August 5, 2015

BY COURIER & RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

RE: EB-2015-0029 – Union Gas Limited ("Union") – 2015-2020 DSM Plan – Interrogatories on Intervenor Evidence

Dear Ms. Walli,

Please find attached Interrogatories on behalf of Union Gas Limited on the evidence prepared by Mr. Chris Neme, Energy Futures Group submitted on behalf of the Green Energy Coalition.

If you have any questions with respect to this submission please contact me at 519-436-5334.

Yours truly,

[original signed by]

Vanessa Innis
Manager, Regulatory Initiatives

Encl.

cc: Lawrie Gluck, Board Staff
Alex Smith, Torys
All Intervenors (EB-2015-0029)

UNION GAS LIMITED
INTERROGATORIES ON EVIDENCE PREPARED BY MR. CHRIS NEME, ENERGY FUTURES GROUP SUBMITTED ON BEHALF OF GREEN ENERGY COALITION

1. *Reference:* L.GEC.1, Pages 9-10

   Preamble: At section III.2, Mr. Neme states that "as Figure 1 shows, leading jurisdictions have already achieved savings levels (actuals for 2014) that are on the order of twice the average of what Enbridge and Union are forecasting to achieve…. "

   Question: Union would like to better understand the information provided in Figure 1.

   a) For Vermont, Massachusetts, Rhode Island and Minnesota please provide the following for each sector (Residential, Commercial and Industrial):
      i. 2014 Throughput
      ii. 2014 Number of customers per sector
      iii. 2012 Sales volumes per sector
      iv. 2012-2014 annual natural gas savings in cubic meters achieved through DSM programs
      v. 2012-2014 cumulative natural gas savings in cubic meters achieved through DSM programs
      vi. 2012-2014 Natural Gas DSM program budgets (per sector and total portfolio)
   b) Please confirm the extent to which the U.S jurisdictions cited in Figure 1 have a Large Volume customer mix (i.e., number of customers, customer type, throughput volumes, sales, etc.) comparable to that of Union's franchise area.

2. *Reference:* L.GEC.1, Pages 24-25

   Preamble: At section V.3, Mr. Neme notes that "a commercial cooling equipment upstream incentive program (blue bars) run by Pacific Gas and Electric in California for over a decade achieved nine times the level of participation that its former "downstream" customer rebate program design (red bars) achieved."

   Question:

   Union would like to better understand the information provided in Figure 3. Please provide further information and all relevant documentation regarding the following aspects of PG&E's program:
   a) Program design
      i. List of the energy efficient equipment incented
      ii. Incentives provided for the upstream and downstream models for each year identified in Figure 3

iii. Incremental costs of the equipment incented

b) Program delivery
   i. Who was the targeted upstream market actor for each year the upstream incentive model was used?
   ii. Were there any changes to marketing strategies/tactics when PG&E switched from a downstream approach to an upstream strategy and vice versa? If so, please discuss the changes.
c) Program evaluation
   i. Evaluation plans on this program
   ii. Net-to-Gross assessments (approach and results) for this program
d) Please clarify what is meant by "Tons of HVAC Equipment"

3. *Reference:* L.GEC.1, Page 25

Preamble: At section V.3, Mr. Neme notes that "Very similar results have been achieved in California for commercial gas boilers and other products. Similarly, in September 2013 Efficiency Vermont launched an upstream incentive for high efficiency circulator pumps for boilers and saw the market share (from one of the leading HVAC wholesalers) for those products increase from 2% or less to about 50% in the span of just one year."

Question: Union would like to better understand the programs offered by California and Vermont as they pertain to the information above. Please provide further information including documentation and/or relevant correspondence regarding:

a) Program design
   i. List of the equipment incented
   ii. Upstream incentive amounts
   iii. Percent of the incremental costs covered by the upstream incentives for each measure
b) Program delivery
   i. Who was the targeted upstream market actor for each offering where the upstream incentive model was used?
   ii. Were there any changes to marketing strategies/tactics when the noted jurisdictions switched from a downstream approach to an upstream strategy? If so, please discuss the changes.
c) Program evaluation
   i. Evaluation plans on these programs
   ii. Net-to-Gross assessments (approach and results) for this program
d) What are the "other products" incented in California?
e) For the leading HVAC wholesaler in Vermont how many units were sold before and after the upstream incentive model was introduced (2% vs. 50% market share)?
f) What is the annual market share for the technology identified in Vermont for years 2012-2014?

4. *Reference:* L.GEC.1, Page 26

   Preamble: At section V.3, Mr. Neme notes that "In contrast Commonwealth Edison's current small business direct install program in Illinois is expecting to serve 5% its eligible customers this year and forecast to serve over 6% next year."

   Question: Please provide the following details regarding Commonwealth Edison's Direct Install program:

   a) What is the offering to the small business customer?
   b) What measures are offered in the direct install program?
   c) What are the incentives for each measure?
   d) Percent of incremental cost and full cost covered by the incentive
   e) Definition of a "small business" customer

5. *Reference:* L.GEC.1, Pages 41-42

   Preamble: At section IX.2, Mr. Neme notes, "My experience with assessing the role that geographically-targeted DSM could play in cost-effectively deferring infrastructure investments – and I have studied every major example of such electric utility efforts over the past two decades, conducted trainings for system planners on how to integrate consideration of DSM into system planning, and am currently working on a pilot project with a Michigan utility – suggests that the key piece of new information most gas utilities would need to assess the potential role of efficiency in deferring infrastructure investments are hourly peak day load shapes (and/or an estimate of the relationship between peak hour savings and annual savings) for each potential efficiency measure. That is a question that could and should be addressed generically and immediately."

   Question: Union would like to better understand the referenced pilot project in Michigan.

   a) Is the pilot project for a natural gas utility?
   b) If the answer to part a) is yes, please provide those documents related to the pilot project which address the relationship between hourly peak day load shape and the potential role of efficiency in deferring infrastructure investments.