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Our File No. 157282

**VIA RESS, EMAIL AND COURIER**

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

Attention: Kirsten Walli  
Board Secretary

Dear Ms. Walli:

**Re: Union Gas Limited, 2014 Demand Side Management Variance and Deferral  
Accounts; Board File No. EB-2015-0276 - BOMA IRs**

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Please find enclosed BOMA's Interrogatories.

Yours truly,

**FOGLER, RUBINOFF LLP**

A handwritten signature in dark ink, appearing to read "Thomas Brett", written over a light blue circular stamp.

Thomas Brett

TB/dd

Encls.

cc: All Parties (*by e-mail*)

**Union Gas, Application for approval of final balances and  
for clearance of certain Demand Side Management  
deferral and variance accounts into rates**

**BOMA Interrogatories**

BOMA represents over 800 Ontario Property and Facility Owners, Managers, Developers, Leasing Agents, and Commercial Real Estate Professionals. Many of these companies own commercial real estate throughout Ontario. Its members account for 80 per cent of all commercial real estate companies in Ontario. BOMA's members are large consumers of natural gas in Ontario and are affected by any changes in EGD's rates and terms of service.

Over the years, BOMA has been active in protecting and advancing the interests of its members on such important policy issues as energy pricing and supply, property taxes, labour requirements, building materials and equipment regulations. BOMA continues to work at all levels of government providing a voice for Commercial Property owners in Toronto and throughout Ontario. BOMA has an active energy committee, and has been particularly involved in DSM area, as the potential savings to commercial building owners are substantial.

BOMA is pleased to submit the following interrogatories.

**1. Integrated Energy Management Systems**

Reference: EB-2015-0276, Exhibit A, Tab 1, Appendix A. Page 4 of 6

*Integrated Energy Management Systems ("IEMS"): A custom program offered to customers to assess, implement, and utilize an integrated system to manage a facility's energy costs, consumption and intensity.*

**Interrogatory:** Does this program apply to the Commercial and Institutional Sector? Does it include Prescriptive Program elements, Capital Projects and/or O& M Projects?

**2. Customer Documentation**

Reference: EB-2015-0276, Exhibit A, Tab 2, Pages 9/10 of 12

*Further, for future projects, the Auditor recommended: "for maintenance and behavioral projects, the customer's standard maintenance and operations practices must be formally documented, as has been agreed to by Union in prior years. This can be accomplished by developing a standard form that each customer fills out with their project application that is sufficiently flexible to accommodate differences across customers. If documentation is not completed, these projects should be disallowed and the savings set to zero."*

*The AC and Union agreed that the customer's standard maintenance and operations practices must be documented and that if the documented evidence for future projects is not sufficient to support the base case, then savings for that project should be set to zero.*

*Union's custom DSM program has adopted continuous improvement processes, with consideration of the input of customers and Union's DSM Consultative stakeholders, to ensure it evolves to address changing markets and policies. As such, the above audit recommendations and adjustments are taken as motivation to make substantial and demonstrative changes in documentation to adequately address the concerns of Union's respective stakeholders. For the 2015 program year, Union has implemented a formalized base case documentation form to be filled out by participating customers. The objective of the form is to explicitly document each customer's base case practices, absent Union's influence. Union expects the form will give future auditors sufficient information to confirm the appropriateness of Union's claimed savings, and address Board staff's suggestions of a minimum threshold for project base case documentation.*

**Interrogatory:** BOMA is concerned about the impact of this requirement on customers. Please provide a copy of the formalized base case documentation form to be filled out by participating customers. Are there different forms for different sectors or segments? If so, please provide them.

### 3. Low -Income Custom Project Findings

Reference: EB-2015-0276, Exhibit B, Tab 2, Page v

*No recommendations or adjustments to verified gas savings or EULs were necessary for low - income custom projects this year. It is recommended that the realization rates for electricity and water savings be capped at 100 percent in situations where the verification process results in extremely high realization rates.*

**Interrogatory:** Please explain how realization rates could exceed 100%? If this means that the savings were higher than reported and verified, why should they be capped at 100%?

### 4. Recommendation #5

Reference: EB-2015-0276, Exhibit B, Tab 3, Page 5

*For maintenance and behavioral projects, the customer's standard maintenance and operations practices must be formally documented, as has been agreed to by Union in prior years. This can be accomplished by developing a standard form that each customer fills out with their project application that is sufficiently flexible to accommodate differences across customers. If documentation is not completed, these projects should be disallowed and the savings set to zero.*

*Resolution: The AC agrees that the customer's standard maintenance and operations practices must be documented and that if the documented evidence is not sufficient to support the base case, then savings for that project should be set to zero. The AC also agrees that capturing a customer's standard maintenance and operations practices can be accomplished with a standard form that is filled out as part of the project application. For 2015 O&M custom projects, Union has developed a formalized approach to capture customer's standard maintenance and operations practices via a standard form. Union will use this form to support the base case and demonstrate incremental savings from the customer's standard practices.*

**Interrogatory:** How will this recommendation and resolution address the incidence of deviations from a customer's documented standard practice and its typical practice?

## 5. Impacts of Audit Recommendations

Reference: EB-2015-0276, Exhibit B, Tab 3. Page 10

*Table 1 – Impact of Audit Recommendations on 2014 Cumulative Gas Savings*

*Table 2– Impact of Audit Recommendations on 2014 DSM Utility Incentives*

Interrogatory: Please explain how the reduction in gas savings had no impact on Utility Incentives.