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February 4, 2019

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

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (“OSEA”)
2016 DSM Deferral and Variance - Interrogatories
Board File Nos. EB-2018-0300/0301**

Please find enclosed Ontario Sustainable Energy Association’s (“OSEA”) interrogatories for its contribution to the above-noted proceedings pursuant to the Board’s Decision and Procedural Order No. 1 dated January 21, 2019.

Yours truly,

Robert Woon

Encl.

cc: Dan Goldberger, OSEA

Document #: 1488251

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, as amended

AND IN THE MATTER OF an application by Union Gas Limited and Enbridge Gas Distribution Inc. for an order or orders approving the balances and the clearance of certain Demand Side Management Variance Accounts into rates, within the next available QRAM following Board's approval.

INTERROGATORIES OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION ("OSEA")

February 4, 2019

I. UNION / ENBRIDGE

OSEA.Union.1 / OSEA.Enbridge.1.

Union Reference: Exhibit A, Tab 1 Appendix B, Page 3 of 5

Enbridge Reference: Exhibit B, Tab 2, Schedule 1, Page 146 of 245

- (a) What are the sources of the input assumptions used in the Technical Resource Manual?
- (b) What is the number and proportion of input assumptions based on Canadian data?
- (c) What is the number and proportion of input assumptions based on Canadian data for natural gas utilities?
- (d) What is the number and proportion of input assumptions based on US data?
- (e) What is the number and proportion of input assumptions based on US electrical utilities' data?
- (f) What is the number and proportion of input assumptions based on US natural gas utilities' data?

- (g) What is the number and proportion of input assumptions based on US in comparable climates as Ontario data?
- (h) What is the number and proportion of input assumptions based on US natural gas utilities' data that are in US States where the heating load is less than $\frac{1}{4}$ of the total natural gas load?

OSEA.Union.2 / OSEA.Enbridge.2.

Union Reference: Exhibit A, Tab 2, Page 18 of 24

Enbridge Reference: Exhibit B, Tab 1, Schedule 1, Page 12 of 18.

- (a) Has Union or Enbridge developed any estimates of how long it will be before the EM&V schedule and timing will be closer to the standard that Union/Enbridge instituted.
- (b) For each of the program years between 2008-2016, please provide the total cost of the EM&V process.

II. ENBRIDGE ONLY

OSEA.Enbridge.3

Reference: Exhibit B, Tab 2, Schedule 1, Page 115 of 245

- (a) How many schools that have participated in Enbridge's School Energy Competition offer also participate in Toronto Region Conservation Authority's Sustainable School program?
- (b) Does Enbridge coordinate with the TRCA?

OSEA.Enbridge.4

Reference: Exhibit B, Tab 3, Schedule 1, Page 23 of 51

Preamble: In the 2016 DSM Annual Verification Report to the EAC, the Evaluation Contractor made a recommendation that Enbridge consider creating a policy to define rules for energy savings calculations and baselines for fuel switching and district heating/cooling measures. This same recommendation was made in the 2015 DSM Annual Verification Report. In EB-2017-0324, Enbridge in Exhibit I.EGDI.OSEA.2 indicated that it was in the process of drafting a fuel switching policy. In EB-2018-0301, Enbridge states that it “is expected to adhere to DSM policies and guiding principles as defined by the Board in the 2015-2020 DSM Framework and Guidelines.”

- (a) Please advise about the status of the Enbridge’s fuel switching policy that was cited in EB-2017-0324.
- (b) Please provide further clarification about what specific DSM policies and guidelines principles is Enbridge going to adhere to in relation to rules for energy saving calculations and baselines for fuel switching and district heating/cooling measures.

III. UNION ONLY

OSEA.Union.3

Reference: Exhibit B, Tab 2, Page 19 of 45

Preamble: In the 2016 DSM Annual Verification Report to the EAC, the Evaluation Contractor made a recommendation that Enbridge consider creating a policy to define rules for energy savings calculations and baselines for fuel switching and district heating/cooling measures. This same recommendation was made in the 2015 DSM Annual Verification Report.

In EB-2017-0323, Union in Exhibit B.OSEA.2 indicated the 2015-2020 DSM Framework did not provide any direction about supporting technologies related to fuel switching or district heating/cooling. In EB-2018-0301, Union stated it “is expected to adhere to DSM policies and guiding principles as defined by the Board in the 2015-2020 DSM Framework and Guidelines.”

- (a) Please explain what steps Union is taking to implement this recommendation given that it is Union's position that there are no policies in the 2015-2020 DSM Framework relating to fuel switching or district heating/cooling.

- (b) Please advise what steps Union is taking to develop a policy for fuel switching and district heating that can be incorporated into the next DSM Framework beyond 2020.