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June 9, 2020

BY RESS And EMAIL

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

Dear Ms. Long:

**Re: EB-2017-0127/0128 and EB-2019-0003 – Enbridge Gas Inc. – 2015-2020
Demand Side Management Mid-Term Review - Progress Report**

In its Report of the Ontario Energy Board: Mid-Term Review of the Demand Side Management (DSM) Framework for Natural Gas Distributors (2015-2020) (EB-2017-0127/0128) (dated November 29, 2018) (the “Mid-Term Report”), the Ontario Energy Board (“OEB” or “the Board”) directed that several updates be made to the 2015-2020 DSM Framework (EB-2014-0134) and OEB-approved DSM Plans (EB-2015-0029/0049). In May 2020, OEB Staff requested that Enbridge Gas Inc. (“Enbridge Gas”) provide a report summarizing progress made in implementing these updates.¹ This is Enbridge Gas’s Progress Report. Table 1 herein, summarizes relevant sections of the Board’s Mid-Term Report, assigns a current status to Enbridge Gas’s efforts to comply (Complete or Ongoing) and provides an explanation of Enbridge Gas’s progress to-date.

If you have any questions, please contact the undersigned.

Sincerely,

[original signed by]

Adam Stiers
Technical Manager, Regulatory Applications

c.c.: Dennis O’Leary (Aird & Berlis)
Josh Wasylyk (OEB Staff)
EB-2017-0127/0128 (Intervenors)
EB-2019-0003 (Intervenors)

¹ Enbridge Gas Inc. was formed by the amalgamation of Enbridge Gas Distribution Inc. (“EGD”) and Union Gas Limited (“Union”) on January 1, 2019 pursuant to the *Ontario Business Corporations Act*, R.S.O. 1990, c. B. 16.

Table 1
Progress Report on Enbridge Gas's Compliance with OEB Mid-Term Report Direction/Updates

Mid-Term Report Reference	Topic	Mid-Term Report Conclusions of the Board	Status	Explanation of Enbridge Gas's Progress
Page 24	Adaptive Thermostat Expansion	<p>"Stakeholders were generally supportive of this request. The OEB supports Union Gas' request to expand this program in 2019 and 2020 as a greater number of residential customers will be able to participate and receive important benefits of this smart technology.</p> <p>Union Gas will track program expenditures in the DSMVA. The OEB supports a notional target of 34,645,000 cumulative cubic meters of natural gas savings. Union Gas' 2019 and 2020 Resource Acquisition scorecards have been updated to reflect this notional target in Appendix A. Union Gas should provide supporting evidence for this target as part of its 2019 DSM deferral and variance account application. This will be the first time the additional natural gas savings are included within the Resource Acquisition scorecard. Parties will have the ability to test this figure as part of that application."</p>	Complete	<p>The Adaptive Thermostats Offering was introduced in the Union rate zones on January 1, 2019, with an incentive of \$75 per thermostat; aligned with the offer available to EGD rate zone customers.</p> <p>In total, Enbridge Gas generated 43.6 M CCM (pre-audit) in savings from residential adaptive thermostats in 2019, which included savings of 8.4 M CCM (pre-audit) from the Union rate zones.</p> <p>While the offering became available to customers in the Union rate zones January 1, 2019, Enbridge Gas experienced delays in establishing instant rebates with its vendors. This delay exacerbated the time required to roll-out this program across the Union rate zones, resulting in lower savings in the first half of 2019. However, in the final months of 2019, savings results began to align more closely with those experienced in the EGD rate zone.</p>
Page 6	Adding Cost of Carbon to Cost Effectiveness	<p>"The cost of carbon, using the publicly available federal carbon cost, will be explicitly included as part of all cost-effectiveness analyses. This will ensure that all benefits are being accounted for when determining the cost-effectiveness of the natural gas utilities' programs."</p>	Complete	<p>The cost of carbon was incorporated into the 30-year avoided cost tables used for all cost-effectiveness analyses starting with the 2017 DSM program year. The costs used were reviewed by OEB Staff, the DSM Evaluation Advisory Committee ("EAC") and the 2017/2018 DSM Evaluation Contractor (i.e. DSM auditor).</p>
Page 14	Educational Content Alignment	<p>"The OEB continues to be of the view that customers in both the utilities' franchise areas should be receiving consistent energy conservation education and messaging. At a minimum, they should be receiving the same information from each gas utility. Given that the current suite of approved programs for both utilities includes educational information, the OEB expects Enbridge Gas and Union Gas to coordinate the educational components of their DSM programs for the remainder of the current multi-year term."</p>	Complete	<p>Energy literacy has been and will continue to be, an important aspect of Enbridge Gas's DSM offerings. Enbridge Gas recognizes that customers in all rate zones should receive consistent energy conservation education and messaging in order to promote a broader culture of conservation. As a result, Enbridge Gas has implemented several consistent energy literacy initiatives across its customer base, mainly via two channels: program delivery and marketing.</p> <p>Residential Customers The residential retrofit offering begins with an initial in-home energy assessment, completed by a registered energy advisor. While on-site, the energy advisor explains all available energy saving opportunities, including how to complete the upgrades and the associated rebates. This conversation creates greater energy literacy and increases the customer's willingness to implement energy saving options. In addition, the homeowner receives the NRCan audit report that was generated. This report reiterates savings opportunities and increases energy literacy, as it provides customers with a record that can be referred to in the future. Marketing for residential offerings, through tactics such as newspaper wraps, direct mails, postcards and bill inserts, include information regarding the benefits of energy efficiency both from savings and home comfort perspectives. In addition, many marketing tactics include simple tips to improve home energy performance.</p> <p>Commercial and Industrial Customers A key component of Enbridge Gas's commercial and industrial offerings is the education and advice that Energy Solutions Advisors ("ESAs") provide on an ongoing basis to help key accounts identify, prioritize and implement energy savings opportunities. Examples of such activities include: Conducting site walk-throughs; Completing engineering calculations to help customers quantify and prioritize opportunities; Connecting customers to service providers who can implement projects.</p> <p>For accounts that do not have an assigned ESA, specific measures are taken in the program delivery process to encourage awareness and adoption of efficiency measures. For example:</p> <ul style="list-style-type: none"> • Included in the Demand Control Kitchen Ventilation ("DCKV") direct install offering is a comprehensive on-site assessment that includes an inspection of the customer's commercial kitchen and education on both the energy and non-energy benefits of the equipment. • For its mid-stream initiative, branch level training sessions are provided to participants throughout various levels of their organization (e.g., head office, administrative, reporting, and sales staff). <p>Enbridge Gas continues to incorporate consistent energy literacy elements in its marketing strategy to improve awareness within the commercial and industrial customer base across areas all rate classes and rate zones. Some examples include:</p> <ul style="list-style-type: none"> • Enbridge Gas hosts quarterly workshops with customers to create awareness and interest in exploring different forms of efficiency measures. Enbridge Gas has also recorded many of these workshops and made them available for viewing online to increase their reach. • Enbridge Gas also hosts webinars with contractor groups and various associations on an ongoing basis to create awareness of efficiency measures and to profile case study examples. • Quarterly newsletters are distributed to customers, which feature technology trends, industry tips, and case studies to create awareness and interest in energy efficiency opportunities. • Enbridge Gas provides access to tools such as efficiency calculators on its website for customers to get a better understanding of potential savings.
Page 6 Page 26	Open Bill Access	<p>"Union Gas is to continue the development and roll out of its Open Bill Access program. This program enables, amongst other things, financing of energy efficiency purchases and billing using Union Gas customer's utility bill. No additional funding will be provided and Union Gas must continue to ensure that the program is consistent with Enbridge Gas' program."</p> <p>"The OEB appreciates Union Gas' efforts in creating an Open Bill Access program. The OEB agrees that if the investment to provide access to this program has largely been made or committed, Union Gas should proceed in order to allow customers to have access to this financing opportunity as soon as possible. While it is expected that the natural gas utilities will eventually share the same billing system, this may take some time to implement. In the interim, Union Gas is encouraged to ensure consistency with Enbridge Gas' program, as this would simplify participation by contractors and other service providers in the province by having programs that are harmonized."</p>	Complete	<p>Throughout the development and launch of the Union rate zones' Open Bill Access program ("OBA"), Enbridge Gas has striven to harmonize the program wherever possible with the existing EGD rate zone OBA program. The eligible equipment/service list differs between the EGD rate zone and Union rate zones OBA programs, as Enbridge Gas was directed by the OEB to focus the Union rate zones program upon energy efficiency/conservation-related equipment and services. However, Enbridge Gas has endeavored to ensure that all other aspects of the respective programs are consistent wherever possible. Further, where a current OBA biller (one that is actively utilizing the EGD rate zone OBA program) chooses to also enroll in the Union rate zones OBA program, the registration fee for that biller to enroll in the Union rate zones OBA program will be waived.</p> <p>The Union rate zones OBA program launched the week of March 30, 2020, via a program webpage linked from the Union rate zones website. Subsequent marketing of the program to potential billers will take place in partnership with the Heating Refrigeration and Air Conditioning Institute of Canada ("HRAI"). Enbridge Gas's current expectation is that interested billers will be enrolled in the program in Q2 2020 and that billing on behalf of those enrolled in the program will commence in Q3 2020.</p>
Page 23	Residential Retrofit Program Alignment	<p>"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."</p>	Complete	<p>Enbridge Gas confirms that its residential retrofit offerings have now been aligned to the extent appropriate/possible to best meet customer needs, manage market confusion and streamline program support and delivery. Full alignment of programming across the province will be best accomplished following consideration of the Post-2020 DSM Framework. Please also see Enbridge Gas's response to interrogatories in its 2021 DSM Plans proceeding (EB-2019-0271, Exhibit I.OSEA.1).</p>
Page 22	Savings by Design Residential	<p>"As part of the DSM Decision, the OEB indicated to Union Gas that its residential new construction program should continue to target improvements of 15% above the new 2017 Ontario Building Code standards. Both natural gas utilities should proceed with a threshold of 15% above 2017 Ontario Building Code for the remainder of the 2015-2020 term."</p>	Complete	<p>Both the Savings by Design Residential Offering and the Optimum Home Offering engage builders to achieve a target of 15% or greater increased energy efficiency performance than levels prescribed by the 2017 Ontario Building Code.</p>

Page 28	Benchmarking Pilot	"While the OEB is interested in the concepts presented, it is not practical to implement this program at this stage of the 2015-2020 DSM Framework. The OEB encourages the natural gas utilities to begin exploring this concept. This appears to be a good candidate for a pilot program in the post-2020 DSM framework."	Ongoing	<p>Benchmarking is a data-driven methodology that analyzes customer energy intensity levels across specific market segments to create a ranked performance index that can be used in several ways to enhance conservation program performance. Enbridge Gas has been and continues to explore the concept of using a benchmarking approach to enhance its ability to better identify high potential participants that would most benefit from participating in its programs, and as a tool to motivate and influence program participants to undertake energy efficiency upgrades.</p> <p>In 2018 and 2019, Enbridge Gas participated in two conservation pilot projects with the Toronto and Region Conservation Authority that focused primarily on the schools and municipal buildings sectors. These pilot projects enrolled customers and guided them through a process that leveraged benchmarking to assess conservation potential, identify high potential buildings and motivate customers to follow through with conservation measures. These pilots generated lessons learned that will help inform future program design with respect to benchmarking and, separately, performance-based conservation methodology. These lessons learned include:</p> <ul style="list-style-type: none"> • When targeting customers through benchmarking, it is important to begin with a relatively simple, homogenous sector (e.g., schools). • It is important to identify and quantify the major energy drivers for customers. This information allows for the determination of an energy intensity value, which ideally includes electricity, in order to rank the sector based on a holistic energy consumption. • This information helps start a more informative dialogue with decision makers to convince them that there is an opportunity to improve energy intensity compared to their peers. • Once decision makers agreed to participate, it is important to arrange a site-based review to validate the theoretical findings with the site opportunities. From this site review, a robust action plan per facility can be created.
Page 30	Collaboration	"Enbridge Gas should continue to explore additional opportunities to provide customers with a single point of contact for energy conservation opportunities."	Ongoing	<p>On March 21, 2019, the Minister of Energy, Northern Development and Mines directed the IESO to discontinue the 2015-2020 Conservation First Framework and implement a new interim framework. As a result, the IESO is centrally delivering energy-efficiency programs on a province-wide basis with a focus on business and industrial programs from April 1, 2019 until December 31, 2020. Due to the uncertainty of the future Conservation and Demand Management ("CDM") framework in Ontario, there are currently fewer opportunities for gas/electric collaboration with electric Local Distribution Companies ("LDCs"); despite this fact, Enbridge Gas remains committed to actively pursuing opportunities with the IESO to develop and deliver combined gas and electric conservation initiatives. Most recently, Enbridge Gas and IESO partnered on a jointly delivered direct install initiative for Demand Control Kitchen Ventilation that provides business customers with streamlined access to gas and electric incentives through a single point of contact.</p> <p>In addition, Enbridge Gas is in the final stages, working with the IESO, of delivering a collaborative Energy Manager initiative which would incentivize energy managers to take a holistic approach and assess all energy saving opportunities within their business. This initiative is expected to launch in the second half of 2020.</p> <p>Future Enbridge Gas/IESO collaboration opportunities are subject to the IESO's mandate; depending on determinations regarding a conservation framework beyond the interim framework that is currently in place until December 31, 2020.</p> <p>In addition to collaborating with the IESO and electric LDC's, Enbridge Gas is exploring how to most effectively provide support to and collaborate with Municipalities, and is taking action to engage in local and regional energy and conservation planning. As a result of its efforts over the past few years, beginning in 2020, Enbridge Gas established a dedicated team to identify where and how Enbridge Gas can partner and support regional municipalities and smaller communities to support the achievement of common conservation objectives.</p>
Page 21	Energy Leaders	"The OEB agrees that it is reasonable for Enbridge Gas to continue to offer this program in 2019 and 2020 as it has proven to be successful. Enbridge Gas is to track the costs of this program within the DSMVA and seek approval of recovery of the amounts as part of the annual DSM deferral and variance account application. The annual spending should be no greater than \$0.4M, the amount proposed by Enbridge Gas."	Ongoing	The Energy Leaders Offering is intended to identify and respond to customers that are progressive in their energy practices and prepared to be early adopters of emerging technologies to achieve deeper savings. This offering provides these early adopters with increased incentives and support for implementing emerging technologies. As a result of the Board's Mid-Term Report, Enbridge Gas has continued to deliver the Energy Leaders Offering and is tracking any related costs within the DSMVA as directed. Enbridge confirms any such spending is not to exceed \$0.4 million.
Page 6 Pages 20-21	Integrated Resource Planning	<p>"Case studies and data analysis should continue in order to better understand how DSM can be included within the natural gas utilities' infrastructure planning processes. The proposed roadmap provided by the natural gas utilities is a starting point. The OEB expects the natural gas utilities to develop more robust procedures to ensure conservation opportunities can be reasonably considered as alternatives to future capital projects."</p> <p>"The natural gas utilities should continue to develop rigorous protocols to include DSM as part of their internal capital planning process. This should include a comprehensive evaluation of conservation and energy efficiency considered as an alternative to reduce or defer infrastructure investments as part of all leave to construct applications."</p>	Ongoing	On April 28th, 2020, the OEB issued a Notice of Hearing related to Enbridge Gas's Integrated Resource Planning ("IRP") Proposal (EB-2020-0091). Enbridge Gas anticipates that one of the outcomes of this proceeding will be the establishment of an IRP policy framework to guide Enbridge Gas's assessment of IRP alternatives ("IRPAs"), relative to other facility and non-facility alternatives (including incremental enhanced energy conservation), to address capacity constraints, related infrastructure requirements, and to serve the forecasted needs of Enbridge Gas customers.
Page 31	Low Income Cost-Effectiveness	"The current Low-Income programs, on aggregate, pass the cost-effectiveness test. However, when evaluated on its own, Union Gas' Furnace End-of-Life program falls below the threshold with a 0.51 TRC-Plus result. The natural gas utilities should continue to monitor low-income programs to ensure they are providing value."	Ongoing	<p>Enbridge Gas takes pride in the quality of its Low-Income programming and considers itself a leader in this sector. As stated by the OEB, on page 26 of its 2015-2020 DSM Framework Filing Guidelines (EB-2014-0134), "[t]o recognize that low-income natural gas DSM programs may result in important benefits not captured by the TRC-Plus test, these programs should continue to be screened using a lower threshold value of 0.70."</p> <p>The Low-Income program in both the EGD rate zone and Union rate zones continues to achieve a TRC-Plus ratio that is greater than 0.7. While the Furnace End-of Life Upgrade Offering and Indigenous Offering, delivered in the Union Gas rate zones, have had TRC-Plus ratios that have fallen below 0.7 in some years, delivering these offerings continues to provide valuable support to the benefit of Low Income customers and is in-line with the Board's Guiding Principle of ensuring low-income programs are accessible across the province.</p> <p>In an effort to maintain overall cost-effectiveness for the Low Income Program, Enbridge Gas has been careful not to actively promote the Furnace End-of-Life Upgrade Offering in the mass market. Enbridge Gas continues to provide limited support for this offering where appropriate to benefit customers in need of such support. Enbridge Gas is careful to ensure that providing such support does not burden the program level TRC ratio.</p>

<p>Page 30</p>	<p>Mass-Market Opportunities</p>	<p>"Union Gas should continue to explore other opportunities for new mass-market programs for residential customers."</p>	<p>Ongoing</p>	<p>Since the Board issued its Mid-Term Report, Enbridge Gas has continued to research and develop new opportunities for mass market programs. Enbridge Gas conducts ongoing research to identify new market opportunities through jurisdictional scans as well as committee participation in many industry associations, including: the Consortium for Energy Efficiency ("CEE"); the Energy Solutions Centre ("ESC"); and the Association of Energy Services Professionals ("AESP"). CEE has just launched an Integrated Home Initiative focused on researching the DSM opportunities associated with smart home technology. Beyond efforts focused on optimizing and aligning the current in-market Home Efficiency Rebate Offerings and Adaptive Thermostats Offerings to achieve consistent residential program delivery across all Enbridge Gas rate zones (please also see the response to interrogatories in Enbridge Gas's 2021 DSM Plans proceeding at EB-2019-0271 Exhibit I.STAFF.4 and at EB-2019-0271 Exhibit I.OSEA.1 for discussion of integration and alignment of DSM), Enbridge Gas continues to lead and participate in a number of pilot projects to inform future mass market program development. Several technology pilots are currently underway with Enbridge Gas acting either as lead or as a participant, including: Air Source Heat Pumps ("ASHP"); and Smart HVAC Controls.</p> <p>In Q1 2020, an Air Sealing Pilot was initiated whereby Enbridge Gas customers receive free air sealing upgrades in their home delivered by a professional contractor. The communities of focus include Windsor, London, Toronto, Ottawa, or nearby areas. Enbridge Gas is assessing this opportunity as a potential stand-alone offering. Enbridge Gas has also been exploring a Virtual Energy Audit Pilot for Residential and Low-Income sectors as it relates to whole home energy retrofits. The concept of developing and testing a virtual energy audit tool (an online tool that aims to provide similar benefits and outcomes as a traditional home energy audit) will help Enbridge Gas understand how best to utilize virtual platforms to quantify gas savings for participants. The objective is to broaden participation among residential ratepayers and extend opportunities to educate customers about what upgrades would provide the greatest benefits in their homes. The effort is also focused on assessing how a virtual audit could be leveraged instead of a traditional in-home audit to provide a reasonable assessment of energy savings for a given project. If successful, this virtual audit approach could help Enbridge Gas expand its reach to more remote residential communities that are currently underserved.</p> <p>Although Enbridge Gas has made good progress in the research and development of new mass market program opportunities, as outlined above, Enbridge Gas acknowledges that in some cases, opportunities to support new emerging technologies are still in early stages, given that these technologies are not yet commercially market-ready. Also, at the current time, it is apparent that some of these technologies would not yet be cost-effective given incremental costs, relative energy costs and based on screening approaches applied under the current 2015-2020 DSM Framework (please also see the response to interrogatories in Enbridge Gas's 2021 DSM Plans proceeding at EB-2019-0271 Exhibit I.STAFF.3).</p>
<p>Page 7 Page 13 Page 31</p>	<p>Cost Efficiencies</p>	<p>"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. However, the merger is still in its very early stages. The OEB will be better positioned to determine the appropriateness of significant changes brought on by the merger as part of the post-2020 DSM framework development."</p> <p>"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."</p> <p>"The OEB appreciates the administrative cost efficiencies the natural gas utilities have strived to achieve. The OEB encourages the utilities to continue to identify areas of optimization. As part of the post-2020 DSM framework development, the OEB will develop a more precise definition of Administrative and Overhead costs."</p>	<p>Ongoing</p>	<p>Since January 1, 2019, Enbridge Gas has taken several actions to harmonize and optimize energy conservation programming and administrative costs including integration of the EGD rate zone and Union rate zones' DSM organizational structures, alignment of program offerings, and consolidation of marketing/advertising efforts. A summary of changes including current status and dependencies are set out in Table 2 below.</p> <p>It should be noted that the current 2015-2020 DSM Framework and OEB-approved 2015-2020 DSM Plans treat cost-efficiencies as a flow through which accrues to ratepayers. As such, net cost-efficiencies will be dealt with through the DSMVAs or will be redirected to support program funding. Please see the response to interrogatories in Enbridge Gas's 2021 DSM Plans proceeding at EB-2019-0271 Exhibit I.CME.2 c), for a detailed discussion regarding the treatment of DSM costs through the DSMVAs.</p>
<p>Page 31</p>	<p>Market Transformation</p>	<p>"The natural gas utilities should continually monitor and assess the impact of their market transformation programs. This will ensure that the programs are achieving their intended goal of helping to re-shape the particular market the program is targeting."</p>	<p>Ongoing</p>	<p>As part of their OEB-approved 2015-2020 DSM Plans, EGD and Union sought to design market transformation program offerings that would lead to comprehensive cultural or code and standard changes. Accordingly, the OEB-approved metrics for these offerings were participatory in nature.</p> <p>EGD and Union, now Enbridge Gas, found that while these program offerings have provided significant value and support to those customers and stakeholders who were enrolled in the program offers, determining the precise nature of resulting market transformation remains extremely difficult. For example, the scorecard goals of the Savings by Design Residential Offerings and Optimum Home Offering were developed with a focus on educating and engaging builders and other related stakeholders regarding means to implement a systematic process to design and build homes to greater levels of energy efficiency than required by code, and to encourage builders to follow through with the implementation of these processes/designs/builds in their construction projects. These goals were measured annually on a participant, or unit basis. To support successful delivery of these offerings and achievement of related scorecard targets, the utilities regularly engaged participants and other stakeholders to better understand where there may be areas for improvement and to ensure alignment with scorecard goals. Feedback from participants has been consistently positive and where barriers or challenges were identified modifications to program design or delivery were undertaken to be adaptive and responsive.</p> <p>Over the course of the current 2015-2020 DSM Framework, markets have changed in both the new construction and retrofit sectors. Considering baseline changes, evolving building codes and the potential for new technologies that are not yet market ready, Enbridge Gas expects to continue to have meaningful opportunities to support market transformation programs in the coming years. Enbridge Gas is examining these opportunities across all market segments in preparation for the completion of a Post-2020 DSM Framework and expects to re-engage participants and stakeholders to prioritize market transformation programs through Post-2020 DSM Framework-related programs in the future.</p>
<p>Page 19 Page 30</p>	<p>NTG/Free Ridership</p>	<p>"The OEB stresses that the natural gas utilities should actively screen potential program participants thoroughly, and actively seek out customers who can most greatly benefit from the programs, therefore ensuring program funds are used as effectively as possible."</p> <p>"The updates provided by Union Gas are encouraging. Ensuring rigorous screening of potential participants, discrete program eligibility and a greater effort on seeking out participants who can benefit greatest from the programs is essential. Both natural gas utilities should continue to be diligent in their screening efforts to ensure that customers participating in their programs would not otherwise undertake the energy efficiency upgrades on their own. The OEB cautions that dedicating resources to education, technical advice, and workshops may not have the intended impact on lowering free ridership levels."</p>	<p>Ongoing</p>	<p>Enbridge Gas continues to focus on actively screening program participants. However, the manner in which screening is undertaken must be balanced with ensuring programs are not administratively burdensome to the customer or overly restrictive (discouraging participation). Screening program participants must work in concert with a focus on seeking out those who can most greatly benefit from programming. Efforts by Enbridge Gas to provide education, technical advice, and workshops are activities it believes will help identify those customers and influence them to participate.</p>

<p>Page 31</p>	<p>Run-it-Right / Run Smart</p>	<p>"...the natural gas utilities should analyze, based on evaluation best practice, natural gas savings achieved for those participants in the Run-it-Right and RunSmart Programs and provide the findings of the program evaluation during the development of the post-2020 DSM framework. The natural gas utilities should work with the OEB's Evaluation Contractor and the EAC to ensure its evaluation is sufficient."</p>	<p>Ongoing</p> <p>The RunSmart Offering and Run-it-Right Offering promote a number of goals, including: (i) providing information, data, tools and education to help customers better understand their gas usage; and (ii) identifying and implementing low-cost/no-cost opportunities for customers to reduce gas consumption in their buildings. As these goals focus both on generating savings and other market transformational elements such as building awareness and energy management education, both offerings have dual metrics reflecting participants and savings:</p> <ul style="list-style-type: none"> • In the Union rate zones, RunSmart contributes to separate savings and participant metrics in the Performance-Based Scorecard; and • In the EGD rate zone, Run-it-Right contributes to a savings metric in the Resource Acquisition Scorecard and has a dedicated participant metric in the Market Transformation and Energy Management Scorecard. <p>As these offerings have evolved, Enbridge Gas has highlighted the ongoing challenge in identifying the various drivers that factor into consumption changes over time. Consequently, determining the particular savings associated with the low cost/no cost recommendations implemented through participation in these offerings relative to usage changes arising from all factors driving consumption in a building means that the application of whole building regression analysis, is not ideally suited to the relatively small percentage saving improvements that accompany low-cost/no-cost solutions (not inclusive of capital upgrades). Despite these challenges Enbridge Gas has made significant efforts to refine the algorithm used to determine natural gas savings. Enbridge Gas has repeatedly engaged various industry experts in the original development and ongoing refinement of measures and analysis for both RunSmart and Run-it-Right.</p> <p>The major challenge facing the ability of these offerings to better account for savings is the time, effort and resources necessary to motivate and engage participants to track the variables that impact consumption over the measurement period, as some of these fluctuations could negate the expected savings, making it challenging to demonstrate the impact these offerings have had. Enbridge Gas expects to use the lessons learned from delivering and evaluating these offerings in the current 2015-2020 DSM Framework to inform the design of similar program offerings under a Post-2020 DSM Framework. Specific considerations around the expected program offering value being provided to participants, balancing the level of accuracy required for reporting energy savings, and assessing the expected resources required to monitor and analyze building operations, will be a primary focus.</p>
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Table 2

Enbridge Gas Actions to Harmonize and Optimize Energy Conservation Programming and Administrative Costs

Area	Completed or Planned Change	Dependencies or Status
Organizational Structure	<p>Integration of the Energy Conservation and Marketing (“ECM”) organizational structure creating single set of accountable departments for conservation programming including a reduction of greater than 20 FTE.</p> <p>Details regarding efficiencies and optimization were included in the responses to interrogatories in Enbridge Gas's 2021 DSM Plans proceeding at EB-2019-0271 Exhibit I.STAFF.4.</p>	Completed in 2019.
Reallocation of Resources	Reallocation of resources to new/emerging areas that align with the goals and objectives of the current 2015-2020 DSM Framework and the interests of stakeholders such as increased resources to engage in Municipal Energy Plans.	<p>Ongoing.</p> <p>Dependent upon the Post-2020 DSM Framework and multi-year DSM Plan.</p>
Alignment of Programming		
Phase 1	All commonly structured programming harmonized where possible within the current 2015-2020 DSM Framework. Distinctly unique programming and tracking/reporting of OEB-approved DSM Plans continues. Further details regarding program alignment were included in the responses to interrogatories in Enbridge Gas's 2021 DSM Plans proceeding at EB-2019-0271 Exhibit I.OSEA.1.	Completed in 2019.
Phase 2	Harmonization of all program and scorecard elements across Ontario.	Dependent on the Post-2020 DSM Framework and multi-year DSM Plan.
Marketing Consolidation		
Phase 1	Consolidation of marketing and campaign materials and updates for program alignment and harmonization.	Completed in 2019.
Phase 2	Consolidation of websites.	Planned for mid-2020 to early 2021 completion.
Phase 3	Consolidation of remaining marketing and campaign materials for consolidated DSM program portfolio.	Dependent on the Post-2020 DSM Framework and multi-year DSM Plan.
Tracking Systems/Process Integration	Integration of separate tracking/reporting systems and process for all rate zones.	<p>Dependent on the Post-2020 DSM Framework and multi-year DSM Plan.</p> <p>Dependent on broader organizational systems integration for information systems tied to DSM tracking systems.</p>