

Ms. Christine Long
Registrar & Board Secretary
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

March 10, 2020

**Re: EB-2019-0271 Enbridge 2021 DSM Plan
Pollution Probe Interrogatories**

Dear Ms. Long:

Please find enclosed Pollution Probe's Interrogatories for Enbridge on the above noted proceeding.

Respectfully submitted on behalf of Pollution Probe.

Original signed by

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cc: Adam Stiers, Enbridge (email via EGIRegulatoryProceedings@enbridge.com)
Dennis O'Leary, Aird & Berlis (via email)
Interest Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

Enbridge 2021 DSM Plan

POLLUTION PROBE INTERROGATORIES

March 10, 2020

Submitted by: Michael Brophy
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Consultant for Pollution Probe

Below are Pollution Probe's Interrogatories related to the above noted proceeding. They are being submitted early to provide additional time to compile the information.

Pollution Probe #1

Please provide a table showing data related to each year of the proposed 6 year plan (5 Year Framework + proposed 1 year extension) including:

- DSM Budget available
- Amount Spent (forecast or actuals if available)
- DSMVA available
- DSMVA used
- Savings in m3
- % of target achieved (actual or forecasted)
- Shareholder Incentive (expected or paid)

Pollution Probe #2

- a) If Enbridge's request for its 2021 DSM Plan is approved as filed and targets are met at the 100% level (for 2020 and 2021), please identify what quantity of the potential identified in the Achievable Potential Study¹ will be realized due to the 2021 DSM Plan.
- b) What is the maximum allowable spending under the current DSM Framework (i.e. \$2 per month per customer)?
- c) Using the maximum allowable spending under the current DSM Framework (i.e. \$2 per month) and assuming a linear increase in results per incremental dollar budget, please indicate what quantity of the potential identified in the 2019 Achievable Potential Study will be realized in 2021.
- d) Please indicate if Enbridge would be willing to receive additional DSM funding (within the current Framework limit) for 2021. If not, please explain why.

¹ <http://www.ieso.ca/2019-conservation-achievable-potential-study>

Pollution Probe #3

Please provide a summary of all stakeholder consultation conducted in development of the proposed 2021 DSM Plan.

Pollution Probe #4

Please provide a summary of all new partnerships and programs Enbridge intends to pursue for 2021, including IESO coordination, leveraging climate change program funding, etc.

Pollution Probe #5

- a) Please provide a summary of all DSM program and overhead efficiencies (actual or forecasted) with Enbridge DSM portfolio since merging Union Gas into Enbridge that will provide benefits in 2021.
- b) Please provide a summary of the increased results expected (actual or forecasted) with the DSM portfolio since merging Union Gas into Enbridge that will result in 2021.
- c) Please provide a summary of all DSM programs that could be merged between the Enbridge and Union portfolios to enable a single program to customers. From the list, please indicate which programs Enbridge intends to merge in 2021. (Note: It is recognized that results will still need to be segmented to enable reporting separately in 2021).
- d) If Enbridge merges a Union/Enbridge program in 2021 to realize benefits, please indicate any approvals (or barriers) Enbridge believes need to be addressed prior to merging the program.

Pollution Probe #6

Please provide a summary of all DSM partnerships planned for 2021.

Pollution Probe #7

Please provide a copy of the final (results or forecast) Enbridge DSM scorecard results for 2015 to 2020.

Pollution Probe #8

- a) Please outline how Enbridge intends to prepare in 2021 for the next DSM Framework and whether additional funding is required for that purpose.
- b) What is the latest date in 2021 that Enbridge would need OEB approval to continue its DSM programs beyond 2021? If this date is not met, please outline the impact to the 2021 program year.

Pollution Probe #9

- a) What stakeholder consultation does Enbridge plan to undertake in 2021 related to its current and future DSM portfolio?
- b) Would Enbridge re-establish the DSM Consultative in 2021 if stakeholders were interested? If not, please indicate why.
- c) Please provide any recommendations that Enbridge has to improve the Evaluation, Measurement, & Verification (EM&V) process and/or Evaluation Advisory Committee (EAC) for 2021.

Pollution Probe #10

Reference: The government intends for approximately \$130 million in ratepayer funded financial support to expand natural gas distribution in Ontario starting in 2021². As part of its review the OEB indicated that it expects existing rate-regulated natural gas distributors with DSM programs to offer access to DSM programs to any new natural gas customers.

² <https://www.oeb.ca/sites/default/files/ltr-final-guidelines-gas-expansion-20200305.pdf>

- a) Please indicate what work Enbridge has undertaken or plans to undertake to ensure that DSM programs are offered to all new customers and that DSM results are maximized.
- b) Please outline what policies and procedure Enbridge has to ensure that DSM is included in 2021 as an integrated component of planning and execution for all new system expansion projects.
- c) Please provide a copy of all system expansion consumer-facing materials Enbridge uses to highlight a potential customer's ability to leverage energy (or cost) saving from the DSM programs if they become a customer.

Pollution Probe #11

Reference: The OEB has directed the natural gas utilities to work jointly on preparing a transition plan that outlines how to include DSM as part of future infrastructure planning activities. The OEB intends to commence a proceeding related to IRP³ which will in part assess DSM as an alternative for deferring or avoiding Ratepayer funded capital projects. Enbridge has indicated that it is struggling to identify best practices and protocols related to this issue.

- a) Please confirm if Enbridge has or would be willing to undertake a study to review leading practices to include energy efficiency as part of IRP (note: could be funded through 2021 DSM or earlier). If not, please indicate what Enbridge's opposition is to undertaking such a study.

³ EB-2019-0159 Procedural Order #1