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March 9, 2018

Ms Kirsten Walli
Board Secretary
Ontario Energy Board
27th floor
2300 Yonge Street
PO Box 2319
Toronto, ON
M4P 1E4

<u>RE: EB-2017-0324</u>
<u>GEC Interrogatories on evidence from Enbridge</u>

Dear Ms Walli,

Please see enclosed two copies of GEC's interrogatories for Enbridge. These have been distributed by email to all parties, and uploaded to the Board's RES system.

Sincerely,

original signed by

(Mr.) Kai Millyard
Case Manager for the
Green Energy Coalition

ec: All parties

GEC Interrogatories for Enbridge on its 2015 DSM Clearance (EB-2017-0324)

1. Regarding Exh. A/Tab 1/Sch 3/ p. 4:
    a. Please confirm that the only difference between the Shareholder Incentive and Lost Revenue values under the "Audit Opinion of EC" and "Enbridge Application" columns is that the Enbridge Application includes different Custom Measure NTG assumptions than the EC.
    b. If there are differences other than Custom Measure NTG assumptions, please identify all other such differences and explain the basis for them.
    c. Please provide Enbridge's calculation of its proposed shareholder incentive, including all relevant assumptions at the measure level (provide at the projector program level for cases in which measure level information was not used), in an Excel spreadsheet with all formulae intact. The calculations provided should include, at a minimum, each of the following for the most disaggregated level available:
        i. the measure name/description (or project or program, if measure level information was not used);
        ii. the number of units participating;
        iii. the gross per unit first year m^3 savings;
        iv. the measure life;
        v. the gross total first year savings across all units (i.e. units multiplied by first year savings);
        vi. the gross total lifetime savings across all units (i.e. units multiplied by first year savings multiplied by measure life);
        vii. the NTG assumption;
        viii. the net total first year savings (i.e. units multiplied by first year savings multiplied by NTG ratio); and
        ix. the net total lifetime savings (i.e. units multiplied by first year savings multiplied by measure life multiplied by NTG ratio).
2. Regarding Exh. A/Tab 1/Sch 3/pp. 4-5, paragraphs 8-12: Enbridge lists five reasons why the EC report should not be accepted by the Board. The fifth reason is that errors were made throughout the audit.
    a. Please confirm that only errors in the EC's final report are those noted in footnote 4 of Enbridge filing. If there are others, please explain.
    b. If the EC were to file a report correcting the errors noted in footnote 4 of Enbridge's filing, would the Company remove the objections raised in paragraph 12? Or is the Company suggesting that because errors were made during the audit process, the EC's report is problematic, even if all identified errors were corrected? Please explain the response.
3. Regarding Exh. A/Tab 1/Sch 3/p. 11, paragraph 26: Enbridge states that "the March 4, 2016 letter from the Board did not contemplate that OEB Staff could unilaterally alter of change the scope of DNV's work already underway."
    a. Is Enbridge suggesting that the Board's letter explicitly prohibited Board Staff from altering DNV's scope of work? If so, please explain the basis for that interpretation,

including references to specific language in the letter that supports Enbridge's interpretation.

b. If the answer to part "a" of this question is "no", is Enbridge suggesting that the Board's letter would have had to explicitly direct Staff to change the scope of work in order for Staff to be permitted to make any changes? If so, what is the basis for that conclusion?

4. Regarding Exh. A/Tab 1/Sch 3/p. 23, paragraph 58: Enbridge states that NTG ratios would have been 10% higher when secondary attribution is correctly included in the value. Please provide an estimate of how just changing the NTG to include secondary attribution effects would change the EC's estimates of first year savings, lifetime savings and the $6.207 million shareholder incentive shown on Exh A/T1/S3 p. 4.
5. Regarding Exh. B/Tab 1/Sch 1 p. 30 of 117, TRC Plus Screening results shown in table 4.4 and PAC screening results shown in Table 4.5 of Enbridge's 2015 DSM Annual Report
    a. Please provide a break-down into the following categories, by program and for the portfolio of programs as whole, of the NPV of TRC Benefits:
        i. Gas benefits (without adders)
        ii. Electric benefits (without adders)
        iii. Water benefits
        iv. Non-energy benefits (i.e. the portion of gas and electric benefits associated with a 15% non-energy benefits adder)
    b. Please provide all of the assumptions and calculations underpinning the TRC Plus cost-effectiveness results. Please provide them in Excel, with all formulae intact, disaggregated at the measure level (wherever possible). The assumptions should include:
        i. Measure name
        ii. Number of measures (used for gross savings calculations)
        iii. Per unit incremental cost
        iv. Per unit incentive/rebate cost
        v. Per unit gross first year gas savings
        vi. Per unit gross first year electric savings
        vii. Per unit water savings
        viii. Measure life
        ix. Net-to-gross assumption
        x. Avoided gas costs, with and without non-energy benefits adder
        xi. Avoided electric costs, with and without non-energy benefits adder
        xii. Avoided water costs
        xiii. Discount rate
        xiv. Other program costs (i.e. other than rebates/incentives)
        xv. Other portfolio costs (i.e. other than rebates/incentives)
    c. For each measure, please also provide each of the following outputs of the cost-effectiveness calculations:
        i. NPV of TRC Plus costs,
        ii. NPV of PAC costs
        iii. NPV of TRC Plus gas benefits
        iv. NPV of TRC Plus electric benefits

v. NPV of TRC plus water benefits
vi. NPV of TRC Plus total benefits
vii. NPV of PAC benefits
viii. TRC Plus Benefit-cost ratio
ix. PAC benefit-cost ratio