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March 9, 2018

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (“OSEA”)
Board File No. EB 2017-0324
Enbridge Gas Limited 2015 DSM Deferral and Variance Accounts**

Please find enclosed Ontario Sustainable Energy Association’s Interrogatories in the above-noted matter.

Yours truly,



Robert Woon

cc: Janis Wilkinson, OSEA
Marion Fraser, Fraser & Company

Document #: 1337010

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 Enbridge Gas Distribution Inc. to dispose of balances in certain deferral and variance accounts related to the delivery of conservation programs in 2015

INTERROGATORIES OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION (“OSEA”)

March 9, 2018

OSEA Interrogatory 1

Reference: Exhibit A, Tab 1, Schedule 3, Page 3 of 48

Preamble: Enbridge has identified the following primary concerns with the Board Staff coordinated 2015 verification process and results:

- The evaluation and audit process lacked the appropriate and necessary degree of transparency, collaboration, efficiency and balanced stakeholder input to ensure a fair and credible process and result;
- The retroactive application of the NTG ratios from the NTG Study is inappropriate and contrary to the Board’s earlier Direction and is both inappropriate and inconsistent with best practices.
- The determination of NTG ratios in the NTG Study by DNV are inappropriate and flawed in that the NTG Study deviated from the appropriate scope of work and did not reflect industry best practice.

- a) Please outline the timetable and major events for:
 - i. the 2015 evaluation and audit process completed by the Evaluation Contractor
 - ii. the evaluation and audit process for previous years when Enbridge managed the process with participation of the Technical Evaluation Committee (TEC) and each of the company specific Evaluation Committee (EC) post 2011.
- b) Please advise what Enbridge recommends to reduce delays seen in the 2015 EM&V process.
- c) Please advise what takeaways from the previous process, where the Technical Evaluation Committee (TEC) and company specific Evaluation Committees operated primarily on a consensus basis with intervenor representatives, can be used to improve collaboration within the EM&V process moving forward.
- d) Please list the major decisions during the EM&V process that were directed by Board staff rather than the EAC.
- e) Was Enbridge informed whether the expert members of the EAC were informed of these directions in advance?
- f) Please describe any specific improvements in the current EM&V process compared to the Stakeholder developed process approved by the Board in the 2011 proceeding.
- g) Please outline the impacts of the delayed 2015 EM&V process on the following:
 - i. Customers and customer representatives
 - ii. Company Evaluation Staff
 - iii. Commercial and Industrial Customer representatives
 - iv. Company Program Development Staff.
- h) Please outline the impact of the lack of transparency on the following, including any differences between the process established in 2011 and the current process:
 - i. Decision making
 - ii. Participation of Enbridge representatives on the EAC
 - iii. Participation of Expert representatives, and
 - iv. Enbridge's ability to replicate evaluation results and understand the application of the modelling and other processes used by the Evaluation Contractor and the direction provided to subcontractors.

- i) Please describe the top three major impacts to audit results resulting from any deviation from best practices.
- j) Please describe Enbridge's view of the process and results of the following:
 - i. Free Riders, including the validity of survey results, transparency of modelling survey comments, and assessment of customer responses.
 - ii. Spillover, including the application of deemed results from study estimates in the United States.

OSEA Interrogatory 2

Reference: Exhibit B, Tab 3, Schedule 1, Pages 26-27 of 50

Preamble:

ES7. Finding: Some measures (e.g. geothermal heat pumps, combined heat and power, and those that save district heating energy) have difficult to define baseline technologies.

Recommendation: Consider establishing a policy to define rules around energy savings calculation for fuel switching and district heating/cooling measures.

Outcome: Less evaluation risk and a better alignment between province energy efficiency goals and program implementation.

Enbridge response: Enbridge will look at considerations to define approaches to energy savings calculations for fuel switching and district heating/cooling measures.

- a) Please advise about Enbridge's status in reviewing approaches for energy saving calculations for these measures.
- b) Please provide further explanation about the steps Enbridge is taking to follow the EC's recommendation about creating rules for energy saving calculations for fuel switching and district heating/cooling measures.