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March 15, 2017

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association Interrogatories for Approval of New and
Updated Demand Side Management Measures and Technical Reference Manual
File Number: EB-2016-0246**

Please find enclosed Ontario Sustainable Energy Association's interrogatories on evidence filed by Union Gas Limited and Enbridge Gas Distribution Inc.

Yours truly,



Robert Woon

Encl.

cc: Nicole Risse, OSEA
Marion Fraser, Fraser & Company

Document #: 1173659

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B).

AND IN THE MATTER OF the Application by Union Gas Limited and Enbridge Gas Distribution Inc. for an order or orders approving and/or accepting their New and Updated Conservation Measures and the Technical Resource Manual.

INTERROGATORIES OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION (“OSEA”)

March 15, 2017

OSEA Interrogatory 1

Reference: Exhibit B, Tab 1, Schedule 2, Annual Resource Savings

- 1 Please provide a column summarizing the cap and trade implications for each measure, including but not limited to the carbon dioxide equivalent of the natural gas savings and associated minimum cost of compliance assuming the auction floor price (monetary savings that can be achieved through implementation of measure). Please provide calculations and assumptions.

OSEA Interrogatory 2

Reference: Exhibit B, Tab 1, Schedule 2, Page 13 of 15

Preamble: Union states “Useful Life estimates are most dependent on the application and quality of maintenance. Any equipment life that was reported higher than 20 years was reduced to 20 years to conform to Union Gas’s 20 year limit”

- 1 Please explain why Union is reducing the Useful Life estimates to 20 years for equipment with reported higher life estimates. If the direction of the OEB was to use common assumptions, why are the useful lives of the two utilities different?

OSEA Interrogatory 3

Reference: Exhibit B, Tab 1, Schedule 3, Page 8 of 8

Preamble: Where assumptions are shared between multiple technologies, they have been gathered in a Common Assumptions table (Appendix A). Among these common assumptions, London, Ontario was selected as a default climate zone, due to its elevation and annual average temperature cycle. In addition to weather-related assumptions, the common assumptions include efficiencies for different types of equipment, common conversions, local conditions that would impact measures like average water temperature, heat content of natural gas, etc.

1 Please explain how local conditions are factored into actual results.

OSEA Interrogatory 4

Reference: Exhibit B, Tab 1, Schedule 6, Page 6 of 271, Table 2, column B.

Preamble: % Furnace Type from 2008 Residential Survey

1 The footnote for this table cites the TNS, Residential Market Survey 2013 as the source for the furnace type population distribution data. Please advise what year(s) the data in the table applies.

OSEA Interrogatory 5

Reference: Exhibit B, Tab 1, Schedule 6, Page 72 of 271

1 Please file the report: Nexant, "Questar Gas, DSM Market Characterization Report," August 2006 and indicate if the utilities intend to update this study.

OSEA Interrogatory 6

Reference: Exhibit B, Tab 1, Schedule 6, Page 105 of 271

- 1 How many showerheads have each of the utilities distributed since demand side programs were initiated in the natural gas sector?

OSEA Interrogatory 7

Reference: Exhibit B, Tab 1, Schedule 6, Page 134 of 271

Preamble: Commercial – Heat Recovery Ventilation – New Construction/Retrofit. The joint submission states that the HRV measure is not eligible in areas where ERV is required by building code.

- 1 Given that the Building Code is provincial, how is this decision rule applied?

OSEA Interrogatory 8

Reference: Exhibit B, Tab 1, Schedule 6, Page 139 of 271

Preamble: The data in “Hours of Weekly Operations” tables appear to be solely from the Nexant report: "Evaluation of Natural Gas DSM Measures: ERVs & HRVs," March 12 2010. While the 24/7 operations make sense for hospitals, multi-residential, etc. the 54 hours of operation per year estimate for schools seems low given the recent expansion of the use of schools for day care, community engagement and other uses.

- 1 Please file the Nexant report and indicate if the utilities intend to update the study.