

Adam Stiers Technical Manager Regulatory Applications Regulatory Affairs Tel: 519-436-4558 Email: <u>astiers@uniongas.com</u> EGIRegulatoryProceedings@enbridge.com Enbridge Gas Inc. P.O. Box 2001 50 Keil Drive N. Chatham, Ontario, N7M 5M1 Canada

June 2, 2020

BY EMAIL and RESS

Ms. Christine E. 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 (Board) File No.: EB-2019-0271 2021 DSM Plans – Updated Interrogatory Response

Further to the updated interrogatory responses filed by Enbridge Gas on May 25, 2020, enclosed please find an updated response to Exhibit I.OGVG.1 in the above noted proceeding.

Enbridge Gas was contacted by counsel to Ontario Greenhouse Vegetable Growers on May 27, 2020, seeking clarification regarding Enbridge Gas's original response to Exhibit I.OGVG.1, filed April 6, 2020. In reviewing its original response, Enbridge Gas realized that it inadvertently described Tables 2, 5 and 6 as containing data for the 2015-2019 DSM program years when they in-fact only contained data for the 2015-2018 DSM program years. In an effort to correct this response, considering that Enbridge Gas included draft 2019 program results in its updated interrogatory response to Exhibit I.SEC.12 filed May 25, 2020, and in order to avoid any further procedural delays, Enbridge Gas has updated its response to Exhibit I.OGVG.1 to include 2019 data, specifically:

Exhibit	Updates
Exhibit I.OGVG.1 a) iii)	Table 2 has been updated to include 2019 data.
Exhibit I.OGVG.1 b) iii)	Table 5 has been updated to include 2019 data.
Exhibit I.OGVG.1 b) iv)	Table 6 has been updated to include 2019 data.

Please contact the undersigned if you have any questions.

Yours truly,

(Original Signed)

Adam Stiers Technical Manager, Regulatory Applications

c.c.: Dennis O'Leary (Aird & Berlis) Josh Wasylyk (OEB Staff) Michael Millar (OEB Counsel) EB-2019-0271 (Intervenors)

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ENBRIDGE GAS INC.

Answer to Interrogatory from Ontario Greenhouse Vegetable Growers Association (OGVG)

Interrogatory

Reference:

General

Question:

- a) For each rate class in both the Enbridge Gas and Union Gas franchise areas, for the years 2015 to 2019, please provide the following information in table form:
 - i. The total number of customers in the rate class in each year.
 - ii. The total DSM costs allocated to the rate class in each year, including amounts embedded in base rates and amounts recovered through deferral and variance accounts (or for years where disposition has not yet been applied for the forecast amounts to be recovered through deferral and variance accounts).
 - iii. The total number of customers in the rate class that were DSM participants in each year.
- b) Please provide in table form:
 - i. The total number of customers in each rate class at the beginning of 2020.
 - ii. The forecast total amount of DSM costs to be allocated to each rate class in 2020, both embedded in base rates and through deferral and variance accounts.
 - iii. The total number of culstomers in each rate class at the beginning of 2020 that were participants in DSM offered by EGI (through its predecessor companies) from 2015 to 2019.
 - iv. The total number of customers in each rate class at the beginning of 2020 that were participants in DSM offered by EGI (through its predecessor companies) from 2015 to 2019 more than once.
 - v. The forecast number of DSM participants in each rate class for 2020.
- c) Please discuss what efforts EGI is making in 2020 and 2021 to target customers in each rate class that have not participated in EGI's DSM programming from 2015 to 2019.

Response

a)

i. Table 1 below indicates the EGD rate zone's and Union rate zones' annual average number of customers by rate class for the period of 2015-2019.

Table 1

Enbridge Gas Inc. EGI Number of Customers by Rate Classes Annual Average for 2015-2019

General Service/Rate Zone	Rate Class	2015	2016	2017	2018	2019
EGD	Rate 1	1,930,657	1,959,569	1,990,032	2,017,128	2,040,710
EGD	Rate 6	163,634	164,698	166,224	167,626	168,093
EGD	Rate 9	6	6	3	2	-
Union South	M1	1,083,032	1,097,031	1,111,544	1,127,353	1,141,279
Union South	M2	7,437	7,730	7,553	7,469	7,783
Union North	R01	333,773	339,334	344,458	349,354	353,643
Union North	R10	2,152	2,219	2,192	2,118	2,144
Total		3,520,691	3,570,587	3,622,006	3,671,050	3,713,652
Contract Market / Rate Zone	Rate Class	2015	2016	2017	2018	2019
EGD	Rate 100	2	2	3	3	4
EGD	Rate 110	227	270	263	273	280
EGD	Rate 115	25	27	27	25	22
EGD	Rate 125	5	5	5	4	4
EGD	Rate 135	43	45	45	43	41
EGD	Rate 145	52	38	37	32	25
EGD	Rate 170	26	25	26	27	23
EGD	Rate 200	1	1	1	1	1
EGD	Rate 300	2	2	2	1	1
EGD	Rate 315	1	1	1	1	1
Union North	Rate_20	50	47	46	44	54
Union North	Rate_25	80	78	79	78	55
Union North	Rate_100	13	14	14	13	12
Union South	Rate_M4	156	165	185	208	232
Union South	Rate_M5	80	72	59	38	42
Union South	Rate_M7	28	28	30	30	36
Union South	Rate_M9	2	2	3	3	4
Union South	Rate_M10	2	2	2	3	2
Union South	Rate_T1	37	37	37	37	37
Union South	Rate_T2	22	22	23	24	25
Union South	Rate_T3	1	1	1	1	1
Total		855	884	889	889	902

ii. Please see Attachment 1 for DSM costs by rate class.

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iii. Table 2 below indicates the EGD rate zone's and Union rate zones' customers who were DSM participants by rate class for the period of 2015-2019.

	Table 2													
General Service	Rate Class	2015	2016	2017	2018	2019								
EGD	Rate 1	7,538	31,206	26,676	31,929	34,148								
EGD	Rate 6	1,444	1,421	1,483	1,107	1,320								
Union South	Rate M1	22,664	8,025	14,276	16,397	16,472								
Union South	Rate M2	412	352	384	346	299								
Union North	Rate 01	2,654	886	1,968	1,766	3,029								
Union North	Rate 10	74	74	114	75	71								
Total		34,786	41,964	44,901	51,620	55,339								
Contract Market	t Rate Class	2015	2016	2017	2018	2019								
EGD	Rate 100	1	1	2	1	3								
EGD	Rate 110	54	58	48	35	39								
EGD	Rate 115	5	6	8	6	6								
EGD	Rate 135	3	5	8	10	9								
EGD	Rate 145	2	1		2									
EGD	Rate 170	6	7	5	1	3								
Union North	Rate 20	17	13	13	12	17								
Union North	Rate 25	1	2	1										
Union North	Rate 100	6	4	6	5	5								
Union South	Rate M4	82	65	81	68	68								
Union South	Rate M5	15	10	10	10	7								
Union South	Rate M7	28	24	27	25	28								
Union South	Rate T1	16	11	21	16	12								
Union South	Rate T2	17	15	15	15	17								
Total		253	222	245	206	214								

NOTES:

- Table 2 includes a customer count which is not the same as the unit or participant count. In some cases, multiple units can be installed for a single customer (e.g. prescriptive programs). In other cases, programs did not report on participant numbers but are included here to be responsive (e.g. EGD Low Income TAPS).
- Rate class categorization for this analysis was determined based on the customers current rate class in order to answer b) iii and b) iv and is not necessarily the same rate class the customer was in at the time the project was implemented. The EGD rate zone home labeling program delivered in 2015 was excluded.

• As a result of updating tables to include 2019 data, the current rate class has changed for some participants, resulting in some past participants showing in a different rate class.

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b) i.

Table 3 below, indicates the EGD rate zone's and Union rate zones' annual average number of customers by rate class based on February-2020 monthend

Table 3

Enbridge Gas Inc. EGI Number of Customers by Rate Classes

General Service/Rate Zone	Rate Class	Feb-20
EGD	Rate 1	2,058,873
EGD	Rate 6	170,008
EGD	Rate 9	-
Union South	M1	1,150,542
Union South	M2	7,898
Union North	R01	356,614
Union North	R10	2,221
Total		3,746,156

Contract Market / Rate Zone	Rate Class	Feb-20
EGD	Rate 100	7
EGD	Rate 110	317
EGD	Rate 115	21
EGD	Rate 125	4
EGD	Rate 135	45
EGD	Rate 145	22
EGD	Rate 170	20
EGD	Rate 200	1
EGD	Rate 300	2
EGD	Rate 315	1
Union North	Rate_20	56
Union North	Rate_25	69
Union North	Rate_100	12
Union South	Rate_M4	239
Union South	Rate_M5	37
Union South	Rate_M7	44
Union South	Rate_M9	4
Union South	Rate_M10	3
Union South	Rate_T1	39
Union South	Rate_T2	25
Union South	Rate_T3	1
Total		969

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Table 4 below, details DSM costs by rate class for 2020. No estimate of 2020 DSM costs to be cleared through DSM-related deferral and variance accounts ii. is currently available for 2020.

Table 4									
General Service	Rate Class	DSM Cos	sts in Rates						
EGD	RATE 1	\$	39,405,864						
EGD	RATE 6	\$	21,074,060						
EGD	RATE 9	\$	2,935						
Union South	Rate M1	\$	27,446,431						
Union South	Rate M2	\$	10,658,120						
Union North	Rate 01	\$	6,624,724						
Union North	Rate 10	\$	3,126,779						
Total		\$	108,338,913						
Contract Market	Rate Class	DSM Cos	sts in Rates						
EGD	RATE 100	\$	-						
EGD	RATE 110	\$	1,752,037						
EGD	RATE 115	\$	1,319,025						
EGD	RATE 125	\$	110,076						
EGD	RATE 135	\$	255,246						
EGD	RATE 145	\$	1,597,384						
EGD	RATE 170	\$	2,195,251						
EGD	RATE 200	\$	38,160						
EGD	RATE 300	\$	7,338						
Union North	Rate 20	\$	1,753,140						
Union North	Rate 100	\$	1,147,290						
Union South	Rate M4	\$	3,092,957						
Union South	Rate M5	\$	2,171,433						
Union South	Rate M7	\$	2,034,347						
Union South	Rate T1	\$	1,568,951						
Union South	Rate T2	\$	4,725,369						
Total		\$	23,768,004						

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iii. Table 5 below indicates the EGD rate zone's and Union rate zones' customers who were DSM participants by rate class from 2015 to 2019.

Table 5										
General Service	Rate Class	Unique Customers								
EGD	Rate 1	128,196								
EGD	Rate 6	5,948								
Union South	Rate M1	75,329								
Union South	Rate M2	1,453								
Union North	Rate 01	10,102								
Union North	Rate 10	350								
Total 221										
Contract Market	Rate Class	Unique Customers								
EGD	Rate 100	4								
EGD	Rate 110	144								
EGD	Rate 115	13								
EGD	Rate 135	21								
EGD	Rate 145	3								
EGD	Rate 170	10								
Union North	Rate 20	33								
Union North	Rate 25	2								
Union North	Rate 100	12								
Union South	Rate M4	183								
Union South	Rate M5	30								
Union South	Rate M7	37								
Union South	Rate T1	30								
Union South	Rate T2	22								
Total		544								

NOTES:

- Table 5 includes a customer count which is not the same as the unit or participant count. In some cases, multiple units can be installed for a single customer (e.g. prescriptive programs). In other cases, programs did not report on participant numbers but are included here to be responsive (e.g. EGD Low Income TAPS).
- Table 5 includes only unique participants. Participants who participated in multiple years were only counted once.
- Rate class categorization for this analysis was determined based on the customers current rate class in order to answer b) iii and b) iv and is not necessarily the same rate class the customer was in at the time the project was implemented. The EGD rate zone home labeling program delivered in 2015 was excluded.
- As a result of updating tables to include 2019 data, the current rate class has changed for some participants, resulting in some past participants showing in a different rate class.

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 Table 6 below indicates the EGD rate zone's and Union rate zones' customers who were DSM participants by rate class from 2015 to 2019, more than once.

Table 6										
General Service	Rate Class	Repeat Customers								
EGD	Rate 1	6,561								
EGD	Rate 6	1,581								
Union South	Rate M1	4,298								
Union South	Rate M2	507								
Union North	Rate 01	736								
Union North	Rate 10	101								
Total		13,784								
Contract Market	Rate Class	Unique Customers								
EGD	Rate 100	3								
EGD	Rate 110	86								
EGD	Rate 115	11								
EGD	Rate 135	13								
EGD	Rate 145	2								
EGD	Rate 170	6								
Union North	Rate 20	24								
Union North	Rate 25	2								
Union North	Rate 100	11								
Union South	Rate M4	142								
Union South	Rate M5	19								
Union South	Rate M7	36								
Union South	Rate T1	25								
Union South	Rate T2	19								
Total		399								

NOTES:

- Table 2 includes a customer count which is not the same as the unit or participant count. In some cases, multiple units can be installed for a single customer (e.g. prescriptive programs). In other cases, programs did not report on participant numbers but are included here to be responsive (e.g. EGD Low Income TAPS).
- Rate class categorization for this analysis was determined based on the customers current rate class in order to answer b) iii and b) iv and is not necessarily the same rate class the customer was in at the time the project was implemented. The EGD rate zone home labeling program delivered in 2015 was excluded.
- As a result of updating tables to include 2019 data, the current rate class has changed for some participants, resulting in some past participants showing in a different rate class.

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- v. EGI does not forecast program participants by rate class.
- c) Enbridge Gas does not target by rate class. Enbridge Gas's offerings are designed to cover a specific sector (e.g., residential, commercial, industrial) or market segment (e.g., low income, foodservice), and individual programs employ methods to target non-participants for uptake. A summary of initiatives to increase participation through to 2020 and 2021 is provided in the response at Exhibit I.OSEA.6.

Enbridge Gas Inc.

Total DSM Costs - 2015-2019

				2015				2016			2	017 (1)				2018 (1)			201	L9 (2)	
				2015				2010			2	017 (1)				2018 (1)			201	[9 (2)	
General Service	Rate Class	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs
		А	В	С	D = A+B+C	А	В	С	D = A+B+C	Α	В	С	D = A+B+C	А	В	С	D = A+B+C	Α	В	С	D = A+B+C
EGD	Rate 1	\$ 20,954,097	N/A	\$ 5,901,877	\$ 26,855,974	\$ 38,039,480	N/A	\$ 4,351,434	\$ 42,390,914	\$ 43,125,238	N/A	\$ 1,453,433	\$ 44,578,671	\$ 47,205,761	N/A	\$ 2,842,053	\$ 50,047,814	\$ 38,629,963	N/A	N/A	\$ 38,629,963
EGD	Rate 6	\$ 12,207,912	N/A	\$ 3,438,449	\$ 15,646,361	\$ 15,255,925	N/A	\$ 1,745,165	\$ 17,001,090	\$ 17,036,079	N/A	\$ 574,160	\$ 17,610,239	\$ 16,615,780	N/A	\$ 1,000,364	\$ 17,616,144	\$ 20,658,237	N/A	N/A	\$ 20,658,237
Union South	M1	\$ 13,186,370	N/A	\$ 3,565,990	\$ 16,752,360	\$ 22,574,194	N/A	\$ 2,020,574	\$ 24,594,768	\$ 34,094,527	N/A	\$ 3,109,031	\$ 37,203,558	\$ 38,116,865	N/A	\$ 3,831,473	\$ 41,948,338	\$ 27,163,647	N/A	N/A	\$ 27,163,647
Union South	M2	\$ 3,728,023	N/A	\$ 1,230,083	\$ 4,958,106	\$ 6,140,753	N/A	\$ 706,006	\$ 6,846,759	\$ 7,393,524	N/A	\$ 772,700	\$ 8,166,224	\$ 7,129,898	N/A	\$ 721,482	\$ 7,851,380	\$ 10,601,605	N/A	N/A	\$ 10,601,605
Union North	R01	\$ 2,779,747	N/A	\$ 775,326	\$ 3,555,073	\$ 4,352,659	N/A	\$ 336,435	\$ 4,689,094	\$ 5,777,036	N/A	\$ 432,147	\$ 6,209,183	\$ 6,855,310	N/A	\$ 548,003	\$ 7,403,314	\$ 6,344,581	N/A	N/A	\$ 6,344,581
Union North	R10	\$ 773,824	N/A	\$ 179,065	\$ 952,890	\$ 1,297,489	N/A	\$	\$ 1,393,794	\$ 1,979,183	N/A	\$ 164,337	\$ 2,143,521	\$ 1,685,783	N/A	\$ 143,696	\$ 1,829,479	\$ 3,001,617	N/A	N/A	\$ 3,001,617
Total		\$ 53,629,973	\$-	\$ 15,090,790	\$ 68,720,763	\$ 87,660,500	\$-	\$ 9,255,919	\$ 96,916,419	\$109,405,587	\$-	\$ 6,505,809	\$ 115,911,396	\$117,609,398	\$ -	\$ 9,087,071	\$ 126,696,469	\$ 106,399,649	\$ -	\$-	\$ 106,399,649

			20	015			20	16			201	17 (1)			20 1	l8 (1)			201	.9 (2)	
Contract Market	Rate Class	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA ⁻	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs	DSM Costs	LRAM	DSMIDA	Total DSM Costs
		А	В	С	D = A+B+C	А	В	С	D = A+B+C	Α	В	С	D = A+B+C	А	В	С	D = A+B+C	А	В	С	D = A+B+C
EGD	Rate 9	\$ 1,435	\$ -	\$ 404	\$ 1,839	\$ 1,822	\$-	\$ 208	\$ 2,030	\$ 2,230	\$ -	\$75	\$ 2,306	\$ 2,776	\$ -	\$ 167	\$ 2,943	\$ 2,878	N/A	N/A	\$ 2,878
EGD	Rate 100	\$-	\$ -	\$-	\$-	\$-	\$-1	\$-	\$-	\$-	\$ -	\$-	\$-	\$-	\$ -	\$-	\$-	\$-	N/A	N/A	\$-
EGD	Rate 110	\$ 1,497,220	\$ 18,536	\$ 421,703	\$ 1,937,459	\$ 1,113,881	\$ 9,230	\$ 127,420	\$ 1,250,531	\$ 1,423,092	\$ 2,985	\$ 47,962	\$ 1,474,038	\$ 863,910	\$ 2,073	\$ 52,012	\$ 917,995	\$ 1,717,402	N/A	N/A	\$ 1,717,402
EGD	Rate 115	\$ 519,150	\$ 6,246	\$ 146,222	\$ 671,618	\$ 476,401	\$ 1,196	\$ 54,497	\$ 532,093	\$ 573,093	\$ -	\$ 19,315	\$ 592,408	\$ 258,002	\$ -	\$ 15,533	\$ 273,535	\$ 1,292,940	N/A	N/A	\$ 1,292,940
EGD	Rate 125	\$ 53,811	\$ -	\$ 15,156	\$ 68,967	\$ 68,317	\$-	\$7,815	\$ 76,131	\$ 83,643	\$ -	\$ 2,819	\$ 86,462	\$ 104,091	\$ -	\$ 6,267	\$ 110,358	\$ 107,934	N/A	N/A	\$ 107,934
EGD	Rate 135	\$ 45,741	\$ 329	\$ 12,883	\$ 58,953	\$ 76,514	\$ 298	\$ 8,753	\$ 85,564	\$ 370,026	\$ 4,776	\$ 12,471	\$ 387,274	\$ 381,017	\$ 2,902	\$ 22,939	\$ 406,859	\$ 250,196	N/A	N/A	\$ 250,196
EGD	Rate 145	\$ 146,935	\$ 2,167	\$ 41,385	\$ 190,487	\$ 75,515	\$ 325	\$ 8,638	\$ 84,478	\$ 87,567	\$ 14	\$ 2,951	\$ 90,532	\$ 514,299	\$ 5,678	\$ 30,964	\$ 550,941	\$ 1,565,792	N/A	N/A	\$ 1,565,792
EGD	Rate 170	\$ 331,431	\$ 939	\$ 93,350	\$ 425,719	\$ 512,194	\$ 3,607	\$ 58,591	\$ 574,392	\$ 171,449	\$ 223	\$ 5,778	\$ 177,450	\$ 165,805	\$ 173	\$	\$ 175,961	\$ 2,151,818	N/A	N/A	\$ 2,151,818
EGD	Rate 200	\$ 18,655	\$-	\$ 5,254	\$ 23,909	\$ 23,683	\$-	\$ 2,709	\$ 26,392	\$ 28,996	\$ -	\$ 977	\$ 29,973	\$ 36,085	\$ -	\$ 2,173	\$ 38,257	\$ 37,417	N/A	N/A	\$ 37,417
EGD	Rate 300	\$ 3,587	\$-	\$ 1,010	\$ 4,598	\$ 4,554	\$-	\$ 521	\$ 5,075	\$ 5,576	\$ -	\$ 188	\$ 5,764	\$ 6,939	\$ -	\$ 418	\$ 7,357	\$ 7,196	N/A	N/A	\$ 7,196
Union North	R20	\$ 838,501	\$ 44,900	\$ 159,824	\$ 1,043,226	\$ 798,316	\$ 19,180	\$ 48,887	\$ 866,382	\$ 1,430,636	\$ 6,769	\$ 120,772	\$ 1,558,177	\$ 293,574	\$ 9,190	\$ 8,489	\$ 311,252	\$ 1,671,732	N/A	N/A	\$ 1,671,732
Union North	R100		\$ 59,082	\$ -	\$ 855,713	\$ 572,450	\$ 4,093	\$-	\$ 576,543	\$ 807,133	\$ (5,032)	\$-	\$ 802,100	\$ 819,365	\$ (5,012)	\$-	\$ 814,353		N/A	N/A	\$ 1,111,159
Union South	M4		\$ 178,227	\$ 694,078	\$ 3,748,917	\$ 3,660,302	\$179,499	\$ 306,562	\$ 4,146,364	\$ 5,278,690	\$208,838	\$ 497,709	\$ 5,985,237		\$381,014	\$ 656,186	\$ 7,028,749		N/A	N/A	\$ 3,150,206
Union South	M5	\$ 1,147,287	\$ 252.096	\$ 236,532	\$ 1,635,915	\$ 2.274.358	\$214,241	\$ 187,060	\$ 2,675,659	\$ 1.317.497	\$208,373	\$ 97,464	\$ 1,623,335	\$ 621,172	\$ 2.010	\$ 27,578	\$ 650,760		N/A	N/A	\$ 1,977,091
Union South	M7		\$ 59,503	\$ 631,583	\$ 3,397,289	\$ 3,635,740	\$ 66,240		\$ 4,015,341	\$ 1,143,215	. ,	\$ 106,852	\$ 1,300,147		\$ 19,524	\$ 258,078	\$ 2,724,080		, N/A	, N/A	\$ 2,129,549
Union South	T1	\$ 887,143	. ,	. ,	*	\$ 1,379,641	\$ 3,011		\$ 1,488,193	\$ 2,356,129	\$ 4,626		\$ 2,578,882	\$ 1,789,310	\$ 4,687	\$ 171,241	\$ 1,965,239		, N/A	, N/A	\$ 1,505,371
Union South	T2	\$ 2,672,302			\$ 2,675,900		\$ 1,295			\$ 3,003,539				\$ 3,373,617		. ,	\$ 3,364,301		N/A		\$ 4,612,216
Total			\$ 630,184	\$ 2,459,386	\$ 17,632,214	\$ 18,653,436				\$ 18,082,512						\$ 1,262,027	\$ 19,342,942		\$ -	-	\$ 23,290,896
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Grand Total \$ 68,172,617 \$ 630,184 \$ 17,550,176 \$ 86,352,977 \$ 106,313,936 \$502,215 \$10,486,482 \$ 117,302,632 \$ 127,488,099 \$ 476,349 \$ 7,639,270 \$ 135,603,718 \$ 135,277,388 \$ 412,925 \$ 10,349,098 \$ 146,039,411 \$ 129,690,546 \$						
	Grand Total	\$ 68,172,617 \$ 630,184 \$ 17,550,176 \$ 86,352,97	⁷ \$ 106,313,936 \$502,215 \$10,486,482 \$ 117,302,632	\$127,488,099 \$476,349 \$7,639,270 \$135,603,718	\$135,277,388 \$412,925 \$10,349,098 \$ 146,039,411	\$ 129,690,546 \$ - \$ - \$ 129,690,546

Note: Total DSM costs includes amounts embedded in base rates, and amounts recovered through deferral

(1) Amounts subject to deferral clearance

(2) At the time of filing, 2019 actual DSM costs allocated by rate class is not available. 2019 OEB Approved