

**SBUA Interrogatories**  
**2022-2027 Demand Side Management Framework and Plan Application**

**Enbridge Gas Inc.**  
**EB-2021-0002**

**October 22, 2021**

**Issue 10**

**10.SBUA.1**

**Reference:** Exhibit E, Tab 1, Schedule 2

Will small commercial customers installing residential-sized space and water heating equipment be eligible to participate in the residential programs offering rebates for this type of equipment?

**10.SBUA.2**

**Reference:** Exhibit E, Tab 1, Schedule 4, paras. 64-73 (Direct Install Program)

- a) Which potential measures were considered for inclusion in the Direct Install Program?
- b) For any measures that were rejected, please explain why they were rejected and what conditions would need to be in place from Enbridge Gas's perspective for those measures to be included in the future.
- c) Are there some measures that might not be cost effective on average, but might be for particular projects that were excluded? If so, what are those measures?
- d) Why aren't all potentially cost-effective measures considered in the Direct Install Program?
- e) Why are there no measures in this program that would provide energy costs savings to customers with high water heating needs, such as food service and hospitality customers? What conditions would need to be in place from Enbridge Gas's perspective in order for such measures to be included?
- f) What will be the specific criteria for determining the incentives for small commercial customers? For example, will it be designed to reduce the payback period to fewer than a given number of years or cover a given percentage of the incremental cost?

- g) Will the Direct Install Program either offer financing or assistance in obtaining financing for projects? If so, what are the specifics?
- h) Will on-bill financing be available? If not, was it considered? If considered, why was it rejected? What conditions would need to be in place from Enbridge Gas's perspective for on-bill financing to be included in the future?

### 10.SBUA.3

**Reference:** Exhibit E, Tab 1, Schedule 4, Attachment 1, p. 43 (Ipsos Enbridge Gas Commercial Next Gen DSM Planning: Stakeholder Engagement – Report of Qualitative Research Findings)

At p. 43 of its report, Ipsos states the following:

Driving awareness of available programs and incentives would be an important first step in reaching small and medium sized businesses, as they are often wearing multiple hats within the business and have a lot of information coming their way on many different aspects of their businesses. ***Associations would recommend a multipronged, proactive outreach as the best means to reach and break through to small businesses and would be willing to disseminate energy efficiency/ conservation program information to its membership as they believe they would be a trusted source that could help Enbridge Gas “cut through the noise”.*** [Emphasis added.]

- a) Since cost management is a key priority for small businesses, what specific steps does Enbridge Gas plan to put in place to ensure that energy costs savings opportunities are directly brought to the attention of decision-makers? Put differently, beyond working through service providers, what concrete steps does Enbridge Gas plan to put in place to address the recommendation that there be “multipronged, proactive outreach”?
- b) Business associations indicated that they would be “willing to disseminate energy efficiency / conservation program information” to their membership and “believe that they would be a trusted resource that could help Enbridge Gas ‘cut through the noise’”. What steps will be put in place to leverage the reach of business associations and to provide them with the tools to help their members understand and execute on the available DSM programming?

- c) Enbridge Gas's website has energy costs savings calculators organized by industry and measure type. What specific steps does Enbridge Gas plan to put in place to increase awareness and use of those calculators amongst its small commercial customers?

#### 10.SBUA.4

**Reference:** Exhibit E, Tab 1, Schedule 4, Attachment 1, p. 44 (Ipsos Enbridge Gas Commercial Next Gen DSM Planning: Stakeholder Engagement – Report of Qualitative Research Findings)

At page 44 of its report, Ipsos states:

Utility / government incentives have been popular and successful in the past in driving small and medium sized businesses to participate in energy efficiency initiatives such as equipment upgrades. ***Providing turnkey or automated solutions, such as monitoring use and alerting businesses about spikes in or high usage, would be ideal.***

As well, ***language and bill simplification, framing the issues and benefits in terms of cost, and avoiding technical terms / speak, would be most helpful to those on the ground running their businesses everyday***, rather than trying to educate them to become energy experts. ***In other words, simplicity and low levels of effort and knowledge is key.***

***Associations are very willing to partner and collaborate with Enbridge Gas in terms of building education and awareness***; however, while they play an active role in discussing and helping small and medium sized businesses understand whether or not their members are eligible for programs and incentives, associations do not directly help them in filling out applications or executing energy efficiency projects – ***their role is more advisory and in reassuring their members on the legitimacy of programs.***

[Emphasis added.]

- a) Is the recommendation to “*provid[e] turnkey or automated solutions, such as monitoring use and alerting businesses about*

*spikes in or high usage*” being implemented? If so, please explain what specific steps Enbridge Gas plans to take to implement it. If not, please explain why and what conditions would need to be in place from Enbridge Gas’s perspective in order to implement the recommendation.

- b) Are the recommendations to implement “*language and bill simplification, framing the issue in terms of cost, and avoiding technical language / speak*” being implemented? If so, please explain what specific steps Enbridge Gas plans to take to implement it. If not, please explain why and what conditions would need to be in place from Enbridge Gas’s perspective in order to implement the recommendation.
- c) Given that “*associations are very willing to partner and collaborate with Enbridge Gas in terms of building education and awareness*”, how does Enbridge Gas plan to work with small business associations in implementing in DSM Plan? Which small business associations does it plan to work with?
- d) One way to work with associations may be to enlist their assistance in making the energy cost calculators accessible and available to their members, for example through email campaigns to their members and embedded links on their websites. Does Enbridge Gas plan to work with small business associations to put in place that type of proactive outreach? If so, please explain how, which associations will be engaged and on what timeframe. If not, please explain why not and what conditions would need to be in place from Enbridge Gas’s perspective in order to pursue such proactive outreach.

## 10.SBUA.5

**Reference:** Exhibit E, Tab 1, Schedule 4, p. 19 (Commercial Custom Offering)

- a) Are commercial and industrial customers of any size allowed to participate in the Commercial Custom Program?
- b) Did Enbridge Gas consider offering a component of the Commercial Custom Program for small commercial customers (less than 100,000 m<sup>3</sup>/year) with higher incentive levels, but still allowing for consideration of any cost-effective measures – unlike the limited measure options in the Direct Install Program which is confined to a limited set of measures? If not, why not? If so, why was it rejected?

- c) For each of the programs addressing commercial customers, please provide the total customer incentive dollars and annual gas savings for small commercial customers (less than 100,000 m<sup>3</sup>/year). Please provide this for each of the plan projected years and each of the historic years back to and including 2018.
- d) Please provide the rate and bill impacts of the planned DSM programs for a typical small commercial customer (less than 100,000 m<sup>3</sup>/year).
- e) Please provide the rate and bill impacts of the expected (100% achievement) and maximum (150% achievement) shareholder incentives for a typical small commercial customer (less than 100,000 m<sup>3</sup>/year).