

OEB STAFF INTERROGATORIES
Enbridge Gas Distribution Inc.
Application for 2015 DSM Clearance of Accounts
EB-2017-0324

March 9, 2018

Staff IR #1

Reference: Exhibit A, Tab 1, Schedule 3, p. 3

Preamble:

Enbridge states: 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. *Emphasis added*

Questions:

- a) Please specify on what basis Enbridge Gas claims that the retroactive application of net-to-gross (NTG) ratios is "inconsistent with best practices." Specifically, 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.

Staff IR #2

Reference: Exhibit A, Tab 1, Schedule 3, p. 4

Preamble:

Enbridge states: In accordance with Section 11.0 of the Guidelines and for comparative purposes, Enbridge provides the DSM values based on the EC's recommended amounts and Enbridge's application as seen in Table 2 below:

2015 DSM Achieved Savings, Shareholder Incentive, and Lost Revenue	Enbridge Pre-Audit	Audit Opinion of EC	Enbridge Application
Shareholder Incentive	\$10,318,594	\$6,207,339	\$10,077,965
Lost Revenue	\$28,800	\$16,405	\$28,976
DSMVA	\$825,460	\$825,460 (not reviewed)	\$825,460

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Questions:

- a) 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 Enbridge Gas (\$10,077,695) and that calculated by the EC (\$6,207,339).
- b) 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 Enbridge Gas (\$28,976) and that calculated by the EC (\$16,405).
- c) On a program-by-program basis, please demonstrate the dollar value of each variance driver in a) and b) as well as the process used by Enbridge Gas to calculate the value.
- d) Within Table 2, Enbridge Gas indicates that the "Audit Opinion of EC" is that the value of Enbridge Gas' DSMVA is \$825,460 (not reviewed). Please clarify whether or not the EC provided an opinion on the value of Enbridge Gas' DSMVA.
- e) Please indicate whether the NTG ratios Enbridge Gas used to calculate its shareholder incentive and lost revenue include spillover.
- f) Enbridge Gas indicates its current NTG assumptions are based on the results of a previous study.
 - i. Please provide a copy of this study.
 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 Enbridge Gas undertaken in order to understand how effectively their DSM programs have been delivered to market?
 - v. What studies or other research has Enbridge Gas initiated since that study in order to ensure DSM programs achieve the high levels of performance and continually deliver ratepayer value?
 1. If applicable, how has Enbridge 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?
- g) If not for the 2015 program year, when does Enbridge Gas believe the results of NTG study completed by DNV GL should be used to calculate program performance?

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Staff IR #3

Reference: Exhibit A, Tab 1, Schedule 5, p. 5

Preamble: Enbridge States

Enbridge states: Fifth, Enbridge uncovered a number of errors made by the EC throughout the verification process, including in the evaluator's individual project level savings verifications, as well as in the EC's application of adjustments to arrive at verified 2015 DSM program results...

Questions:

- a) Please confirm that all errors identified by Enbridge Gas were corrected by the EC and the final 2015 evaluation report included at Exhibit B, Tab 5, Schedule 2 of Enbridge Gas' application reflects these corrections.
- b) Please indicate during what process Enbridge Gas identified the errors. E.g., did Enbridge Gas identify the errors during the EAC review process the EC facilitated in order to gain stakeholder feedback on preliminary findings?

Staff IR #4

Reference: Exhibit A, Tab 1, Schedule 3, p. 8

Preamble:

Enbridge states: As stated in the Board's August 21, 2015 letter, the EAC was to provide input and advice throughout the process, including the evaluation and audit of DSM results and the development of the Evaluation, Measurement & Verification Plan to be drafted by the EC.

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 Enbridge Gas developed and provided to the EC related to their 2015 DSM programs.
- b) Prior to the 2015-2020 evaluation period, did Enbridge Gas 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?

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- i. If applicable, please provide an example of an overall DSM portfolio evaluation plan developed by Enbridge Gas prior to the 2015-2020 period.
- 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 1, Schedule 3, p. 9

Preamble:

Enbridge states: The Board's letter dated March 4, 2016 outlined the transition of the, then current, ongoing DSM evaluation activities from the TEC to the EAC.

Questions:

- a) Per the OEB's March 4, 2016 letter, Enbridge Gas 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 Gas 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 Gas, 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).
 - ii. Please provide any documentation related to methodological discussions that were undertaken before the study was transitioned to the OEB.

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- 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. Enbridge Gas states that the TEC resolved that net-to-gross ratios developed through the study were “to be used on a go-forward basis.” Please indicate the first year the TEC expected that updated net-to-gross ratios would be applied to Enbridge 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 OEBs Decision 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. 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 Enbridge’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 Enbridge believes the retroactive application of 2015 NTG study results to 2015 results may be inappropriate.

Staff IR #6

Reference: Exhibit A, Tab 1, Schedule 3, p. 10

Preamble:

Enbridge states: The EC was selected with no EAC or utility input or consultation.

Questions:

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- a) In the August 21, 2015 letter from the OEB to DSM stakeholders, as referenced at Exhibit A, Tab 1, Page 7 of 48 of Enbridge's 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.
- d) Please confirm whether or not Enbridge is aware that a non-utility member of the EAC participated in the latest round of EM&V procurements related soliciting evaluation contractors for 2016 and 2017 program years.

Staff IR #7

Reference: Exhibit A, Tab 1, Schedule 3, p. 10

Preamble:

Enbridge states: The 2015 EM&V process took approximately 18 months.

Questions:

- a) Related to the 2015 EM&V process, please indicate when OEB staff provided Enbridge with the non-disclosure agreement (NDA) for signature for Enbridge to release data required for evaluation activities, and when Enbridge returned the signed document to OEB staff and DNV GL.
- b) Please indicate the length of time Enbridge required to fulfill all data requests made by the EC to facilitate the evaluation of Enbridge's DSM programs. Please specify the date that the last set of data was provided to the EC.
- c) Please indicate whether or not Enbridge 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 Enbridge was provided for this review.
- d) Please provide Enbridge Gas' 2012, 2013, 2014 Auditor's Reports and Audit Committee Reports.

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- 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 #8

Reference: Exhibit A, Tab 1, Schedule 3, p. 12

Preamble:

Enbridge states: As further discussed below, the outcomes of the NTG study should not be applied to 2015 program results for purposes of determining the Company's shareholder incentive.

Questions:

- a) As stated at Exhibit A, Tab 1, Schedule 3, p. 9 of Enbridge's application, the TEC, which included Enbridge, had agreed to a scope of work for the NTG study in April 2014. Please discuss the extent to which the study's scope – and specifically the methodology used to generate the NTG estimate – agreed to by Enbridge in April 2014 differs from the study completed by DNV GL in 2017.
- b) Please provide the comments Enbridge made on the applicability and appropriateness of the self-report methodology during development of the study's scope of work.
- c) Please indicate if the study filed in response to IR #2 used a self-report methodology.

Staff IR #9

Reference: Exhibit A, Tab 1, Schedule 3, p. 14

Preamble:

Enbridge states: Effectively, the Company believes the EAC's structure and the burden placed on OEB Staff, with limited prior experience, contributed to a lack of transparency and limited collaboration between Board Staff and members of the EAC. *Emphasis added*

Questions:

- a) Enbridge indicates that there was a lack of transparency and collaboration between OEB staff and members of the EAC. Is this Enbridge's view, or is

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Enbridge 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, Schedule 3, p. 14

Preamble:

Enbridge states: We understand Board Staff is currently drafting a charter in an effort to establish greater role clarity for the EAC.

Questions:

- a) Please confirm that Enbridge 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 Enbridge participated in a discussion with OEB staff and EAC members on December 6, 2017.
- c) Please confirm that, in response to a request by an EAC member, OEB staff provided further opportunity to comment on the Terms of Reference in February 2018.
- d) Please indicate whether Enbridge Gas provided input to OEB staff on the Terms of reference during b) and c).

Staff IR #11

Reference: Exhibit A, Tab 1, Schedule 3, Page 15 of 48

Preamble:

Enbridge states: With regard to one of the most significant evaluation efforts, the development of the NTG Study, though the EC did solicit comments from the EAC on the survey instrument, much of the commentary and input provided by Enbridge Gas was dismissed. In addition Enbridge Gas was not provided an opportunity to provide input in respect of the EC's determination of an appropriate scoring algorithm and upon receipt of the draft results of the free-ridership interviews, Enbridge Gas repeatedly requested details regarding the determination of participant scoring based on example feedback provided, but has received limited information from this request."

Questions:

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- a) Please provide a listing of all commentary and input provided by Enbridge Gas on the survey as well as an indication of which of this input was responded to by the EC.
- b) Why does Enbridge believe that their comments were not considered by the EC?
- c) Enbridge comments that “In addition Enbridge Gas was not provided an opportunity to provide input in respect of the EC’s determination of an appropriate scoring algorithm...”
 - i. Please describe Enbridge Gas’ experience and expertise developing scoring algorithms for purposes of establishing program specific NTG ratios.
- d) 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 the NTG study. Further, please provide the comment matrices developed by the EC and shared with all members of the EAC on the 2015 CPSV evaluation and 2015 annual report.

Staff IR #12

Reference: Exhibit A, Tab 1, Schedule 3, p. 15

Preamble:

Enbridge states: In addition, despite repeated requests by Enbridge Gas for the EC to provide complete details of the data used in its determinations, in many regards, the EC would not provide Enbridge Gas with detailed documentation or clear calculations to allow Enbridge Gas to replicate (and therefore understand and confirm) the EC’s findings.

Questions:

- a) Please specify the findings/results of the EC Enbridge Gas was attempting to replicate. Indicate if they related to energy impacts, cost effectiveness, etc.
- b) Please detail all data requests made by Enbridge Gas to the EC throughout the evaluation process. Please specify which of these requests were fulfilled and which, in the opinion of Enbridge Gas, were not satisfactorily addressed.
- c) The EC was not able to provide requested data to Enbridge Gas 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 B, Tab 6, Schedule 1, as it relates to NTG data, experts note that “contractors will not release information if used to identify specific customers.” Why does Enbridge Gas believe the EC should have overlooked its

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commitment to respondents to protect their confidential data which is contrary to best-practice?

Staff IR #13

Reference: Exhibit A, Tab 1, Schedule 3, p. 17

Preamble:

Enbridge states: Other examples that contributed to a less than transparent and credible process included:

- Refusal to record meeting minutes to capture key decisions (despite suggestions from the utilities to do so);
- Failing to track and follow-up on meeting action items;
- Questions and decision points that went unanswered creating uncertainty; and,
- A refusal to provide clarity and transparency regarding budgets and spending for the EM&V related activities.

Questions:

- a) In order to capture both key decisions as well as action items, as of August 15, 2017, OEB Staff develop and distribute a list of these important meeting takeaways following each weekly EAC meeting. Please describe why Enbridge Gas believes recording key decision and action items is insufficient.
- b) Please confirm that Enbridge Gas had an Audit Committee that undertook the annual evaluation of DSM results in 2012 to 2014, which included utility representatives and intervenor members.
- c) Please confirm whether its Audit Committee kept minutes and action items that were circulated to the Audit Committee for approval after each meeting, and filed them online.
 - i. If so, please provide a sample of those 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 #14

Reference: Exhibit A, Tab 1, Schedule 3, Page 17 of 48

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Preamble:

Enbridge states: A concern for Enbridge Gas involved the practice of OEB Staff receiving and reviewing reports and deliverables from the EC prior to the EAC. During the verification process, it became clear that OEB Staff were providing comments and feedback to the EC that were not visible to the EAC, including undisclosed comments on specific evaluation reports. The utilities requested transparency in this regard; however comments were not shared with the group. Though the EC's incorporation of, or impact of these comments are not known, this lack of transparency caused concerns regarding the ability of the EC to maintain the position of an independent expert and brought the objectivity of Board Staff's role as overseer into question.

Questions:

- a) Please confirm that the work deliverables referred to by Enbridge 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.

Staff IR #15

Reference: Exhibit A, Tab 1, Schedule 3, pp. 17-18

Preamble:

Enbridge states: 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. At a minimum, the utilities require budget information to facilitate contract payment, to assist with budgeting for other aspect of program planning and utility led evaluation (e.g. process evaluation) as well as to support financial reporting requirements. Currently Enbridge has no ability to monitor spending or accrue funds, this has proved unnecessarily challenging.

Questions:

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- a) Please confirm that OEB staff provided Enbridge Gas, when requested, with accrual amounts to assist them with managing their evaluation budgets.
 - iii. Please confirm that accruals were provided at least twice annually, in March and December of each year.
- b) Please indicate what “facilitate contract payment” refers to in the text above.
- c) Please indicate what other aspects of program planning refers Enbridge Gas requires the DSM Evaluation budget for.
- d) Please indicate what utility-led process evaluations Enbridge Gas has funded since January 1, 2015.
 - i. Please indicate the cost of each evaluation.

Staff IR #16

Reference: Exhibit A, Tab 1, Schedule 3, p. 22

Preamble:

Enbridge states: A further example of concern where the intended scope of work was not followed in the EC’s execution of the NTG study is in regards to the determination and consideration of secondary attribution.

Questions:

- a) Within Navigant’s report provided at Exhibit B, Tab 6, Schedule 1, which Enbridge provides as expert evidence, 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 Enbridge 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 #17

Reference: Exhibit A, Tab 1, Schedule 3, p. 14

Preamble:

Enbridge states: Currently, California bases its shareholder incentives on a combination of net savings and three other (non-savings) factors, including custom project review performance, non-resource programs, and codes/standards. The state now applies NTG on a prospective basis for most of the portfolio; however, for inputs and measures

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that are determined to be “uncertain,” such as custom project NTG, the evaluated NTG results are applied retrospectively.

Questions:

- a) Please explain why in California evaluated NTG results for custom programs are considered to be “uncertain” and therefore inappropriate to apply on a prospective basis.

Staff IR #18

Reference: Exhibit A, Tab 1, Schedule 3, p. 41

Preamble:

Enbridge states: A further concern shared by Enbridge regarding the EC’s NTG findings related to the requirement, as outlined for the NTG study, that the sampling methodology should be designed to achieve a 90/10 precision target (“90/10” precision is a statistical standard for which there is 90% confidence that sample results are within +/- 10% relative precision). However the relative precision of some of the ratios did not come close to meeting this expectation.

Questions:

- a) Which NTG ratios did not reach the targeted 90/10 precision target?
- b) What level of absolute precision did these NTG ratios achieve?
- c) For what reasons was the EC not able to achieve the targeted 90/10 precision for these NTG ratios?
- d) In their report, did the EC suggest that the application of the NTG ratios which achieved less than the targeted absolute precision should not be applied and/or would result in an inaccurate/unreliable estimate of program impacts?

Staff IR #19

Reference: Exhibit B, Tab 6, Schedule 1, p. 5

Preamble:

Enbridge states: **Theme 4. Collaborative Overall stakeholder process.** In addition to transparency and review of final NTG estimates, the stakeholder processes in each

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state were predicated on defined, open stakeholder processes that build confidence in the NTG estimation process.

Questions:

- a) Page 5 of Navigant's report states that a key theme observed across leading jurisdictions was a "Collaborative Overall Stakeholder Process" that lead to "agreed-upon approaches for estimating NTG as well as processes for finalizing NTG estimates". Please describe who the stakeholders to this process are and if and how the collaborative process used in these jurisdictions compares to the collaborative process employed in Ontario via the EAC.
- b) Please identify the point in time when these stakeholder processes occur. I.e., please specify whether these stakeholder processes occur pre-program delivery as part of the program design process or post-program delivery as part of an after-the-fact evaluation process.
- c) Please identify the typical amount of time these jurisdictions take to complete their annual DSM portfolio evaluation process.

Staff IR #20

Reference: Exhibit B, Tab 6, Schedule 1

Question:

- 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 Enbridge's programs.

Staff IR #21

Reference: Exhibit B, Tab 6, Schedule 1, p. 5

Preamble:

Navigant's report states: ***Selected NTG methods***. Each case study state uses methods other than self-report surveys, such as randomized control trials (RCTs) and comparison states, but these are typically used for residential or mass-market commercial products. All experts noted concerns with self-report methods but said that

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the primary method for custom project NTG is self-report survey methods due to the unique nature of commercial and industrial (C&I) custom projects. *Emphasis added*

Questions:

- a) Please confirm that the EC completed a self-report survey in order to establish a NTG value for Enbridge's commercial and industrial custom programs.
- b) Please confirm that, consistent with Navigant's report, experts agree that a self-report methodology is the industry-accepted approach to developing NTG ratios for custom programs.
- c) Please confirm whether or not, based on Enbridge's DSM program design and delivery methods, an RCT or other econometric approach is possible for any of Enbridge's DSM programs.

Staff IR #22

Reference: Exhibit B, Tab 6, Schedule 1, p. 5

Preamble:

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

Navigant's report states: ***Mitigating issues with self-report methods.*** Given concerns with self-report methods, experts noted the following approaches are used to improve the accuracy of self-report studies:

- **Fast feedback:** Fast feedback refers to survey methods where the respondents are asked about factors influencing their participation in a program at a time near to when they participated - e.g., within 3 months of completing participation.

Questions:

- a) Please confirm that Enbridge 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

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data cannot be provided until, at the earliest, mid-March 2018 which equates to a 15-month delay for projects undertaken in January 2017.

- b) 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.
- c) Specifically for custom project NTG ratios; please indicate the extent to which the three jurisdictions discussed in Navigant's report (California, Illinois and Massachusetts) utilize all of the four steps identified above in order to mitigate the issues of self-report studies.

Staff IR #23

Reference: Exhibit A, Tab 1, Schedule 3, p. 31 and Exhibit B, Tab 6, Schedule 1, p. 9

Preamble:

Enbridge states: The process undertaken to finalize NTG estimates to be used in incentive calculations, establishing targets and in informing program design involved much more than simply accepting the results of a study. In all states, stakeholders worked together to review, challenge and modify initial estimates from EM&V studies, for example aiming to arrive at a consensus value considering relevant issues raised and factors to be considered. All three states had an established collaborative, transparent stakeholder process which aims to seek agreement among stakeholders as part of the finalization of NTG estimates, particularly in the case of self-report survey methods."

Navigant's report states: In practice, this means that NTG studies are completed approximately 6 months prior to the start of the plan period and, therefore, must be planned and studied 1-2 years prior to the plan period. For example, for the 2019-2021 plan, NTG studies must be completed by mid-2018 and are being planned and implemented in 2017 and early 2018.

Questions:

- a) Please confirm whether or not Massachusetts' newly adopted policy of prospective NTG ratios has been subjected to regulatory review. If no, when will the policy be assessed by the regulator? If yes, what were the results?
- b) Please comment on the extent to which the program planning and design process employed by the jurisdictions studied (Massachusetts, California, Illinois) compares to the process used by Enbridge. Specifically, please discuss the

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extent the named jurisdictions include stakeholders in program development, and compare it to how Enbridge develops their programs.

- i. Please confirm at what stage of the program life-cycle the collaborative efforts referenced by Enbridge at Exhibit A, Tab 1, Schedule 3, p. 31 are undertaken by these jurisdictions (e.g., pre-program delivery, post-program delivery, etc.)
- ii. Please identify the stakeholders involved in this consultative process.
- iii. Please describe the role of the utilities in the process.