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March 16, 2020

**VIA RESS AND COURIER**

**Christine E. Long**  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

Dear Ms. Long:

**Re: EB-2019-0271 – Enbridge Gas Inc. 2021 DSM Plan Application – Notice of Intervention**

We are counsel to the Association of Power Producers of Ontario (**APPrO**). Please find enclosed APPrO's interrogatories to Enbridge Gas Inc., filed pursuant to Procedural Order No. 1.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'L' followed by a long, sweeping horizontal stroke that ends in an arrowhead.

Lisa (Elisabeth) DeMarco

c. David Butters, APPrO  
Adam Stiers, Enbridge Gas Inc.  
Dennis O'Leary, Aird & Berlis LLP

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an Application by Enbridge  
Gas Inc. (**EGI**), for an order or orders pursuant to section  
36(1) of the Act for approval of the 2021 Demand Side  
Management Plans.

**EB-2019-0271**

**INTERROGATORIES**

**OF**

**ASSOCIATION OF POWER PRODUCERS OF ONTARIO (APPrO)**

**March 16, 2020**

**Question:**      **APPrO-1**

**Reference:**      • Exhibit A, page 5 of 6

**Preamble:**      EGI requests that the OEB approve the same DSM annual budgets for the 2021 DSM program as those approved for 2020 for each of EGD and Union rate zones.

- a)      Please present a detailed 2021 DSM budget in a manner that permits side-by-side comparison with the approved budget for 2020 for each of the EGD and Union rate zones.
- b)      Please confirm that the 2021 DSM program does not propose any new, expanded or additional DSM-related costs applicable to large volume customers (**LVCs**) that are gas-fired generators (**GFGs**).

**Question: APPrO-2**

Reference: 

- Exhibit A, Attachment 1
- Exhibit A, Attachment 2

- a) For each large volume customer (**LVC**) rate class in the EGD and Union rate zones, please provide the following information in tabular form for 2015 through 2019 (actuals), 2020 (forecast), and 2021 (proposed):
- i) number of customers in each rate class and the proportion of those customers that are gas-fired generators (**GFGs**);
  - ii) number of customers in each rate class that participate in DSM programs and the proportion of those customers that are GFGs; and
  - iii) DSM costs allocated to the rate class (through base rates and deferral and variance accounts).

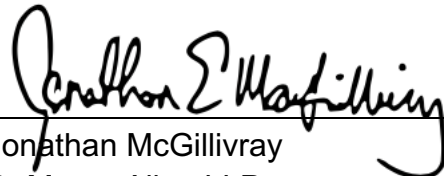
ALL OF WHICH IS RESPECTFULLY  
SUBMITTED THIS

16<sup>th</sup> day of March, 2020



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Lisa (Elisabeth) DeMarco  
DeMarco Allan LLP  
Counsel for APPrO



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Jonathan McGillivray  
DeMarco Allan LLP  
Counsel for APPrO