

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c. 15, Schedule B, as amended (the “OEB Act”);

AND IN THE MATTER OF an Application by Enbridge Gas Inc. for an Order or Orders approving the balances and clearance of certain non-commodity 2017 & 2018 Demand Side Management deferral and variance accounts into rates, within the next available QRAM following the Board’s approval.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Ex. A/2/1 p. 3] Please describe the rationale for the six month adjustment for Union legacy customers, and the one time adjustment for Enbridge legacy customers. Please describe how the methodologies ensure that both approaches are fair to all customers, including customers whose January to June load is higher than their July to December load.
2. [Ex. A/4/1. P 4 et seq.] The EC has provided what appear to be 82 recommendations, but for many of them Enbridge appears to either reject the recommendations, or agree only to further study. Please provide a list of all EC recommendations that the Applicant proposes to implement in the manner recommended, and the actual or planned timing of that implementation.
3. [Ex. B/3/1, p. 2] Please extend Table 1 to include 2021, and to include 2022 assuming that, due to Covid-19 challenges, a new DSM Plan has not been approved for 2022 and the current plan is extended a further year.
4. [Ex. B/3/1, p. 3] Enbridge has reported cost overruns in the Tracking and Reporting System. Please provide the original business case for that project, and detailed justification for the overruns.
5. [Ex. B/3/1, p. 5 and C/3/1, p. 4] Please confirm that the figures in Tables 2 and 3 in each case have not been audited or otherwise reviewed by any independent party.
6. [Ex. B/3/1, p. 7] Please restate Tables 4 and 5 removing all impacts of the Home Energy Conservation Program in DSMIDA, DMSVA, and LRAMVA, including any budget transfers, incremental incentives, lost revenues, and increased costs.
7. [Ex. B/3/1/A1, p. 1] Please confirm that, for an average school with annual volume of 40,000 m³, the one-time charge is expected to be \$66. Please confirm that, for the approximately 3,000 schools in the Enbridge franchise area, the expected one-time charge

is about \$200,000. Please calculate how much is currently included in annual rates for the DSM programs for these 3,000 schools assuming that consumption level.

8. [Ex. C/3/1, p. 3] Please provide the case reference for the Applicant's Board authority to pay for the IRP study using a budget transfer. Please provide a detailed statement of the costs that are included in the claim, including a copy of the contract with, and invoice from, any consultant used in the study who billed more than \$200,000. Please confirm that this claim has not been audited by the EC or any other independent party.
9. [Ex. C/3/1, p. 3] Please provide the case reference for the Applicant's Board authority to pay for the Open Bill Access program using a budget transfer. Please provide a detailed statement of the costs that are included in the claim, including a copy of the contract with, and invoice from, any consultant used who billed more than \$200,000. Please confirm that this claim has not been audited by the EC or any other independent party.
10. [Ex. C/3/1, p. 9 and C/3/1/A10, p. 1] Please restate Tables 6 and 7 removing all impacts of the Home Reno Rebate Program in DSMIDA, DMSVA, and LRAMVA, including any budget transfers, incremental incentives, lost revenues, and increased costs. Please recalculate the figures in Appendix A10 on the same basis.
11. [Ex. C/3/1/A10, p. 1] Please confirm that, for an average Union South school with January to June volume of 25,000 m³, the six month charge is expected to total \$450. Please confirm that, for the approximately 1,100 schools in the Union South franchise area, the expected six month charge is about \$500,000. Please calculate how much is currently included in annual rates for the DSM programs for these 1,100 schools assuming that consumption level.
12. [Same] Please confirm that, for an average Union North school with January to June volume of 25,000 m³, the six month credit is expected to total \$150. Please confirm that, for the approximately 600 schools in the Union North franchise area, the expected six month credit is about \$90,000. Please calculate how much is currently included in annual rates for the DSM programs for these 600 schools assuming that consumption level.

Respectfully submitted on behalf of the School Energy Coalition this September 17, 2020.

Jay Shepherd
Counsel for the School Energy Coalition