



PUBLIC INTEREST ADVOCACY CENTRE  
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October 22, 2021

**VIA E-MAIL**

Ms. Christine Long  
Registrar and Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 27th floor  
P.O. Box 2319  
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: EB-2021-0002 Enbridge Gas Inc. Natural Gas DSM Plan (2022-2027)  
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC) on Draft Issues List**

Attached please find the interrogatories of VECC in the above proceeding.

Yours truly,

*Original Signed By*

John Lawford

Counsel for VECC

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EB-2021-0002

Enbridge Gas Inc.

Application for Multi-Year Natural Gas Demand Side  
Management Plan (2022 to 2027)

VECC Interrogatories October 22, 2021

5-VECC-1

Ref: Exhibit C Tab1 Schedule 1 Page 9

In order to fund the costs of administering and delivering DSM programs, including marketing efforts, financial incentives to participants, and educating consumers, long-term and annual DSM budgets must be developed that will enable the achievement of DSM objectives over the duration of a DSM plan period.

Please provide the total marketing costs, financial incentive costs to participants, and education costs broken down by DSM program category for the years 2020 to 2023.

5-VECC-2

Ref: Exhibit C Tab1 Schedule 1 Page 22

With respect to attribution of benefits between Enbridge Gas and other parties, where Enbridge Gas's allocated share of natural gas savings in the partnership agreement is more than 20% of the share that would have been allocated based on a "percentage of total dollars spent" basis, an explanation for the difference should be provided.

Please explain how the 20% threshold was determined.

5-VECC-3

Ref: Exhibit C Tab1 Schedule 1 Page 2

With respect to re-allocation of DSM Plan costs, Enbridge Gas indicates any requisite re-allocation of costs amounting to \$1,000,000 or more in a given year will require Enbridge Gas to file for an adjustment to the DSM Plan.

Please explain the basis for the \$1,000,000 threshold.

5-VECC-4

Ref: Exhibit C Tab1 Schedule 1 Page 39

To recognize that the Low Income natural gas DSM program may result in important benefits not captured by the TRC-Plus test, this program should continue to be screened using a lower threshold value of 0.7. Low Income offerings that fail to meet a TRC-Plus cost-benefit ratio of 0.7 can still be applied for, and approval of these programs will be considered on their merits

Please discuss if Enbridge Gas reviewed lowering the threshold value of 0.70 for the low income sector. If yes, please provide details and any evaluation and analysis undertaken.

#### 5-VECC-5

Ref: Exhibit D Tab 1 Schedule 1 Page 5

Please summarize all key components of the DSM Framework/Plan that Enbridge Gas proposes to exclude from the Mid-Point Assessment.

#### 6-VECC-6

Ref: Exhibit D Tab 1 Schedule 1 Page 11 Table 4

- a) Please provide a further breakdown of the Residential and Low Income offering costs.
- b) Please provide a further breakdown and description of Portfolio Administration Costs of \$8,569,922.

#### 6-VECC-7

Ref: Exhibit D Tab 1 Schedule 1 Page 18 Table 11

Table 11 shows the overall allocation of headcount within the budget at a program and portfolio level for the years 2023 and 2024.

Please add forecast 2021 to Table 11.

#### 6-VECC-8

Ref: Exhibit D Tab 1 Schedule 1 Page 21

Ten additional FTE's have been identified as being necessary to address the OEB guidance, Proposed Framework guiding principles and the Government's Environmental Plan and its support for continued and expanded DSM.

Please provide the function of each position and the allocation of FTE costs to each DSM program and portfolio administration.

#### 6-VECC-9

Ref: Exhibit D, Tab 1, Schedule 1

Please provide the number of vacancies per month by year for the years 2019 to 2021.

8-VECC-10

Ref: Exhibit C Tab1 Schedule 1 Page 14

The proposed maximum shareholder achievable for Enbridge Gas should be consistent with the total amount approved by the OEB for the two legacy utilities in the prior 2015-2020 framework. This annual maximum shareholder incentive totals \$20.9 million. 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 multi-year plan.

Please provide details/calculation of how the \$20.9 million was determined.

10a-VECC-11

Ref: Exhibit E Tab 1 Schedule 2 Page 1

Enbridge Gas's proposed Residential program builds on the successes and learnings of the existing Residential program, while incorporating new offerings and elements.

Please summarize the key successes in the Residential program to date.

10a-VECC-12

Ref: Exhibit E Tab 1 Schedule 2 Page 1

The residential sector is comprised of more than 3,400,000 accounts that collectively consume over 8.6 billion cubic meters of natural gas per annum and this segment also includes low income residential customers.

Please provide the data for the low income sector.

10a-VECC-13

Ref: Exhibit E Tab 1 Schedule 2 Page 5

Enbridge Gas indicates that it intends to address the market awareness barrier by broadening and enhancing relationships with contractors and other delivery partners, including an increased focus on those supporting thermal envelope upgrades. By improving contractor awareness of the offering, they will, in turn, be able to inform their clients of the program and address upfront barriers at the opportune time for customer participation, during renovations.

- a) Please identify the other delivery partners.
- b) Does Enbridge Gas set targets for increased market awareness? If yes, please provide for the Residential program.

10a-VECC-14

Ref: Exhibit E Tab 1 Schedule 2

Please complete the following table.

Residential Offering Name	2015 Participants (Actual)	2020 Participants (Actual)	2023 Participants (Forecast)	2027 Participants (Forecast)	2023 Average Participant Incentive Assumption (\$)	2023 Average Participant NG Savings Assumption (m3)
Whole Home						
Single Measure						
Smart Home						

10a-VECC-15

Ref: Exhibit E Tab 1 Schedule 2 Page 12

Measure incentives are provided to participants according to the measure installed. Table 1 provides the proposed measure incentives.

Please compare to the measure incentives previously in place.

10a-VECC-16

Ref: Exhibit E Tab 1 Schedule 2 Page 13

Enbridge Gas is currently conducting a pilot on virtual audits to determine its viability as a future offering enhancement.

Please provide the scope, timeframe and cost of the pilot.

10a-VECC-17

Ref: Exhibit E Tab 1 Schedule 2 Page 18

Participating contractor responsibilities will include identifying candidates as well as submitting program applications and supporting documentation. Customers will be required to sign an agreement confirming that work has been completed as appropriate before an incentive is paid out as a condition of the offering.

Please provide a copy of the program application and supporting documentation, and the customer agreement.

10a-VECC-18

Ref: Exhibit E Tab 1 Schedule 2 Page 22

With respect to the Smart Home offering, eligible participants will receive a \$75 incentive towards the purchase of a qualifying smart control device. For participants who qualify as moderate income as part of the collaboration with the IESO, an additional incentive of \$50 (for a maximum total incentive of \$125) will be provided.

Please compare to the measure incentives previously in place.

#### 10b-VECC-19

Ref: Exhibit E Tab 1 Schedule 3 Page 1

Enbridge Gas has a strong history of successful delivery of energy efficiency programs specifically designed to meet the needs of lower income customers.

- a) Please summarize the key successes in delivery of Low Income programs to date.
- b) Please summarize the key lessons learned in delivery of Low Income programs to date.

#### 10b-VECC-20

Ref: Exhibit E Tab 1 Schedule 3 Page 2

Enbridge Gas works closely with its network of community-based organizations, local community service providers, social and assisted housing networks, non-profit organizations, and faith-based organizations to gain trust and improve accessibility to programming.

Please discuss Enbridge Gas's plans to grow the network over the 2023 to 2027 period.

#### 10b-VECC-21

Ref: Exhibit E Tab 1 Schedule 3 Page 4

Low income programming inclusion a health and safety budget to improve the safety and well-being of the home and aid in removing barriers to participation.

Please provide the health and safety budget for 2023.

#### 10b-VECC-22

Ref: Exhibit E Tab 1 Schedule 3 Page 4

Low income programming includes enhanced incentives, low or no cost direct install measures to improve economic feasibility of efficiency projects contributing to the preservation and improvement of the multi-residential social and assisted housing supply and privately-owned multi-residential buildings with high incidence of low income tenants.

- a) Please provide further information on enhanced incentives.

b) Please discuss eligibility requirements for low cost compared to no costs.

c) Please quantify low cost for low income participants.

10b-VECC-23

Ref: Exhibit E Tab 1 Schedule 3 Page 8

The offering is delivered by third-party Delivery Agents (“DAs”) across the franchise. DAs are responsible for customer intake, income qualification, pre and post energy assessments, and the installation of beneficial upgrades. DAs have access to a health and safety budget to complete minor improvements where barriers may exist to inhibit a customer’s ability to participate in the offering.

Please provide the third party costs for the low income offering.

10b-VECC-24

Please complete the following table.

Low Income Offering	2015 Target Market Size	2015 Participants (Actual)	2020 Participants (Actual)	2023 Target Market Size	2023 Participants (Forecast)	2023 Avg Participant Incentive (\$)	2023 Avg Participant NG savings (m3)
Home Winterproofing							
Affordable Housing Multi-Residential Offering (AHMR)							