

IN THE MATTER of the *Ontario Energy Board Act 1998*, Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by Enbridge Gas Distribution Inc. for an Order or Orders approving their demand side management plan for the six year period commencing January 1, 2015.

INTERROGATORIES
OF THE
SCHOOL ENERGY COALITION

1. [No Reference] Please provide a detailed list of all cumulative savings results in the Enbridge 2014 Annual DSM Report that are derived in whole or in part using the Enbridge e-tools software. Please confirm that Enbridge plans to continue to use e-tools for 2016 and subsequent years. With respect to e-tools:
 - a. Please provide a list of all measures on the current Input Assumptions list for which e-tools is used to calculate savings from projects.
 - b. Please provide the full source code for the software.
 - c. Please provide a complete list of all assumptions used in the software, including without limitation software for operating conditions, useful life, baseline, and any other factors.
 - d. Please provide all of the algorithms used in the e-tools software to convert data, whether project specific or assumed, into savings.
 - e. Please advise how many Enbridge employees are trained in the e-tools software and have full access to the source code and all underlying assumptions and algorithms.
 - f. Please provide a list of all third parties, including but not limited to auditors, evaluation consultants, intervenor representatives, and others, who have been given full access to the source code and all underlying assumptions and algorithms.

2. [No reference] Please provide a side by side comparison of the programs proposed by Enbridge in 2016-2020, and the programs proposed by Union Gas in EB-2015-0029 for the same period, and identify any differences between the programs. Where there are differences,
 - a. Please explain the reasons, if any, why Enbridge believes it has proposed a better approach.
 - b. Please describe any collaboration or integration activities between Enbridge and Union that have caused dissimilar programs to become more similar.
3. [Ex. B/1/2, p. 17] With respect to the Collaboration and Innovation Fund:
 - a. Please provide details on how Enbridge plans to obtain input from stakeholders and others on new CIF projects and potential projects.
 - b. Please confirm that Enbridge will annually produce a plan for the CIF in advance of the year, and discuss the plan with stakeholders and/or the DSM Consultative prior to its implementation.
 - c. Please provide details with respect to how Enbridge proposes to include CCM or other results from CIF projects in the scorecards.
4. [Ex. B/1/2, p. 25] Please advise whether Enbridge agrees that, as a general rule, the discussions at the audit committee and at any committee advising on evaluation studies (i.e. any successor to the TEC) should be public, on the record, and fully transparent. Please provide a detailed explanation of any categories of information for each committee that in Enbridge's view have to be protected through confidentiality, and the reasons for confidentiality in each case. Where possible, please make specific reference to the Board's confidentiality rules.
5. [Ex. B/1/3, p. 6] With respect to the proposed 2015 Resource Acquisition scorecard:
 - a. Please confirm that Enbridge does not expect to be able to achieve the lower bound for lifetime cubic meters. Please advise where Enbridge is on that metric as of May 31, 2015. Please provide Enbridge's current estimate of its 2015 full year achievement on that metric.
 - b. Please advise the date in 2015 in which Enbridge has already passed the upper bound for participants in residential deep savings. Please provide Enbridge's current estimate of its 2015 full year achievement on that metric.
6. [Ex. B/1/3, p. 17] Please provide a full explanation as to why Enbridge needs complete flexibility on the \$4.92 million incremental budget. Please confirm that the proposed flexibility would allow Enbridge to decide not to proceed with one or more of the

projects on pages 14-16. For each of the listed projects, please advise the total amount spent to date in 2015 on that project, and the total value of any 2015 financial commitments already made with respect to that project.

7. [Ex. B/1/4] Please confirm that Enbridge is, in several programs, proposing increases to the incentives provides to customers or channel partners for energy efficiency projects. Please provide details of all changes to targets and scorecards that have been made to reflect the increased market penetration these increased incentives are expected to generate.
8. [Ex. B/1/4, p. 3+] Please provide a table showing the unit costs (fixed monthly and/or volumetric based on cubic meters) that have been or will be charged to each customer class in each of 2014 through 2020. For 2014, please use actuals. For 2015 through 2020, please assume the proposed DSM budget is spent exactly as proposed. Please include in the costs and allocations the amount of the shareholder incentive, actual for 2014, and forecast for 2015 through 2020 on the assumption that the company achieves the target level in each year on all scorecard metrics. Please provide a similar table showing sensitivity to program implementation changes, by assuming for each class that the DSMVA is allocated to that class, and that the upper bound is achieved for the shareholder incentive on all scorecard metrics.
9. [Ex. B/1/4, p. 40] Please confirm that Enbridge proposes to reduce its targets for CCM on a go-forward basis if the input assumptions for any measure changes during the course of the plan. Please advise what Board approvals or review Enbridge is proposing for any proposed change in target resulting from this adjustment, and what Board approvals or review Enbridge is proposing with respect to the cost-effectiveness of programs affected by the changes in input assumptions.
10. [Ex. B/1/5, p. 5+] Please restate Tables 3, 5, and 7 on the basis of unit rates for each class (e.g. per cubic meter). Please provide tables similar to Tables 1 and 2 of each of 2019 and 2020, and a unit rates table for each of those years as well.
11. [Ex. B/1/6, p. 6] Please provide a draft accounting order for the proposed 2015 and 2016 DSMPIDA accounts. Please confirm that amounts to go into the DSMPIDA account in any year would be charged to the DSM budget for that year, as if paid to customers, and would be eligible for recovery under the DSMVA if the conditions of that account were met.
12. [Ex. B/1/6, p. 7] Please advise the amount of accrued SBD commitments Enbridge proposes to add to the 2015 DSMPIDA with respect to years prior to 2015. Please advise whether those amounts are in addition to the DSM budget for 2015, or part of that budget. If they are in addition to the budget, please confirm that they are spending commitments applicable to prior years that have not been included in the DSM spending for those prior years, and will not be included in the DSM budgets for any year after 2014 either.

13. [Ex. B/1/6, p. 7] Please confirm that Enbridge is proposing that it be allowed to carry forward committed but unspent amounts in any year and, if those amounts are not spent on the commitments to which they relate, they would be available to Enbridge as additional budget in the subsequent years. Please confirm that for these amounts Enbridge would not be required to meet the criteria for the cost efficiency incentive proposed by the Board in the Framework.
14. [Ex. B/2/1, p. 11-14] With respect to the Custom Commercial program:
- a. Please explain why the tiered incentive proposal doesn't disincent customers who have already implemented energy efficiency measures, and thus have less room to reduce their usage in percentage terms.
 - b. Please advise whether Enbridge considered establishing the tiered incentive structure over a multi-year period, so that customers can propose multi-year projects that, over more than one year, achieve higher percentage reductions, rather than being required to achieve those reductions in one year.
 - c. Please confirm that this program is available to school boards, and can be applied to multiple locations of a single customer. If so, how would the tiered structure and annual cap work in those cases? For example, if a school board achieves 30% savings in ten schools, with aggregate annual savings of 500,000 cubic metres, would the customer be limited by the \$100,000 annual cap?
 - d. Please advise the number of school boards that participated in the Custom Commercial program in each of 2012-2014, and the total amount of incentives paid to those school boards in each of those years.
15. [Ex. B/2/1, p. 17-19] With respect to the C/I Prescriptive (Fixed) Incentive Program:
- a. Please provide a complete list of the prescriptive and quasi-prescriptive measures currently offered in this program.
 - b. Please identify which of the measures are listed in the current list of input assumptions filed with the Board.
 - c. For each prescriptive measure on the list, please provide the amount of the incentive, or the formula for calculating the incentive where applicable, both as in effect in 2014, and as proposed for 2016.
 - d. Please confirm that this program is available for schools in rates 6 and 100.
16. [Ex. B/2/1, p. 19-22] With respect to the Energy Leaders program:
- a. Please provide indicative information on how the incentives available to customers in this program will differ from incentives paid in other C/I programs.

- b. Please confirm that projects accepted in this program will in all case be required to pass the TRC-plus test with a ratio of greater than 1.0.
 - c. Please confirm that this program is available for customers with multiple locations, including but not limited to schools.
 - d. Please identify in the evidence the Evaluation Plan for this program.
- 17. [Ex. B/2/1, p. 30-33] Please provide a side by side comparison of the proposed Small Commercial New Construction program with the Savings by Design program and the previous Design Assistance Program. For each of the years 2012-2014, please provide the number of schools that participated in SBD, and the total amount of incentives paid to those school boards in respect of that participation.
- 18. [Ex. B/2/1, p. 58-62] With respect to the Savings by Design – Commercial program:
 - a. Please confirm that the program will continue to be available to schools and school boards.
 - b. Please explain what steps, if any, Enbridge has taken to offer this program jointly with electricity distributors, and the results of those steps. Please advise what plans Enbridge has to integrate this offering with electricity efficiency measures.
- 19. [Ex. B/2/1, p. 62-67] With respect to the New Construction Commissioning program:
 - a. Please confirm that the program will be available to schools and school boards.
 - b. Please explain what steps, if any, Enbridge has taken to offer this program jointly with electricity distributors, and the results of those steps. Please advise what plans Enbridge has to integrate this offering with electricity efficiency measures.
- 20. [Ex. B/2/1, p. 71-75] Please explain what steps, if any, Enbridge has taken to offer the Home Rating program jointly with electricity distributors and/or the OPA/IESO, and the results of those steps.
- 21. [Ex. B/2/1, p. 78] Please confirm that 38% of the buildings diagnosed under the Energy Compass program to date have been schools. Please provide details on what followup, if any, Enbridge has undertaken to determine the savings and other benefits that have resulted from the participation by those schools in the program.
- 22. [Ex. B/2/1, p. 79-84] With respect to the School Energy Competition program:
 - a. Please describe in detail Enbridge’s plans to develop curriculum and other aspects of this program jointly with school boards and their educational specialists.

- b. Please advise how Enbridge plans to co-ordinate student contact aspects of this program with existing energy efficiency curriculum components, and existing rules and policies with respect to student contact activities.
 - c. Please advise whether school boards that already have an energy monitoring system in place will be required to use the Enbridge EMIS, or will be disqualified from participation.
23. [Ex. B/2/1, p. 84-88] With respect to the Run it Right program:
- a. Please confirm that the program is available to schools in rates 6 and 100.
 - b. Please advise whether customers that have daily consumption meters that are competitive to Metretek, or have other energy monitoring capabilities, are eligible for participation in the program and, if so, whether to participate they have to shift to Metretek metering.
24. [Ex. B/2/1, p. 91-97] With respect to the Comprehensive Energy Management program:
- a. Please confirm that the program is available to customers, such as school boards, with multiple locations having in aggregate more than 340,000 cubic meters of consumption annually. If not confirmed, please confirm that only approximately 1% (about 25) of the schools in the Enbridge franchise area would qualify for participation.
 - b. Please provide details of how this program integrates or interacts with the Energy Leaders program.
 - c. Please explain what steps, if any, Enbridge has taken to offer this program jointly with electricity distributors, and the results of those steps. Please advise what plans Enbridge has to integrate this offering with electricity efficiency measures.
25. [Ex. B/2/2, p. 2] Please advise if Enbridge has any specific proposals with respect to stakeholder involvement in supervision of the annual audit, or supervision of evaluation and other studies. In EB-2015-0029, Union Gas has made specific proposals to continue with the audit committee, and modify the TEC to become the Evaluation Advisory Forum. Please provide Enbridge's views on those proposals in as much detail as possible.
26. [Ex. B/2/2, p. 5] Please extend the table to include the years 2011 through 2015.

Respectfully submitted on behalf of the School Energy Coalition this 3rd day of June, 2015

Jay Shepherd