

VIA E-MAIL

June 12, 2020

Ontario Energy Board
Attn: Ms. Christine Long, Board Secretary
P.O. Box 2319
27th Floor, 2300 Yonge Street
Toronto ON M4P 1E4

RE: EB-2019-0271 – EGI 2021 DSM Plan Proposal – FRPO Submission

We are writing on behalf of the Federation of Rental-housing Providers of Ontario (FRPO) in response to Procedural Order No. 4 issued by the Board June 1, 2020. The Order invited parties to make submission on the EGI 2021 DSM Plan Proposal.

Introduction

FRPO respects that keeping momentum of conservation and demand reduction programs is important and understands the Board direction in this proceeding. We have reviewed EGI's evidence, interrogatory responses and argument-in-chief and support the plan as proposed with one recommendation or encouragement on the Low-Income ("LI") program which is outlined below. FRPO would also like to comment briefly on the impact of the current times and the need for data to allow the Board and others to work with Enbridge on evolutions for the Post 2021 framework.

Low-Income Programs

In our requests for information, we were striving to understand the efficacy of multi-residential programs. As we have communicated to the Board previously, most low-income families live in multi-unit residential buildings¹. FRPO worked with Enbridge Gas Distribution and Low-income group representatives to increase the access of LI DSM to a broader cross-section of these families. We were interested in getting some data to measure the impact of these programs relative to other LI programs during the term of the current framework. In Exhibit I.FRPO.1, we were informed on some limitations on data sought and provided cross-reference to data provided in Exhibit I.SEC.12. Using those cross-references, we prepared a table very similar to the one requested but providing comparisons of those programs at least for the Union Gas territory for the years 2016-2018 (please see Attachment 1).

¹ Vertical Poverty – Poverty by Postal Code 2. United Way, Toronto, 2011. This is the most extensive study that reinforces this fact while providing additional information and data. Available at <https://www.unitedwaygt.org/document.doc?id=89>

In viewing the table in Attachment 1, one can see that multi-family low-income programs have a significantly greater efficacy than single-family homes. We respect that EGI will be rolling over its programs without significant modification but we respectfully submit that greater investment in multi-family buildings both socially- and privately-owned would provide greater savings without any real changes to the program beyond perhaps allocation of resources. Given some concerns about the efficacy of dollars invested in single-family homes by other intervenors, we would encourage EGI to adjust the proportion of spending to more multi-family buildings. Further, given the company's integration of the two legacy utilities, we believe savings can be increased by a transference of Enbridge Gas Distribution approaches to the legacy Union Gas rate zone².

Pandemic Impact

FRPO respects that EGI is faced with substantial obstacles in delivering its 2020 DSM program³. As a result, spending and results will be down relative to previous years. We respect that. We encourage EGI to ensure that data is collected and available to, as is reasonably possible, isolate the impacts quantifiably for the benefit of all stakeholders in the DSM plan.

Data Availability

Without blame, we recognize that verified results are lagging as evidenced by interrogatory responses. We encourage the company, Board staff and stakeholders to work together to assist us all in having data available to allow the Board to make informed decisions for the consideration and determination of the next framework.

Respectfully Submitted on Behalf of FRPO,



Dwayne R. Quinn
Principal
DR QUINN & ASSOCIATES LTD.

- c. A. Stiers, EGIRegulatoryProceedings
Interested Parties – EB-2019-0271

² A comparison of Table 1 in I.FRPO.1 evidences significantly greater savings in the EGD rate zone than the Union rate zone.

³ AIC, pages 11-12 and Exhibit I.SEC.16

ATTACHMENT 1: LI COMPARISON

UNION GAS		Cumulative Natural Gas Savings									
YEAR: 2018	Lower Band	Target	Upper Band	Weight	Achievement	Percent of Metric	Weighted % of Scorecard Achieved	Shareholder Incentive (by % Contribution)	Budget Investment	Actual Investment	Achievement per Actual
TYPE	10 ⁶ m ³	10 ⁶ m ³	10 ⁶ m ³	%	10 ⁶ m ³	%	%	\$	Million \$	Million \$	m ³ /S
LOW INCOME							83.9	350,811			
Single-Family	30.8	41.0	61.5	60	32	78.2	46.9	164,530	8.93	7.05	4.5
Privately-owned Multi-Family	3.4	4.5	6.8	5	6.5	145.5	7.3	25,609		0.63	10.3
Social & Assisted Multi-Family	17.4	23.2	34.8	35	19.7	84.9	29.7	104,191		1.99	9.9

UNION GAS		Cumulative Natural Gas Savings									
YEAR: 2017	Lower Band	Target	Upper Band	Weight	Achievement	Percent of Metric	Weighted % of Scorecard Achieved	Shareholder Incentive (by % Contribution)	Budget Investment	Actual Investment	Achievement per Actual
TYPE	10 ⁶ m ³	10 ⁶ m ³	10 ⁶ m ³	%	10 ⁶ m ³	%	%	\$	Million \$	Million \$	m ³ /S
LOW INCOME							82.8	304,325			
Single-Family	33.7	45.0	67.5	60	30.7	68.1	40.9	143,482	7.3	6.8	4.5
Privately-owned Multi-Family	11.9	15.8	23.7	5	4.4	27.6	1.4	4,911	N/A	0.4	11.0
Social & Assisted Multi-Family	14.5	19.4	29.0	35	22.4	115.9	40.6	142,429	N/A	2.5	9.0

UNION GAS		Cumulative Natural Gas Savings									
YEAR: 2016	Lower Band	Target	Upper Band	Weight	Achievement	Percent of Metric	Weighted % of Scorecard Achieved	Shareholder Incentive (by % Contribution)	Budget Investment	Actual Investment	Achievement per Actual
TYPE	10 ⁶ m ³	10 ⁶ m ³	10 ⁶ m ³	%	10 ⁶ m ³	%	%	\$	Million \$	Million \$	m ³ /S
LOW INCOME							103	1,151,656			
Single-Family	28.3	37.8	56.7	60	45.8	121	73	256,092	7.1	7.6	6.0
Privately-owned Multi-Family	2.3	3.0	4.5	5	8.1	200	10	35,081	N/A	1.8	10.6
Social & Assisted Multi-Family	13.8	18.4	27.7	35	10.9	59.1	21	73,670	N/A		

Social-housing and Privately-Owned Together