

**IN THE MATTER** of the *Ontario Energy Board Act 1998*, Schedule B to the *Energy Competition Act*, 1998, S.O. 1998, c.15;

**AND IN THE MATTER OF** an Application by Union Gas Limited for an Order or Orders approving the clearance and disposition of certain deferral and variance accounts.

## **INTERROGATORIES**

### **OF THE**

### **SCHOOL ENERGY COALITION**

1. [General] Please provide a table of all of the custom projects reviewed by the CPSV reviewers, showing the following columns with information for each project:
  - a. Reviewer name
  - b. Project number
  - c. Nature of project
  - d. In-service date of project
  - e. Claimed CCM
  - f. CPSV recommended CCM
  - g. Final Audit-approved CCM
  - h. Project cost as verified
  - i. Incentive paid
  - j. Simple payback
2. Please confirm that none of the baselines for any of the custom projects assume a cap-and-trade system for carbon in Ontario.
3. [Ex. A/2, p. 7] Please confirm that the procedures for 2014 by which the Auditor assessed the reasonableness of the baseline were the same as those used for 2013 results.
4. [Ex. B/1, Table 13.0] Please refile this table but, on each line that aggregates “incentives/promotion” or “incentives/promotion/admin” break that out into the individual lines. Please ensure that transfers between categories are included for this more granular reporting.
5. [Ex. B/1, Appendix E] Please provide a table showing all claimed CCM for Custom O&M projects. Please provide a calculation of the total incremental impact of those projects on the DSMIDA.

6. [Ex. B/1, Appendix L, pp 1-3] Please provide an explanation why the amounts claimed for every single one of the low income projects reviewed were materially incorrect. Please provide a description of any internal information or control issues, or other factors, that Union believes have contributed to the poor accuracy results for this category of projects. Please provide any evidence in the possession of Union Gas that show whether or not the adjustments by the reviewer are in fact indicative of similar adjustments required for the projects not reviewed (i.e. whether the statistical assumptions relevant to the sample are actually reasonable).
7. [Ex. B/1, Appendix L, p. 13] Please explain how the 103% efficiency issue was eventually resolved. If it was never resolved (i.e. if the cause of the problem was never identified), please explain why.
8. [Ex. B/1, Appendix M] Please confirm the reviewer's general assumption in reviewing each project that, unless there was "hard evidence" to the contrary, the savings proposed by the Applicant should be used.
9. [Ex. B/1, Appendix M, p. 2] Please confirm that the claimed savings for steam leak repairs were 13.5% of the total, but after review the savings from those projects were 10.8% of the total. Please confirm that approximately 65% of the reviewer's CCM reductions for the reviewed projects represented reductions in projects designated as steam leak repairs.
10. [Ex. B/1, Appendix N] Please provide a copy of the report with only the portions that need to be redacted – i.e. with customer-identifying information - actually redacted, similar to the reports in Appendices L and M.

Respectfully submitted on behalf of the School Energy Coalition this 22<sup>nd</sup> day of February, 2016

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Jay Shepherd