

Sent by RESS Filing

October 22, 2021

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4

Attention: Christine Long, Board Registrar

Dear Ms. Long:

Re: LIEN Interrogatories
Enbridge Gas Inc.'s Application for Multi-Year Natural Gas DSM Plan (2022-2027)
Board File No. EB-2021-0002

Please find attached LIEN's interrogatories in the above-noted matter pursuant to Ontario Energy Board's Decision on Issues List and Procedural Order No. 3 dated September 9, 2021.

Yours truly,



Matt Gardner
Certified as a Specialist in Environmental Law
by the Law Society of Ontario

Document #: 2036034

LOW-INCOME ENERGY NETWORK (LIEN)
INTERROGATORIES
FOR ENBRIDGE GAS INC'S
APPLICATION FOR MULTI-YEAR NATURAL GAS DSM PLAN
(2022 TO 2027)

EB-2021-0002

OCTOBER 22, 2021

1 5.LIEN.IR#1

Regarding the allocation of funds between programs, Exhibit C Tab 1 Schedule 1 page 15 of 66 states, *“However, if Enbridge Gas decides to re-allocate funds among existing, approved DSM programs, Enbridge Gas should inform the OEB, as well as stakeholders, in the event that cumulative fund transfers among OEB approved DSM programs exceed 30% of the approved annual DSM budget for an individual DSM program (either the program funds are being transferred from, or the program funds are being transferred to).”*

- a) For each program offering within the low-income program of Union Gas and Enbridge Gas rate zones, please indicate by rate zone for each year between 2015 and 2021 any dollar transfer amount, either from the low-income program offering to another program, or from another program to the low-income offering, and indicate the source and endpoint of the transfer.

2 5.LIEN.IR#2

Regarding Enbridge Gas's proposal to include as a low-income program feature described at Exhibit C Tab 1 Schedule 1 page 18 of 66, *“Require no, or low, upfront costs to the income qualified consumer”*:

- a) How does Enbridge Gas determine such an upfront cost? For example, is it a percent of the total measure cost or is it based on ability to pay?
- b) What is Enbridge Gas's rationale for including the low-income program feature of charging a low-income participant a low upfront cost?
- c) Under what circumstances will Enbridge Gas require a low upfront cost be paid by a low-income participant?
- d) Does the upfront cost apply to low-income homeowners as well as tenants in affordable housing?

- e) What research has Enbridge Gas conducted specific to the Ontario low-income segment, or any other jurisdictional research, to justify the charging of an upfront cost for low-income homeowners and tenants, as well as other low-income participants? Please provide this research.
- f) What research has Enbridge Gas conducted specific to the Ontario low-income segment, or any other jurisdictional research, to justify the amount of upfront cost a low-income participant should pay for a particular measure or service? Please provide this research.
- g) For the 2015 to 2021 period for each of Enbridge Gas and Union Gas rate zones, which low-income program offerings required a low-income homeowner or tenant to provide an upfront financial contribution to a program offering measure or service, what was the dollar amount of that contribution/measure or service and contribution/participant, and how many participants provided this type of contribution?

3 5.LIEN.IR#3

Regarding Enbridge Gas's proposal to provide a list at Exhibit C Tab 1 Schedule 1 page 18-19 of 66, "*Low Income Program Considerations*":

- a) For measures directly installed in low-income homeowner and tenant dwellings, please provide rationale as to why identifying, documenting and reporting on potential health and safety hazards that were addressed during installation or that prevented installation of a particular measure(s) not included as a low-income program feature?
- b) Would Enbridge Gas be willing to include this as a feature and provide such documentation?

4 5.LIEN.IR#4

Regarding Enbridge Gas's proposal for the content of the mid-point assessment at Exhibit D Tab 1 Schedule 1 page 6 of 26, Enbridge proposes: "*Any other changes to the DSM Plan deemed appropriate by Enbridge Gas for program offerings to ensure they are meeting customer needs and the objectives for such offerings...Enbridge Gas will reasonably consider the feedback of customers and stakeholders received as part of its stakeholder efforts for the purposes of informing the mid-point assessment application.*":

- a) What is Enbridge Gas's customer and stakeholder engagement plan for DSM for 2022 to the mid-point assessment and from the mid-point assessment to the end of 2027?
- b) In particular, what are the specifics – timing and type of engagement, feedback expected to be sought etc. - by year regarding engagement with low-income energy customers, social service agencies, and LIEN?

- c) Would Enbridge Gas be open to stakeholders and customer groups having the opportunity to raise recommended changes to DSM programs, including recommending new programs, as part of the mid-point assessment?

5 6.LIEN.IR#5

Exhibit B Tab 1 Schedule 1 indicates that Enbridge Gas is proposing a 3% policy growth escalator over the previous year for the 2023-2027 period covered by its proposed DSM Plan.

- a) Given that low-income communities and households have been hit harder by Covid-19 than other sectors of the Ontario economy, how did Enbridge Gas take this situation into account in setting the 3% policy growth escalator for the DSM Program budgets?
- b) What is
 - i. Enbridge Gas's forecast customer growth rate and total customer increment for each of the years covered by the proposed 2022-2027 DSM Plan, and
 - ii. growth rate and customer increment for each of the years covered by the DSM Plan, broken down by the following segments: residential, low income, on-reserve First Nations, commercial, and industrial sectors?
- c) Did Enbridge Gas consider its customer growth rate or customer increment by sector in determining the 3% policy growth escalator? And if so, how? And if not, why not?
- d) What factors did Enbridge Gas take into account and which of these were most important to Enbridge Gas in determining the 3% policy growth rate escalator?

6 6.LIEN.IR#6

Exhibit D Tab 1 Schedule 1 pages 11 through 15 of 26, inclusive. Regarding the Low Income DSM program budget, please provide a table which shows:

- a) the low-income budget in total and broken down by program offering and rate zone for 2021, 2022, and in total, and broken down by program offering for 2023-2027.
 - i. Please indicate the total low-income program budget change year over year and percentage change as well as the program offering budget change and percentage change year over year.
- b) Enbridge Gas's forecast of low-income customers broken down by residential customers and for multi-residential broken down by social and assisted housing and by market rental buildings, over the 2021 to 2027 period.

- i. Please indicate number of participants forecasted, average savings per participant by low-income program offering forecasted and forecasted % uptake compared to customer forecast for each year over the 2021-2027 period.

7 6.LIEN.IR#7

Regarding Exhibit D Tab 1 Schedule 1, pages 11 through 15 of 26, inclusive:

- a) How much of the delivery budget for each year of Winterproofing program and Affordable Housing program for 2023 to 2027 period has been allocated to health and safety upgrades to enable measure installation in the dwellings?
- b) How much budget/dwelling for each of the Winterproofing and Affordable Housing programs per year will be available to be spent on health and safety upgrades?
- c) How much budget/dwelling was available and was spent for each year from 2015 to 2021 (best available) for EGD rate zone Home Winterproofing and Low-Income Multi-Residential programs and for Union Gas's rate zone Home Weatherization and Multi-family programs on health or safety upgrades to enable measure installation in these dwellings? How many dwellings received these upgrades for each year from 2015 to 2021 (best available) and how does this compare to the total number of dwellings visited that required health or safety upgrades before measure(s) could be installed?

8 10b.LIEN.IR#8

Regarding Home Winterproofing program at Exhibit E Tab 1 Schedule 3, page 4 of 20:

- a) Which specific measures are provided at no cost and which ones at low cost, what is the total estimated cost of each measure and what is the financial contribution by measure that will be required for each of the low-cost measures?
- b) What studies were done in the Ontario low-income homeowner market to test and verify both the homeowner's willingness and ability to pay the upfront cost of the low-cost measures? Please provide these studies.
- c) For the Enbridge rate zone Home Winterproofing program and the Union rate zone Home Weatherization program, for each year of 2015 to 2021 (best available):
 - i. which measures were offered with an upfront financial contribution required by the low-income participant
 - ii. what was the financial contribution required by measure

- iii. what was the total cost of the measure, and
 - iv. what percent of the total number of low-income participants in each program provided a financial contribution?
- d) Has Enbridge set an internal target, budget or made a forecast for either the number or percent of participants forecast to participate broken down by private single family, residents of on-reserve First Nations and social and assisted housing, and if so, what are those targets, budgets and forecasts? If Enbridge has not set such targets or made such forecasts, please explain why not.

9 10b.LIEN.IR#9

Regarding Affordable Housing Multi-Residential Offering at Exhibit E Tab 1
Schedule 3, pages 13-20 of 20:

- a) Which direct install specific measures are provided at no cost and which at low cost to the customer, what is the total estimated cost of each measure, and what is the financial contribution by measure that will be required for each of the low-cost measures?
- b) Regarding the low cost to the customer for direct install measures, is the customer defined as the resident of the unit or is it the affordable housing or privately-owned multi-residential building owner or property manager?
- c) Why is the list of in-suite measures limited to heat reflector panels and showerheads? Were other measures also evaluated, and if so, which ones and why were they excluded? Why were bathroom and faucet aerators excluded?