

ONTARIO ENERGY BOARD

Union Gas Limited (Union)

**Application to dispose of 2015 Demand Side Management Program
Variance Account Balances**

INTERROGATORIES TO UNION

FROM

INDUSTRIAL GAS USERS ASSOCIATION (IGUA)

1. **Reference:** Exhibit A, Tab 1, page 6.

Preamble:

Union's Application states:

.... Union's 2015 audit adjusted DSM results include OEB-approved 2014 NTG adjustment factors. ... 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.

IGUA has reviewed the interrogatories recently filed by several other parties herein. IGUA wishes to clearly understand how and when "spillover" has been applied in evaluating Union's DSM program results. Accordingly, in addition to the interrogatories already filed, IGUA requests as follows:

- (a) Please provide each of the "spillover" and "free ridership" adjustment factors included in the OEB-approved 2014 NTG adjustment factors referenced by Union.
- (b) Please confirm that the "spillover" and "free ridership" adjustment factors provided in response to part (a) are those used by Union in calculating its "*audit adjusted results*" as presented in the instant application.
- (c) Please provide specific reference to the OEB determinations relied on by Union in asserting OEB approval of each of the "spillover" and "free ridership" adjustment factors provided in response to part (a).
- (d) Please provide all documentation previously filed with the Board supporting the "spillover" adjustment factor provided in response to part (a).

- (e) Please explain Union's understanding of the status of the ongoing Commercial and Industrial Custom Project net-to-Gross Study and when it will be completed and presented to the Board for approval.

2. **Reference:** Exhibit A, Tab 2, page 41.

Preamble:

Union's Application states:

Union requests that the OEB...

- *Direct the EC to exclude Union's Large Volume program from the NTG Study on the basis that measurement of whether decision making was influenced by the program incentives is incompatible with this program since the incentives accessible to customers are their own DSM contributions;*
- (a) Please clarify what adjustment factors in addition to "free ridership" adjustment, Union applies to the results of its Large Volume DSM program, how such additional adjustment factors are derived, and what evidence Union relies on in support of the appropriateness of such additional adjustment factors.

3. **Reference:** Exhibit A, Tab 3, Appendix A, Schedule 3.

Preamble:

Union's evidence indicates that actual 2015 DSM costs:

- For Rate T1 customers were \$0.887 million.
 - For Rate T2 customers were \$2.672 million.
 - For Rate 100 customers were \$0.797 million.
- (a) Please indicate how much of the actual DSM costs for each of the T1, T2 and Rate 100 customer classes in 2015 were for customer DSM incentives (including, in the case of Rate T2 and 100 customers, access to the customer's own DSM related rate payments).
- (b) Please break down, for each of Rates T1, T2 and 100, by cost category, the difference between actual 2015 DSM costs and the amounts indicated in response to part (a).