



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DÉFENSE DE L'INTÉRÊT PUBLIC

June 2, 2015

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: EB-2015-0029 - Union Gas Limited 2015-2020 Demand Side Management Plan
Vulnerable Energy Consumers Coalition (VECC) Interrogatories**

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Janigan
Counsel for VECC

Cc: Union Gas Limited - Vanessa Innis - vinnis@uniongas.com

**Union Gas Limited 2015-2020 Demand Side Management Plan
VECC Interrogatories**

Interrogatory #1

Ref: General

- a) Please define Union's franchise area.
- b) Please list the major urban centres in Union's franchise area.
- c) Please summarize key DSM trends from past DSM program delivery that informed Union's proposed 2016-2020 DSM Plan.
- d) Please summarize key lessons learned from past DSM program delivery that informed Union's proposed 2016-2020 DSM Plan.
- e) Please summarize Union's collaboration with Enbridge Gas and the opportunities for DSM Program alignment.
- f) Please provide a summary of new Union staff positions required to delivery Union's 2016-2020 DSM program and the associated incremental costs.
- g) For the years 2012-2020, please provide the % of DSM budget allocated to each of the following: residential, low income, commercial, industrial, market transformation, research, evaluation, administration, pilots and DSM tracking and reporting upgrades.

Interrogatory #2

Ref: Exhibit A, Tab 1, Page 5

Preamble: Since 2007, Union's DSM Programs have helped save an estimated \$7.5 billion cubic metres of natural gas.

- a) Please confirm the timeframe that the \$7.5 billion cubic metres of natural gas savings occurred.
- b) Please provide a Table to show the annual natural gas savings (m3) and annual DSM program costs for the years 1997 to 2014.

Interrogatory #3

Ref: Exhibit A, Tab 1, Appendix A Schedule 4

- a) Please reproduce Schedule 4 to include a column for Low Income Customers.

Interrogatory #4

Ref: Exhibit A, Tab 1, Appendix A Schedule 5

- a) Please reproduce Schedule 5 to include a column for Low Income Customers.
- b) For each market sector (residential, industrial, commercial and Low Income) please provide the % of the market targeted by each proposed DSM offering in Union's DSM Plan.

Interrogatory #5

Ref: Exhibit A, Tab 1, Appendix C, Page 3

Preamble: Union indicates that once the electric LDCs have completed their CDM plans for 2015-2020 Union intends to have additional discussions on potential areas of collaboration.

- a) Please explain why Union will not be having ongoing discussions on potential areas of alignment with LDCs, as they develop their CDM plans instead of when their plans are completed, in order to minimize missed opportunities.
- b) Please comment on any opportunities that may exist to share resources between Union and the electric LDCs.
- c) Of the 65 LDCs in Union's franchise area, how many align with the geographical reach of Union's proposed 2016-2020 DSM Program offerings.

Interrogatory #6

Ref: Exhibit A, Tab 3, Page 6 Table 2, 2016-2020 DSM Plan Budget

Preamble: Under the Portfolio Budget, Union proposes to spend \$3.5 million in the 2016-2020 time period on pilots.

- a) Please provide a breakdown and description of the proposed pilot expenditures by year and reference program offerings and market sectors targeted for each pilot.

Interrogatory #7

Ref: Exhibit A, Tab 3, Page 12 Table 3, Union's 2016-2020 Long Term Natural Gas Savings

- a) Please reproduce Table 3 to include the period 2012-2015.

Interrogatory #8

Ref: Exhibit A, Tab 3, Page 67

Preamble: Union indicates the average monthly bill impact for Residential customers in Rate 01 is \$2.20 month in 2020.

- a) Please explain the difference between a Rate 01 and Rate M1 customer.
- b) Please provide the average consumption per year for a Rate 01 customer.
- c) If the average monthly bill impact for Residential customers in Rate 01 is reduced to \$2.00 per month in 2020 please discuss the adjustments Union would need to make to its proposed 2016-2020 DSM Plan.

Interrogatory #9

Ref: Exhibit A, Tab 3, Appendix A

- a) Please provide a table that lists each DSM Program offering in 2015 and complete the following columns:
 - Year Commenced
 - Total Budget (\$)
 - Total Natural Gas Savings.
- b) Please identify the DSM programs offered in 2015 that are no longer being offered in 2016-2020 and explain why.
- c) Please provide a table that lists each DSM Program offering for the years 2016-2020 and complete the following columns:
 - Year Commenced
 - Status (unchanged/new/expanded/reduced)
 - Customer Class Targeted
 - Rate Class Targeted
 - Geographical Reach
 - Total 2016-2020 Budget \$
 - Total 2016-2020 Gas Savings (m3)
 - Total 2016-2020 Customer Program Incentives \$
 - Cross Promotion of Other DSM Programs (ID programs)
 - Program Delivery Partners (Yes or No)
 - Contractor Services (Yes or No)
 - RFP Process to retain partners/services (Yes or No)
 - Opportunity to Collaborate with LDCs (Yes or No)

Interrogatory #10

Ref: Exhibit A, Tab 3, Appendix A, Residential Program

- a) Please discuss any changes to the 2016-2020 Residential Program that were considered and rejected by Union and explain why.
- b) Please provide the forecast participation rates for each residential program offering for the years 2016-2020 compared to 2012-2015 and show any calculations.

Interrogatory #11

Ref: Exhibit A, Tab 3, Appendix A, Pages 3-8 Home Reno Rebate (HRR) Offering

- a) Please describe more fully Union's current Service Organization and Contractor Network and discuss how many of each are available and the specific services they each provide.
- b) Please provide cost details for a typical "D Assessment" to establish a homes current energy use and identify energy saving opportunities.
- c) Please provide cost details for a typical "E Assessment" to determine energy savings.
- d) Please provide the size of the Target Market (i.e. number of residential customers living in detached, semi-detached and individually metered row houses).
- e) Please provide the number of customers in part (d) with a natural gas furnace/boiler.

Interrogatory #12

Ref: Exhibit A, Tab 3, Appendix A, Pages 9-11 Behavioural Offering

- a) Please define Normalized Average Consumption (NAC).
- b) Please confirm the total number of highest consuming residential customers (i.e. consuming greater than Union's NAC).
- c) Please describe a typical vendor for this program.
- d) Please provide the party that would complete and deliver the energy assessment questionnaire.
- e) Please provide the geographical reach for this Program.
- f) Please discuss how Union's research of other jurisdictions informed its Behavioural Offering.

Interrogatory #13

Ref: Exhibit A, Tab 3, Appendix A, Pages 12-13 Energy Savings Kit (ESK)

- a) Since 2000, please provide to the end of 2014, the total number of ESKs provided, the total number of ESKs installed, the total natural gas savings (m3) and the total cost (\$).
- b) Please provide the cost of an ESK in 2016.
- c) Please provide the size of the Target Market (i.e. the number of residential customers living in detached, semi-detached and individually metered row houses who have a natural gas water heater and furnace).
- d) Please indicate how many in the target market have received a kit in the past.
- e) Please explain why this offering is not available to customers in high-rise buildings and multi-family buildings with more than 5 units.
- f) Please describe who the third party delivery agents are and explain how they are retained.
- g) Does Union undertake door-to-door delivery in-house? If yes, please compare the average cost per ESK door delivery of a third party delivery agent compared to Union staff.
- h) Please provide the geographical reach for this Program.
- i) Please discuss if Union has collaborated with local municipalities who deliver similar kits to meet water and energy savings and provide details.

Interrogatory #14

Ref: Exhibit A, Tab 3, Appendix A, Page 14, Table 2

Preamble: Table 2 shows \$1,850,000 in Development and Start-Up costs in 2016.

- a) Please provide a breakdown/description of these costs.

Interrogatory #15

Ref: Exhibit A, Tab 3, Appendix A, Page 14, Table 2

Preamble: Table 2 shows Incentives/Promotion costs for the Home Reno Rebate, Behavioural and ESK offerings.

- a) Please provide separate costs for incentives and promotion for each program.

Interrogatory #16

Ref: Exhibit A, Tab 3, Appendix A, Page 14, Table 3 Residential Program Participation

- a) Please provide the residential program participation for each year for the years 2012 to 2015 for the HRR and ESK programs.

Interrogatory #17

Ref: Exhibit A, Tab 3, Appendix A, Page 16, Table 4 Simple Payback Analysis per Participant

- a) Please provide the calculations for columns (a), (b) and (d).
- b) Please discuss how the simple payback analysis per participant for each offering compares to 2015.

Interrogatory #18

Ref: Exhibit A, Tab 3, Appendix A, Page 15, Table 5 Residential Program NG Savings

- a) Please reproduce Table 5 for the offerings in years 2012 to 2015.

Interrogatory #19

Ref: Exhibit A, Tab 3, Appendix A, Page 15, Table 6 Residential Program Cumulative NG Savings

- a) Please reproduce Table 6 for the offerings in years 2012 to 2015.

Interrogatory #20

Ref: Exhibit A, Tab 3, Appendix A, Page 16

Preamble: The lifetime m³ targets for HRR were built using the current assumptions within the Hot2000 modeling tools. Union indicates there are anticipated changes to the modelling tools that may impact the lifetime m³ targets and could result in an adjustment up or down.

- a) Please explain the Hot2000 modeling tools.
- b) Please explain how Union will respond to an upward or downward adjustment in lifetime m³ targets.

Interrogatory #21

Ref: Exhibit A, Tab 3, Appendix A, Page 16

- a) Please provide Union's service standard related to wait times to have an energy assessment completed.
- b) Does Union have other service standards related to its Residential Program Offerings? If yes, please provide?
- c) Please discuss how Union tracks its performance related to service standards.

Interrogatory #23

Ref: Exhibit A, Tab 3, Appendix A, Page 23

- a) Please explain how the 3,000 units for the Programmable Thermostat are derived.

Interrogatory #24

Ref: Exhibit A, Tab 3, Appendix A, Page 72 Low Income Program

- a) Please discuss any changes to the 2016-2020 Low Income Program that were considered and rejected and explain why.
- b) Please provide the forecast participation rates for each Low Income Program offering for the years 2016-2020 compared to 2012-2015 and show any calculations.
- c) Please discuss how Union's research of other jurisdictions informed its Low Income Program offering.

Interrogatory #25

Ref: Exhibit A, Tab 3, Appendix A, Pages 73-77 Home Weatherization

- a) Please provide the average premium paid per customer to deliver the program in non-urban centres.
- b) Please provide the cost to provide a carbon monoxide detector per home and provide the number of carbon monoxide detectors unit to be provided over the period 2016-2020.
- c) Please provide the cost of a typical home energy audit and follow-up home energy audit and confirm the party that will undertake each audit.
- d) Please confirm the total number of Part 9 buildings in Union's franchise area.

Interrogatory #26

Ref: Exhibit A, Tab 3, Appendix A, Pages 77-80 Aboriginal Offering

- a) Please provide the party that will undertake the audit and insulation upgrades.

Interrogatory #27

Ref: Exhibit A, Tab 3, Appendix A, Pages 83-86 Multi-Family Offering

- a) Please provide the party that will undertake the Energy Audit and Report.

Interrogatory #28

Ref: Exhibit A, Tab 3, Appendix A, Page 87 Table 27 Low Income Program Budget

- a) Please reproduce Table 27 showing incentives and promotion costs separately.
- b) Please provide the same Table produced in part (a) for the years 2012 to 2015.

Interrogatory #29

Ref: Exhibit A, Tab 3, Appendix A, Page 88 Table 28 Low Income Program Participation

- a) Please reproduce Table 28 for the offerings for the years 2012 to 2015.

Interrogatory #30

Ref: Exhibit A, Tab 3, Appendix A, Page 88 Table 29 Simple Payback Analysis per Participant

- a) Please provide the calculations for columns (a), (b) and (d).
- b) Please discuss how the simple payback analysis per participant for each offering compares to 2015.

Interrogatory #31

Ref: Exhibit A, Tab 3, Appendix A, Page 89 Table 30 Low Income Program Annual NG Savings

- a) Please reproduce Table 30 for offerings for the years 2012 to 2015.

Interrogatory #32

Ref: Exhibit A, Tab 3, Appendix A, Page 89 Table 31 Low Income Lifetime NG Savings

- a) Please reproduce Table 31 for the offerings for the years 2012 to 2015.

Interrogatory #33

Ref: Exhibit A, Tab 3, Appendix A, Pages 99-107 Market Transformation

- a) Please discuss any changes to the 2016-2020 Market Transformation Program that were considered and rejected and explain why.
- b) Please provide the forecast participation rates for each Market Transformation Program offering for the years 2016-2020 compared to 2012-2014 and show any calculations.
- c) Please provide the forecast participation rate for 2015.

Interrogatory #34

Ref: Exhibit A, Tab 3, Appendix A, Optimum Home

- a) Page 100 - Please provide the calculation for 14% of homes built to the Optimum Home specification in 2014.
- b) Please provide the total number of homes and % of homes built to the Optimum Home specification prior to 2014.
- c) Please provide the increase in minimum energy efficiency requirements expected in a new updated version of the Ontario Building Code in 2015.
- d) Please confirm the party that retains the proposed consulting services and building scientists.

Interrogatory #35

Ref: Exhibit A, Tab 3, Appendix A, Page 105 Table 34 Market Transformation Program Budget

- a) Page 105 - Please reproduce Table 34 showing Incentives and Promotion costs separately.
- b) Please provide a similar Table to part (a) for the offerings and costs for the years 2012 to 2015.

Interrogatory #36

Ref: Exhibit A, Tab 3, Appendix A, Page 106 Table 35 Market Transformation Program Target

- a) Please provide the targets and actuals for the years 2012 to 2014.
- b) Please provide the 2015 target.