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January 26, 2018

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: LIEN Interrogatories
Board File Nos. EB-2017-224/0255/0275
Enbridge Gas Distribution Inc., Union Gas Limited and Epcor Natural Gas Limited
2018 Cap and Trade Compliance Plans Cost Recovery**

Please find enclosed LIEN's interrogatories in the above-noted matters.

Yours truly,

Nicole Petersen

Encl.

Document #: 1314655

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

EB-2017-0255

JANUARY 26, 2018

GHG ABATEMENT ACTIVITIES/MEASURES

- 1 *Exhibit 3, Tab 1, page 4 – “ In terms of existing customer abatement measures, Union continues to reflect the OEB-approved DSM impacts as a reduction to its emission forecast, as noted in Exhibit 2. As noted in Union’s 2017 Compliance Plan, Union has included an additional customer abatement program, the Government of Ontario’s GIF. 2018 GIF volumes have been reflected in Union’s volume and emissions forecast, (see Exhibit 2, Schedule 1) and are incremental to the DSM volumes.” ...*

(footnote) The Green Investment Fund is a government program that was announced in February, 2016. Union will receive funding of \$42 million to enhance the Home Reno Rebate offering and achieve additional GHG emissions reductions through 2018.

- 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 2018 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 2018 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 Exhibit 3, Tab 4, page 2 - Many of Union’s customer abatement activities target new homes and new builds. Does Union plan to include any low-income-specific GHG abatement activities/measures in its offerings (and if so, please describe)?
- 3 Exhibit 3, Tab 4, page 13 - At what stage of the pilot project process will low-income consumers be considered?

LOW-INCOME CUSTOMER OUTREACH

- 4 Exhibit 5, page 3 – Union surveyed its customer base to establish whether customers were absorbing Cap-and-Trade information. Did Union establish the success rate of communications among low-income consumers?

IMPACTS ON LOW-INCOME CUSTOMERS' BILLS

- 5 Exhibit 1, page 12 – Union estimates a \$5 increase per year to customer bills for a typical residential customer.
 - a) Please provide the average residential Union natural gas customer's total billed amount for 2017.
 - b) Please provide the average residential Union natural gas customer's billed amount broken down for each month in 2017.
- 6 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.