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February 24, 2017

Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms Walli:

**Re: LIEN Interrogatories of Union Gas Limited, Enbridge Gas Distribution Inc., and
Natural Resource Gas Limited – EB-2016-0296/0300/0330**

We enclose the Interrogatories of the Low Income Energy Network to Union Gas Limited, Enbridge Gas Distribution Inc., and Natural Resource Gas Limited in the EB-2016-0296/0300/0330 proceeding.

Yours truly,



Matt Gardner

Encls.

Document #: 1162326

**LIEN INTERROGATORIES - ENBRIDGE GAS DISTRIBUTION INC
("ENBRIDGE")
CAP AND TRADE COMPLIANCE PLAN**

EB-2016-0300

FEBRUARY 24, 2017

COMPLIANCE PLAN SCHEDULE

- 1 On what schedule does Enbridge anticipate filing its compliance plans beyond 2017 (i.e., annually, multi-year)?

GHG ABATEMENT ACTIVITIES/MEASURES

- 2 Exhibit C, Tab 2, Schedule 1, page 14 - *"A number of the customer-related emission abatement opportunities are anticipated to be assessed and where appropriate included in future Compliance Plans, but as discussed in the New Business section of the evidence, Exhibit C, Tab 6, Schedule 1, will do so under separate applications or within leave to construct applications."*; Exhibit C, Tab 6, Schedule 1, page 2 - *"It is the Company's expectation that these plans and related investments will be presented to the Board for consideration as part of a future rate application or project specific leave to construct application."*
 - a) Please confirm what Enbridge means by "where appropriate included in future Compliance Plans" (emphasis added).
 - b) If Enbridge does not intend to present its "*customer-related emission abatement opportunities*" (i.e., GHG abatement activities on customer side) to the Board in future Compliance Plans, but rather during rate applications, what is Enbridge's rationale for doing so?
- 3 Exhibit C, Tab 2, Schedule 1, page 14 - *"In 2017, Enbridge's sole customer-related abatement activity is driven by home energy retrofits which are incremental to currently approved DSM programming and which were funded by the government through the Green Investment Fund ("GIF")"*; Exhibit C, Tab 3, Schedule 4, page 3 - *"The whole home retrofit program was designed to be similar to Enbridge's existing DSM offer, the Home Energy Conservation program, and is available to all customers regardless of primary fuel type. In addition, the funding was also meant to increase the deployment of the Adaptive Thermostats offer, also consistent with the Company's DSM program, as well as funding to pursue educational and behavioural-based GHG reductions."*
 - a) Please provide a breakdown of Enbridge's plan (including which specific measures will be employed and timing for implementation) for Enbridge's whole

home energy efficiency retrofit program through the Green Investment Fund, for 2017 and beyond.

- b) Please explain how Enbridge's whole home energy efficiency retrofit program is incremental to Enbridge's DSM Home Energy Conservation program.
 - c) Does Enbridge intend to implement social housing retrofits through the Green Investment Fund? If so, please provide a breakdown of Enbridge's plan (including which specific measures will be employed and timing for implementation) for 2017 and beyond.
 - d) Does Enbridge plan to seek approval from the Board to implement GHG abatement activities/measures that expand or increase funding for Enbridge's existing DSM programs?
- 4 What potential GHG abatement activities/measures (including categories/types of activities such as those set out by the Board in the *Regulatory Framework for the Assessment of Costs of Natural Gas Utilities' Cap and Trade Activities*, and/or specific measures within such categories), other than the whole home energy efficiency retrofit program, does Enbridge anticipate undertaking in 2018 and beyond? Does Enbridge plan to include any low-income-specific GHG abatement activities/measures in its offerings (and if so, please describe)?

LOW-INCOME CUSTOMER OUTREACH

- 5 Exhibit E, Tab 1, Schedule 1, Appendix A at page 3 – “*Engagement with social agencies delivering programs to low income customers and representatives such as the Low-Income Energy Network (LIEN) and Vulnerable Energy Consumers Coalition (VECC)*”.
- a) How does Enbridge plan to engage with social services agencies to deliver programs to low-income customers and representatives?
 - b) Please confirm what Enbridge means by “delivering programs”. Does this mean delivery of GHG abatement activities/measures to low-income customers? Does it include education as well?

IMPACTS ON LOW-INCOME CUSTOMERS' BILLS

- 6 Exhibit E, Tab 1, Schedule 1, Appendix B – Enbridge estimates \$79/year increased costs on typical residential customer's bills, to be “*adjusted periodically to reflect changes in the cost of GHG allowances that we have to purchase. The cost to you will depend on the actual price of allowances and how much natural gas you use. The Ontario Energy Board will review and approve cap and trade costs.*”
- a) Please provide the average residential Enbridge natural gas customer's total billed amount for 2016.

- b) Please provide the average residential Enbridge natural gas customer's billed amount broken down for each month in 2016.
- 7 Has Enbridge considered, and will Enbridge consider, rate mitigation measures (through GHG abatement measures, financial assistance, or other measures), specific to low-income customers to minimize the impact of cap and trade on low-income customers? Please specify which measures Enbridge has considered and will consider.

**LIEN INTERROGATORIES - UNION GAS LIMITED
("UNION")
CAP AND TRADE COMPLIANCE PLAN**

EB-2016-0296

FEBRUARY 24, 2017

GHG ABATEMENT ACTIVITIES/MEASURES

- 1 Exhibit 3, page 25 – *“For 2017, there is only one customer abatement program included in Union’s compliance plan that is incremental to the DSM plan. Through the Government of Ontario’s GIF Union has entered into an agreement with the Ministry of Energy to receive funding of \$42 million to enhance the Home Reno Rebate offering and achieve additional GHG emissions reductions through 2018.”; “In addition to the GIF, Union is also exploring a number of opportunities for customer abatement such as the use of combined heat and power projects and renewable natural gas in the gas supply portfolio... As Union evaluates these programs, the outcomes of this analysis will be provided in future compliance plans.”*
 - a) Please provide a breakdown of Union’s plan (including which specific measures will be employed and timing for implementation) for Union’s Home Reno Rebate offering through the Green Investment Fund, for 2017 and beyond.
 - b) Does Union intend to implement social housing retrofits through the Green Investment Fund? If so, please provide a breakdown of Union’s plan (including which specific measures will be employed and timing for implementation) for 2017 and beyond.
 - c) Does Union plan to seek approval from the Board to implement GHG abatement activities/measures that expand or increase funding for Union’s existing DSM programs (other than the Home Reno Rebate offering)?
- 2 What potential GHG abatement activities/measures (including categories/types of activities such as those set out by the Board in the *Regulatory Framework for the Assessment of Costs of Natural Gas Utilities’ Cap and Trade Activities*, and/or specific measures within such categories), other than the Home Reno Rebate, does Union anticipate undertaking in 2018 and beyond? Does Union plan to include any low-income-specific GHG abatement activities/measures in its offerings (and if so, please describe)?

LOW-INCOME CUSTOMER OUTREACH

- 3 Enbridge plans to engage with social service agencies, LIEN and VECC, to deliver programs (presumably GHG abatement programs and education about same) to low-income customers as part of its customer outreach.

- a) Does Union intend to do the same?
- b) If yes to (a), how does Union plan to engage with social services agencies to deliver programs and education to low-income customers and representatives?

IMPACTS ON LOW-INCOME CUSTOMERS' BILLS

- 4 Exhibit 5, Appendix B and Exhibit 7, page 5 – Union estimates somewhere between \$70 to \$80 increase for 2017 to residential customers' bills annually; \$74/year increase on typical residential customer's bill.
 - a) Please provide the average residential Union natural gas customer's total billed amount for 2016.
 - b) Please provide the average residential Union natural gas customer's billed amount broken down for each month in 2016.
- 5 Has Union considered, and will Union consider, rate mitigation measures (through GHG abatement measures, financial assistance, or other measures), specific to low-income customers to minimize the impact of cap and trade on low-income customers? Please specify which measures Union has considered and will consider.

**LIEN INTERROGATORIES - NATURAL RESOURCE GAS LIMITED
("NRG")
CAP AND TRADE COMPLIANCE PLAN**

EB-2016-0330

FEBRUARY 24, 2017

COMPLIANCE PLAN SCHEDULE

- 1 On what schedule does NRG anticipate filing its compliance plans beyond 2017 (i.e., annually, multi-year)?

GHG ABATEMENT ACTIVITIES/MEASURES

- 2 What potential GHG abatement activities/measures (including categories/types of activities such as those set out by the Board in the *Regulatory Framework for the Assessment of Costs of Natural Gas Utilities' Cap and Trade Activities*, and/or specific measures within such categories) does NRG anticipate undertaking in 2018 and beyond?

LOW-INCOME CUSTOMER OUTREACH

- 3 Enbridge plans to engage with social service agencies, LIEN and VECC, to deliver programs (presumably GHG abatement programs and education about same) to low-income customers as part of its customer outreach.
 - a) Does NRG intend to do the same?
 - b) If yes to (a), how does NRG plan to engage with social services agencies to deliver programs and education to low-income customers and representatives?

IMPACTS ON LOW-INCOME CUSTOMERS' BILLS

- 4 Pages 5 and 26 – NRG estimates that *"The average home consumes approximately 2000 cubic metres of natural gas per year. Therefore, customers should expect to pay between \$70 and \$80 more per year for their natural gas."*
 - a) Please provide the average residential NRG natural gas customer's total billed amount for 2016.
 - b) Please provide the average residential NRG natural gas customer's billed amount broken down for each month in 2016.
- 5 Has NRG considered, and will NRG consider, rate mitigation measures (through GHG abatement measures, financial assistance, or other measures), specific to low-

income customers to minimize the impact of cap and trade on NRG's low-income customers? Please specify which measures NRG has considered and will consider.

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