

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S.O. 1998, c.15, Schedule B, as amended (the “OEB Act”);

**AND IN THE MATTER OF** an Application jointly brought by Enbridge Gas Distribution Inc. and Union Gas Limited seeking the approval of the Ontario Energy Board for new and updated DSM measures and the Technical Reference Manual.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

1. [Ex. B/1/1, p. 2] Each year the assumptions filed by the Utilities includes a cover communication explaining limitations on the approval of the filing by the TEC. Please file the most recent such communication provided to the Board by the Utilities.
2. [B/1/1, p. 4] Please confirm that the Union Custom EUL Table and the Enbridge Measure Life Guide for Custom Offers have not been approved by the TEC or by the Board. Please describe in detail any approvals that have been given by any person other than the Utilities to these documents. Please confirm that, in seeking approval from the Board for these documents, the Utilities are asking the Board to look at these documents, and the information within them, with a view to approving them for the first time.
3. [B/1/2, p 1-10] With respect to the TRM Summary table:
  - a. Please confirm that the Utilities are not seeking direct or indirect approval of any of the free rider rates in these pages. If the free rider rates are up for approval, please provide the evidentiary basis of each of those rates.
  - b. Please confirm that the Utilities are seeking approval for the assumptions provided in the subdocs, and not the summary table. Please confirm that, in the event of any disparity in any given situation between the relevant subdoc, and the summary table, the subdoc will apply.
  - c. For each measure for which the Utility does not either arrange or verify installation of the measure (e.g. showerheads, thermostats, aerators, etc.), please describe how savings assumptions are adjusted to account for the probability of installation of the measure.
4. [B/1/2, p. 11-14] With respect to the Union Gas EUL table:

- a. Where no source is listed for any EUL, please explain the evidentiary basis on which Union Gas is seeking the Board's approval for these assumptions.
  - b. Please provide references 1, 5, 9, 10, and 11. For each of the references that is Audited Results, please provide both the Audit Report and the Report of the Audit Committee.
  - c. Please provide a reference for the Board's approval of the values under the column "2016-2020".
  - d. [also reference B/1/5, p. 6] Please advise which of the EULs is Equipment Life only, and which are adjusted for Measure Persistence. In the latter case, please advise the limitations presented by persistence, including business turnover forecasts, forecast early replacement, and any other limits.
5. [B/1/2, p. 15] With respect to the Enbridge EUL table:
    - a. Please provide the basis for the EUL for Home Energy Conservation with furnace upgrade.
    - b. Please provide reference 7.
    - c. [also reference B/1/5, p. 6] Please advise which of the EULs is Equipment Life only, and which are adjusted for Measure Persistence. In the latter case, please advise the limitations presented by persistence, including business turnover forecasts, forecast early replacement, and any other limits
  6. [B/1/3, p. 1] Please confirm that the TEC did not prioritize the measures, but rather provided ERS with all of the existing substantiation documents, many of which had not been approved by the TEC, and a recommended order in which to review those subdocs.
  7. [B/1/3, p. 1] Please confirm that the proposed TRM includes measures that are not cost-effective. Please provide a list of all measures that are not cost-effective, or are marginally cost-effective, at current avoided costs, together with the cost-effectiveness calculations for each. Please explain why it is appropriate to include in the TRM measures that are not cost-effective.
  8. [B/1/3, p. 2] Please confirm that, notwithstanding the assumptions and algorithms in the proposed TRM, all results from the Utilities must be tested and calculated against best available information at the time. Please confirm that, with this Application, the Utilities are not seeking to modify that principle, or propose that the TRM assumptions be applied instead of better, more recent information.
  9. [B/1/3, p. 2] When "utility/program administrators" estimate savings from the program using the TRM, what consequences are the Utilities proposing will flow from that reliance on the TRM?

10. [B/1/3, p. 3] Please confirm that Commercial (other than Multi-Res) and Industrial subdocs do not apply to Low Income.
11. [B/1/3, p. 4 and 6] Please confirm that the Utilities and the EAC use the dual baseline method for calculating savings for early replacements. Please describe the dual baseline method, and identify the places in the TRM in which it is references. Please define the term RUL (Remaining Useful Life) and explain why it is not included in the TRM definitions.
12. [B/1/3, p. 4] Please confirm that none of the measure assumptions include any tests for the causal relationship between the utility program and the customer's decision to replace operable equipment. If there are any such tests in the assumptions, please identify.
13. [B/1/3, p. 5] Please reconcile the definition of Measure Life in Table 1 with the definition of Measure Life in Schedule 5. If in a given situation the two produce different results, which overrides the other?
14. [B/1/3, p. 8] Please confirm that no persistence study has been done, and the TEC has not expressed any opinion or endorsement on whether any of the Measure Lives properly account for any persistence.
15. [B/1/4, p. 1] With respect to the TRM Common Assumptions Table:
  - a. [also reference B/1/5, p. 3] Please advise the current heat content of gas for Union Gas and Enbridge in their most recent QRAM applications. Please explain how the TRM heat content assumption is to be adjusted, if at all, to reflect up to date heat content.
  - b. Please provide the supporting evidence for residential household size and multi-residential household size in the Union Gas franchise area.
  - c. Please provide the basis on which the Utilities believe that the average standard efficiency of commercial water heaters has not changed since 2009.
  - d. Please provide any studies or other evidence showing that a 55 degree balance temperature is appropriate in the Utilities' franchise areas.
16. [B/1/5, p. 2 and 7] Please confirm that "Baseline" assumes that during the entire life of the measure all conditions will remain the same, e.g. no insulation or other complementary conservation measures will be installed, use and production will remain the same, etc. Please advise how assumptions of no change apply in dual baseline situations, where a future "standard efficiency" measure may be influenced by technical standards, building codes, and market changes.
17. [B/1/67, p. 6] Please advise what adjustments have been made, or are intended, to the assumptions for natural gas use in Table 2 to reflect trends in installation of higher efficiency furnaces.

18. [B/1/6, p. 100] With respect to low-flow showerheads:
  - a. Please explain why it is still assumed that new construction homes will have a 2.5 gpm showerhead as a baseline.
  - b. Please explain why it is assumed that showering time will remain the same, at 7.6 minutes, for a 2.5 gpm and a 1.5 gpm or 1.25 gpm showerhead.
19. [B/1/6, p. 150] Please explain why, if the range for defrost derating is 5-15%, it is appropriate to use a 5% derating and consider it “conservative”.
20. [B/1/6, p. 176] With respect to Heat Reflector Panels:
  - a. Please confirm that the only basis for the measure life is the manufacturer’s claim of the equipment life. Please explain how the measure life has been, or should be, adjusted for the RUL of the radiators, the boiler system, or the building. Please explain how useful life has been, or should be, adjusted for behavioural changes, including but not limited to de-installation, destruction or damage, etc.
  - b. Please confirm that the only basis for the other assumptions for this measure are internal analysis and conclusions from Enbridge, and no independent support for the assumptions has been presented.
21. [B/1/6, p. 212, 218, 237, 244] Please confirm that the assumptions for these measures have been developed by Fisher-Nickel Inc., a firm associated with a utility, PG&E. Please confirm that the only other primary source is NGTC, a firm associated with Gaz Metro. Please confirm that these assumptions have not been verified by any independent third party sources.

Respectfully submitted on behalf of the School Energy Coalition this March 15, 2017.

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Jay Shepherd  
Counsel for the School Energy Coalition