



PUBLIC INTEREST ADVOCACY CENTRE
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March 16, 2020

VIA E-MAIL

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

Dear Ms. Long:

**Re: EB-2019-0271 Enbridge Gas Inc. 2021 Demand Side Management Plan
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.
We have also directed a copy of the same to the Applicant.

Yours truly,

(Original Signed By)

John Lawford
Counsel for VECC

Copy to: Enbridge Gas Inc.

EB-2019-0271

Enbridge Gas Inc. (Enbridge)

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

VECC Interrogatories - March 16, 2020

VECC-1

Ref: General

- a) Please provide the actual Percentage of Lifetime Natural Gas Savings from 2017 to 2019 DSM Programs by customer segment for the Union and Enbridge rate zones.
- b) Please provide the forecast Percentage of Lifetime Natural Gas Savings from 2020 to 2021 DSM Programs by customer segment for the Union and Enbridge rate zones.

VECC-2

Ref: General

- a) Please provide the actual Program Spending as a Percentage of Overall 2017 to 2019 DSM Budgets by customer segment for the Union and Enbridge rate zones.
- b) Please provide the forecast Program Spending as a Percentage of Overall 2020 and 2021 DSM Budgets by customer segment for the Union and Enbridge rate zones.

VECC-3

Ref: General

- a) Please provide the residential program's participation targets and results for the years 2017 to 2019 for the Union and Enbridge rate zones.
- b) Please provide the residential program's forecast participation targets for the years 2020 and 2021 for the Union and Enbridge rate zones.

VECC-4

- a) Please provide the low-income program's participation targets and results for the years 2017 to 2019 for the Union and Enbridge rate zones.

- b) Please provide the low-income program's forecast participation targets for the years 2020 and 2021 for the Union and Enbridge rate zones.

VECC-5

Ref: EB-2017-0127/0128 Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) P7 & P32

Page 7: It is expected that the merger of Enbridge Gas and Union Gas will result in greater efficiencies and more consistent program delivery throughout the province.

Page 32: The OEB expects that as the merger between Enbridge Gas and Union Gas proceeds, the utilities will strive for cohesion and begin planning for a combined DSM plan in the post-2020 term. The OEB expects further efficiencies as a result of having a single utility providing natural gas conservation programs to customers.

- a) Please provide a summary of all DSM programs that are candidates for harmonization.
- b) Please identify all of the DSM programs in part (a) that have been harmonized and provide an update.
- c) Please identify all of the DSM programs in part (a) that have not been harmonized and explain why.
- d) Please provide details and discuss how Enbridge's DSM human resource strategy and compliment has been adjusted as a result of the merger and how it impacts DSM plans in 2021.

VECC-6

Please discuss if Enbridge has identified any new opportunities for smaller customers, residential and low income, and explain how this impacts Enbridge's 2021 DSM Plans.

VECC-7

Ref: EB-2017-0127/0128 Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) P32

The Mid-term review states "The natural gas utilities should continue to re-examine the design and delivery of their programs to ensure they are optimized to provide the best value to customers."

Please explain how Enbridge has responded to the above and how it impacts Enbridge's 2021 DSM Plans.

VECC-8

Ref: EB-2017-0127 Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) P32

The Mid-term review states “The OEB expects the natural gas utilities to continue to strive for cost efficiencies in its overheads and administration, including marketing and promotion costs, especially considering the merger of Enbridge Gas and Union Gas.

- a) Please explain how Enbridge has achieved cost efficiencies in its marketing and promotion costs and quantify the savings.
- b) Please discuss marketing and promotion cost efficiencies planned for 2021 and beyond.

VECC-9

Please identify which program areas have a greater opportunity for more inclusion.

VECC-10

Please identify program areas where significant potential remains.

VECC-11

- a) Please provide verified scorecard achievements by both natural gas utilities for the years 2015 to 2019 in the same format as Figure 1 and Figure 2 on Page 10 of the Mid-Term Review.
- b) Please provide the scorecard targets for 2020 and 2021 in the same format as part a.