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March 16, 2020

Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> Floor  
Toronto ON M4P 1E4

Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: Ontario Sustainable Energy Association (“OSEA”) Interrogatories  
Enbridge Gas Inc.’s 2021 Demand Side Management Plan  
Board File No. EB-2019-0271**

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Please find enclosed Ontario Sustainable Energy Association’s Interrogatories in the above-noted matter.

OSEA has had the benefit of reviewing interrogatories from other parties and has made attempts to ensure there is no overlap between questions.

Yours truly,



Victoria Chai

Enclosure

cc: Dan Goldberger, OSEA  
Marion Fraser, Fraser & Company

Document #: 1695084

## **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 its 2021 Demand  
Side Management Plan

### **INTERROGATORIES OF ONTARIO SUSTAINABLE ENERGY ASSOCIATION (“OSEA”)**

March 16, 2020

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#### **OSEA IR 1**

*Reference:* Application, page 1 of 5

*Preamble:* Enbridge Gas Distribution Inc. and Union Gas Limited merged  
on January 1, 2019 to become Enbridge Gas Inc.

- a) Please provide a description of any changes to Enbridge and Union’s DSM programs that occurred after the two companies amalgamated, such as changes to program rules, scorecards, targets and program incentives.
  - b) Please file the most up to date organization charts that show how Enbridge Gas Inc. has restructured its DSM functions. Please provide a table showing FTE for both Enbridge and Union DSM functions for 2019 and the forecast FTE for 2020 and 2021. If the FTE numbers are lower in 2020 and 2021, please explain how Enbridge intends to deliver on the programs in order to achieve the targets set out.
  - c) Please include details about the current relationship between DSM and other related functions in the merged utility including but not limited to Integrated Resources Planning, Carbon Reductions, Gas Supply Planning.
- 2 What steps will Enbridge take in the 2021 DSM plan to link DSM programs with Enbridge’s Asset Management and Integrated Resource Plans? In particular, what steps will Enbridge take to focus program spending on areas where building of pipes and pipe assets could be deferred in order to yield positive system benefits.

## **OSEA IR 2**

*Reference:* Exhibit A, Page 4 of 6

*Preamble:* Enbridge Gas requests that the Board approve the same DSM annual budgets for the 2021 DSM program year as those previously approved by the Board for 2020.

- a) What are the quantitative and qualitative impacts of maintaining the DSM budget at the same level as 2020, including the lost potential for savings that could have been achieved with an increased budget?
- b) What are the quantitative and qualitative impacts of continuing to operate Enbridge Gas's DSM programs if Enbridge Gas does not implement all of the changes requested in the Mid Term Review?

## **OSEA IR 3**

*Reference:* Exhibit A, Attachment 1, Page 2 of 3; Exhibit A, Attachment 2, Page 2 of 4

- a) Please provide a year by year (2015-2020) analysis of the Low Income Programs for both Union and Enbridge before the merger.
- b) Please indicate if any changes were made during the merger to better harmonize the Low Income Programs, incentives and program rules.

## **OSEA IR 4**

*Reference:* Exhibit A, Attachment 1; Exhibit A, Attachment 2

- a) Please provide a year by year (2015-2020) analysis of the Industrial programs for both Union and Enbridge before the merger.
- b) Please indicate if any changes were made upon the merger to better harmonize the Industrial programs, incentives and program rules.

## **OSEA IR 5**

*Reference:* Exhibit A

- a) How did Enbridge and Union previously make use of Ontario's public sector energy and water database in DSM planning and program implementation, and what plans are being considered for doing so in 2020 and 2021?
- b) What efforts are being made to work collaboratively with Ontario's municipalities and regions to deliver on their energy management plans and develop joint programs to reduce energy and GHG emissions?

## **OSEA IR 6**

*Preamble:* Guiding Principle 5 from the 2015-2020 DSM Framework states that programs should be designed “so that they achieve high customer participation levels”.

- a) Please provide details on how Enbridge has designed its DSM programs so that they achieve high customer participation levels, with examples of results and participation numbers achieved over the 2015-2020 period.

## **OSEA IR 7**

*Reference:* Exhibit A

- a) Does Enbridge Gas have any plans to include sustainable technologies (for example, geothermal, combined heat and power, ground source heat pumps, or AMI technologies) as part of its 2021 DSM plan?
- b) If so, please include details on how these sustainable technologies will be incorporated into the 2021 DSM programs.
- c) If not:
  - i. Were sustainable technologies considered when formulating the 2021 DSM plan?
  - ii. What assessment was done to determine whether or not to include sustainable technologies?

## **OSEA IR 8**

*Reference:* Exhibit A.

*Preamble:* The Ontario Environment Plan states that the Ontario government will require natural gas utilities to implement a voluntary renewable natural gas option for customers.<sup>1</sup>

- a) What steps has Enbridge Gas taken to implement a voluntary renewable natural gas option for customers?
- b) When does Enbridge Gas expect to launch the voluntary renewable natural gas program? Please describe details of the plan.

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<sup>1</sup> Preserving and Protecting our Environment for Future Generations, November 29, 2018, page 33  
<<https://prod-environmental-registry.s3.amazonaws.com/2018-11/EnvironmentPlan.pdf>>

**OSEA IR 9**

*Reference:* Exhibit A.

*Preamble:* The Ontario Environment Plan states that Ontario will aim to reduce emissions to 143 megatonnes by 2030.<sup>2</sup> This reduction includes: (i) incremental increases in natural gas savings and (ii) encouraging uptake of renewable natural gas, as two of the paths to meeting the 2030 target.

- a) How will Enbridge Gas increase uptake of renewable natural gas between 2021 and 2030 to achieve Enbridge Gas' share of the natural gas savings required by 2030?
- b) How will Enbridge Gas increase uptake of other DSM programs between 2021 and 2030 to achieve Enbridge Gas' share of the natural gas savings required by 2030?

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<sup>2</sup> Preserving and Protecting our Environment for Future Generations, November 29, 2018, page 23  
<<https://prod-environmental-registry.s3.amazonaws.com/2018-11/EnvironmentPlan.pdf>>