

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF** the Ontario Energy Board Act, 1998, S. O. 1998,  
c. 15, Schedule B;

**AND IN THE MATTER OF** an application by Enbridge Gas Inc.  
To extend approved 2020 Demand Side Management Plan  
for one year into 2021

**NOTICE OF MOTION AND MOTION RECORD**

The Green Energy Coalition (GEC) hereby makes a motion to the Ontario Energy Board (“the Board”).

**PROPOSED METHOD OF HEARING:** This motion is to be heard by written hearing.

**THE MOTION IS FOR:**

1. An order that Enbridge Gas Inc. (the company) provide a full and adequate response to the following interrogatories:

a. Exhibit I.GEC.1

b. Exhibit I.GEC.2

2. Such further and other relief as counsel may request.

**THE GROUNDS FOR THE MOTION ARE:**

3. In I.GEC.1 GEC sought Excel spreadsheets, with formulae and calculations intact, showing detailed data for each efficiency measure and for each program – separately for Enbridge and Union Gas – that was supported in 2017, 2018 and 2019 (with customer-specific data collapsed).

4. In I.GEC.2 GEC sought participation levels – in each way that they may have been tracked – for each non-resource acquisition program for Union and Enbridge in 2017, 2018 and 2019.

5. In response the company referred to program level detail it has provided but refused to provide measure tracking data, indicating its view *inter alia* that it would be burdensome to provide and that the Board’s direction on the scope of this proceeding precluded consideration of that material.

6. On April 11<sup>th</sup> GEC contacted the company requesting further and better responses.

7. Late on April 15<sup>th</sup> the company indicated that it was unprepared to provide such responses.

6. GEC recognizes that the Board has limited the scope of this proceeding to limit consideration of broader concerns that will be best considered as part of the framework review. GEC also appreciates that the Board does not wish to micro-manage the company’s delivery of DSM. We submit that as the company seeks approval of a \$132 million budget and the Board has convened a hearing and allowed interrogatories it is entirely appropriate to seek information that is required to consider minor changes that are time-sensitive and do not needlessly encroach on the framework discussion or descend into micro-management. However, as the following example illustrates, without sufficient access to disaggregated data, intervenors and the Board cannot determine whether changes that fall between those two borders are required at this time to avoid significant misdirection of resources, a waste of customer funds and unjust enrichment of the company.

7. The government has issued new regulations governing the efficiency of furnaces manufactured on or after July 3, 2019, requiring 95% efficiency. (see: <https://www.nrcan.gc.ca/energy-efficiency/energy-efficiency-regulations/guide-canadas-energy-efficiency/gas-furnaces/6879> )

8. Exhibit I.EP.4 shows that the company is offering a \$750 customer incentive (and up to twice that if combined with other measures) for furnaces more than 95% efficient. The exhibit indicates that two measures are required to qualify for the incentive.

9. The company’s website (see: <https://enbridgesmartsavings.com/home-efficiency-rebate/home-energy-upgrades>) indicates that “For replacing a less than 96% AFUE natural gas furnace with a 96% AFUE or higher condensing natural gas furnace” there is an incentive of \$500 and “Customers who complete more than two upgrades also qualify for a \$250 bonus for each additional upgrade installed” and “If you are upgrading your natural gas furnace, you must

complete at least 2 additional upgrades (a total of 3 upgrades) to qualify for the Home Efficiency Rebate”.

10. The effect of the above is that the furnace incentive is at a minimum \$750 for an improvement to only 1% above the regulatory minimum. In an end of furnace life situation this is the extent of the impact. In an early replacement situation any greater impact is only available until the furnace would otherwise have been replaced at end of life.

11. It is clear from the interrogatory responses that a large portion of the company’s residential resource acquisition achievement has been as a result of the Home Energy Conservation program which includes furnace replacements (See: SEC 12 attachments). Accordingly, it is of concern that a huge proportion of the residential resource acquisition budget may be spent for a very limited benefit, rather than redirected toward opportunities that could better improve efficiency. To understand the extent of the problem and to suggest opportunities for redirection of emphasis it is necessary to see data pertaining to this and other measures.

12. GEC submits that in this example and potentially in others, without access to measure-specific data and participation rates it is not possible to know whether a change to the scorecard or other specific rules are needed to avoid misdirection of resources, significant waste of customer funds and possible unjust enrichment of the company.

13. GEC recognizes the need to avoid undue burden on the company’s resources and appreciates that the data sought may only be readily available in raw form in various formats rather than as a single spreadsheet. GEC submits that it is not required that the data be compiled in a single sheet for it to be useful. GEC submits that the data for 2017 and 2018 should be readily available as it will have been provided to the evaluator (and will have been compiled by the evaluator and provided back to the company for review) and that the company should have tracking information for participation for all measures and programs for 2019 as part of its routine operations. Accordingly the provision of the information sought will not require significant effort or delay.

## **RELIEF REQUESTED**

14. GEC seeks an Order requiring the company to file copies of all tracking spreadsheets for all measures offered in the 2017-19 period (with data that would disclose confidential customer information obscured but provided in a summed manner) and further, to provide participation

levels – in each way that they may have been tracked – for each non-resource acquisition program for Union and Enbridge in 2017, 2018 and 2019.

**THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:**

- a. Evidence on the record in this proceeding; and
- b. Any further evidence as counsel may advise and the Board may permit.

**Date: April 17, 2020**

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Counsel for GEC**

**TO: The Applicant and Parties**