

GEC INTERROGATORY #41

INTERROGATORY

Topic 2 - DSM Targets

Reference C/T1/S1 Conservation Potential

Apart from the Conservation Potential Study, please provide copies of all research efforts, whether completed in-house or externally, characterizing DSM measure savings or other screening inputs or DSM market information such as market size and share.

RESPONSE

Given the breadth of the above request, best efforts have been made to collect as many reports as possible. While the information gathered has served to inform the Company's thinking and general direction with regard to program design, evaluation and marketing, Enbridge does not specifically endorse any particular portion of this information, nor has the Company attempted to tie any one study directly to any part of its proposed DSM Plan.

The Company has assembled 122 reports which total nearly 10,000 pages in aggregate in response to GEC's request. Given the voluminous nature of this response Enbridge does not wish to burden the public record of this proceeding with such a large quantity of content which may or may not prove relevant. Aside from mere logistics, the Company is also concerned that within the 10,000 pages assembled, which Enbridge staff have not reasonably had the chance to examine freshly and in full within the context of this proceeding, customer information could be contained in the form of case studies or other formats. For these reasons the Company invites GEC and other interested parties to request these documents directly from Enbridge, subject to claims of confidentiality. Should parties wish to introduce portions of the assembled reports on the public record in this proceeding they would be invited to do so provided that matters of confidentiality are properly considered and addressed prior to the introduction of said evidence.

Witnesses: S. Mills
F. Oliver-Glasford
B. Ott
R. Sigurdson