

Ref: Exhibit A, Tab 2, Page 32 of 38

Union's evidence states: "*Union will continue to conduct research activities in coordination and collaboration with Enbridge over the term of the Plan resulting in more cost effective projects, reducing duplication of research efforts, and greater value to customers.*"

We are interested in the level of collaboration and the resulting studies and implications.

- 1) Please list the collaborative studies undertaken by Union and Enbridge in the last 5 years.
 - a) Please provide a brief abstract or summary of each study and resulting implementation by Union Gas.

Ref: Exhibit A, Tab 3, Appendix A, Pages 43-46 of 117

- 2) For each of the years, 2012 to 2014, for the greenhouse contract customers, please provide:
 - a) the number of C/I projects, actual costs and m3 savings broken down by:
 - i) total prescriptive
 - ii) greenhouse prescriptive
 - b) the number of C/I projects, actual costs and m3 savings broken down by:
 - i) total custom
 - ii) greenhouse custom
- 3) Please provide the amount collected in rates from the greenhouse contract customers sector for each of the years 2012 to 2014 broken down by:
 - a) Base rates
 - b) DSM clearance from a previous period

Ref: Exhibit A, Tab 1, Page 20-21 of 23

Union's evidence states: *"While the new Rate T1 remained in the Large Volume Scorecard, the rate class was treated differently than Rate T2 1 and Rate 100. Specifically, the Programs offered to Rate T1 customers were consistent with the Commercial/Industrial Custom offering on the Resource Acquisition Scorecard."*

- 4) Please provide the specific changes to program offerings that were made to T1 customers complete with the date of implementation of the respective changes.
- 5) Please provide the calculated m3 savings per actual dollars invested from T1 rate class in 2012, 2013 and 2014.

Ref: Exhibit A, Tab 3, Page 54-55 of 73

Union' evidence states: *"Further, the Rate T1 rate class is similar to Enbridge's Rate 100 rate class, which is also not included in the definition of Large Volume rate class within the Board's Framework"*

- 6) Please provide the number of customers in Enbridge Rate 100 class.
 - a) Please provide the distinct characteristics that Union is using to make the above comparison statement.

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Union's evidence states: *"Further engaging with electric LDCs to understand their CDM Plans and interest in the collaboration opportunities Union has identified and opportunities they have identified to work together"*

- 7) Please provide a list of specific collaboration opportunities that Union has identified:
 - a) Please specify the synergistic opportunities for each identified collaboration

- b) Please describe how these opportunities, created by money invested through collaboration fund will find themselves into subsequent years programming.
- c) Please provide a detailed description of how expected m3 savings from these collaborations will be forecasted and used to adjust the m3 targets in the years of implementation.

Ref: Exhibit A, Tab 1, Appendix C, Page 4 of 7 and Tab 3, Appendix A, page 68 of 117

In Exhibit A, Tab 1, Union evidence states: *“Union could promote and identify any potential electric energy efficiency opportunities, such as combined heat and power, arising with participating gas customers through customer visits, energy studies/audits, gas projects.”*

- 8) Please provide any studies that Union has done corporately or reviewed from other utilities and/or jurisdictions on the potential benefits of combined heat and power for the greenhouse sector.
 - a) From these studies and/or Union’s assessments, what types of program offerings has Union considered and what are the barriers to implementation?
- 9) In Tab 3, Union references the use of the “Combined Heat and Power Application Tool” and other applications for use with T2 customers.
 - a) Is there a scale limitation that would inhibit the use of these applications for T1 or even M4 and M5 customers?
 - b) Has Union used these applications on smaller customers?
 - c) Please summarize Union’s views on the potential for the use of these applications on greenhouse operations for energy efficiency benefits.

Ref: EB-2014-0273, Exhibit A, Tab 5, Schedule 2

10) Please provide the delivery component of the annual bill for the following customers using current rates:

- a) without the applied for DSM deferral account impact
 - i) Contract demand: 11,000 m³/day Annual Volume: 2,500,000 m³
 - (1) as an M4 customer
 - (2) as an M5 customer
 - ii) Contract demand: 30,000 m³/day Annual Volume: 5,600,000 m³
 - (1) as an M4 customer
 - (2) as an M5 customer
- b) with the applied for DSM deferral account impact
 - i) Contract demand: 11,000 m³/day Annual Volume: 2,500,000 m³
 - (1) as an M4 customer
 - (2) as an M5 customer
 - ii) Contract demand: 30,000 m³/day Annual Volume: 5,600,000 m³
 - (1) as an M4 customer
 - (2) as an M5 customer
- c) For each of the respective scenarios, please provide the percentage annual delivery component bill impact associated with the applied for DSM account disposition (for the above inquiry, tabular format would be appreciated).