

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the *Ontario Energy Board Act 1998*, S.O. 1998, c.15, Sch. B;

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for an order or orders pursuant to Section 36(1) of the Ontario Energy Board Act, 1998, approving the 2021 Demand Side Management Plans.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

1. [Application, p. 3]. Please confirm that the Applicant is not seeking continuation of the Demand Side Management Variance Account (DSMVA), nor the continuation of its ability to spend over its approved budget in accordance with the DSMVA rules. If not confirmed, please provide a table showing the approved budgets by rate class for both EGD and Union for each year 2015 to 2019, the actual amount spent by rate class in each year, and the amount, if any, collected from or refunded to customers through the DSMVA by rate class in respect of each year (or expected to be collected or refunded, if not yet completed).
2. [App. p. 3; Ex. A, p. 5] Please provide a single, detailed, combined DSM budget for the Applicant for 2021, consistent with the approvals requested in this Application, in a side by side table together with the budgets expected for 2020 under the existing approved Plan, and the actual amounts spent in 2019. In combining the previously separate budgets, please aggregate all amounts such as general and administration expenses that are similar but included in separate budgets for EGD and Union.
3. [App. p. 4] Please provide the number of the Applicant's customers that are francophones. Please confirm that the Applicant offers all of its DSM programs in both English and French. If there are any exceptions to that, please provide details.
4. [Ex. A, p. 1] Please confirm that, if the Board does not approve the Application, the existing DSM plans end December 31, 2020, and that because DSM is a flow-through, the result of that termination would be a reduction in rates in 2021. Please estimate, by rate class, the percentage reduction in distribution rates if the existing plans expire and are not extended. Please exclude (or separately identify) all wind down costs for the DSM activities, and describe how the Applicant believes they should be dealt with for ratemaking purposes.
5. [Ex. A, p. 4] Please provide complete details of all merger savings achieved, planned or expected by combining the DSM programs of EGD and Union. Please provide a detailed

impact analysis of all such savings for the 2021 calendar year, and explain why the impact is as high (or low) as it is for each expense category. Please confirm that, if this Application is approved as filed, one result is that the shareholders of the Applicant benefit from any 2021 merger savings for the DSM programs. If not confirmed, please explain the Applicant's view of the interaction between the DSMVA and merger savings.

6. [Ex. A, p. 4-5] Please provide a detailed, line item budget for all spending proposed for 2021 that is not direct payments to customers or vendors for incentives, and is not direct payments to third parties for marketing or other services.
7. Ex. A, p. 4-5] Please provide a detailed human resources report for the DSM program, including FTE/headcount, in the form normally used by the Board for utility spending on compensation. Please include 2015-2019 actuals, 2020 forecast, and 2021 proposed.
8. [Ex. A, p.6] Please provide a comprehensive list of all elements of the existing approved DSM plans, and indicate whether each such element is proposed to be the same, or changed, for 2021. By way of example, the Applicant has the ability to move money between programs, subject to certain limits. Is the Applicant's intention to retain that unchanged, or to change it? Please apply this example by analogy to all elements of the plans.
9. [General] For each year from 2015 to 2019 inclusive, please provide a comprehensive report on each program and offering, including but not limited to:
  - a. Name
  - b. Metrics
  - c. Targets
  - d. Lower Band
  - e. Upper Band
  - f. Achievement (audited if applicable)
  - g. Contribution to shareholder incentive
  - h. Amounts spent
  - i. Cost effectiveness
10. [General] Please provide a table showing the LRAMVA amounts (including those not yet cleared), the shareholder incentive amounts, and the average use adjustments, for each year from 2015 to 2019.
11. [General] Please file a copy of the current draft of the 2018 Natural Gas Demand-Side Management Annual Verification Report (the "2018 Audit Report"), or the final if it has been released by the time these interrogatories are answered.
12. [General] The 2018 Audit Report contains tables 1-1 through 1-4. Please file those tables for 2018, and the same data in the same format for each of 2015, 2016, 2017, and 2019.
13. [General] The 2018 Audit Report includes a lengthy list of recommendations. Please provide, with respect to each recommendation: a) the text of the recommendation, b) the first year the recommendation, or one substantially similar, was made, c) the Applicant's response to the recommendation, and d) the status of any planned changes in response to the recommendation.

14. [General] For each program or offering that was not cost-effective in any of the years 2015 through 2019, please describe the Applicant's plans for that program or offering in 2020 and 2021, including specifics of any actions that will be undertaken to ensure that they are cost-effective in those years.
15. [General] It is likely that, if this Application is approved either as filed or in a modified form, subsequently (late in 2020 or early in 2021) the Applicant will have a clear view of the Board's expectations for the next framework starting in 2022. Assuming that is the case, please:
  - a. Provide a detailed explanation of the Applicant's ability to adjust the spending, programs, offerings, scope, and other DSM aspects in 2021 as a result of the directions taken in the next framework.
  - b. Include in that explanation i) adjustments to ensure 2021 spending and programs are as efficient as possible, ii) adjustments to ensure that the transition to 2022 is as smooth as possible, and iii) adjustments ordered by the Board to specifically apply to 2021.
  - c. Identify the extent to which any adjustments are dependent on the timing of the Board's approval of the final DSM framework for 2022 and beyond.

Respectfully submitted on behalf of the School Energy Coalition on March 11, 2020.

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Jay Shepherd  
Counsel for School Energy Coalition