



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-2015-0049 Enbridge Gas Distribution Inc. 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: Enbridge Gas Distribution Inc.

**Enbridge Gas Distribution Inc. 2015-2020 Demand Side Management Plan  
VECC Interrogatories**

**Interrogatory #1**

Ref: General

- a) Please define Enbridge's franchise area.
- b) Please list the largest urban centres in Enbridge's franchise area.
- a) Please summarize the key DSM trends from past DSM program delivery that informed Enbridge's proposed 2016-2020 DSM Plan.
- c) Please summarize the key lessons learned from past DSM program delivery that informed Enbridge's proposed 2016-2020 DSM Plan.
- d) Please provide total number of customers in each market sector targeted in Enbridge's 2016-2020 DSM Portfolio.
- e) Please provide the Rate Classes that correspond to each market sector.
- f) For each proposed DSM offering in Enbridge's DSM Plan, please quantify the target market by CCM contributor and provide the forecast participation rates for each year of the DSM Plan.
- g) Please confirm the percentage of measures proposed in Enbridge's offerings that have a measure life of 10 years or more.
- h) Please provide the number of new Enbridge staff positions required to delivery Enbridge's 2016-2020 DSM program and the incremental costs.

**Interrogatory #2**

Ref: B-1-1 Page 1

Preamble: Between 1995 and 2013 Enbridge's customers have saved approximately 8.8 billion cubic metres of natural gas.

- a) Please provide a table that shows the annual natural gas savings (m<sup>3</sup>) and annual DSM Program costs (\$) for the years 1995 to 2014.

**Interrogatory #3**

Ref: B-1-2 Page 2 Table 1

Preamble: Table 1 provides the 2020 Goal and Annual Budgets and CCM Targets for the years 2015 to 2020.

- a) Please provide a similar Table that shows the Annual Budgets and CCM Targets for the years 2012 to 2014 along with Actual Costs and CCM Results.

#### **Interrogatory #4**

Ref: B-1-2 Page 3 Table 2

Preamble: Table 2 provides info on the 2020 Goal and CCM contributor.

- a) Please add a budget (\$) column to Table 2.
- b) Please provide a similar Table to show 2012 to 2014 CCM results by Contributor.

#### **Interrogatory #5**

Ref: B-1-2 Page 3 Table 1 2015 Budget and Maximum Shareholder Incentive

- a) Please add the following columns to the table:
  - Net Effective m3
  - Cumulative m3
- b) Please explain the types of costs included in overhead costs.

#### **Interrogatory #6**

Ref: B-1-2 Page 6

Preamble: Enbridge engaged in a half-day discussion and discovery session with Union Gas Limited (Union Gas) to consider how to best align methodologies where feasible.

- a) When was the session held?
- b) Please summarize the timing of any additional discovery sessions held with Union Gas regarding Union and Enbridge's 2015-2020 DSM Plans.
- c) Please discuss the opportunities for alignment between Enbridge and Union Gas.

#### **Interrogatory #7**

Ref: B-1-4 Pages 3-5 Tables 1 to 5

- a) Please add the following columns to each Table:
  - Net Effective m3
  - Cumulative m3

#### **Interrogatory #8**

Ref: B-1-4 Pages 9 Table 7 2016 to 2020 Resource Acquisition Budget

- a) Please provide the allocation methodology for RiR and CEM budgets between the Resource Acquisition and MTEM budgets.
- b) Please provide a similar Table for the years 2012 to 2015.

**Interrogatory #9**

Ref: B-1-4 Page 19 Table 14: 2016-2020 Low Income Budget

- a) Please provide a similar Table for the years 2012 to 2015.

**Interrogatory #10**

Ref: B-1-4 Page 27 Table 21 2016 to 2020 MTEM Budget

- a) Please provide a similar Table for the years 2012 to 2015.

**Interrogatory #11**

Ref: B-1-4 Page 39 Table 27

- a) Please provide Enbridge's Natural Gas Savings Goal for 2015 by CCM Contributor.

**Interrogatory #12**

Ref: B-2-1 Page 3

Preamble: The Table on Page 3 lists the 22 offerings that make up Enbridge's DSM Program Portfolio for 2016 to 2010.

- a) Please recast and complete the Table with the following columns added:

- Year Program Commenced
- Customer Sector Targeted
- Rate Classes Targeted
- Geographical Reach
- Total 2016-2020 Budget \$
- Total 2016-2020 Gas Savings (m<sup>3</sup>)
- Total 2016-2020 Customer Program Incentives \$
- Cross Promotion of Other DSM Programs (identify program)
- Program Delivery Partners (Yes or No)
- Contractor Services (Yes or No)
- RFP Process to retain partners/services (Yes or No)
- Collaboration Opportunity with LDC (yes/no)

**Interrogatory #13**

Ref: B-2-1 Page 37 Low Income Multi-Residential – Affordable Housing

Preamble: Enbridge indicates that the social and assisted housing segment represents approximately 12% of the total multi-residential housing sector, and 8% of the total multi-residential housing sector is represented by commercial private sector multi-residential buildings.

- a) Please quantify the number of existing multi-residential buildings in Enbridge's service territory.

#### **Interrogatory #14**

Ref: B-2-1 Page 37 Low Income Multi-Residential – Affordable Housing

Preamble: Enbridge indicates that 42% of social and assisted housing has participated in an Enbridge incentive program.

- a) Please provide the calculation for the 42%.

#### **Interrogatory #15**

Ref: EB-2012-0394 B-1-3 Page 10

Preamble: Enbridge indicates for Part 3 buildings, insuite measures from which Enbridge may choose are expanded to include, but are not limited to: clothes dryer rack, cold water wash detergent and leak repairs.

- a) Are these measures still part of the offering? If not, why not?

#### **Interrogatory #16**

Ref: B-2-1 Page 41 Low Income Multi-Residential – Affordable Housing

- a) Please explain the City of Toronto's STEP Program.

#### **Interrogatory #17**

Ref: B-2-1 Page 45 Low Income New Construction

- a) Please discuss the specific needs of the Target Market.
- b) Please discuss the scope of the pilot in 2015.

#### **Interrogatory #18**

Ref: B-2-1 Page 48 Low Income New Construction

- a) Please explain further how eligibility for the additional up to \$2,250 per unit, to a maximum of \$100,000 per building is applied.
- b) Please explain further how eligibility for the commissioning incentive of up to \$10,000 is applied.

#### **Interrogatory #19**

Ref: B-2-1 Page 71 My Home health Record

- a) Please explain how Enbridge determined the split between non-ebill and ebill participants.

#### **Interrogatory #20**

Ref: B-2-1 Page 75 Home Rating

- a) Please confirm the two-pronged approach.
- b) When does Enbridge anticipate home rating assessments will be undertaken and confirm the proposed quantity per year?
- c) Please explain further how the incentive works.

#### **Interrogatory #21**

Ref: B-2-1 Page 97 Energy Literacy

- a) Why is Rate 125 excluded?

#### **Interrogatory #22**

Ref: B-2-3 Page 8

Preamble: Enbridge indicates that its DSM Plan seeks to balance cost-effectiveness alongside the Board's guiding principles and key priorities, many of which drive important activities which are less cost-effective than Enbridge's past results.

- a) Please discuss the specific activities in the Plan that are less cost-effective than Enbridge's past results.

#### **Interrogatory #23**

Ref: B-2-4 Page 14

- a) Please explain why Rates 9, 125, 200 & 200 are not eligible for DSM programs.

#### **Interrogatory #24**

Ref: B-2-6 Page 2 Input Assumptions

- a) Please provide the status of the new and updated DSM Measures Application EB-2014-0354.
- b) Please discuss the impact on the current application if the final new and updated measures differ from those set out in the EB-2014-0354 filing.

### **Interrogatory #25**

Ref: B-3-4 Page 2 DSM Potential Study

Preamble: Enbridge indicates that the level of Enbridge's endorsement of the Potential Study found at C-1-1 may vary amongst the specific areas examined.

- a) Please explain this statement more fully.

### **Interrogatory #26**

Ref: B-3-5 Carbon Pricing

Preamble: Enbridge believes that it is appropriate to claim ownership of residential emission reductions as it is in a position to act as aggregator.

- a) Please discuss if Enbridge has undertaken any research in other jurisdictions or stakeholder consultations to inform its position on carbon pricing.
- b) By way of example, please explain more fully how residential DSM customers could use the economic value of their carbon emission reductions to increase the DSM incentives.

### **Interrogatory #27**

Ref: B-4-1 CDM Collaboration

- a) How many LDCs currently operate within Enbridge's franchise area?
- b) How many of these LDCs align with the geographical reach of Enbridge's 2016-2020 DSM Plan?
- c) How many of these LDCs has Enbridge collaborated with in the development of its DSM plan?

### **Interrogatory #28**

Ref: B-4-1 Page 10 CDM Collaboration

Preamble: Enbridge indicates additional barriers to large scale collaboration include collaboration funding that currently does not include electric and gas collaborative efforts.

- a) Please explain the source and purpose of the collaboration funding.

**Interrogatory #29**

Ref: B-4-2 Page 2 Collaboration and Innovation Fund

- a) Please provide the criteria used to determine the initiatives that are eligible for funding.

**Interrogatory #30**

Ref: C-1 Schedules 1-4

- a) Please provide the cost of each report.
- b) Please indicate the method to retain Navigant Consulting Inc. to prepare each applicable report? (i.e. sole source, RFP)