

**OEB STAFF INTERROGATORIES**  
**Union Gas Limited**  
**Application for 2015 DSM Disposition of**  
**Demand Side Management Deferral and Variance Accounts**  
**EB-2017-0323**

**March 9, 2018**

**Staff IR #1**

Reference: Exhibit A, Tab 1, p. 4 and Exhibit A, Tab 2, p. 21

Preamble:

Union Gas states: Examples of such shortfalls in the EM&V process began at the outset when the independent third-party consultant DNV GL was hired to be the EC without any Evaluation Advisory Committee ("EAC") member consultation or consideration.

And

Union Gas states: In April 2016, the EC was hired without input from EAC members to audit the utilities' full 2015 DSM program portfolio without any EAC consultation.

Questions:

- a) In the August 21, 2015 letter from the OEB to DSM stakeholders, as referenced at Exhibit A, Tab 2, p. 4 of Union Gas' application, the OEB states that the role of OEB is to include, amongst other responsibilities, "...selecting a third party Evaluation Contractor (the EC)." Please describe how OEB Staff's selection of DNV GL (the EC) without EAC or utility input was not appropriate.
- b) Please confirm whether or not all members of the EAC were invited to provide input on the RFP's Scope of Work used to procure the EC to evaluate the 2015 program year.
- c) Please confirm whether or not all members of the EAC were invited to provide input on the Scopes of Work used to procure other supporting evaluation contractors for the 2016 and 2017 program years.

**Staff IR #2**

Reference: Exhibit A, Tab 1, p. 5

Preamble:

Union Gas states: The approximate one year delay of the EM&V results is excessive and is in part due to the prolonged time taken to finalize the EM&V Plan, and excessive project sampling relative to prior audits for the 2015 Custom Project Savings Verification ("CPSV") Process.

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Questions:

- a) Related to the 2015 EM&V process, please indicate when OEB staff provided Union Gas with the non-disclosure agreement (NDA) for signature for Union to release data required for evaluation activities, and when Union returned the signed document to OEB staff and DNV GL.
- b) Please indicate the length of time Union required to fulfill all data requests made by the EC to facilitate the evaluation of Union's DSM programs. Please specify the date that the last set of data was provided to the EC.
- c) Please indicate whether or not Union Gas was provided with an opportunity to review/provide input on all major deliverables of the evaluation project. If yes, please indicate, in total, the amount of days Union Gas was provided for this review.

**Staff IR #3**

Reference: Exhibit A, Tab 1, p. 6

Preamble:

Union Gas states: In accordance with Union's recommendations above, Union's 2015 audit adjusted DSM results include OEB-approved 2014 NTG adjustment factors. These results are presented at Exhibit A, Tab 3, Appendix A, Schedule 1. Union requests that the OEB approve the 2015 audit adjusted results as presented on the basis of the arguments summarized above and described in further detail herein. Table 2 below provides Union's 2015 pre-audit, audited, and audit adjusted amounts for comparison. Union's 2015 audited DSM results are presented at Exhibit A, Tab 3, Appendix B, Schedule 1.

Table 2  
2015 DSM Results (\$ Millions)

	<b>2015 Pre-Audit</b>	<b>2015 Audited Results</b>	<b>2015 Audit Adjusted Results</b>
<b>LRAM</b>	\$0.613	\$0.602	\$0.617
<b>DSMVA</b>	(\$0.195)	(\$0.195)	(\$0.195)
<b>DSMIDA</b>	\$7.548	\$7.040	\$7.472
<b>TOTAL</b>	\$7.966	\$7.447	\$7.895

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Questions:

- a) Please confirm that the term “Audit” refers to the Evaluation, Measurement, & Verification (EM&V) results reported in DNV GL’s EC report, as defined in the 2015-2020 DSM Guidelines and noted in other areas of Union’s application.
- b) Please describe the various drivers of the variance (e.g., the use of differing NTG ratios, per unit savings assumptions, etc.) between the shareholder incentive calculated by Union (\$7.472 million) and that calculated by the EC (\$7.040 million).
- c) Please describe the various drivers of the variance (e.g., the use of differing NTG ratios, per unit savings assumptions, etc.) between the lost revenue calculated by Union (\$0.617 million) and that calculated by the EC (\$0.602 million).
- d) On a program-by-program basis, please demonstrate the dollar value of each variance driver in b) and c) as well as the process used by Union to calculate the value.
- e) Within Table 2, Union indicates that the “2015 Audited Results” include that the value of Union’s DSMVA is (\$0.195). Please clarify whether or not the EC provided an opinion on the value of Union’s DSMVA.
- f) Please indicate whether the NTG ratios Union used to calculate its shareholder incentive and lost revenue include spillover.

**Staff IR #4**

Reference: Exhibit A, Tab 2, p. 4

Questions:

- a) Per the OEB’s August 21, 2015 letter, prior to the EC finalizing the evaluation, measurement & verification plan, Enbridge and Union Gas were “responsible for developing an initial evaluation plan that will inform the evaluation of programs...” Please provide all initial evaluation plans Union Gas developed and provided to the EC related to their 2015 DSM programs.
- b) Prior to the 2015-2020 evaluation period, did Union produce an overall DSM portfolio evaluation plan in order to identify key evaluation priorities and guide the annual evaluation process? If so, who reviewed/approved these plans?
  - i. If applicable, please provide an example of an overall DSM portfolio evaluation plan developed by Union prior to the 2015-2020 period.

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- ii. Please describe how this evaluation plan was used to establish annual evaluation priorities prior to the 2015-2020 period.

**Staff IR #5**

Reference: Exhibit A, Tab 2, p. 6

**Preamble:**

Union Gas states: The OEB explained that going forward the utilities should continue to manage the contractual obligations and costs associated with the NTG Study while OEB Staff assumed responsibility for its oversight. Transition plans were also provided for TRM Development, a Boiler Baseline Study, and a Persistence Study. These transitions have occurred and the TEC has been discontinued.

**Questions:**

- a) Per the OEB's March 4, 2016 letter, Enbridge and Union Gas, with the endorsement of the TEC, procured DNV GL to complete a net-to-gross study for custom commercial and industrial projects. When the OEB released its March 4, 2016 letter; more than two years following when Enbridge and Union Gas initiated the procurement process, the study's work plan had not as of yet been completed.
- i. Please provide the timeline for this project. Specifically, please identify:
- The date the RFP was posted;
  - The date DNV GL (formerly KEMA) was selected as the successful proponent of the procurement;
  - The date DNV GL was contracted to complete the project;
  - The date of the first meeting between DNV GL and the TEC;
  - The date the first draft of the work plan was completed;
  - The date the final work plan was completed;
  - The date DNV GL began implementing the final work plan; and,
  - A description of the final project deliverable provided to Enbridge, Union Gas and the TEC by DNV GL as well as the date it was provided (i.e., the last deliverable before the project was transitioned to the OEB).

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- ii. Please provide any documentation related to methodological discussions that were undertaken before the study was transitioned to the OEB.
  - iii. Please provide the draft work plan that was to be presented to the TEC on March 10, 2016.
  - iv. Please describe the original timing for when the TEC expected the net-to-gross study to be completed.
  - v. Please indicate the first year the TEC expected that updated net-to-gross ratios would be applied to Union Gas' DSM results.
  - vi. Please describe the reasons for the significant delays and specifically why it took an extended period of time to complete the first stage of the project.
- b) Per the OEB's March 4, 2016 letter, as part of OEB Decisions issued in 2015, Enbridge and Union Gas were "directed to complete a Boiler Baseline Study in 2015, with the findings incorporated in the evaluation of 2014 results."
- i. Please provide a status update on the Boiler Baseline study.
  - ii. With regard to the boiler baseline study, the OEB's March 4, 2016 letter states "This study was the result of OEB decisions for both Enbridge and Union Gas and therefore the utilities are expected to complete it." Please confirm that Union Gas and Enbridge have always retained responsibility for completing the boiler baseline study.
  - iii. Please provide an expected timeline for completion of the study.
  - iv. Please describe the magnitude of impact the study may have on Union Gas's DSM results for years 2014, 2015, 2016, 2017 and 2018.
  - v. Given the OEB's direction that the results of the Boiler Baseline Study are to be retroactively applied to 2014 results, please describe why Union Gas believes the retroactive application of 2015 NTG study results to 2015 results may be inappropriate.

**Staff IR #6**

Reference: Exhibit A, Tab 2, pp. 6-7

Preamble:

Union Gas states: The 2015 EM&V process took approximately 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

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scrutiny of consensus-based Audit Committees on all aspects of the audit, including selection of the auditor.

**Questions:**

- a) Related to the 2015 EM&V process, please indicate when OEB staff provided Union Gas with the non-disclosure agreement (NDA) for signature for Union Gas to release data required for evaluation activities, and when Union returned the signed document to OEB staff and DNV GL.
- b) Please indicate the length of time Union Gas required to fulfill all data requests made by the EC to facilitate the evaluation of Union Gas's DSM programs. Please specify the date that the last set of data was provided to the EC.
- c) Please indicate whether or not Union Gas was provided with an opportunity to review/provide input on all major deliverables of the evaluation project. If yes, please indicate, in total, the amount of days Union Gas was provided for this review.
- d) Please provide Union Gas' 2012, 2013, 2014 Auditor's Reports and Audit Committee Reports.
- e) Please describe the extent to which the auditor selected by the Audit Committee performed primary research as well as other robust evaluation studies in order to inform the results demonstrated in the 2012, 2013, 2014 Auditor's Reports.

**Staff IR #7**

Reference: Exhibit A, Tab 2, p.8 and Exhibit A, Tab 2, p. 11

**Preamble:**

Union Gas states: The audit adjusted \$7.472 million DSM incentive claimed in this Application uses a 46% custom program NTG adjustment factor (please see Exhibit A, Tab 3, Appendix A, Schedule 4). Use of this factor to calculate DSM incentive amounts is appropriate and consistent with the original and revised OEB Decision and Order on Union's 2015-2020 DSM Plan. In contrast, the audited DSM incentive amount is inconsistent, because it:

- a) Does not reflect the original and revised OEB Decision and Order;
- b) Calculates 2015 audited DSM program results using different NTG factors than those used to calculate the OEB-approved 2015 targets;
- c) Is inconsistent with the scope of the original NTG Study Request for Proposal; and
- d) Uses results from the incomplete and ongoing NTG Study.

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And

Union Gas states: Union's approach to setting its 2015 targets was consistent with this direction as it used input assumptions that were the result of the 2014 program EM&V. Specifically, Union used 2014 post-audit results, including the 46% NTG adjustment factor for Union's Commercial Industrial ("CI") and Large Volume custom programs, to establish its 2015 targets.

Questions:

- a) Please cite the jurisdictions which do not leverage best-available information when developing final estimates of efficiency program impacts and performance incentives as well as whether or not these jurisdictions' decision to not use best-available information has been sanctioned by their regulator.
- b) Union Gas indicates its current NTG assumptions for their Commercial Industrial and Large Volume custom programs are based on the results of the 2014 evaluation process.
  - i. Please provide a copy of the study that established the NTG value.
    - 1. If not included in the study report, please provide documentation showing details of the methodology used to develop the NTG estimate (e.g., the final scope of work)
  - ii. Please indicate the date this study was completed.
  - iii. Please provide copies of the calculation workbooks used to determine the NTG values in this study.
  - iv. Since the completion of that study, what efforts has Union Gas undertaken in order to understand how effectively their DSM programs have been delivered to market?
  - v. What studies or other research has Union Gas initiated in order to ensure DSM programs achieve the high levels of performance and continually deliver ratepayer value?
    - 1. If applicable, how has Union Gas reflected the findings, insights or lessons learned from these studies into their program design and delivery strategies?
    - 2. If such studies have not been completed, why not?
- c) If not for the 2015 program year, when does Union Gas believe the results of NTG study completed by DNV GL should be used to calculate program performance?

**Staff IR #8**

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Reference: Exhibit A, Tab 2, p.14

Preamble:

Union Gas states: To date, only results of the Free Rider component of the NTG Study are available, the Spillover component remains in-field, and Secondary Attribution findings were not applied to utility results by the EC.

Questions:

- a) Within Navigant's report provided at Exhibit A, Tab 2, Navigant documents how leading jurisdictions define NTG. Given only Massachusetts and not Illinois and California include secondary attribution in their calculation of NTG, why does Union Gas believe this factor should be included in its NTG estimate?
- b) How was the EC's decision not to consider secondary attribution inconsistent with best practice?

**Staff IR #9**

Reference: Exhibit A, Tab 2, p.16

Preamble:

Union Gas states: The EM&V process has lacked the collaboration, transparency, and predictability outlined by the OEB in its justification for coordinating the process, and the regulatory efficiency and stability expected by Union.

Questions:

- a) Union Gas indicates that there was a lack of transparency and collaboration between OEB staff and members of the EAC. Is this Union Gas' view, or is Union Gas speaking on behalf of the EAC? Please indicate the members of the EAC you consulted who also believe the process lacked transparency and collaboration.

**Staff IR #10**

Reference: Exhibit A, Tab 1, p.5 and Exhibit A, Tab 2, p. 24



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Union Gas states: Shortfalls persist beyond the 2015 EM&V process with the utilities not being supplied the supporting information required to accurately forecast, accrue and track EM&V related costs.

And

Union Gas states: Union is concerned with the lack of transparency regarding budgets and costs for the EC's 2015 EM&V activities. The EC was hired through a multi-year contract with the OEB but the details of this contract (including budgets) has not been shared with the utilities. However, the utilities are expected to pay for this work using their respective EM&V budgets, which are approved by the OEB and ultimately paid for by customers. Withholding proposals and related budgets from the utilities is not a reasonable approach to EM&V coordination since the utilities are dependent upon budget information for contract payment, completion of program planning, and financial reporting. Under the current process Union has lost the ability to track and accurately accrue related costs. This has created an environment of uncertainty and made management of evaluation budgets, which can be used for other evaluation activities, needlessly difficult.

Questions:

- a) Please confirm that OEB staff provided Union Gas, when requested, with accrual amounts to assist them with managing their evaluation budgets.
  - i. Please confirm that accruals were provided at least twice annually, in March and December of each year.
- b) Please indicate what contract payments Union gas is referring to in the text above.
- c) Please indicate what utility-led process evaluations Union has funded since January 1, 2015.
  - i. Please indicate the cost of each evaluation.
- d) Please explain what "completion of program planning" refers to in the text above.

**Staff IR #11**

Reference: Exhibit A, Tab 2, p.27

Preamble:

Union Gas states: These delays have also effectively created a new barrier to lowering Free Ridership as the utilities have not received actionable Free Ridership mitigation

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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.

Questions:

- a) Please confirm that insights to enhance program design and implementation practices are outcomes of process evaluation.
- b) Why is Union Gas reliant on the impact evaluations completed by the EC to provide process evaluation related insights?
- c) Please describe all process evaluation related efforts Union Gas has undertaken in the last 3-years to ensure program performance is optimized.

**Staff IR #12**

Reference: Exhibit A, Tab 2, p.28

Preamble:

Union Gas states: Since the EC's work deliverables were provided to the EAC after the OEB Staff comments were incorporated, the impacts of the comments on the EC's deliverables, methodologies, and Scope of Work are unknown.

Questions:

- a) Please confirm that the work deliverables referred to by Union Gas were not presented to EAC members as final deliverables, and that all EAC members had an opportunity to provide input on these work deliverables before final versions were approved.
- b) Please confirm that, in response to concerns raised by the EAC, OEB staff changed their process so that they no longer review documentation from the EC in advance of other EAC members.
- c) Please confirm that OEB staff documented this change in the draft EAC Terms of Reference.

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**Staff IR #13**

Reference: Exhibit A, Tab 2, p. 23

Preamble:

Union Gas states: Union recommends that an EAC Charter reinstate a provision similar to the 2012-2014 auditor selection process that provides for more transparent and collaborative vendor selection among members of the EAC, and enables all parties to view the proposals and understand the scope of work and budget implications associated with the selection process. This will help ensure stakeholders are engaged and support the audit early in the process, and can lead to more constructive EAC activities and a more efficient EM&V process.

Questions:

- a) Please confirm that Union received the OEB's DSM EAC Terms of Reference, a draft of which was shared with EAC members on December 5, 2017.
- b) Related to the Terms of Reference, please confirm that Union Gas participated in a discussion with OEB staff and EAC members on December 6, 2017.
- c) Please confirm that, after a request by a Union Gas representative, OEB staff provided further opportunity to comment on the Terms of Reference in February 2018.
- d) Please indicate whether Union Gas provided input to OEB staff on the Terms of reference during b) and c).

**Staff IR #14**

Reference: Exhibit A, Tab 2, p. 28

Preamble:

Union Gas states: To begin to address the challenges experienced during the 2015 EM&V process, Union recommends that going forward the EAC be allowed to provide an advisory role to ensure timelines are kept on track and to help keep the entire process transparent in order to inform the utilities and its customers.

Questions:

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- a) Please confirm that Union is aware of the consolidated schedule that the EC developed to provide EAC members information on timelines as it relates to data requests made to the utilities, and deadlines for EAC members to provide deadlines to comments on EC work products.
  - a. Please file a screenshot of the schedule.
- b) Please provide the comment matrices developed by the EC and shared with all members of the EAC in order to track all feedback provided by EAC members on DNV GL's 2015 NTG/CPSV study. Further, please provide the comment matrices developed by the EC and shared with all members of the EAC on the EC's 2015 annual verification report.
- c) Union Gas states that the EAC should provide an "advisory role" in the future. Please clarify how this role differs from the role currently played by the EAC.

**Staff IR #15**

Reference: Exhibit A, Tab 2, p. 29

Preamble:

Union Gas states: Union recommends that a formal Charter or Terms of Reference be established for the EAC and OEB Staff, with clear objectives, conflict resolution processes, and accountabilities for OEB Staff's role as coordinator, along with the expected advisory functions of the utilities and other members of the EAC. This Charter should be developed in collaboration with the EAC, and include consideration of the following components:

- Consensus as an overarching objective;
- Definition of OEB Staff's role as coordinator;
- Guidance on how differences of opinions will be resolved when consensus is not achievable;
- Clarity on the EAC's role in guiding the EM&V process;
- Reintroduction of a provision similar to the 2012-2014 auditor selection process that makes vendor selection more transparent and collaborative among members of the EAC;
- Definition of OEB Staff and utility accountabilities related to budget and invoice management;
- Greater transparency between OEB Staff, EC and the EAC on evaluation budgets and costs;
- A process to manage delays for EM&V work;

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- Consistent with the principle of transparency, all communication should be shared with all EAC members, excluding anything with specific customer information; and,
- A requirement for official meeting minutes prepared by an independent scribe for EAC meetings held both in-person and via teleconference. Minutes should be publicly posted quarterly on the OEB website similar to TEC meeting minutes.

Questions:

- a) Please confirm that Union Gas had an Audit Committee that undertook the annual evaluation of DSM results in 2012 to 2014, which included utility representatives and intervenor members.
  - i. Please indicate if an independent scribe was included in the Audit Committee.
- b) Please confirm whether, when Union conducted its own audit of 2014 results under the previous DSM framework, whether its Audit Committee kept minutes and action items that were circulated to the Audit Committee for approval after each meeting and posted online.
  - i. If so, please provide a sample of those approved minutes and action items.
  - ii. Please provide samples of other documentation, such as comment matrices, that the Audit Committee developed to ensure all committee members' comments were addressed.

**Staff IR #16**

Reference: Exhibit A, Tab 2, p. 34

Union Gas states: Union is concerned that the EC will continue with this approach during the 2016 EM&V process, negatively impacting Union's customer relationships, causing delays similar to those in 2015, and adding an unnecessary cost to customers. In the interest of continuous improvement, Union urges the OEB to direct the EC to abandon the oversampling approach and return to the sampling methodology that was developed for, and that gained the consensus of, the TEC.

Questions:

- a) Please indicate how many customer complaints were received on the extensive duration of the site visits.

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- a. Please provide redacted verbatim responses from those customers.
- b) Please indicate how many customer complaints were received on CPSV site visits in 2012, 2013, and 2014.
- c) Please confirm that the EC reduced sampling levels in 2016 response to comments from EAC members, as noted in the 2016 CPSV Scope of Work.

**Staff IR #17**

Reference: Exhibit A, Tab 2, p. 35

Preamble:

Union Gas states: In a number of instances, the EC did not provide the EAC with documentation, calculations or other detail sufficient to reproduce its EM&V findings. Despite requests from members of the EAC for more transparency, the EC provided insufficient information to reproduce EM&V findings. This lack of supporting information limits a critical review of EM&V findings, requires the EAC to rely upon an assumption that the EC “did it right”, and reduces the ability of the EAC to provide effective input and advice into the EM&V process. In areas for which Union was able to verify the EC’s calculations, errors were found.

Questions:

- a) Please specify the findings/results of the EC Union was attempting to replicate. Indicate if they related to energy impacts, cost effectiveness, etc.
- b) Please detail all data requests made by Union to the EC throughout the evaluation process. Please specify which of these requests were fulfilled and which, in the opinion of Union, were not satisfactorily addressed.
- c) The EC was not able to provide requested data to Union given its confidential nature. Specifically, the data could not be provided in a manner that would protect the anonymity of survey respondents. On page 8 of Navigant’s report found at Exhibit A, Tab 2, Appendix E, as it relates to NTG data, experts note that “contractors will not release information if used to identify specific customers.” Why does Union believe the EC should have overlooked its commitment to respondents to protect their confidential data which is contrary to best-practice?
- d) Please confirm that all errors identified by Union were corrected by the EC and the final 2015 evaluation report.

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- e) Please indicate during what process Union Gas identified the errors. E.g., did Union Gas identify the errors during the EAC review process the EC facilitated in order to gain stakeholder feedback on preliminary findings?

**Staff IR #18**

Reference: Exhibit A, Tab 2, p. 37 and Exhibit A, Tab 2, Appendix E

Preamble:

Union Gas states: Given the information contained in the Navigant Study, it is apparent that the EC's NTG Study did not meet best practice standards.

And

Navigant identifies that the following steps can be taken in order to mitigate the issues surrounding self-report studies:

- Fast Feedback
- Sensitivity Analysis
- Triangulation
- Other Best Practice

Questions:

- a) Please specify where in Navigant's report that Navigant states the NTG study completed by DNV did not leverage a best-practice approach and should therefore not be considered as a reasonable proxy for the influence of Union's programs.
- b) Please confirm that Union communicated to the EAC that the participant data required to facilitate the self-report method cannot be made available by the utilities earlier than mid-March of the subsequent year. E.g., 2017 participant data cannot be provided until, at the earliest, mid-March 2018 which equates to a 15-month delay for projects undertaken in January 2017.
- c) Please confirm that, due to these delays, it is not possible to complete the self-report method within the 3-month period following participation as recommended by Navigant.
- d) Specifically for custom project NTG ratios; please indicate the extent to which the three jurisdictions discussed in Navigant's report (California, Illinois and

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Massachusetts) utilize all of the four steps identified above in order to mitigate the issues of self-report studies.