REF: Exhibit D, Tab 1, Schedule 1, page 5 And page 9 Table 2 footnote 1.

Preamble: EGI evidence states: "*Enbridge Gas believes it is appropriate and prudent to assess the program portfolio in certain specific areas towards the end of the first two-years of the plan to ensure the plan continues to be aligned with the market and evolving policy in Ontario. A limited mid-point assessment will provide an opportunity to determine if any additional program offerings merit introduction, or if changing market factors/government policy necessitate some re-consideration in program design or delivery*."

And

"*The Building Beyond Code and Low Carbon Transition budgets to be reassessed at the mid-point assessment*"

We would like to understand better the rationale for the timing of this proposed review.

Interrogatory Number: Issue 1.FRPO.1 & .2

1) What is the likelihood that EGI will have year 1 (2023) audited results available?
    a) Please provide the type of information that would be available on the results from the Building Beyond Code and Low Carbon Transition programs.

2) Coupled with the expectation of the status of year 1, it is clear that year 2 results would not be available even in unaudited fashion. Please comment on the practical efficacy of an early year three review of the first two years of the framework.

REF: Exhibit B, Tab 1, Schedule 1, page 9 and Exhibit D

Preamble: EGI evidence states: "*The Proposed Framework builds on the 2015-2020 DSM Framework…*"

To understand EGI's proposed Framework going forward, it is our view, that the Board and stakeholders would benefit from seeing the context of the program budgets and results in the previous Framework. We understand that with the evolution of programs there may not be a precise fit for the purposes of allocations so that we ask that EGI provide the best fit and highlight any outliers.

Interrogatory Number: Issue 5.FRPO.3 & .4

3) For each of the program areas costs forecasted in Exhibit D, Schedule 1, Tables 4-8, please provide the actual annual spending for the 2015-2020 period, categorized by Incentive, Promotion, Delivery, Administration and Total.

4) For each of the program areas Scorecards proposed in Exhibit D, Schedule 1, Tables 5-9, please provide the results obtained for the 2015-2020 period, categorized by Metric, Weight and DSMI Allocation, Score and Resulting Incentive.

REF: Exhibit C, Tab 1, Schedule 1, page 6

Preamble: EGI evidence states: "***DSM plans should balance the achievement of cost-effective natural gas savings and customer bill impacts.* "***The appropriate level of ratepayer funding expended for DSM programs must weigh the cost-effective natural gas savings to be achieved against both short-term and long-term customer bill impacts. The OEB expects that all requests for ratepayer-funding to support DSM programs be accompanied by detailed evidence that shows how the programs will benefit Ontario's natural gas customers, help reduce overall natural gas usage and costs*."

We would like to understand how the DSM programs of the previous framework help reduce ratepayer costs.

Interrogatory Number: Issue 6.FRPO.5

5) Please provide reference to specific elements of the pre-filed evidence that show that the DSM reduces ratepayer costs.
    a. Please supplement this evidence with any additional analysis not currently on the record.

REF: Exhibit D, Tab 1, Schedule 1, Attachment 1, page 1

Preamble: We would like to understand the increase in staff for the legacy utility programs just ahead of the utility merger.

Interrogatory Number: Issue 6.FRPO.6

6) Please describe the prime factor(s) that led to a 10% increase in Union Gas staff between 2015 and 2017 and the almost 30% increase in Enbridge Gas Distribution staff between 2015 and 2018 as the company's prepared for a merger.
    a) Please provide the number of full time staff dedicated to each of the respective utilities during th 2015-2020 period (i.e., does not include staff whose time was partially allocated to DSM).

REF: Exhibit C, Tab 1, Schedule 1, page 37-38 And 47

Preamble: EGI evidence states: "*For the purposes of determining LRAM amounts, all input assumptions and adjustment factor changes will be applied retroactively to the year being evaluated, regardless of the approach used for the purposes of determining shareholder incentive amounts and cost-effectiveness described in Section 9.3.*"

And

"*Further, lost revenues will not act as a disincentive to Enbridge Gas's delivery of DSM programs.*"

We would like to understand better the impact of LRAM on ratepayer costs and the efficacy of those investments by ratepayers.

Interrogatory Number: Issue 7.FRPO.7 & .8

7) For each year of 2015-2020, for each rate class, please provide the LRAM rate impacts (quantum and percentage) at start of each year for the respective legacy utilities/rate zones.

8) Please provide any analysis performed by EGI (or the respective legacy utilities) to reconcile LRAM implications and NAC for a utility rate zone.

REF: Exhibit C, Tab 1, Schedule 1, page 49 And 54

Preamble: EGI evidence states: *"Capital assets (property, plant and equipment) associated with the multi-year DSM Plan will be included in rate base and will be treated in the same manner as distribution assets."*

And

"Any assets purchased with funds from third parties (i.e. not funded through distribution rates) will not be eligible for inclusion in rate base, nor will there be any distribution rate recovery of ongoing operating costs associated with the asset, or income taxes payable in relation to third-party funded activities."

We would like to understand EGI's proposed practices relative to DSM capital assets.

Interrogatory Number: Issue 7.FRPO.9 & .10

9) Is the practical effect of the practice in the first excerpt result in assets completely funded through DSM allocations to rates (i.e., fully ratepayer funded as part of DSM increment) would then move to rate base for further recovery? Please explain fully.

10) Please reconcile the above practice with the handling of third party funded assets in the second excerpt. Please compare and contrast fully.

REF: Exhibit B, Tab 1, Schedule 1, page 8

Preamble: EGI evidence states: ""*It is important to acknowledge that Ontario's DSM frameworks have consistently maintained the goal of facilitating energy efficiency and conservation of natural gas in a manner that benefits natural gas ratepayers through, inter alia, bill reductions while at the same time making the shareholder eligible to earn an incentive and providing certainty that the utility is not unduly exposed to risk.*"

Interrogatory Number: Issue 8.FRPO.11

11) Please identify the type of risks that parties were xposed to in the previous framework.
    b. Please describe the risk, what party bore the risk (utility, participant, ratepayer) and how it was mitigated.

REF: Exhibit C, Tab 1, Schedule 1, page 14

Preamble: EGI evidence states: "*Subsequently, just as the DSM budget will be increased for inflation, this maximum incentive should be increased annually for inflation over the course of the next multiyear plan.*"

We would like to understand the premise behind the proposition that the maximum incentive <u>should</u> be tied to inflation.

Interrogatory Number: Issue 8.FRPO.12

12) Please explain the reason(s) why the maximum incentive should be inflated (i.e., based upon what principle(s) of need, increased financial risk or other econometric measure?

REF: Exhibit D, Tab 1, Schedule 1, page 17, Table 10

Preamble: We would like to understand the assumptions behind the forecast budget in Table 10.

Interrogatory Number: Issue 10.FRPO.13

13) Please provide the assumptions behind the almost doubling of the Residential budget with a much smaller (approximate 20%) increase in the Commercial budget.

REF: Exhibit D, Tab 1, Schedule 2, page 13

Preamble: EGI evidence states: "*A portion of the maximum shareholder incentive has been allocated to the multi-year Low Carbon Transition program. This program is designed to increase awareness, training, and installation of heat pump technologies in the province over time aligned with the Pan Canadian Framework as described in Exhibit E, Tab 3, Schedule 1.*"

We would like to understand the ratepayer value proposition with regard to this proposed program.

Interrogatory Number: Issue 10.FRPO.14

14) Please provide EGI's perspectives on the nature of these programs relative to the business risk of the utility.
    a) Please comment on why the shareholder not only can use ratepayer funds to reduce investment risk <u>BUT ALSO</u> expect a return for using the ratepayer's funds to reduce its risk. Please explain what the shareholder is investing or risking in this proposed program.

REF: Exhibit D, Tab 1, Schedule 3, page 11 including Table 7

Preamble: We would like to understand the value proposition for ratepayers of this training initiative and how it would be measured.

Interrogatory Number: Issue 10.FRPO.15 & .16

15) From EGI's research, for Ontario or EGI franchise area, please provide the current number of:
    a) Annual installations of Residential heat pumps
    b) Current number of trained contractors
    c) Annual installations of Commercial heat pumps
    d) Current number of trained engineers

16) For the purpose of the proposed measurements:
    a) How will the number of Residential heat pumps be measured (e.g., only those pumps installed by EGI trained contractors)?
    b) How will the number of trained contractors be measured (e.g. those who were trained by EGI or EGI sponsored programs)?
    c) How will the number of Commercial heat pumps be measured (e.g., only those pumps installed by EGI trained contractors)?
    d) How will the number of trained engineers be measured (e.g. those who were trained by EGI or EGI sponsored programs)?

REF: Exhibit D, Tab 1, Schedule 3, page 12 including Table 8

Preamble: We would like to understand the value proposition for ratepayers by adding a stretch target to the cumulative resource acquisition targets.

Interrogatory Number: Issue 10.FRPO.17

17) The summary Table 8 seems to infer that qualified year one savings are assumed to persist for the five years of the framework. Please confirm.
    a) Is the practical effect of this metric just adding an additional incentive for meeting a greater than 115% of the resource acquisition targets? Please explain fully the ratepayer value generated by this new, additional incentive based upon Resource Acquisition savings proposed for the shareholder.

REF: Exhibit E, Tab 1, Schedule 3, page 4

Preamble: EGI evidence states: "*Low income programming encompasses the following important components:*
…
• *Turnkey, fully funded weatherization programming for income qualified residents of single family and low-rise social housing;*"

We would like to understand better the Low-income program and practices related to multi-family residential housing.

Interrogatory Number: Issue 10.FRPO.18 & .19

18) Is the turnkey, fully funded weatherization programming available to qualified, privately-owned affordable housing? If not, why not?

19) For the period of 2015-2020, please provide the low-income, resource acquisition savings for multi-family residential buildings. Please provide the results on an annual basis for each legacy utility/rate zone and categorized by social housing or privately-owned buildings.
    a) As a result of the savings provided, please comment on strategies that EGI believes will have greatest efficacy and ratepayer value.

REF: Exhibit E, Tab 1, Schedule 3, page 19-20

EGI evidence states: *"Privately owned multi-residential building that can demonstrate one of the following criteria:*

• Privately owned multi-residential building owner or property manager must confirm, based on rent roll review, that at least 30% of the units are rented at less than 80% of the median market rent, as determined by the Canadian Mortgage and Housing Corporation;

OR

• Existence of Rent Geared to Income ("RGI") or rent supplement contract(s) with the designated service manager office;

OR

• The building has participated in a federal or provincial affordable housing funding program in the last 5 years.

All privately owned building owners or operators must also sign an agreement to forego Above Guideline Increase ("AGI")."

We would like to understand the effectiveness of the above criteria in identifying and providing low income DSM to privately-owned multi-family buildings under the previous framework.

Interrogatory Number: Issue 10.FRPO.20 & .21

20) For the period of 2015-2020, for successful installation of low income DSM initiatives, please provide the percentage of buildings qualified using each of the above criteria.

21) Specific to the last qualification, please confirm that the agreement is to forego an Above Guideline Increase associated with work undertaken as part of the Low-income DSM program.

REF: Exhibit C, Tab 1, Schedule 1, page 21

Preamble: EGI evidence states: "*Pilots and tests could be included within Resource Acquisition and Market Transformation programs and are necessary to evolve the current portfolio of DSM programs.*"

We would like to understand EGI's experience with pilot and tests in DSM.

Interrogatory Number: Issue 11.FRPO.22 & .23

22) Please provide examples of tests in the previous framework. Please describe what was learned.

23) Please provide examples of pilots in the previous framework. Please describe what was implemented.

REF: Exhibit C, Tab 1, Schedule 2, page 3

Preamble: EGI evidence states: "*Enbridge Gas proposed in the IRP Framework that if an ETEE is included in an IRP Plan that the cost of the ETEE and the results would be attributed to IRP. With this treatment if follows there would therefore be no impact on the DSM plan results.*"

We would like to understand how EGI proposes to handle the cost of DSM staff who are presumably used to implement the EETE.

Interrogatory Number: Issue 15.FRPO.24

24) Please describe how DSM staff costs would be handled.