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April 24, 2020

BY RESS, EMAIL AND COURIER

Ms. Christine Long
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board File No.: EB-2019-0271
2021 DSM Plans
Enbridge Reply Submission to Green Energy Coalition (GEC) Motion**

In accordance with Procedural Order No. 2 dated April 21, 2020, enclosed please find Enbridge Gas' reply submission to GEC's Motion in the above noted proceeding.

If you have any questions, please contact the undersigned.

Sincerely,

(Original Signed)

Adam Stiers
Technical Manager, Regulatory Applications

cc.: D. O'Leary (Aird & Berlis)
EB-2019-0271 Intervenors

ONTARIO ENERGY BOARD

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

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*, extending the approved 2020 Demand Side Management Plan for one year into 2021 and approving the 2021 Demand Side Management Plan.

Submissions of Enbridge Gas Inc. to the Notice of Motion of the Green Energy Coalition (GEC) dated April 17, 2020

GEC filed a motion on Friday, April 17, 2020 (“Motion”) seeking an order requiring Enbridge Gas Inc. (“Enbridge Gas” or the “Company”) to provide “a full and adequate response to the following Interrogatories: (a) Exhibit I.GEC.1 and (b) Exhibit I.GEC.2”. On April 21, the Ontario Energy Board (“OEB” or “Board”) issued Procedural Order No. 2 which set out the timelines for submissions on this Motion and specifically requiring Enbridge Gas to respond to several questions set out in the Procedural Order.

For the reasons stated in this reply submission, Enbridge Gas submits that its response to GEC Interrogatories No. 1 and 2 were both appropriately responsive and detailed and were consistent with the scope that the OEB has set in this proceeding by its Procedural Order No. 1 dated February 24, 2020.¹ The fact is that the Company does not have an excel spreadsheet precisely of the nature requested by GEC. It did however make reasonable efforts to respond to these Interrogatories both directly and in responses to other Interrogatories asked by other parties.

Enbridge Gas is further concerned by the “alternative” suggested by GEC in its motion materials which asks that the Company turn over all of the raw data it has and will provide to the evaluation contractors. There are numerous reasons why Enbridge Gas submits that this is inappropriate in this submission not least of which is the fact that any proposed change to program offerings of

¹ EB-2019-0271, OEB Procedural Order No. 1 (February 24, 2020).

any magnitude will necessarily require extensive changes to targets and scorecards. This will defeat the Board's intent of there being no material changes for the purpose of the rollover of approved 2020 programs into 2021.

Enbridge Gas further notes that what GEC requests appears to be overly broad for its stated purpose. In an email from Counsel for GEC to Counsel to Enbridge Gas dated April 22, 2020, which was copied to Board Staff and Board Counsel, Mr. Poch stated: "I wanted to make it clear that we would be content with the 2017 and 2018 data that has already been verified by the evaluator, as well as the "unverified" 2019 data. Our main interest is in understanding participation levels by measure, how much each measure is saving on average, etc. We don't need those numbers to be precise to the third decimal point to make the recommendations we may consider making". As GEC appears to already have existing views about certain program offerings, it could have limited its interrogatory to questions about and data supporting those program offerings rather than asking for extensive and detailed data on the Company's entire portfolio. No justification has been given by GEC as to why it needs the entire raw database for the two legacy utilities that would be compiled and provided for audit purposes.

This submission will start by first examining the specific requests detailed in GEC Interrogatories No. 1 and 2 and highlighting that Enbridge Gas has in fact responded to the extent reasonable to each specific item requested and highlight that most of the requested data for the 2017 and 2018 program years is also available respectively in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports available on the Board's website.² This submission will next put these GEC Interrogatories into context. The Company will then summarize its response to same. This submission then turns to the reasons why providing what GEC has requested both in its Interrogatories No. 1 and 2 and in its Notice of Motion would require an unacceptable amount of work and goes far beyond the scope of this proceeding and the role of a stakeholder group in proceedings of this nature.

² <https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G-K & O.

<https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G-K & O.

GEC IR No. 1 and 2

GEC's Notice of Motion underplays the breadth and magnitude of what GEC requested in its Interrogatories No. 1 and 2.

In GEC's Interrogatory No. 1, GEC asks for an Excel spreadsheet, with formulae and calculations intact, that shows the following for each efficiency measure and for each program – separately for Enbridge Gas and Union Gas, that was supported in 2017, 2018 and 2019. This Interrogatory then goes on to list 11(a-l) constituent elements required in the spreadsheet, many of which have several further individual elements. For example, subclause (c) requires unit gas savings (m³), electric savings (kWh), water savings (liters), incremental costs, measure life and net gross assumption used to estimate savings achieved in each year. Stated differently, GEC has asked for every meaningful piece of data at the measure level for every program and program offering. It has not limited its request in any way. It applies to the entire portfolio of both legacy utilities. This is the type of request that one would make if it wanted to make material changes across the entire portfolio of already approved program offerings. Nonetheless as noted below, Enbridge Gas has indeed provided most of the data, at a level that meets with the request. In addition, full program offering and measure level audited DSM results details for the 2017 and 2018 program years can be found in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports available on the Board's website.³

GEC Interrogatory No. 2 asks the Company to provide participation levels – in each way that they may have been tracked – for each non-resource acquisition program for Union Gas and Enbridge Gas in 2017, 2018 and 2019. As also noted below, this information was indeed provided. In addition, full participation details for the 2017 and 2018 program years for the non-resource acquisition programs can be found in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports available on the Board's website.⁴

³ <https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G, H, I, O.

<https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G, H, I, O.

⁴ <https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix J, K.

<https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix J, K.

At Section 13 of GEC's Notice of Motion, GEC states that it appreciates that the data sought may only be readily available in raw form in various formats rather than as a single spreadsheet. GEC submitted further that the data for 2017 and 2018 should be readily available as it will have been provided to the evaluation contractor(s). This is the alternative which GEC now proposes.

This revised request is likely the result of the advice given to GEC on April 15 by the Company that it does not have an Excel spreadsheet with formulas and calculations intact which readily responds to GEC Interrogatories No. 1 and 2. It is likely then that GEC has stated that it is prepared to accept, in the alternative, all of the raw data provided to the evaluation contractor ("EC") that are engaged by Board Staff for the purposes of undertaking the evaluation monitoring and verification ("EMV") process of the Company's DSM activities in a particular year. As both Board Staff and the EC can attest, the EC requests a "flat file" of program data for the purposes of auditing the results of each program year. This file requested from Enbridge Gas does not include formulas and calculations as characterized by GEC, in GEC Interrogatory No. 1.

Leaving aside for the moment the extraordinary breadth of this request and purpose, Enbridge Gas notes that the EC as well as all other supporting program evaluators are engaged pursuant to contractual obligations which obligate them to not disclose customer specific or commercially sensitive information which might reveal information relating to specific customers and their commercial activities. As well, these evaluators are contractually prohibited from making use of the data for their own commercial purposes. The Company further notes that members of the Evaluation and Audit Committee are bound by similar obligations and that the key consultant for GEC, Mr. Chris Neme, is a member of the Evaluation and Audit Committee ("EAC"). The Gas Distribution Access Rule ("GDAR") prohibits Enbridge Gas from disclosing, other than to the Board, consumer information unless sufficiently aggregated.⁵ This mandates that the Company must ensure that the data released does not violate this rule. The GEC Notice of Motion makes no mention of these important customer and shareholder safeguards. More will be stated about this below.

The Company further notes that the raw data which its activities generate and which are provided to the EC, is not normally placed on the public record given the importance of preserving customer confidentiality and to avoid third parties making use of the raw data for their own commercial interests. The Company therefore does not "sanitize" the raw data to a level that would be

⁵ Ontario Energy Board, Gas Distribution Access Rule (Amended March 1. 2020), Section 5.3, p. 17.

necessary for publication out of the normal course because there is no expectation that it will be placed on the public record.

The importance of ensuring that customer specific data and commercially sensitive information remain confidential, is as important now as it has been in the past. Customers rely on Enbridge Gas to not disclose commercially sensitive information. If this were to occur, their confidence in the Company's DSM activities would erode. Similarly, third-party commercial entities could benefit from the release of the raw data and put them in a position where they would be able to compete with the Company's DSM activities and undermine the success of its program offerings.

Enbridge Gas has Fully Responded to GEC Interrogatories No. 1 and 2

There were approximately 230 parts to the combined set of Interrogatories submitted by intervenors in this proceeding. Many of these were similar or overlapping and many asked for the response to be in a particular format. To make the process manageable, Enbridge Gas attempted to consolidate responses where they were overlapping. In its response to the Interrogatories which are the subject of this Motion, GEC was directed to the response of Enbridge Gas to Schools Energy Coalition ("SEC") Interrogatory No. 12 and in particular Attachments 3 and 4. These attachments included the 2017 and 2018 budget, expenditure and savings details which have already undergone a full EMV audit process and are now pending final Board approval in an upcoming clearance proceeding for these years. The Company noted in its April 6th Interrogatory response that 2019 program year details were still being compiled and were therefore not currently available. By a letter to the Board dated April 3, 2020, the Company advised that this information will be available by May 29, 2020 being the date by which the Company has confirmed it will be providing the 2019 Draft Annual Report to the EC.⁶ If it would be of benefit to the Board, the Company is prepared to generate a further table similar to SEC 12, Attachments 3 & 4 for 2019 before the 2019 Draft Annual Report is provided to the EC and file it in this proceeding. Enbridge Gas believes that it could generate this table by May 1, 2020. While this table would be close to being final, the Company must reserve the right to amend the table to reflect any changes which are determined necessary as the Company completes its finalization of the 2019 Draft Annual Report.

⁶ EB-2015-0245, OEB Letter: 2019 Draft Demand Side Management Evaluation Reports (April 3, 2020).

In response to GEC Interrogatory No. 2, Enbridge Gas also directed GEC to its response to SEC 12 Attachments 3 and 4 which contained 2017 and 2018 program year market transformation and performance-based conservation participation details, as requested. Enbridge Gas is similarly prepared to provide data for 2019 by May 1, 2020, subject to the same reservation noted above.

In Procedural Order No. 2, the Board acknowledges that “GEC submitted that its requests within the two Interrogatories noted above seek detailed data for energy efficiency measures for each program for the 2017, 2018 and 2019 program years, as well as participation levels for non-resource acquisition programs.” The attached Table 1 provides a comparison of each of the specific data requests made by GEC in GEC Interrogatories No. 1 and 2 and the data provided by Enbridge Gas in response.

It should be noted that in its Motion materials at Section 5 GEC states: “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.” However, in its original interrogatory, GEC acknowledged in part c), “For programs for which measure level data are not available (e.g. because savings are tracked at a measure bundle or program level only), as well as for C&I custom programs, please provide average per participant savings, incremental cost, measure life for the measure bundle.” As noted in Table 1, and provided in Attachments 3 and 4 to the response to SEC Interrogatory No. 12, this is the level of data which Enbridge Gas has already provided.

The fact is that between the responses given to GEC in respect of the two subject Interrogatories and several responses to other stakeholders, the material data GEC requested has already been provided. This is confirmed by the detailed summary of what the Company provided on a part by part basis in Table 1. The details and summary of what was provided as set out in Table 1 form part of this submission. What has been provided is the information that is available without Enbridge Gas being required to generate an entirely new spreadsheet which would take considerable resources and would not provide GEC with materially more information than what has already been disclosed. Additionally, as started previously, full and detailed audited program offering and measure level results data and inputs are provided by the Evaluation Contractor for

each of the 2017 and 2018 program years in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports available on the Board's website.⁷

It is noteworthy that in several instances, while the specific calculations sought have not been provided, the data necessary to make the calculations requested has been provided. Enbridge Gas operates under the reasonable assumption that GEC does not plan to undertake a comprehensive review of each and every program offering in the portfolio of the two legacy utilities. Accordingly, rather than Enbridge Gas staff having to replicate the calculations in respect of each and every program offering for both of the legacy utilities, it believes that it is reasonable that GEC complete the computations in respect of those program offerings it wishes to review and comment upon.

Due to the overlapping nature of the significant number of Interrogatories which were seeking particular program details, Enbridge Gas acknowledges that in some instances the data requested in GEC Interrogatory No. 1 appears in separate interrogatory responses. This is noted in Table 1. If required, Enbridge Gas could pull the information from the various Interrogatories and consolidate them into one spreadsheet similar to the attachments provided in response to SEC Interrogatory No. 12. This work is estimated to take about two business days and represents a reasonable compromise. However, Enbridge Gas cautions that the time estimate above applies only to the requested information sought in GEC Interrogatory No. 1, any additional requests would, of course, take additional time and effort.

Context

At page 2 of Procedural Order No. 2, the Board reiterates "the OEB does not expect material changes to the previously-approved DSM plans during a transition year. However, it is appropriate to ensure that previously-approved programs continue to deliver cost-effective savings in 2021, and that results can be maximized in order to provide good value to customers." GEC's apparent objective is to cherry pick certain measures from the suite of program offerings to advocate that these measures be prioritized above program offerings available to other customer segments because on a unit by unit basis a particular measure may

⁷ <https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G-K, & O.
<https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G-K, & O.

drive more m³ savings, notwithstanding the OEB-approved scorecards and metrics already in place in accordance with the Board's 2015-2020 Multi Year DSM Plan Decision and Mid-Term Review. There should be no question that this amounts to a micromanagement of the Company's DSM activities.

It should be recalled that the Board found less than a year and a half ago in its Mid-Term Report that:

“The current suite of natural gas conservation programs approved as part of the OEB's DSM Decision continue to be appropriate and effective. Verified program results from the 2015 and 2016 program years show strong performance and long-term natural gas reductions across the residential, commercial and industrial sectors. Therefore, the OEB concludes that material changes to the DSM Framework and DSM Plans are not warranted at this time.”⁸

No change in regulation, legislation or the environment has nullified this conclusion. The Board was certainly not inviting parties to begin micromanaging the Company's DSM activities.

It is important to realize that to the extent that such micromanagement results in the need for changes to targets, scorecards and many of its methodologies as previously approved by the Board, this proceeding will necessarily have to change from one involving a proposed rollover into 2021 into one that will involve a detailed examination of targets and scorecards for the purposes of resetting same by the Board.

It is helpful to reference the example used in GEC's motion materials at Sections 7 through 11. GEC correctly notes that government regulations now require new furnaces manufactured on or after July 3, 2019 to have a 95% efficiency rating. As noted by GEC, Enbridge Gas's program offering includes, among many eligible measures, furnace replacements, which now requires the installation of furnaces greater than 95% efficiency to qualify. There is no question that the change in government regulations had an impact but with recent changes made to the program offering to appropriately reflect the new furnace standard, the program offering remains cost effective. GEC does not suggest otherwise. Instead, GEC's example proves the point that GEC's intent is to micromanage based on some assessment of prior years project data without any “on the ground” delivery or market experience in Ontario by advocating to the Board that another measure or program offering is more worthy of pursuit. It is important to recall the support from the Board

⁸ EB-2017-0127 / EB-2017-0128, Report of the Ontario Energy Board Mid-Term Review of the Demand Side Management Framework for Natural Gas Distributors (2015-2020) (November 29, 2018), p. 5.

of the evolution and alignment of the two original residential retrofit programs in the Board's Mid-Term Report in November 2018:⁹

"The OEB approved Enbridge Gas' and Union Gas' residential programs as part of the DSM Decision, despite the differences in how customer incentives were calculated. Enbridge Gas' current program provides a single performance-based incentive that is calculated based on the total annual natural gas savings. Union Gas' program provides prescriptive financial incentives for individual energy efficiency technologies.

Enbridge Gas proposed to align its customer incentive calculations with Union Gas to give customers greater continuity across the province, and to make the program and the benefits to customers easier to understand. Enbridge Gas did not propose any changes to the OEB-approved budget. Going forward, Enbridge Gas proposed to provide prescriptive incentives for each individual energy efficiency measure installed, with an eligibility requirement of a minimum of two measures installed.

OEB Conclusion

The OEB supports the Home Energy Conservation design changes proposed by Enbridge Gas. These changes will allow customers to receive consistent, easy-to-understand programming across the province to help make energy efficiency improvements and manage energy costs."

It is also appropriate to note some important details about Enbridge Gas's current residential home retrofit program offering, which reflect the market evolution since the Board's Mid-Term Report. First and foremost, there is no current residential offering that solely incents a furnace replacement. In the case of the Company's current Home Efficiency Rebate ("HER") program offering, where a residential retrofit audit includes the recommendation of a furnace replacement, to be eligible for the program, and qualify for incentives, the participant is required to also undertake at least two other material home efficiency upgrades (this was not the case previously). These upgrades can be very costly for the homeowner, but are critical elements of the program offering to ensure that it remains cost effective and to ensure that the overall program results continue to drive significant gas savings. The Company's objective is that the aggregate of all of the homes participating in the program offering achieve, on average, at least a 15% reduction in annual natural gas use as determined through a pre and post energy assessment comparison.

The goal which should not be lost is not the replacement of a furnace but rather the implementation of multiple measures of energy conservation upgrades. Looking solely at the difference between the more efficient furnace and the 95% efficiency rating is not an appropriate

⁹ Ibid, p. 23.

measure of the success of this program. Based on Enbridge Gas' experience, when a customer is replacing their furnace it is an opportune time to promote the additional envelope improvements that can drive savings that might not otherwise occur.

Second, residential customers often have gas furnaces which operate well beyond their stated life expectancies. The objective of the program is to encourage residential customers to replace what may be completely functioning lower efficiency furnaces with furnaces with a higher efficiency than mandated by regulation. In other words, the program incents people to replace their existing furnace earlier than they might otherwise have done so, and to install a furnace with a higher efficiency rating than that required by regulation and, most importantly, to capitalize on this retrofit opportunity by additionally undertaking deeper energy efficiency home upgrades.

Would program data show that there are program offerings in a given year that provide more CCM savings per dollar spent than others? Answer: yes. There will always be differences in the cost effectiveness of various program offerings, particularly in comparing efforts delivered across each of the customer segments, e.g. low income vs. residential vs. commercial or industrial. This is simply a reflection of the various real world impacts in which program offerings are operated. Factors such as: the availability in the market place of energy efficiency equipment and installation contractors and, where necessary, verification inspectors; the total cost to the consumer net of any program offering incentive; the economic climate in which decisions are being made; and, the time required and difficulty that a customer must accept for the new higher efficiency equipment and measures to be installed are all factors that exist in the real world but which do not appear in the data.

GEC also appears to be suggesting that a review of historical data from 2017 and 2018 on the one hand, alongside consideration of the current program offerings available in 2020 will generate reasonable conclusions. Program rules, incentive levels, baselines and measure criteria that were in place in 2017 and 2018 are different from the program offering requirements which have evolved and are in place in 2020 and will likely evolve further in 2021.

The Board has historically itself not micromanaged the DSM activities of the natural gas utilities. The 2015-2020 Framework specifically provides that the utilities may direct funding from one program to other programs up to a 30% threshold without providing notice to the Board.¹⁰ The

¹⁰ EB-2014-0134, OEB Filing Guidelines to the Demand Side Management Framework for Natural Gas Distributors (2015-2020) (December 22, 2014), pp. 14–15.

point is that the existing 2015-2020 Framework already provides the utilities with the flexibility to allocate funding to pursue successful program offerings and to maximize results. For a stakeholder to review project by project data and then submit that money should be directed from one measure to another without recognition and therefore assessment of the full real world considerations in which the program offerings are being operated is of no help.

A simple comparison of historical raw data does not take into consideration the principles set out in the existing 2015-2020 Framework. Budget is required to be directed at programs which support all rate payer classes. If cost effectiveness (i.e. \$/CCM for each effort) was the sole criteria, then low income programs would be discontinued. Increasing participation rates is another objective of the existing Framework. This issue needs to be considered when evaluating the specifics of each program offering. A simple comparison of the \$/CCM of program offerings does not include this important consideration. Cancelling or greatly reducing the residential Home Efficiency Rebate program offering highlighted in GEC's Motion will negatively impact the participation rate of residential ratepayers.

Importantly, what may appear to be a minor change to a program offering may have profound and major implications for other aspects of the Company's portfolio of DSM activities. For example, should GEC propose the elimination of the HER program offering and argue that all of these moneys be directed to, for example, a particular commercial or industrial measure, this will upset the scorecards which were approved by the Board in its approval of the 2015-2020 DSM Plans filed by the utilities and as adjusted by the Board's Mid-Term Review. Targets will need to be reset, as will the methodology to determine the shareholder incentive. Such a change is not mere tinkering. Changes of this nature will require a major retooling of important aspects of the evaluation methodologies.

Even a modest diversion of funding from one program offering to others could result in the same need for a major overhaul of targets and scorecards. If the budget for one program offering is, for example, doubled, it is not reasonable to conclude automatically that the targets for that program offering should simply be doubled. Again, consideration must be given to the real world realities in which the program offering already operates

Responses to Specific Questions from the Board

In Procedural Order No. 2 the OEB states that it expects Enbridge Gas to address the appropriateness of the request by GEC, any issues related to providing full responses, the level of effort required, and the time frame in which a full response could be provided if the OEB is to order Enbridge Gas to do so. Enbridge Gas responds to these questions below.

(a) The Appropriateness of the Request

As noted above, the Company does not have readily available the precise information and functions exactly as requested by GEC in its Interrogatories. Enbridge Gas has however, as confirmed by Table 1, provided an extensive amount of information that comes reasonably close to meeting GEC's request. Despite this, GEC in its Notice of Motion indicates that it now wants the raw data which has traditionally been provided to the EC or auditor.

It is important to be clear what this raw data "dump" would provide. The data that would be provided is compiled on a project by project basis with each applicable table containing thousands of rows and dozens of columns of information. The resulting spreadsheets contain hundreds of thousands of data points for each of the legacy utilities. The EC receives this information and then manipulates the data as it considers appropriate for the purposes of undertaking its review and verification process. The spreadsheets supplied do not contain underlying formulae, as requested by GEC in GEC Interrogatory No. 1.

The EC's use the data to generate evaluation reports setting out their conclusions, initially in draft, which are then reviewed by the EAC, including Board Staff and Enbridge Gas. This is a substantial and time consuming undertaking spanning months. The data that is provided was never intended to be broadly released given that it is only raw data and not a complete picture of DSM activities in the real world. It certainly was never intended to be the means to cherry pick and favour what appear to be more cost effective program offerings based on an analysis completed in a vacuum devoid of real world variables.

It is paradoxical that in a proceeding where the Board has expressed a clear intent to narrow the scope of the proceeding that GEC makes a request for the Company's entire DSM database for the years in question. Inconsistent with the Board's direction, rather than limiting its Interrogatories to the program offerings or measures for which concern exists, GEC appears intent on reviewing each and every program offering on a measure by measure basis and to then propose an entirely different line-up of program offerings based on its determination of the optimal mix of program participation.

Enbridge Gas submits that this is wholly inappropriate not only because it amounts to micromanaging and would necessitate material changes to targets and scorecards but because it would involve a change in the mix of program offerings to various customer groups which may be inconsistent with the 2015-2020 Framework and the past decisions of the Board approving the current portfolio of programs.

Importantly, any suggested changes to the program mix will not be based on evidence before the Board in this proceeding. There is no provision in Procedural Order No. 1 for evidence to be introduced by a stakeholder group nor any ability for the Company to file evidence in response to a suggested change in program mix. Such changes need to be considered in the context of the real world and the current 2015-2020 Framework. Stated differently, any party can take existing results, double the funding for example and allege that the results should similarly double. This is not the real world and absent evidence from the Company about real world situations, there is no evidentiary basis to support such changes.

As well, the Company has a very practical concern with the release of raw data which can then be manipulated by a party with the "revised" results being presented to the Board. Enbridge Gas, as required, maintains the tracking and reporting systems as the official system of record. To the extent that all data is released, and it is then manipulated and relied upon by intervenors in a proceeding, this creates potential conflicts with that system of record. It is for this reason as much as the others that the request by GEC is considered inappropriate.

(b) Any Issues Related to Providing Full Responses

As noted earlier, Enbridge Gas believes that it has provided a reasonable and fulsome response to GEC Interrogatories No. 1 & 2. However, in an effort to fully respond to the questions asked by the Board, in addition to the concerns expressed above, an important issue associated with GEC's alternative request, for all of the raw data, is the basis upon which the release of raw data can be undertaken. Unlike members of the EAC like Mr. Neme or the EC's, GEC itself and none of the other parties to this proceeding are subject to any undertaking to not disclose customer specific and commercially sensitive information. There is no non-disclosure agreement in existence which would prohibit stakeholders in this proceeding from making use of such data for their own commercial purposes or for the benefit of third-party interests. Enbridge Gas notes that a number of the intervenors and their consultants either support or are themselves active in the conservation marketplace. It should be recalled that certain intervenor groups actively participate to promote the interests of their members and that their submissions and Interrogatories may be shaped by this.

If the entire raw data base is to be provided, it would be incumbent on the Company to undertake a review of same to insure that it is appropriately sanitized to meet the requirement of GDAR and the commitment made to customers that their commercially sensitive data will not be released. This effort will be necessary even if stakeholders sign broadly worded undertakings to the Board and NDA's as the sanitized version of the data will need to be placed on the public record subject to the Board's confidentiality practice direction.

The Company notes that even with appropriate protocols and safeguards in place protecting customer specific and commercially sensitive data, GEC's request is extraordinary.

GEC's request begs the question: What was the point of a multi-year DSM decision by the Board? If approved DSM programs can be second guessed, in this case in a proposed rollover, what is the benefit of the multi-year approval and the Mid-Term Review? What is the point of having a Framework that guides the Company's selection and design of program offerings? One of the underlying

purposes of the existing 2015-2020 Framework is to provide mechanisms to ensure that cost effective programs are operated on a continuous and reasonable basis. It should be recalled that the underlying purpose for the shareholder incentive is that it incents the Company to maximize savings.

One can only imagine the mayhem in future proceedings (perhaps this proceeding) if all stakeholders undertake the same detailed review as GEC proposes for the purposes of offering their preferred portfolio of programs. Enbridge Gas submits that what GEC is proposing is a paradigm shift in the role of an intervenor from one that reviews and comments on prior years results in a deferral and variance account clearance proceeding to one that uses prior years results to generate a forecast for a future year to support a proposal for a mix of programs, offerings, and/or measures that it supports. Undertaking DSM planning by “committee” is simply not workable.

It should be recognized that if GEC (or other intervenors) suggest some other mix of funding for new, amended or changed program offerings, unlike the Company, none are accountable for the delivery and results of this new mix. Enbridge Gas notes that GEC has no operational experience in Ontario. It does not deal with nor has it partnered with Ontario third-party entities necessary to deliver various program offerings. GEC does not deal with nor communicate with and address issues and questions raised by Enbridge Gas ratepayers. If suggestions proposed by GEC do not maximize results, Enbridge Gas ratepayers and shareholders suffer. GEC is wholly unaffected. As this proceeding will long since have concluded, GEC (and any other intervenor that advocates a different mix) would not even be at risk of recovering some of their costs.

Enbridge Gas is accountable to the Board and ratepayers. It should remain the entity that determines the appropriate program mix to maximize results without micromanagement from outside entities.

(c) The Level of Effort Required and the Timeline in Which a Full Response Could be Provided

Again, Enbridge Gas believes that it has already provided a reasonable response to GEC Interrogatories No. 1 & 2. As indicated earlier, the Company is prepared

to file a table similar to the attachments to SEC Interrogatory No. 12 for the 2019 program year by May 1, 2020 subject to the abovementioned right to revise if needed. Also of note, Enbridge Gas attests that a full and detailed set of information at the program offering and measure level for the 2017 and 2018 program years is also available respectively in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports available on the Board's website.¹¹ In respect of GEC's alternate request for all of the raw data for the years in question, excluding the important and resource consuming task of sanitizing the data of all customer information and commercially sensitive data, there is minimal effort required in providing the raw data in its current state. Despite this, the Company submits that this is inappropriate for the reasons given above and because of the likely delay this will cause to the decision that is required in this proceeding and given the fact this task would divert resources from other productive pursuits.

If the raw data is to be produced, the Board will need to require all parties to execute an appropriate and broadly worded undertaking which prohibits disclosure and the use of any data received by the stakeholder, any of its consultants and counsel. This will undoubtedly cause further delay.

(d) Other Ramifications

Importantly, there are serious other implications which will almost certainly arise if GEC is permitted to micromanage the Company's DSM activities. First and foremost is the evidentiary record that will be before the Board. If GEC receives the entire raw database which the Company provides to the EC and manipulates it using various methodologies and formulae, without GEC providing a full and detailed explanation of what it did and how it manipulated the data to arrive at the results (for example changes in baselines and assumptions), neither the Board, Enbridge Gas nor other stakeholders will be able to verify what has been done. The filing of argument by GEC which references results it generated using the raw

¹¹ <https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf> (March 13, 2020), Appendix G-K & O.

<https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf> (March 13, 2020) Appendix G-K & O.

data is not evidence and is therefore not a basis for the Board to make rulings. Add to this the fact that the Board will further have no evidence of the impact of such proposed changes on the affected program offerings, targets and scorecards and it becomes appropriate to question the value to the Board of what GEC is requesting.

GEC's Motion materials suggest that it does not want to micromanage nor advocate changes that will involve material impacts. If GEC believes that there are program offerings that could benefit from their knowledge, then such proposals should have been advanced in its Interrogatories. Instead, it is clear that it wants to undertake a complete review of the minute details of DSM activities. Enbridge Gas submits that the only reason underlying GEC's request is its intent to both micromanage and propose material changes. There can be no other explanation for the manner in which it has proceeded.

Enbridge Gas submits that if GEC is granted the relief requested, the Board will need to issue a further Procedural Order that requires GEC to file written intervenor evidence with a detailed and fulsome explanation of what was done and how the data was manipulated to arrive at its results and any factual evidence that supports the results in the real world. Enbridge Gas should then be permitted the right to ask Interrogatories and, if it deems necessary, to file reply evidence. The procedural order will also have to provide a mechanism whereby stakeholders and the Company can file evidence and make submissions about the impacts on targets and scorecards of what GEC is proposing.

The Company submits that such a scenario is wholly out of scope with what was contemplated by the Board by Procedural Order No. 1. For this reason, the Company submits that the request by GEC should be denied and that the Board should confirm that the Company's response to GEC Interrogatories No. 1 and 2 were adequate subject to the additional May filing of a spreadsheet for 2019.

Table 1

GEC Interrogatory No. 1	Enbridge Gas Position (Provided in interrogatory responses or Not Provided)	Additional References
Please provide an Excel spreadsheet, with formulae and calculations intact, that shows the following for each efficiency measure and for each program – separately for Enbridge and Union Gas – that was supported in 2017, 2018 and 2019:	Enbridge Gas does not have available spreadsheets with formulae and calculations intact for the information requested, however an excel document was provided with the data as outlined below for the 2017 and 2018 DSM program years. Enbridge Gas is working toward providing the similar data for 2019 and expects that this can be completed by May 1st.	In addition to what was provided by Enbridge Gas in interrogatory responses, much of the requested data for the 2017 and 2018 program years for program offerings as well as at a measure level is also available respectively in the 2017 and 2018 Natural Gas Demand-Side Management Annual Verification Reports ("2017 Verification Report" & "2018 Verification Report", Appendices G-K, & O, available on the OEB's website. A sample of this information is provided at Figure 1. (Exceptions include electricity and water savings; incremental costs/incentives at measure level) 2017 Verification Report: https://www.oeb.ca/sites/default/files/2017-DSM-Annual-Verification-Report.pdf 2018 Verification Report: https://www.oeb.ca/sites/default/files/2018-DSM-Annual-Verification-Report.pdf
a. The program name	Provided: See the response at Exhibit I.SEC.12.	See also 2017 Verification Report and 2018 Verification Report: - Appendix G: Resource Acquisition Programs (including detailed HER measure details - see table 6.14) - Appendix H: Low Income Programs - Appendix I: Large Volume Programs - Appendix O: Prescriptive Savings Verification Technical Resource Manuals for each program years can be found on the Board's website: https://www.oeb.ca/industry/policy-initiatives-and-consultations/natural-gas-demand-side-management-dsm
b. The measure name and description	Groupings were Provided in line with part c. below	
c. The per unit gas savings (m ³), electric savings (kWh), water savings (litres), incremental cost, measure life and net-to-gross assumption used to estimate savings achieved in each year. For programs for which measure level data are not available (e.g. because savings are tracked at a measure bundle or program level only), as well as for C&I custom programs, please provide average per participant savings, incremental cost, measure life for the measure bundle.	Provided: - Net natural gas savings, bundled - See the response at Exhibit I.SEC.12. - Gross natural gas savings, bundled - See the response at Exhibit I.SEC.12. - Net natural gas savings and gross natural gas savings provided - See the response at Exhibit I.SEC.12, average NTG can easily be calculated. - Incremental costs, bundled - See the response at Exhibit I.ED.1. - Annual natural gas savings vs. cumulative natural gas savings provided - See the response at Exhibit I.SEC 12, Avg. measure life bundled can easily be produced. - For HER, average incremental cost and savings per home (i.e. per unit) are provided in the response at Exhibit I.GEC.4, as well as participant measure breakdown. Not Provided: - Electric savings - Water savings - Incremental cost at measure level (can be found in TRMs available for each year on Board's website: https://www.oeb.ca/industry/policy-initiatives-and-consultations/natural-gas-demand-side-management-dsm	
d. The actual number of participants per measure (or measure bundle or C&I Custom program).	Provided: Bundled - See the response at Exhibit I.SEC.12.	
e. The gross realization rate adjustment factor applied (for the years for which it is available)	Not Provided Realization rates are an evaluation determinant and are detailed in the 2017 and 2018 Verification Reports. See Additional References.	See 2017 Verification Report and 2018 Verification Report: - Appendix G: Resource Acquisition Programs (including detailed - Appendix H: Low Income Programs - Appendix I: Large Volume Programs - Appendix O: Prescriptive Savings Verification - Appendix R: Custom Programs Verification and F/R. - Appendix S: Prescriptive NTG
f. The net-to-gross assumption used at the measure level (if applicable) or at the program level (if not applicable at the measure level).	Provided: Average NTG ratios, bundled - Can be easily produced based on the response at Exhibit I.SEC.12 net natural gas savings vs. gross natural gas savings.	
g. A computation of the net first year savings per measure (per measure savings multiplied by number of measures/participants multiplied by the gross realization rate multiplied by the net-to-gross ratio).	Provided: Annual natural gas savings, bundled - See the response at Exhibit I.SEC.12.	
h. A computation of the net lifetime savings per measure (per measure first year savings multiplied by measure life)	Provided: Cumulative natural gas savings, bundled - See the response at Exhibit I.SEC.12.	
i. The sum of net savings, both first year and lifetime, across all measures in each program and for the portfolio as a whole.	Provided: Bundled - See the response at Exhibit I.SEC.12.	
j. The rebate level (or average rebate level for measures or measure bundles for which rebate levels vary by customer or project).	Provided: Average incentive costs, bundled - Can easily be produced based on the response at Exhibit I.ED.1 for 2018. *For HER, average incentive per home is provided in the response at Exhibit I.GEC.4.	
k. Total rebate payments by measure (or measure bundle), program and program portfolio.	Provided: Average incentive costs, bundled - Can be produced easily based on the response at Exhibit I.ED.1 for 2018. *For HER, average incentive per home is provided in the response at Exhibit I.GEC.4.	
l. Total non-rebate spending by program, including non-resource acquisition programs, and for the portfolio as a whole, broken down by any sub-categories that are separately tracked.	Provided: Bundled - See SEC.12	
GEC Interrogatory No. 2	EGI Response	Additional Resources
Please 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.	Provided: Bundled for 2017 and 2018 - See the response at Exhibit I.SEC.12. In addition, further details regarding non-resource acquisition program can be found in the 2017 and 2018 Annual Verification reports in Appendix J and K.	See also 2017 Verification Report and 2018 Verification Report: - Appendix J: Market Transformation Scorecards - Appendix K: Performance Based (Union) and Market Transformation (Enbridge)

Figure 1

Savings Calculation Values

Savings tables in this section utilize measure names and units from the TRM wherever possible. Utilities utilized different units (BTU vs kBTU) or name variations, those are not used here.

Table 6-152. Enbridge measure savings calculation values*

Program	Measure	Pure or Quasi	Source	Savings Factor (m ³)	Unit	EUL	Gross Realization Rate	Free Ridership	Adjustment Factor
Residential Adaptive Thermostats	Residential Adaptive Thermostat	Pure	TRM 2.0	185.00	unit	15	100.00%	4%	100%
C&I Prescriptive	Air Door Double 8x6 Cx Offer	Pure	TRM 2.0	3,243.00	unit	15	100.00%	5%	100%
C&I Prescriptive	Air Door Double with Vestibule 7x3 Cx Offer	Pure	TRM 2.0	909.00	unit	15	100.00%	5%	100%
C&I Prescriptive	Air Door 8x10 Cx Campaign	Pure	TRM 2.0	15,135.00	unit	15	100.00%	5%	100%
C&I Prescriptive	Air Door Single 7x6 Cx Offer	Pure	TRM 2.0	1,343.00	unit	15	100.00%	5%	100%
C&I Prescriptive	DCKV up to 5000 CFM Cx Offer	Pure	TRM 2.0, 2017 C&I Prescriptive Verification Study	4,207.00	unit	15	102.74%	5%	100%
C&I Prescriptive	DCKV 10001 - 15000 CFM Cx Offer	Pure	TRM 2.0, 2017 C&I Prescriptive Verification Study	17,529.00	unit	15	102.74%	5%	100%
C&I Prescriptive	DCKV 5001 - 10000 CFM Cx Offer	Pure	TRM 2.0, 2017 C&I Prescriptive Verification Study	10,517.00	unit	15	102.74%	5%	100%
C&I Prescriptive	Destratification Fan Cx Offer	Pure	TRM 2.0	1,734.00	unit	15	100.00%	10%	100%
C&I Prescriptive	Destratification Fan Cx Offer	Pure	TRM 2.0	583.00	unit	15	100.00%	10%	100%
C&I Prescriptive	DW Under-Counter High Temp Cx Offer	Pure	TRM 2.0	137.00	unit	10	100.00%	40%	100%
C&I Prescriptive	Fryer Cx Offer	Pure	TRM 2.0	1,408.00	unit	12	100.00%	20%	100%
C&I Prescriptive	Fryer Cx Campaign	Pure	TRM 2.0	1,408.00	unit	12	100.00%	20%	100%
C&I Prescriptive	Showerhead Offer	Pure	TRM 2.0, Showerhead Verification Study Among Rental Buildings	30.60	unit	10	100.00%	10%	85%