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October 22, 2021

Ms. Christine Long
Board Secretary
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Long,

**Re: Re: Enbridge 2022 to 2027 Demand Side Management (“DSM”) Plan
EB-2021-0002**

Please find enclosed the interrogatories submitted on behalf of the Ontario Greenhouse Vegetable Growers (OGVG).

If there are any questions with respect to the interrogatories, please feel free to contact the undersigned.

Yours very truly,



Michael R. Buonaguro
Encl.

EB-2021-0002

Enbridge Gas Inc.

Enbridge 2022 to 2027 Demand Side Management (“DSM”) Plan EB-2021-0002

**INTERROGATORIES OF THE ONTARIO GREENHOUSE VEGETABLE
GROWERS**

October 22, 2021

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OGVG-1

Ref: General

Preamble: With respect to parts a) and b) of this interrogatory OGVG notes that it asked a similar interrogatory of EGI in EB-2019-0271 (OGVG-1) covering the 2015 to 2019 period; it is OGVG's expectation that the answers provided in that proceeding for parts a) and b) and their sub parts (as updated on April 6, 2020) are adequate for the purposes of this proceeding, subject to adding information relating to 2020.

- a) For each rate class in both the Enbridge Gas and Union Gas franchise areas, for the years 2015 to 2020, please provide the following information in table form:
 - i) The total number of customers in the rate class in each year.
 - ii) The total DSM costs allocated to the rate class in each year, including amounts embedded in base rates and amounts recovered through deferral and variance accounts (or for years where disposition has not yet been applied for the forecast amounts to be recovered through deferral and variance accounts).
 - iii) The total number of customers in the rate class that were DSM participants in each year.
- b) Please provide in table form:
 - i) The total number of customers in each rate class at the beginning of 2021.
 - ii) The forecast total amount of DSM costs to be allocated to each rate class in 2021, both embedded in base rates and through deferral and variance accounts.
 - iii) The total number of customers in each rate class at the beginning of 2021 that were participants in DSM offered by EGI (or its predecessor companies) from 2015 to 2020.
 - iv) The total number of customers in each rate class at the beginning of 2021 that were participants in DSM offered by EGI (or its predecessor companies) from 2015 to 2020 more than once.
 - v) The total number of customers in each rate class at the beginning of 2021 that did not participate in DSM offered by EGI (or its predecessor companies) from 2015 to 2020.

- c) With respect to the contract rate class customers identified in part b) v) of this interrogatory as having not participated in DSM offered by EGI (or its predecessor companies) over the 2015-2020 period, please provide in table form an analysis of the reasons why, to the extent known, those customers have not participated. By way of example, OGVG would expect the table to indicate the number of customers in each rate class that have been contacted by EGI for the purposes of engaging them in DSM where the customer has declined to participate for its own reasons; the number of customers that were contacted and evaluated for possible DSM programming where it was determined the customer would not benefit from the incremental DSM products offered by EGI (i.e. the customer's operations were already optimized); the number of customers that EGI has simply never been in contact with respect to possible DSM participation, and so on.
- d) Please describe what incentive, if any, there is in EGI's proposed DSM framework that incentivizes EGI to seek out new contract class customers for its DSM programming as opposed to re-visiting customers that have already participated.
- e) Please describe what dis-incentive, if any, there is in EGI's proposed DSM framework that dis-incentivizes EGI from revisiting contract class customers that they have already previously engaged in DSM programming rather than seeking out contract rate customers that have never participated in DSM programming.