



October 22, 2021

VIA RESS

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Long,

**Re: Enbridge Gas Inc.
Multi-Year Demand Side Management Plan (2022-2027) Application
Board File No.: EB-2021-0002**

We are counsel to the Association of Power Producers on Ontario (**APPrO**) in the above-noted proceeding. Please find enclosed the interrogatories of APPrO, filed pursuant to Procedural Order No. 3.

Sincerely,

A handwritten signature in black ink, appearing to be "Lisa DeMarco", with a long, sweeping horizontal line extending to the right.

Lisa (Elisabeth) DeMarco

c. Asha Patel, Enbridge Gas Inc.
Dennis O'Leary, Aird & Berlis LLP
David Butters, APPrO

Encl.

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an application by Enbridge Gas
Inc. (**EGI**) pursuant to Section 36(1) of the Act, for an order
or orders approving its Demand Side Management Plan for
2022-2027 (the **Application**).

EB-2021-0002

INTERROGATORIES OF
ASSOCIATION OF POWER PRODUCERS OF ONTARIO (APPro)
TO
ENBRIDGE GAS INC.

October 22, 2021

Question: **10e.APPrO.1**

Reference: • Exhibit E, Tab 1, Schedule 6, pp. 1 and 5-9

Preamble: EGI's Direct Access Offering encourages large volume customers (**LVCs**) to maintain a focus on energy efficiency by encouraging the development of energy efficiency plans and encouraging action on identified efficiency opportunities.

- a) For each of EGI's LVC rate class(es), please provide the following information in tabular format for 2020 (actuals), 2021-2022 (forecast), and 2023-2027 (proposed):
- (i) number of customers in each rate class and the proportion of those customers that are gas-fired generators (**GFGs**);
 - (ii) number of customers in each rate class that participate in DSM programs and the proportion of those customers that are GFGs; and
 - (iii) DSM costs allocated to the rate class (through base rates and deferral and variance accounts).

Question: **10e.APPrO.2**

Reference: • Exhibit E, Tab 1, Schedule 5, Attachment 1
 • Exhibit E, Tab 1, Schedule 5, Attachment 2

Preamble: EGI retained Ipsos to undertake a customer engagement process for industrial customers. Ipsos in its final report on DSM Next Generation customer engagement noted that “there is some room for improvement when it comes to the natural gas conservation program incentives in the eyes of participants.”

- a) Please provide a copy of all written instructions by EGI in relation to EGI's customer engagement for the DSM and the reports provided in Exhibit E, Tab 1, Schedule 5, Attachments 1 - 2.

- b) Please provide any and all notes from the customer engagement relating to LVCs and GFGs that are supplementary to the reports provided in Exhibit E, Tab 1, Schedule 5, Attachments 1 - 2.

- c) Please describe any and all feedback from or related to GFGs.

Question: 10e.APPrO.3

Reference:

- Exhibit E, Tab 1, Schedule 6, pp. 3-5
- Exhibit E, Tab 4, Schedule 6, pp. 8-9

Preamble: EGI notes that its Large Volume Program Strategy “builds on the successes and learnings of the existing Large Volume program, with modifications intended to be responsive to customer feedback.”

EGI indicates that changes to the Large Volume program include reducing the Large Volume program budget which will decrease DSM related rate impacts in the Rate 100 and T2 large volume rate classes.

EGI indicates that it engaged a number of LVCs and stakeholders to provide an overview of the proposed Direct Access offering. EGI notes that some stakeholders were opposed to paying for DSM programming while others were supportive of increasing funding for the Large Volume program.

- a) Please provide the expected rate impacts of the proposed Large Volume program for each rate class.
- b) Please provide specific examples of the feedback EGI received, both in favour of the Large Volume Program and against the program. Did the consultation include gas-fired generators (**GFGs**)? If yes, how many? Please describe their feedback. If no, why not?
- c) Please provide all working papers, analysis, and reports written or carried out supporting EGI’s decision to reduce the incentive budget and total Direct Access offering budget for the base year and corresponding inflationary increases.
- d) Please indicate in what way EGI is increasing the flexibility of the types of projects eligible for the Direct Access offering?

Question: **10e.APPrO.4**

Reference: • Exhibit E, Tab 4, Schedule 6, Attachment 3

Preamble: EGI undertook a customer engagement process on Large Volume DSM and its Next Generation Program.

- a) Please provide a copy of all written instructions by EGI in relation to EGI's customer engagement with Large Volume customers DSM and the slide deck provided in Exhibit E, Tab 4, Schedule 6, Attachments 3.
- b) Please provide any and all notes from the customer engagement and discussion relating to Large Volume Customers and GFGs
- c) Please describe any and all feedback from or related to GFGs.
- d) Please provide examples of questions EGI asked stakeholders regarding Large Volume DSM and the Next Generation Program.

Question: 10e.APPrO.5

- Reference:
- Exhibit C, Tab 1, Schedule 1, p. 5
 - Exhibit E, Tab 1, Schedule 1, pp.1 and 4
 - Exhibit E, Tab 1, Schedule 4, p. 15
 - Exhibit E, Tab 1, Schedule 5
 - Exhibit E, Tab 3, Schedule 1

Preamble: EGI notes that one of the primary objectives of its DSM plan includes playing “a role in meeting Ontario’s greenhouse gas reductions goals”. EGI also notes that “all levels of government have made known the desire to reduce [GHG] emissions and have articulated target reductions for both 2030 and 2050.”

EGI’s Industrial Customer offering seeks to achieve sustained and progressive energy efficiency through a continuous energy improvement approach. EGI notes that one of the Industrial Custom offering’s objectives is the reduction of GHG emissions to meet Ontario’s reduction goals.

In EGI’s 2021 DSM Plan Application proceeding, APPrO noted that GFGs are already incented to find efficiencies and reduce GHG emissions from numerous other regulatory requirements and that numerous climate change, GHG emission reduction and low-carbon fuels policies and programs at all levels of government continue to apply to GFGs. APPrP further noted “that the electricity sector, and clean, natural gas-fired electricity generators therein, appear to be subject to more, stacked, and multiple carbon-related costs than any other sector of the economy.”¹

- a) Please provide the rate impact of exempting GFGs from any obligation to contribute to the DSM costs allocated to the LVC rate classes.
- b) Please explain and provide details regarding implementing the required changes to EGI’s billing system to accommodate exempting GFGs from any obligation to contribute to DSM costs, as contemplated above and detailed in the written submissions of APPrO and the reply submissions on same of EGI in Board File No. EB-2019-0271.

¹ Please see written submissions of APPrO in EGI 2021 DSM Plan Application proceeding, Board File No. EB-2019-0271, pp. 2-4, available online at: <https://www.rds.oeb.ca/CMWebDrawer/Record/679731/File/document>.

ALL OF WHICH IS RESPECTFULLY
SUBMITTED THIS

22nd day of October, 2021

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a long, sweeping horizontal stroke that ends in a small arrowhead pointing to the right.

Lisa (Elisabeth) DeMarco
Resilient LLP
Counsel for APPrO