



Fogler, Rubinoff LLP  
Lawyers

77 King Street West  
Suite 3000, PO Box 95  
TD Centre North Tower  
Toronto, ON M5K 1G8  
t: 416.864.9700 | f: 416.941.8852  
foglers.com

March 16, 2020

Reply To: Thomas Brett  
Direct Dial: 416.941.8861  
E-mail: tbrett@foglers.com  
Our File No. 195568

**VIA RESS, EMAIL AND COURIER**

Ontario Energy Board  
2300 Yonge Street  
27th Floor  
Toronto, Ontario  
M4P 1E4

Attention: Kirsten Walli  
Board Secretary

Dear Ms. Walli:

**Re: EB-2019-0271: Enbridge Gas Inc. ("EGI"), 2021 DSM Plans**

Please find enclosed herewith BOMA's Interrogatories.

Yours truly,

**FOGLER, RUBINOFF LLP**

A handwritten signature in blue ink, appearing to read "Tom Brett per: [initials]".

Thomas Brett

TB/dd

Encls.

cc: All Parties (*via email*)

**ONTARIO ENERGY BOARD**

**Enbridge Gas Inc.**

**2021 DSM Plan**

---

**INTERROGATORIES OF THE  
BUILDING OWNERS AND MANAGERS ASSOCIATION, GREATER TORONTO  
("BOMA")**

---

**March 16, 2020**

**Tom Brett**  
Fogler, Rubinoff LLP  
77 King Street West, Suite 3000  
P.O. Box 95, TD Centre North Tower  
Toronto, ON M5K 1G8

**Counsel for BOMA**

## **Interrogatories of BOMA**

### **1. Interrogatory #1**

*Reference. EB-2019-0271, Page 1 of 5, paragraph #2*

- (a) Please provide a table summarizing the entire list of programs for each company prior to the merger, the annual budget for each of the years from 2015, 2016, 2017, 2018, 2019 and 2020, and the annual actual expenditures for each of the years 2015, 2016, 2017, 2018 and 2019.
- (b) Please also include the gross savings of each of the programs, as well as the final approved and evaluated net savings.
- (c) Please include an annual variance analysis with respect to overspending or underspending, as well as a variance analysis of the program results, both gross and net.

### **2. Interrogatory #2**

*Reference. EB-2019-0271, Page 2 of 5, paragraph #4.*

Please file the Final Report of the Performance-Based Conservation Pilot Project, December 2018 Revision 1 with Appendices, which both natural gas utilities participated in the IESO (our emphasis).

3. **Interrogatory #3**

*Reference. EB-2019-0271, Page 2 of 5, paragraph #4.*

Please file a copy of Performance-Based Conservation Pilot Project, Final Report: Executive Summary, December 2018 Revision 1, which both natural gas utilities participated in the IESO (our emphasis).

4. **Interrogatory #4**

*Reference. EB-2019-0271, Page 2 of 5, paragraph #4.*

(a) BOMA expresses the following concerns in its comments on the Mid Term Review. BOMA's concerns stems from several facts:

- The current methodology for estimating natural gas conservation potential drastically underestimates the available savings and their cost-effectiveness.
- The Technical Resource Manual, which the utilities must use to determine the cost-effectiveness of technologies, is based primarily on US data for electricity utilities, primarily in the southwestern US.
- The current framework relies on estimates, assumptions, and deemed savings of typical buildings rather than actual metered data in the facility in question.
- The current framework, based as it is on the traditional California Standard Practice, was developed for electricity utilities.

- The current framework's evaluation approach fails to recognize the savings demonstrated at the meter, yet rewards utilities who convince customers to install equipment that may inadvertently increase gas consumption.
  - The current framework's focus on "net to gross" and "free ridership" could be replaced with a program concept which engages utility staff as customer advisors rather than promoters or subsidizers of specific equipment, resulting in greater proven and positive improvements for customers and the environment.
- (b) Please indicate why the company believes the current DSM framework is satisfactory, particularly given the changes which were requested in the Mid Term Review.