

**ONTARIO ENERGY BOARD**

**Enbridge Gas Distribution Inc.**

**Application to dispose of balances in certain deferral and variance accounts  
related to the delivery of conservation programs in 2015**

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**INTERROGATORIES OF  
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO  
("BOMA")**

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**Interrogatories of BOMA**

1. ***Ref: Filed: 2017-12-19, EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Pages 1-2 of 48***

*Preamble: Though the current Framework encompasses 2015 to 2020, the Board directed that 2015 would act as a transition year and the “gas utilities should roll-forward their 2014 DSM plans, including all programs parameters (i.e., budget, targets, incentive structure) into 2015.”*

Interrogatory: Please confirm Enbridge’s understanding of “all” of the elements included in the term “program parameters” including the use of the previous audits to establish targets as the basis for review of performance of the 2015 program year.

2. ***Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 5 of 48***

*Preamble: While it does include a proxy deemed spillover value sourced from another study conducted in Massachusetts (applied as a result of an instruction given by Board Staff – to be discussed further below), Enbridge views the report as incomplete.*

Interrogatory: Please explain why the use of a proxy deemed spillover value from another jurisdiction and another study is not appropriate.

3. ***Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 5 of 48***

*Preamble: Third, the EC Report excludes another important feature of the NTG Study specified in the scope of work, namely Secondary Attribution. DNV quantified Secondary Attribution but did not apply these findings to final NTG Study results.*

Interrogatory: Please explain the feature, “Secondary Attribution” and indicate the impact of the Evaluation Contractor not applying it to the 2015 results.

4. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 5 of 48**

*Preamble: Fourth, the NTG outcomes are not credible and Enbridge does not have confidence in them as they do not reflect best practice approaches in undertaking self-report NTG studies.*

Interrogatory: Please outline how the evaluation deviates from best practices with reference to the designation of free riders and the application of the concept of free riders to programs such as Run It Right which by application of the program rules for participants excludes free riders.

5. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 5 of 48**

*Preamble: Finally, in Enbridge's efforts to gain understanding of NTG adjustments made by the EC, despite continued requests for detailed information to enable the Company to replicate the calculations used by the EC to arrive at its proposed NTG values, the EC failed to provide the details required for the Company to do this analysis. Enbridge therefore had no ability to review live calculations or understand the consideration of participant responses to the NTG scoring algorithm.*

Interrogatory: Please confirm that in previous evaluation processes, the company was able to replicate the calculations used by the EC and understand how participant responses were used in the scoring algorithm.

6. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 10 of 48**

*Preamble: In the first year of the new OEB Staff led EM&V process, almost 22 months after the end of the utilities' 2015 program year, the OEB issued two reports on October 16th, 2017, developed by the EC, DNV, providing its calculations for 2015 DSM verification results.*

Interrogatory: Please provide a typical schedule for annual reporting and evaluation when it was managed by the utilities.

7. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 12 of 48**

*Preamble: Ultimately, a year later, the day prior to the EAC receiving a copy of the EC's draft CPSV/NTG report, Board Staff emailed the two utilities on May 23, 2017, and confirmed it had instructed DNV to retroactively apply the NTG Study results (they were not in fact NTG values, they proposed free ridership values but did not include spillover) to 2015 DSM program results.*

Interrogatory: Please confirm whether Enbridge was aware if the EAC members had received a copy of the May 23, 2017 email from Board Staff to the Evaluation Contractor.

8. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 15 of 48**

*Preamble: Enbridge notes that it developed together with Union Gas and other DSM stakeholders a document entitled Joint Terms of Reference which was filed in draft and ultimately approved by the Board in EB-2011-0295. This document detailed the duties and responsibilities of all participants in the EM&V process during the 2012 to 2014 Framework and was of great assistance ensuring that the review of annual results and the updating of measure assumptions was undertaken in an objective and efficient fashion. These rules guided the parties and provided certainty as to the process. Enbridge submits that a charter which includes a materially similar set of rules would greatly assist in the timely generation of credible results in future.*

Interrogatory: Please confirm that a key element of the 2011 Charter was the use of a consensus-based process to govern EM&V.

9. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 17 of 48**

*Preamble: Despite the utilities having responsibility and accountability for an overall annual evaluation budget for their respective DSM portfolios, OEB Staff has refused to provide details on EM&V budgets for planned verifications or details regarding forecasted spending in a given year.*

Interrogatory: Please outline how Enbridge managed its evaluation budget when it managed the evaluation process. Please indicate the approved evaluation budgets and

actual spending for the evaluations completed after the 2011 Terms of Reference were established until the completion of the 2014 evaluation. Please provide the current status of the costs of the 2015 evaluation and indicate how it compares to the OEB approved budget under the most recent DSM Framework.

10. **Ref: EB-2017-0324, Exhibit A, Tab 1, Schedule 3, Page 34 of 48**

*Preamble: Enbridge is of the view that the survey instrument employed by the EC focused the customer largely on the program's provision of customer incentive payments and did not sufficiently probe for the customer's impression of all the services, support and value provided by the utility. "If a survey is conducted 1 year or more after participation in a program, the respondent may not recall all the features of the program and all the assistance provided. Instead, respondents may focus narrowly on the influence of the rebate or incentive payment."30 Utility support and therefore influence can be part of any number of customer engagement activities, for example, site assessment, facility audits, project feasibility studies, marketing communications, case studies, workshops and education events and generally through on-going customer relationship development and support over many years. Limiting assessment of these varied influence factors puts the determination of the NTG scoring in question.*

Interrogatory: Please comment on Enbridge's understanding of how or if the contractors who delivered the survey were briefed with respect to the nature of Enbridge Programs. Did Enbridge understand if they were fully briefed on the multi-faceted nature of the Enbridge's Custom Programs which differ substantially from the prescriptive programs (which a generally composed of a higher efficiency product and an incentive with generic information about the use of such a product.)?

11. **Ref: <https://www.mycommittee.com/BestPractice/Committees/Chairingacommittee/ChairResponsibilities/tabid/264/Default.aspx>**

*Preamble: Board or Committee Chair Responsibilities: The chair's duties and responsibilities include, but are not limited to, the following;*

*The Chair shall:*

- *In consultation with the Executive Director, CEO or other board or committee members, schedule dates, times and location for meetings*
- *Ensure meeting are called and held in accordance with the organizations' mandate, terms of reference or by-laws*
- *In consultation with the Executive Director or CEO, and/or other board or committee members establish and confirm an agenda for each meeting*
- *Ensure the meeting agenda and relevant documents are circulated to the members of the committee 3-5 days in advance of the meeting*
- *Officiate and conduct meetings*
- *Provide leadership & ensure committee members are aware of their obligations and that the committee complies with its responsibilities*
- *Ensure there is sufficient time during the meeting to fully discuss agenda items*
- *Ensure that discussion on agenda items is on topic, productive and professional*
- *Ensure minutes are complete and accurate, retained, included and reviewed at the next meeting*
- *Chair in camera meetings as required.*

Interrogatory: Union has proposed a Terms of Reference for the Evaluation Advisory Committee. Would Enbridge be agreeable to the above referenced roles and responsibilities of a committee chair to address some of the shortfalls of the current committee structure and operational processes?