

Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Sch. B, as amended;

AND IN THE MATTER OF the Application by Union Gas
Limited for the Disposition of 2015 Demand Side Management
Deferral and Variance Accounts

Interrogatories of Energy Probe Research Foundation

March 8, 2018

IR#1

Reference: Exhibit A, Tab 2, Page 6-7

Preamble: “In April 2016, the EC was selected, with no EAC or utility collaboration, to audit the utilities’ respective 2015 portfolios of DSM programs. The 2015 EM&V process took 19 months to complete. This is approximately nine months longer than the duration of historical utility coordinated audits, despite the fact that historical processes were subjected to the scrutiny of consensus-based Audit Committees on all aspects of the audit, including selection of the auditor.

Can Union provide a detailed timeline (from start to finish) of its previous DSM audits.

IR #2

Reference: Exhibit A, Tab 2, Page 6-7

Preamble: Union’s application proposes basing 2015 results on 2014 assumptions.

Is Union proposing to do the same for 2016 results, even though it’s clear that the assumptions used for 2016 activities (2015 assumptions) are clearly out of date?

IR #3

Reference: Exhibit A, Tab 2, Page 27

Preamble: “These delays have also effectively created a new barrier to lowering Free Ridership as the utilities have not received actionable Free Ridership mitigation recommendations from the EC in a timely manner. One method by which Union can reduce Free Ridership within its custom offerings is by enhancing program design and implementation practices to include new Free Ridership mitigation efforts. One source of new Free Ridership mitigation efforts comes from feedback provided through the EM&V process. As part of this process, the EC and/or CPSV consultant provides an in-depth review of Union’s custom offerings, integrates knowledge and expertise from other jurisdictions, and provides feedback that can be incorporated into program design.”

- a). Please provide any documents from 2015 and 2016 that detail Union’s efforts to reduce free-ridership.
- b). If no such documents exist, please explain why Union hasn’t, on its own accord, attempted to mitigate to the greatest extent possible the problem of free ridership among its DSM programs.

IR #4

Reference: Exhibit A, Tab 2, Page 31

Preamble: “During the 2015 EM&V process, Union provided extensive comments highlighting concerns it had with the approach and scope of the EC’s proposed activities. In Union’s opinion, many of these comments were not fully addressed and related issues were not resolved.”

Please provide these comments and any documents related to them.

IR #5

Reference: Exhibit A, Tab 2, Page 32

Preamble: “As such, if Secondary Attribution is not measured, a program’s Free Rider rate might increase, leading to incorrect and understated program results.”

- a). Please provide Union’s Secondary Attribution estimates for 2014, 2015 and 2016.
- b). Please provide any updates – and any documents associated with those updates – that Union has made to its Secondary Attribution estimates since 2015.

IR #6

Reference: Exhibit A, Tab 2, Page 33

Preamble: “The EC conducted CPSV on a quantity of projects that was more than double the target sample size proposed in its CPSV/NTG Scope of Work.”

- a). Can Union comment on whether the increased sample size would increase the accuracy of the study compared to previous studies.

IR #7

Reference: Exhibit A, Tab 2, Page 33

Preamble: “Customers were burdened by this approach which was reflected in increased customer complaints related to the extensive duration of site visits.”

Please provide a copy of any complaints Union received as a direct result of an increased sample size and the “verification of every project completed at a sampled site.”

IR #8

Reference: Exhibit A, Tab 2, Page 33-34

Preamble: “EC took this approach without providing evidence to the EAC that the benefits of the approach outweigh its additional time and resource drawbacks. The decision to oversample was questioned by EAC members throughout the EM&V process. The utilities requested that the EC compare CPSV results with and without oversampled projects to determine if study results would appreciably change if the EC did not oversample. This request was refused.”

Please provide a copy of that request and the refusal.

IR #9

Reference: Exhibit A, Tab 2, Page 38

Preamble: “Furthermore, it is Union’s contention that the unique design of Union’s Large Volume Direct Access program is incompatible with the concept of a NTG Study.”

- a). Is Union of the view that the benefits of its Large Volume Direct Access program can’t be verified or fully quantified?
- b). If the answer to a). is yes, please explain how the Board and gas customers can evaluate the economic efficiency of this program.

IR #10

Reference: Exhibit A, Tab 3, Page 13, Table 4

Can Union explain the low achievement levels of its large volume programs. We’re particularly interested given the comments detailed in IR #9 where Union states that it believes the benefits of these programs can’t be verified in NTG studies.