October 28, 2020

Christine E. Long
Registrar and Board Secretary
Ontario Energy Board
2300 Yonge Street, P.O. Box 2319
Toronto ON
M4P 1E4

Dear Ms. Long,

RE: EB-2020-0067 Enbridge 20172018 DSM Deferral and Variance Account Disposition Submission of Energy Probe Research Foundation

Attached is the submission of Energy Probe Research Foundation (Energy Probe) in the EB-2020-0067 proceeding, the application by Enbridge Gas Inc. to the Ontario Energy Board for the approval of its proposed disposition of the balances in the 2017 and 2018 Demand Side Management deferral and variance accounts.

Respectfully submitted on behalf of Energy Probe.

Tom Ladanyi Digitally signed by Tom Ladanyi Date: 2020.10.28 13:20:17 -04'00'

Tom Ladanyi
TL Energy Regulatory Consultants Inc.
Consultant representing Energy Probe

cc. Adam Stiers (Enbridge Gas Inc.)
Patricia Adams (Energy Probe Research Foundation)
Roger Higgin (Sustainable Planning Associates Inc.)
Dennis O'Leary (Aird & Berlis LLP)

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EB-2020-0067

ONTARIO ENERGY BOARD

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

Enbridge Gas 2017 and 2018 DSM Deferral and Variance Accounts Disposition

Energy Probe Submission

October 28, 2020

In summary, Energy Probe does not dispute the disposition of the 2017 and 2018 DSM Deferral and Variance Accounts with the exceptions of:

- **The overrun in the Tracking and Reporting System costs**
- **The disposition period for the EGI rate zone.**

Energy Probe also has the following Comments based on the IR responses:

2017 Residential Program

The single largest factor that contributed to Enbridge Gas missing the small volume natural gas savings metric in 2017 was related to the Home Efficiency Conservation ("HEC") offer. In 2017, HEC participants with furnace replacement projects were subject to a baseline adjustment to AFUE 90 (rather than using the existing furnace efficiency), significantly reducing savings claims. The impact is evident when comparing the 2016 HEC offering results of 230 million CCM savings to the 2017 HEC offering results of 154 million CCM savings.

Energy Probe notes that it has taken over a year for EGI to consolidate the Home Energy Conservation offers for the legacy Union and EGI rate zones[1].

Tracking and Reporting Systems

With regard to Tracking and Reporting Systems, it is disappointing that the legacy programs have continued and had not been consolidated. EGD and Union focused on the development and implementation of their own unique respective DSM Tracking and Reporting IT systems[2].

Energy Probe agrees with Board Staff's proposal for disallowance of 50% of the incremental cost overrun incurred in the development of the DSM Tracking System, or approximately $0.54M,

The Board should direct EGI to place priority on a providing a consolidated DSM tracking system.

Run it Right Program

The Run-It-Right offering focuses on building optimization by providing customers with education, metering infrastructure and incentives for low cost/no-cost opportunities.

EGI states that when viewed as a Resource Acquisition offer, the driver for the low TRC and PAC is due primarily to the fact that the offer is resource intensive (due to the need to upgrade metering infrastructure for many participants) and the incentivized low cost/ no-cost measures generate low savings in comparison to capital upgrades.

Enbridge Gas states it continues to offer Run-it-Right within its portfolio because of its claimed

[1] EP-3 IR response
[2] EP-5 IR response

effectiveness at engaging smaller customers, influencing them to become more energy aware, and because of how it works in concert with Enbridge Gas's other offers by identifying all energy savings opportunities (capital and operational) through its building optimization process[3].

While Energy Probe supporters are not in the commercial sector, Energy Probe believes that EGI needs to better justify the Run It Right program, given that it fails the TRC and PAC tests.

Disposition of Account Balances

The estimated bill impact for a typical Rate 1 customer in the EGD rate zone consuming 2,400 m^3 of natural gas per year is approximately $10.80 or about a 1% bill impact based on the total annual bill using the October 2020 QRAM rates. EGI states that "given that the impact is not significant", Enbridge Gas is proposing to implement the recovery over one month instead of 3 months.[4]

By comparison the Bill Impact is a $27 charge for Union South Rate M1 customers and this will be recovered over 6 months[5].

As it stated last year, Enbridge Gas is not able to administer one-time adjustments for general service customers in the Union rate zones because of limitations in the current billing system used for this group of customers.[6]

Energy Probe does not support a One Time Charge for the EGI Rate zone. To balance the amounts between the EGI and Union Rate zones, the charge should be over 3 months for the EGI Rate Zone.

Respectfully Submitted on Behalf of Energy Probe by its consultants,

Roger Higgin	**Tom Ladanyi**
SPA Inc.	**TL Energy Regulatory Consultants Inc.**

[3] EP-2 IR Response
[4] EP-6 IR Response
[5] EP-7 IR Response
[6] Staff-1 IR Response and LPMA -1 IR Response