

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

May 3, 2021

**Re: EB-2021-0072 2019 DSM Deferral and Variance Account Disposition Application
Pollution Probe Interrogatories**

Dear Ms. Long:

In accordance with Procedural Order No. 1 dated April 20, 2021 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant.

Typically, all relevant evidence to the proceeding is placed on the public record in the OEB web drawer under the docket number. Pollution Probe had indicated that the 2019 Natural Gas DSM Annual Verification Report was not filed in this proceeding, but it was referenced in the evidence filed. In Procedural Order No. 1 the OEB notes that a link to the Evaluation Contractor's report titled "2019 Natural Gas Demand-Side Management Annual Verification Report" has been provided at Exhibit A/Tab 3/Schedule 1 of Enbridge Gas's evidence. Pollution Probe accepts that reference as part of the public record in this proceeding and has treated it as such.

Respectfully submitted on behalf of Pollution Probe.



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cc: Ms. Asha Patel, Enbridge Regulatory (via email)
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Josh Wasylyk (via email)
All Parties (via email)
Richard Carlson, Pollution Probe (via email)

ONTARIO ENERGY BOARD

**Enbridge 2019 Demand Side Management Deferral and
Variance Account Disposition**

POLLUTION PROBE INTERROGATORIES

May 3, 2021

**Submitted by: Michael Brophy
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Consultant for Pollution Probe

Pollution Probe #1

[Ex. A, T3, Sch. 1]

References:

“On August 21, 2015, the OEB issued a letter which provided additional details regarding a new OEB-Staff coordinated evaluation governance structure.” (page 2)

“The EC concluded 2019 DSM program year EM&V activities in 2020 with the release and presentation of the following report to OEB Staff and the EAC:

- 2019 Natural Gas DSM Annual Verification (December 3, 2020).” (page 4)

- a) Please provide the scope of work for the 2019 Natural Gas DSM Annual Verification Report.
- b) Please provide the scope of work for the Evaluation Advisory Committee (“EAC”).
- c) Please provide the scope of work for the third-party Evaluation Contractor (“EC”).
- d) Please provide a summary of any 2019 DSM activities or costs not covered by the 2019 Natural Gas DSM Annual Verification Report.

Pollution Probe #2

[Ex. A, T3, Sch. 1]

Reference: <https://www.oeb.ca/sites/default/files/2019-Natural-Gas-Demand-Side-Management-Annual-Verification-Report.pdf>

- a) To Enbridge’s knowledge, has there been any public consultation related to the 2019 Natural Gas DSM Annual Verification Report.
- b) Please confirm if Enbridge intends to use the results of the 2019 Natural Gas DSM Annual Verification Report for public reporting purposes of its final 2019 DSM savings and related attributes (e.g. GHG reductions). If not correct, please indicate what source Enbridge would use instead.
- c) On page 4 of the above referenced report, DNV GL indicates that “total dollars spent was not reviewed”. Please summarize the evidence provided in this proceeding to support review of the total dollars spent and the related DSMVA clearances sought.
- d) Has the EC (DNV GL) and/or the EAC reviewed and recommended approval of the DSMVA amounts for 2019? If yes, please provide the reference or document.

- e) Has the EAC endorsed the findings outlined in the 2019 Natural Gas DSM Annual Verification Report? If yes, please provide a copy of their endorsement.
- f) Table 9-2 on page 29 indicates that Enbridge “Process and Program Evaluation” was underspent by 12%. Please indicate what activities are typically included in that category and what led to the reduction in spending in 2019.
- g) Table 9-7 on page 31 indicates that Union “Research” and “Evaluation” was underspent by 23% and 29%, respectively. Please indicate what activities are typically included in those categories and what led to the reduction in spending in 2019.

Pollution Probe #3

[Ex. A, T4, Sch. 1]

- a) Please provide the net TRC-Plus resulting from 2019 DSM portfolio and the new cumulative lifetime net TRC-Plus for the Enbridge and Union DSM portfolios since inception.
- b) Please indicate what carbon price assumptions were included in the calculations for the response to question a above.
- c) Please confirm that the Lost Distribution Revenue in Table ES1 is the partially effective 2019 DSM volumetric results minus the partially effective DSM estimate (i.e. 2019 volumetric budget) that was applied for 2019 rates. If that is not correct, please indicate why.
- d) Please provide the cost and benefits related to the Gas Technology Institute (“GTI”) Utilization Technology Development (“UTD”) Membership.

Pollution Probe #4

[Ex. A, T4, Sch. 1]

Reference: “Enbridge Gas completed the work on implementation of the EGD rate zone IT system in Q1 of 2019 and rolled out the solution to users. The Company had completed the bulk of the design and execution activities in 2018 with the completion of these occurring during Q1 of 2019.”

- a) Please provide a summary by year of costs related to the IT system that have been capitalized.
- b) Please provide a copy of the approved Business Case for the IT system.
- c) Please confirm that 2019 is the commissioning year for the new IT system. If not, please provide the commissioning date.
- d) Please describe what project elements or costs for the IT system were evaluated by the third-party Evaluation Contractor or included in the 2019 Natural Gas DSM Annual Verification Report.

Pollution Probe #5

[Ex. A, T4, Sch. 1, Page 68]

- a) Please explain how costs related to the OEB EAC and DSM Annual Verification Report are budgeted or captured in Table 8.7.
- b) Please indicate what budget category Enbridge and Union use to budget and record OEB EAC and DSM Annual Verification Report costs.

Pollution Probe #6

[Ex. A, T4, Sch. 1, Appendix A]

- a) Please provide the carbon price assumptions used in the Union and Enbridge Rate Zones Avoided Gas Costs.
- b) The discount rate listed in A1 (page 82) and A2 (page 84) is 5.32%. Please provide the calculation and source of information for this discount rate