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March 16, 2019

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

Dear Ms. Long,

RE: EB-2019-0271 - London Property Management Association Interrogatories for Enbridge Gas Inc. Application for DSM Extension to 2021

Please find attached the interrogatories of the London Property Management Association in the above noted proceeding.

Yours very truly,

Randy Aiken

Randy Aiken
Aiken & Associates

c.c. EGI Regulatory Proceedings (e-mail only)

Enbridge Gas Inc.

**Application to extend approved 2020 Demand Side
Management Plan for one-year into 2021**

**INTERROGATORIES OF THE
LONDON PROPERTY MANAGEMENT ASSOCIATION**

Interrogatory #1

Ref: Exhibit A, page 6

EGI has requested approval of its 2021 DSM plans by April 2, 2020 because of the lead-time for some DSM programming and to ensure the continuity of DSM programming. In Procedural Order #1 dated February 24, 2020, the OEB set out a schedule that concluded with filing of written reply submissions on June 2, 2020. Given that this is two months beyond the date for the requested decision, what impact does EGI expect a decision post June 2, 2020 to have on its ability to ensure adequate lead-time for some DSM programming and the continuity of its DSM programming?

Interrogatory #2

Ref: Exhibit A, page 5

- a) Please provide a table that shows the DSM budget for each of the EGD rate zone and Union rate zones for each of 2017 through 2021. For each of 2017 through 2019, please also show the actual DSM expenditures for each of the rate zones.
- b) If there is any difference in the DSM budget between the approved 2020 level and the proposed 2021 level other than those noted in footnote 5, please reconcile the difference, including references to any OEB document related to the changes.
- c) Please provide the actual shareholder incentives earned in each of 2017 through 2019 by rate zone. Please also provide the maximum shareholder incentive by rate zone that is available for 2020 and proposed for 2021.

Interrogatory #3

Ref: Exhibit A

Please detail any changes between the Board approved 2020 DSM plans and the proposed DSM plans.

Interrogatory #4

Ref: Exhibit A, page 6

Paragraph 11 states that no incremental changes to rates are required because of the rollover of the 2020 programs to 2021.

- a) Please confirm that this means that EGI will continue to allocate the DSM costs to the rates classes in the same manner in 2021 as it did in 2020.
- b) Please confirm that this means that the costs that are allocated to the rate classes in 2021 will be the same as those allocated in 2020.
- c) How will EGI allocate the incremental costs noted in footnote 5 on page 5?
- d) If any of the above cannot be confirmed, please explain how the variances will be tracked by rate class.

Interrogatory #5

Ref: Exhibit A, page 5 & EB-2017-0127/0128 Report of the Ontario Energy Board dated November 29, 2018

- a) Please confirm that the date in footnote 6 should be November 29, 2018, not November 29, 2019.
- b) Please confirm that the page referenced in footnote 5 should be page 12 and not page 3.
- c) Please provide a cost effectiveness table, similar to Table 2 on page 12 of the Report of the Ontario Energy Board, in the same level of detail shown for each of Union Gas and Enbridge Gas, extending the data from 2015 to 2016, to include data for 2017, 2018 and 2019.