

February 4, 2019

Ontario Energy Board
2300 Yonge St., 27th Floor
Toronto, ON
M4P 1E4

Attn: Ms Kirsten Walli, Board Secretary

By electronic filing and e-mail

Dear Ms Walli:

Re: EB-2018-0300 & 0301 - Union and Enbridge 2016 DSM Clearances – GEC IRs

Having reviewed SEC's and Board Staff's interrogatories, GEC has the following added questions:

For both utilities:

1. Enbridge and Union have highlighted in the 2016 Clearance applications that there is a dispute between the utilities, OEB Staff and some other parties regarding interpretation of past OEB guidance with respect to whether the 2015 Custom Program NTG adjustments should be used to revise the 2016 target (as well as to estimate 2016 actual results for comparison to the target). Putting aside the interpretation of that guidance, do the companies believe, as a matter of policy (whether currently or in the future), that it is appropriate for NTG adjustments used to estimate actual savings from Custom C&I projects in a given year also be used to adjust savings targets for such Custom C&I projects in future years? If so, please explain the policy rationale for doing so.
2. Please calculate the requested clearance values assuming that 2016 targets are adjusted for the updated NTG values only for truly custom programs (i.e. for custom programs that are not simply a program where customers choose from a menu of prescriptive measure options with minimal utility staff involvement).
3. Given that there may be new NTG results available for the 2017 and 2018 program periods, what vintage of NTG values does the company propose be used for the custom targets for those years that will be used to calculate DSM account clearances?

For Enbridge:

1. Regarding B/1/1 p. 9, in addition to providing “details of the change to the August 1 revised scorecard” as requested in SEC Interrogatory 5, please also provide an Excel spreadsheet, with all assumptions and formulae intact, that shows how the change was computed.
2. Enbridge argues that the OEB intended for Custom C&I NTG adjustments applied to estimates of actual 2015 savings also be used to adjust 2016 goals. If that was the case, why was there not a transparent calculation of 2016 goals by program type – i.e. so that a single NTG assumption change in an Excel spreadsheet could be inserted with the rippling effects on performance metrics subsequently and transparently computed – filed by the utilities and in the public record? In other words, why did Enbridge have to go through a series of calculations, involving several assumptions as described in B/1/1 pp. 10-11 (paragraphs 25-27) to estimate the impact of applying the 2015 Custom C&I NTG values on 2016 targets?

For Union:

1. A/2 p. 21: Union states that the 2017 EM&V process contains “incremental scope” related to C&I prescriptive measure installation verification for four key measures, as well as NTG studies for the same measures. Please explain Union’s understanding of the schedule for the 2017 annual savings review and how the “incremental scope” associated with the C&I prescriptive measure review would be expected to extend the likely conclusion of the 2017 annual savings review.
2. Please provide all Schedules in A/2/Appendix B in Excel format with all formulae intact.

Sincerely,

A handwritten signature in black ink, appearing to read "David Poch". The signature is fluid and cursive, with the first name "David" and the last name "Poch" clearly distinguishable.

David Poch

Cc: All parties