. 8

Exhibit A / Tab 3 / p. 26

Preamble:

Union noted that it increased its Low-Income program budget by 66% to \$11.3 million in 2016, and then further to \$14.9 million in 2020 (representing more than double the 2015 Low-Income program budget). Union noted that the Low-Income program budget represents approximately 26% of the total program budget, which is consistent with the 2012-2014 DSM Plan.

Questions:

- a) Please provide rationale for not increasing the proportional allocation of the overall DSM budget to Low-Income programs given the OEB's key priority to expand the Low-Income program offerings across the province.
- b) Please discuss whether additional funding for Low-Income programs could address any barriers to achieving savings in the Low-Income sector.

- c) Please estimate the changes to the targeted savings on the 2016 Low-Income Scorecard if the proposed Low-Income program budget was increased to represent 30% or 40% of the total program budget.

Interrogatory #10

Topic: DSM Budgets

Ref: Exhibit A / Tab 3 / Appendix A / pp. 56-59

Preamble:

Union noted that the Strategic Energy Management program funding will be required through 2023 to complete the program cycle for all participating customers.

Questions:

- a) Please advise whether Union is seeking approval of post-2020 Strategic Energy Management program funding as part of the current application.
- b) Please update Tables 19 – 22 related to the Strategic Energy Management program to include 2021-2023.

Interrogatory #11

Topic: DSM Budgets

Ref: EB-2014-0134 / Report of the Board / Section 15.1
Exhibit A / Tab 2 / pp. 5-6

Preamble:

With regard to the 2015 DSM budgets, the OEB stated, at section 15.1 of the Natural Gas DSM Framework, that:

The gas utilities may increase overall spending by up to 15%, consistent with the Board's guidance as part of the gas utilities' current, approved DSM plans, and use these additional funds to begin to incorporate and address the guiding principles and key priorities outlined in the DSM framework.

In its evidence, Union stated that its 2015 budget (\$34 million) includes \$1.4 million that will be used to begin to address the guiding principles and key priorities outlined in the DSM Framework. Union stated that the \$1.4 million of incremental budget is in addition to the 15% overspend provision in place since EB-2006-0021. Union stated that it is inappropriate to use the 15% overspend amount in the manner that it intends to spend the \$1.4 million of incremental budget. Union stated that the overspend amount is reserved to aggressively pursue programs which prove to be successful and strive towards the achievement of the upper band of its target.

Questions:

- a) Please discuss how Union's proposal to exclude the \$1.4 million from the 15% overspend provision is consistent with the OEB's direction set out in the DSM Framework.
- b) Please provide further rationale as to why Union cannot use the entire 15% overspend provision to address the guiding principles and key priorities outlined in the DSM Framework.
- c) Please discuss whether Union could manage the \$1.4 million of 2015 incremental budget requirements (as set out in Table 3) with the amounts available to it through the 15% overspend provision.
- d) Please advise whether Union has already started working on the projects listed in Table 3. If so, please provide the spending to date.

Interrogatory #12

Topic: DSM Budgets

Ref: Exhibit A / Tab 2 / pp. 26-31
Exhibit A / Tab 2 / p. 7

Questions:

- a) Please reconcile the 2015 evaluation budget of \$1.13 million cited at Exhibit A / Tab 2 / Page 31 and the evaluation budget of \$0.97 million cited in Table 4 (Exhibit A / Tab 2 / Page 7).
- b) Please confirm that the evaluation budget proposed is based on the costs associated with Union's proposed evaluation and audit approach (set out at section 9.0 in Exhibit A / Tab 2).

Interrogatory #13

Topic: DSM Budgets

Ref: Exhibit A / Tab 3 / pp. 6-8

Questions:

- a) Please reconcile the 2016 evaluation budget of \$2.3 million cited at Exhibit A / Tab 3 / Page 8 and the evaluation budget of \$1.3 million cited in Table 2 (Exhibit A / Tab 3 / Page 6). Please highlight the line items in Table 2 to which Union has assigned program specific evaluation costs.
- b) Please advise whether \$2.3 million is the proposed evaluation budget for the entire 2016-2020 period. If not, please provide the estimated evaluation budget for each year 2017-2020.
- c) Please advise how Union proposes to handle changes to the evaluation budget if the OEB orders a different approach for evaluation and audit.

Interrogatory #14

Topic: Shareholder Incentive

Ref: EB-2014-0134 / Report of the Board / Section 5.2

Exhibit A / Tab 3 / p. 36

Preamble:

Union allocated the DSM incentive on the basis of the proportion of the overall budget applicable to each of its scorecards. This methodology allocates a small percentage of the incentive to the performance-based program scorecard (1.3%).

The DSM Framework stated that the gas utilities are expected to allocate the total shareholder incentive amount across their scorecards. The DSM Framework stated that the gas distributors should submit a weighted scorecard considering the following:

- Allocate the large majority of the maximum shareholder incentive amount to programs that will achieve significant lifetime natural gas savings;
- Allocate the total maximum shareholder incentive amount to various programs based on the budgeted amounts for each program; and,
- Allocate an appropriate portion of the maximum shareholder incentive amount (e.g., 10%) to the performance metrics that will encourage and achieve the Board's key priorities outlined in Section 6.1 of the framework.

Questions:

- a) Please explain how Union's proposed allocation of the DSM incentive addresses all of the considerations cited above.
- b) Please discuss whether Union considered an alternative allocation methodology that would provide a greater incentive to aggressively pursue performance-based programs.

Interrogatory #15

Topic: Program Types

Ref: Exhibit A / Tab 1 / p. 12-13

Preamble:

Union noted that it has proposed many new and innovative programs in its DSM Plan.

Questions:

- a) Please identify any other programs (including pilot programs) that Union considered but chose not to include within its portfolio of programs.
- b) If applicable, please identify the reason(s) why Union chose not to further pursue these programs.

Interrogatory #16

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix A / pp. 37-40

Questions:

- a) For the C/I Custom offering, please indicate the rate classes which have customers eligible for these programs, the number of eligible customers per customer segment and the total annual gas consumption per customer segment.
- b) Please provide the Return on Investment (ROI), or payback period threshold, that these customer segments typically have and how these financial indicators have been taken into consideration in the design and delivery of these custom offerings in order to minimize free riders.
- c) Please indicate whether Union considered payback period or ROI in the design of this offering's eligibility criteria.
- d) Please indicate whether Union designed this offering assuming that the free ridership values will be similar to those used for the same offering over the 2012-2014 period.

Interrogatory #17

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix A / pp. 27-30

Exhibit A / Tab 3 / Appendix A / pp. 30-36

Questions:

- a) For the C/I Prescriptive and Direct Install offerings, please provide typical payback periods associated with the efficiency equipment included in these offers.
- b) Please indicate whether Union undertook any research on the current penetration of these technologies in the marketplace. If yes, please provide estimates of penetration rates in Union's franchise area for each relevant technology.
- c) Please explain how payback and market penetration have been taken into consideration in the design of this offering in the context of minimizing free ridership.
- d) Please indicate the free ridership rate that will be used for these offerings.

Interrogatory #18

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix A / p. 8-9

Preamble:

Union notes that it will launch a behavioural offering in which a Home Energy Report will be sent by mail to 300,000 highest consuming residential customers. Union also noted that a similar report will be made available to all residential customers through its online portal.

Question:

- a) Please discuss whether Union will screen participants using Municipal Property Assessment Corporation (MPAC) data in order to ensure that older vintage homes are targeted. If not, please explain why.
- b) Please discuss the differences between what will be contained in the Home Energy Report and what Union will make available to all residential customers through its online portal.

Interrogatory #19

Topic: Program Types

Ref: Exhibit A / Tab 3 / p. 63

Preamble:

Union noted that it will not be offering a program based on fee-for-service consulting to its large volume customers for a variety of reasons. Instead, Union proposed a Large Volume program consisting of technical support and customer training on energy efficiency.

Question:

- a) Has Union considered requiring large volume customers to track energy performance and show improvement in the energy efficiency of their operations in order to be eligible to receive technical support and training from Union through the Large Volume program?

Interrogatory #20

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix C / p. 49-50

Preamble:

The eligibility criteria for Union's Low-Income Multi-Family program for privately-owned buildings include: (a) "the building is located in a low-income neighbourhood"; and (b) the "average rents of the building are at or below the Average Market Rent for that municipality."

Questions:

- a) Please provide rationale for the proposed eligibility criteria.
- b) Please discuss the accuracy of the proposed eligibility criteria for identifying low-income consumers (who live in privately-owned multi-family housing buildings) that would meet the 135% Low-Income Cut-off (LICO) eligibility requirements applicable to Union's other low-income programs.
- c) In buildings where tenants do not pay their own gas bills, how will low-income tenants benefit from the natural gas cost savings accruing from the program?
- d) How will Union ensure that any cost savings that accrue from the program are passed onto low-income tenants?
- e) Please explain why Union did not include a requirement that eligible buildings must have tenants paying for natural gas usage separate from rent?
- f) Please discuss whether Union considered adding a requirement that participating buildings must agree to separate tenants' rent and natural gas costs to allow tenants to benefit financially from natural gas cost savings.

Interrogatory #21

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix A / pp. 12-15

Preamble:

The Energy Savings Kit (ESK) program has been offered since 2000. The payback period for ESKs is about 3 months and the payback period for programmable thermostats is about 1.57 years (before any incentive is provided).

Union's ESK contains a \$25 rebate coupon for a programmable thermostat. OEB staff notes that Enbridge offers a \$75 rebate coupon for an adaptive thermostat.

Questions:

- a) Please explain the need to continue the ESK program from 2016 to 2020 in the context of the OEB's direction, in the DSM Framework, requiring utilities to move towards programs that are designed to achieve deeper savings.
- b) Please discuss the market saturation rates in Union's service territory for all of the individual items within the ESK.

- c) If Union were to discontinue the ESK program, please discuss how Union would reallocate the ESK budget.
- d) Please discuss whether Union is concerned that by offering incentives for programmable thermostats it may be undermining the adoption of more advanced adaptive and web-enabled thermostat technologies.
- e) Please discuss Union's position regarding offering a larger rebate coupon for an adaptive thermostat (instead of a programmable thermostat).

Interrogatory #22

Topic: Program Types

Ref: Exhibit A / Tab 3 / Appendix A / pp. 3-8

Preamble:

The incentive provided by Union through its Home Reno Rebate offer ranges from \$2500 to \$5000. In contrast, the maximum incentive provided by Enbridge through its Home Energy Conservation offer is \$2100 per customer.

Questions:

- a) Please provide rationale as to why Union is providing a significantly higher incentive amount than Enbridge in a similar program offering.
- b) Using the data collected from the 2012-2014 Home Reno Rebate offering, please provide the average cost of the retrofit per house and the payback period (before and after the financial incentive is applied).
- c) Please indicate whether Union considered advanced air-source heat pumps and ground source heat pumps for the offering. Please indicate if Union has discussed collaboration with the IESO or the LDCs to promote these technologies.
- d) Please confirm whether the basement and wall insulation measure rebates listed in Table 1 (Exhibit A / Tab 3 / Appendix A / p. 5) are prorated according to the percentage of wall area insulated and whether the home is detached or semi-detached.

Interrogatory #23

Topic: Program Evaluation

Ref: Exhibit A / Tab 3 / Appendix C / p. 7

EB-2014-0134 / Report of the Board / Section 6.2

Preamble:

A key priority in the DSM Framework is that utilities should "implement DSM programs that are evidence-based and rely on detailed customer data." Union intends to use the Hot2000 software for evaluation of the Residential Home Reno Rebate offering.

Question:

- a) Please explain why actual metered/billing data will not be used in the evaluation of the Residential Home Reno Rebate offering in the context of the key priority set out in the DSM Framework.

Interrogatory #24

Topic: Program Evaluation

Ref: Exhibit A / Tab 3 / Appendix A / p. 54-55

Questions:

- a) For the RunSmart initiative, please indicate whether external factors affecting natural gas savings (weather, changes to building occupancy, etc.) will be controlled for in the natural gas savings analysis, which relies on metered data. If so, please list these factors and explain how these factors will be addressed as part of the evaluation.

Interrogatory #25

Topic: Input Assumptions

Ref: Exhibit A / Tab 3/ p. 44

Exhibit A / Tab 3 / Appendix D

Questions:

- a) Please provide evidence and rationale for the 0% free ridership rate applicable to the Strategic Energy Management and RunSmart offerings.
- b) Please provide evidence and rationale for the 5% free ridership rate applicable to the Home Reno Rebate offering for the 2016-2020 period.
- c) For all of Union's program offerings:
 - i. Please discuss what actions Union is taking to minimize free ridership.
 - ii. Please discuss the factors that Union considers in establishing that a customer is not a free rider.
 - iii. Please discuss whether, and how, the payback period or other financial metrics and market penetration of technologies were considered in the design of Union's DSM programs.

Interrogatory #26

Topic: Input Assumptions

Ref: Exhibit A / Tab 3 / p. 17

EB-2014-0134 / Report of the Board / Section 8.0

EB-2014-0134 / Filing Guidelines / Section 8.2

Preamble:

Union noted that “any input assumptions adjustments that occur as a result of the TRM and the NTG study will be applied to Union’s 2016 targets on a go-forward basis only...”

The DSM Framework indicates that “to effectively estimate the amount of energy savings achieved through the delivery and implementation of DSM programs, the gas utilities rely on a set of approved engineering assumptions that represent the best available information...”

The DSM Filing Guidelines state that “the evaluation of the achieved results...should be based on the best available information, which, in this case, refers to the updated input assumptions resulting from the evaluation and audit process of the same program year.”

Questions:

- a) Please explain how Union’s proposed approach is consistent with the DSM Framework and Guidelines, which require the use of the most updated information in the calculation of savings?

Interrogatory #27

Topic: Avoided Costs

Ref: Exhibit A / Tab 2 / p. 26

Exhibit A / Tab 2 / Appendix B

Questions:

- a) Please confirm whether Union included the avoided distribution and transmission cost estimate (cited at Exhibit A / Tab 2 / p. 26) in its avoided gas cost forecasts used for program screening.

Interrogatory #28

Topic: Accounting Treatment – Recovery and Disposition of DSM Amounts

Ref: Exhibit A / Tab 3 / p. 37

Preamble:

Union proposed to include the target DSM incentive (\$4.1 million) in rates and record the variance between the actual DSM incentive achieved and the amount in rates in the DSMIDA. Union stated that its proposal is based on interest from customers that want to avoid large out-of-period adjustments.

Questions:

- a) Please confirm that 2016 would be the first time that any portion of the DSM incentive would be built into rates.
- b) Please highlight which stakeholders have asked Union to include a DSM incentive amount in rates rather than dispose of the entire amount through the DSMIDA.

Interrogatory #29

Topic: Accounting Treatment – Recovery and Disposition of DSM Amounts

Ref: Exhibit A / Tab 3 / pp. 37-38

Preamble:

Union stated that if it is able to meet its overall annual natural gas savings target, it will be eligible to carry forward any unused approved DSM budget amounts in the immediately following year.

Questions:

- a) Please advise where Union plans to record any unused approved DSM budget to carry forward into the next year.
- b) Does Union think that it would be more transparent if a new deferral account was created for this purpose (i.e. an account similar to Enbridge's proposed Cost-Efficiency Incentive Deferral Account)?

Interrogatory #30

Topic: Accounting Treatment – Recovery and Disposition of DSM Amounts

Ref: Exhibit A / Tab 2 / pp. 35-36

EB-2013-0202 / Exhibit A / Tab 1 / pp.35-36

Preamble:

Union noted that it included \$1 million in the 2015 budget and \$5 million in the 2016 budget related to its DSM Tracking and Reporting System Upgrades.

Questions:

- a) Please provide the Operations and Maintenance (O&M) costs related to the DSM Tracking and Reporting System Upgrade project.
- b) Please discuss how Union proposes to recover these O&M costs.
- c) Please explain why Union believes that the DSM Tracking and Reporting System Upgrade project meets the criteria for Z-factor treatment set out in the EB-2013-0202 Settlement Agreement.

Interrogatory #31

Topic: Integration and Coordination of Natural Gas DSM and Electricity CDM Programs

Ref: Exhibit A / Tab 1 / Appendix C / p. 3
EB-2014-0134 / Report of the Board / Section 6.2

Preamble:

A key priority included in the DSM Framework is that utilities should “increase collaboration and integration of natural gas DSM programs and electricity CDM programs.”

Union stated that once the electric LDCs have completed their CDM Plans for 2015-2020, Union intends to have additional discussions on potential areas of collaboration. OEB staff notes that the LDCs have now completed their CDM plans for the 2015-2020 period.

Questions:

- a) Please provide the total number of electricity distributors with which Union has discussed coordination and integration of CDM and DSM.
- b) Please discuss any progress made on these collaborative efforts to date.
- c) Please provide a list of pilot programs that Union has initiated in cooperation with the electricity distributors.

Interrogatory #32

Topic: Future Infrastructure Planning Activities

Ref: Exhibit A / Tab 1 / Appendix D

Questions:

- a) Please provide the estimated timelines for work on the DSM and Infrastructure Study.
- b) If available, please provide any details on Union’s preliminary transition plan.
- c) If available, please indicate any progress Union has made with regard to coordinating study efforts with Enbridge.