

ONTARIO ENERGY BOARD

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

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 2019 Demand Side Management Deferral and Variance Accounts into rates, within the next available QRAM.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Ex. B/2/1, p. 4] Please confirm that the \$1 million annual DSM IT amount is included in 2021 rates, but will be credited back to customers in full through the DSMVA.
2. [B/3/1, Appendix A1 and C/2/1, Appendix A5] Please confirm that, for a typical school with 40,000 annual volume,
 - a. That school in the EGD rate zone will pay a single adjustment of \$7.60, but an identical school in the Union south rate zone will pay an aggregate adjustment of about \$175.00;
 - b. The programs available to those two identical schools in different rate zones are not materially different;
 - c. The amounts built into rates for DSM programs for the school in the Union south rate zone are significantly higher than the amounts built into rates for DSM programs for that identical school in the EGD rate zone; and
 - d. Shifting additional funds to residential programs increases the costs borne by schools in the Union rate zone, but does not increase the costs borne by schools in the EGD rate zone.
3. [A/4/1, p. 9] Please advise whether the figures 30 billion lifetime cubic meters and 56.2 million tonnes of GHG emissions are based on gross or net savings. Please confirm that these LCMs and GHGs, whether gross or net, have not yet been saved, but are projected to be saved over the lifetime of the measures installed, both in the past and in the future.
4. [A/4/1, p. 20] Please provide a breakdown of distribution revenue for 2019 between EGD and Union rate zones.

5. [A/4/1, p. 33] Please describe in more detail the plans to terminate all prescriptive boiler programs.
6. [A/4/1, p. 63] The evidence states “The intention of the audit is for the EC [to] provide an opinion on whether the claimed...Demand Side Management Variance Account ha[s] been correctly calculated using reasonable assumptions”. Please confirm that no part of the EC’s scope of work is to do any audit of the DSMVA, no opinion has provided by the EC on the calculations or reasonableness of the DSMVA, and no independent support for the DSMVA amounts claimed has been provided by the Applicant in the Application.
7. [A/4/1, p. 91] Please advise why there are two levels of incentive listed for elementary schools.

Respectfully submitted on behalf of the School Energy Coalition this May 3, 2021.

Jay Shepherd
Counsel for the School Energy Coalition