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500 Consumers Road  
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December 16, 2021

**VIA EMAIL and RESS**

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

Dear Christine Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File: EB-2021-0002  
Multi-Year Demand Side Management Plan (2022-2027)  
2022 DSM Plan Year Low Income Eligibility Criteria and Updated Evidence for  
Multi-Year Demand Side Management Plan**

Please see the attached correspondence from Enbridge Gas on updates to the eligibility criteria for privately owned market rate multi-residential buildings in the Affordable Housing Multi-Residential offering for the 2022 DSM Plan Year.

In addition, Enbridge Gas is filing updates to one Exhibit as set out in Table 1:

Table 1

Exhibit Reference	Update
E-1-3 page 19, para 49	Removed the criteria "Existence of Rent Geared to Income ("RGI") or rent supplement contracts(s) with the designated service manager office". Added "municipal" in addition to federal and provincial.

Please contact the undersigned if you have any questions.

Yours truly,

Asha Patel  
Technical Manager Regulatory Applications

cc: Dennis O'Leary (Aird and Berlis)  
EB-2021-0002 (Intervenors)

December 16, 2021

Christine Long  
Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor  
Toronto, ON M4P 1E4

Dear Christine Long:

**RE: Enbridge Gas Inc. (Enbridge Gas)  
Ontario Energy Board (OEB) File No.: EB-2021-0002  
2022 DSM Plan**

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On May 3, 2021, Enbridge Gas filed its Multi-Year DSM Plan (2022-2027) which included updates to the eligibility criteria for privately owned market rate multi-residential buildings in the Affordable Housing Multi-Residential (“AHMR”) offering. On August 26, 2021, the OEB issued a Decision and Order related to 2022 Natural Gas DSM Activities which ordered the continuation of Enbridge Gas’s 2021 DSM Plans for legacy EGD and Union Gas rate zones for 2022.<sup>1</sup> Enbridge Gas subsequently refiled an updated Application which removed the 2022 DSM Plan year, making the Multi-Year DSM Plan applicable for 2023-2027.

As a result of the above, the eligibility criteria for privately owned market rate multi-residential buildings in the AHMR offering for 2022 is currently based on the approach in the 2015-2020 DSM Framework and Plan. This Letter is to inform the OEB and to confirm to applicable stakeholders that the Company will implement changes to eligibility criteria for both legacy DSM Plans in the 2022 DSM Plan year for privately owned market rate multi-residential buildings in the AHMR offering. Specifically, Enbridge Gas is harmonizing the eligibility criteria market rate for AHMR only. Enbridge Gas is not making any other changes to the approved programs or to the approved legacy DSM Plans.

The harmonized eligibility criteria effective for the 2022 DSM Plan year for Enbridge Gas are:

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

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<sup>1</sup> EB-2021-0002, EGI DSM Multi-year Plan and Framework Application (September 29, 2021), Exhibit E, Tab 1, Schedule 3, pp. 19-20.

- The building has participated in a federal, provincial, or municipal 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”).

Enbridge Gas is making the above changes for the following reasons as it benefits low income customers:

- Harmonization of eligibility criteria across the legacy utility rate zones improves customers' experience and reduces confusion.
- Current legacy EGD uses outdated Statistics Canada data to support its current geo-targeted approach. The Company is not confident the current criteria will appropriately identify privately owned buildings with incidence of low-income tenants and the Company wants to ensure low income program funds are directed to the right customers.
- Customers would be well-served by eligibility criteria that align with criteria used in other government affordable housing programs to enhance stack-ability of program funds, cross-promotion and qualifications among programs.

Enbridge Gas believes these criteria, adopted from the eligibility criteria of several Canadian Mortgage and Housing Corporation (CMHC) affordable housing programs, is based on the best available information in the market today.<sup>2,3</sup> The current eligibility criteria used in the legacy EGD rate zone is based on data that is outdated and is less relevant to the demographic make-up of communities today. Enbridge Gas is updating the eligibility criteria for the 2022 DSM Program Year as it is in the best interest of low-income customers. Enbridge Gas stakeholdered these changes over the course of three meetings and gained support to move forward with the changes from the majority of participating stakeholders.

At the November 30, 2021 Stakeholder meeting, Enbridge Gas held a presentation with interested stakeholders and intervenors to review the proposed eligibility criteria in more depth and to understand if there was support for moving forward with harmonized eligibility criteria for the 2022 DSM program year. An invitation went out to all low income intervenors and some additional stakeholders<sup>4</sup>. The stakeholders and intervenors who participated were: LIEN, FRPO, VECC, and CMHC. Meaningful discussion was held during the presentation. LIEN, VECC, and CMHC supported not delaying updating the eligibility criteria given the benefits for low-income customers as stated above. Enbridge Gas notes it had also previously presented the proposed eligibility changes to stakeholders in March of 2021 and received positive feedback.<sup>5</sup>

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<sup>2</sup> [Federal Lands Initiative for Affordable Housing | CMHC \(cmhc-schl.gc.ca\)](https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/co-investment-fund)

<sup>3</sup> <https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/co-investment-fund>

<sup>4</sup> The parties who were invited to the stakeholder meeting were: FRPO, LIEN, VECC, LPMA, GEC, CHRA and CMHC.

<sup>5</sup> EB-2021-0002, EGI DSM Multi-year Plan and Framework Application (September 29, 2021), Exhibit E, Tab 4, Schedule 6, pp. 2-5.

As part of the stakeholder discussions, some stakeholders inquired and questioned the value of continuing to include the existence of the Rent Geared to Income or rent supplement contract(s) criteria as part of the new eligibility criteria. Enbridge Gas undertook some analysis and found that Rent Geared to Income and rent supplement contracts have not historically qualified many participants and agrees that this one criteria should be removed as per stakeholder feedback. In conjunction with this Letter, Enbridge Gas has filed an update to the Multi-Year DSM Plan (2023-2027), EB-2021-0002, to update the eligibility criteria consistent with this Letter.

In sum, given the benefits to low-income customers and the support received from stakeholders, Enbridge Gas, in its role as Program Administrator, is advising the OEB and stakeholders that the Company will implement the harmonized eligibility criteria for privately owned market rate multi-residential buildings as part of the AHMR offering in the 2022 DSM program year for all rate zones. Enbridge Gas commits to providing annual updates on the impact of the change to eligibility criteria to the OEB and stakeholders as part of the DSM Annual Reports, annual General DSM Stakeholder meetings, and if necessary, during the mid-point assessment.

Sincerely,

Asha Patel  
Technical Manager, Regulatory Applications

cc: Dennis O'Leary (Aird and Berlis)  
EB-2021-0002 (Parties)

## ENBRIDGE GAS DSM PLAN - LOW INCOME PROGRAM

### **Low Income Sector Strategy**

1. Enbridge Gas has a strong history of successful delivery of energy efficiency programs specifically designed to meet the needs of lower income customers. There are two different measures of poverty and housing need, the Low Income Measure, after tax ("LIM-AT") and Core Housing Need ("CHN"), that each suggest about 15% of people in Ontario fall below the threshold for each measure.<sup>1</sup> Enbridge Gas's Low Income program is intended to serve these constituents, including families living in both social and privately owned housing, and in both single and multi-family residential buildings across the province.
2. Of growing concern, Ontario is at risk of losing considerable supply of social and affordable housing stock due to deteriorating conditions and expiring social housing provider agreements. At present, a large portion of affordable housing stock is over 40 years old and large investment is needed to preserve housing suitability.<sup>2</sup> It is estimated that about a third of available social housing stock could expire and transition to privately owned and operated housing in the next 10 years.<sup>3</sup>
3. Enbridge Gas is uniquely positioned to support broader investment into the capital upgrades and energy retrofit requirements facing these buildings. Enbridge Gas has the experience and record of success in delivering programming, including financial incentives and technical support, to facilitate upgrades in the energy systems of

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<sup>1</sup> Community housing renewal: Ontario's action plan under the National Housing Strategy, Ministry of Municipal Affairs and Housing. <https://www.ontario.ca/document/community-housing-renewal-ontarios-action-plan-under-national-housing-strategy/housing-needs-ontario>

<sup>2</sup> Ibid.

<sup>3</sup> Ibid, sourced from Auditor General of Ontario, Annual Report 2017.

social housing buildings. Enbridge Gas also recognizes that increasing numbers of low income customers are living in privately owned buildings due to the shortage of social housing in the province, and appreciates the need to improve efforts to identify and target these buildings franchise-wide by extending support through the Affordable Housing Multi-Residential offering.

#### Barriers

4. Low income households can be challenging to find, often because customers are hesitant to self-identify as low income. Once identified, there are several other barriers preventing low income customers from participating in energy efficiency programs, including:
  - Affordability and access to funds to make equipment upgrades and repairs;
  - Awareness or limited understanding of energy and energy use;
  - Competing priorities for necessities such as food, shelter, health and safety;
  - Lack of trust – skepticism that “nothing is free”, or fear of claw backs of financial assistance; and
  - Communication / language barriers.
5. In addition, physical and structural problems within the housing units such as the presence of asbestos, pest infiltration or excessive hoarding, elevates the challenge and safety risk for residents (as well as contractors) in undertaking improvement projects. In these unfortunate instances, units are ineligible for participation until environmental and safety risks are adequately addressed.
6. 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.

7. In the case of multi-residential low income housing, barriers can include:

- competing priorities and lack of capital;
- a lack of awareness of efficiency upgrade opportunities;
- challenges understanding the complexities of a building's energy management;
- confusion or incorrect assumptions of perceived complicated participation requirements;
- other available funding involves a complex process to navigate which poses a barrier and timelines can be slow causing the housing provider to bear more costs; and
- limited human resources to identify and undertake efficiency projects.

8. The Low Income program has evolved over the last 15 years to meet the changing needs of customers and adapt to evolving market conditions. Enbridge Gas continuously monitors the cost of delivery, evaluates the mix of measures offered and tests modifications to incentive strategies to optimize results. Especially important with this market segment, Enbridge Gas routinely seeks customer feedback, learns from the on-the-ground experience of delivery agents, and solicits the valuable insights provided by key interested stakeholders with expertise in this sector.

9. Enbridge Gas consulted with several familiar stakeholders in preparing this application to revisit discussions for potential improvements. Enbridge Gas's proposals received positive support and stakeholders provided constructive feedback.

## Low Income Program Proposal

10. Low income programming encompasses the following important components:

- Strategic outreach specifically tailored to the unique characteristics of hard-to-reach customers;
- Updated, province-wide income eligibility criteria, consistent with CDM criteria;
- Turnkey, fully funded weatherization programming for income qualified residents of single family and low-rise social housing;
- Inclusion of a health and safety budget to improve the safety and well-being of the home and aid in removing barriers to participation;
- Standardized private multi-residential building eligibility screening; and
- 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.

11. A high-level description of the Low Income Program offerings as well as their associated are listed below:

<u>Offering Name</u>	<u>High Level Description</u>	<u>Key Offering Elements</u>
Home Winterproofing	A free home energy assessment and weatherization services (i.e. insulation and air sealing) provided where possible at no-cost/low-cost to eligible participants.	<ul style="list-style-type: none"><li>• Free energy assessment</li><li>• Full weatherization upgrades and direct install of improvement measures</li><li>• Customer education and energy literacy</li></ul>



		<ul style="list-style-type: none"> <li>• Health and safety components</li> <li>• Outreach and training to intake agencies</li> <li>• Marketing and Communications</li> </ul>
Affordable Housing Multi-Residential	Enhanced prescriptive, custom, and direct install incentives for natural gas savings for multi-residential buildings classified as either social housing or privately owned buildings demonstrating high incidence of low income tenants.	<ul style="list-style-type: none"> <li>• Financial Supports</li> <li>• Energy Assessments</li> <li>• Technical Assistance</li> <li>• Opportunity Identification</li> <li>• Education/Webinars/</li> <li>• Marketing/ Communications</li> </ul>

#### OEB Objectives and Guiding Principles

12. Enbridge Gas is pleased to continue delivering comprehensive programming for the low income sector through its franchise-wide Home Winterproofing and the Affordable Housing Multi-Residential offerings. In direct response to the OEB's primary objective for DSM, these offerings will continue to focus on supporting natural gas reductions through the installation of energy efficiency upgrades and building envelope improvements to achieve water and space heating savings and

help low income households become “more efficient in order to help better manage their energy bills.”<sup>4</sup>

13. In line with guiding principles (and the OEB’s specific direction in its December 1, 2020 letter), signaling that DSM planning should ensure that “small volume, low income and on-reserve First Nations communities are well served,”<sup>5</sup> the Low Income Single Family and Affordable Housing Multi-Residential offerings are designed distinctly from the other mass residential and commercial offerings to recognize and address the unique customer needs and barriers to participation faced by this market segment.
14. Similarly, reflecting DSM guiding principles, the Low Income program is “designed to provide opportunities for a broad spectrum of consumer groups and customer needs to encourage widespread customer participation over time and ensure all segments of the market are reached.”<sup>6</sup> Within the low income customer group, there are several particularly hard-to-reach subgroups that require tailored customer outreach, notably First Nations communities, other visible minorities, recent immigrants and senior citizens.
15. Importantly, and also reflecting guiding principles, Enbridge Gas is engaged with the IESO examining how to appropriately coordinate DSM and electricity CDM efforts geared to low income households across the province. Enbridge Gas has already aligned income eligibility requirements for the Home Winterproofing program (“HWP”) with the electricity income tested CDM program eligibility requirements, consistent with the Energy Affordability Program. Currently, Enbridge Gas and the IESO are in discussions exploring the possibility of a coordinated delivery of the

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<sup>4</sup> EB-2019-0003, OEB Letter Post-2020 Natural Gas Demand Side Management Framework (December 1, 2020), p. 2.

<sup>5</sup> Ibid, p. 5.

<sup>6</sup> EB-2021-0002, Application, Proposed Framework, Exhibit C, Tab 1, Schedule 1, p. 6.

single family low income offerings. This would allow for a single point of entry to province-wide programs for income eligible customers.

## **Home Winterproofing Offering**

### Background

16. This offering continues to support the province's most vulnerable populations by improving the energy efficiency of their homes and assisting customers in managing their natural gas bills. Low income is commonly described as households spending 30% or more of household income towards shelter costs.<sup>7</sup> For customers in this position, disposable household income to finance energy efficiency improvements which will result in savings on energy bills, is not typically available. To support these customers, the Home Winterproofing offering provides free energy assessments and no-cost/low-cost, direct install and weatherization upgrades to improve the home. To maximize the value of the free in-home energy assessment, Energy Advisors educate participants on how to manage energy use, and where warranted, implement health and safety measures.

### Objective

17. The objective of the Home Winterproofing offering is to reduce energy costs for residents of single family households (typically low-rise housing including but not limited to detached, semi-detached, row/townhouse or mobile home with permanent foundation) by improving the energy efficiency of their homes.

### Target Market

18. The target market for the Home Winterproofing offering includes:

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<sup>7</sup> <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/core-housing-need/identifying-core-housing-need>

- All single family social and assisted housing, including co-operative and non-profit housing.
- Residents in private single family (low-rise) dwellings who meet income qualification and eligibility criteria.
- Residents of on-reserve First Nations communities who meet income qualification and eligibility criteria.

#### Offering Details

19. The Home Winterproofing offering includes a free in-home energy assessment and weatherization services at no cost or low cost to the participant and addresses some health and safety measures as needed.
20. The Home Winterproofing offering provides support to single families on fixed incomes, those who rely on income assistance programs, and those who are generally most vulnerable to increases in energy prices. Enbridge Gas works with community-based organizations to promote and deliver the offering and leverages municipalities and associations active in the community to raise awareness. Enbridge Gas will also continue coordination with the Low-Income Energy Assistance Program (“LEAP”), wherein LEAP administrators are trained to prequalify and guide LEAP recipients to the Home Winterproofing offering.
21. 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.

Eligibility Criteria

22. To be eligible for Home Winterproofing, a participant must be an Enbridge Gas residential income eligible\* customer.

\*Income Eligibility

23. Consistent with the direction given by the OEB, Enbridge Gas has revised and aligned Low Income qualification screening criteria with the Tier 1 eligibility income criteria outlined in the IESO Energy Affordability Program as follows:

24. To qualify for low income (Tier 1) support, the participant must be:

- i) A resident of an eligible social or assisted housing property:

**Social and Assisted Housing**, for the purposes of DSM Low Income programming includes:

- Non-profit providers of social or assisted housing under a federal, provincial or municipally funded program, and includes, without limitation, non-profit corporations governed by the Housing Services Act, 2011 (as amended or any successor legislation);
- Public housing corporations owned by municipalities directly or through local housing corporations;
- Non-profit housing co-operatives as defined in the Co-operative Corporations Act;
- Non-profit housing corporations that manage or own residential (including multi-residential) buildings developed under the “Affordable Housing Program”; and
- Non-profit organizations, or municipal or provincial governments that manage or own residential (including multi-residential) supportive housing, shelters and hostels

OR

- ii) An individual who owns, rents, or leases a residence in Ontario and meets ONE of the following criteria:

- a. Has an annual household income for the previous year that does not exceed 135% of the most recent Statistics Canada before-tax Low Income Measurement ("LIM"). As of May 2021, this would equate to the following limits:

Number of People in Household	Before-tax Household Income
1	\$36,578
2	\$51,729
3	\$63,354
4	\$73,157
5	\$81,791
6	\$89,598
7+	\$96,775

- b. Received one of the following types of assistance in the past 12 months.
- Allowance for Survivors
  - Guaranteed Income Supplement
  - Allowances for Seniors
  - Ontario Works
  - Ontario Disability Support Program ("ODSP")
  - Healthy Smiles Ontario Child Dental Program
- c. Received a Low-Income Energy Assistance Program ("LEAP") grant or were part of the Ontario Electricity Support Program ("OESP") within the last 12 months.

- d. Qualified to participate in the Tier 1 CDM Energy Assistance Program (“EAP”) formally known as the Home Assistance program (“HAP”) during the past 12 months.

**OR**

- iii) A resident of an on-reserve First Nation single family home that can demonstrate one of the following:
- A letter from Band Housing confirming that community income thresholds are within income eligibility criteria, OR
  - Confirmation that the community has participated in the CDM Energy Assistance Program Tier 1 during the past 12 months.

Incentives/Enablers

25. The Home Winterproofing offering includes the following financial supports and services for participants:

i) Energy Assessment

All participants receive a free energy assessment (pre-assessment) of the home by a participating Energy Advisor. The Energy Advisor will do a walk-through of the home, identifying energy efficiency opportunities to the customer. The initial energy assessment is an opportunity to educate customers on how to improve the efficiency of the home and reduce gas bills. The Energy Advisor recommends suitable weatherization improvements to be completed in the home. After upgrades have been installed, the Energy Advisor returns to the home to conduct a post-assessment to verify the gas savings from any weatherization improvements completed.

ii) Direct Install Incentives

The home is prequalified for direct install measures at no or low cost to the customer and include showerheads, aerators, adaptive thermostats, and pipe wrap.

iii) Weatherization Services

Based on the findings of the energy assessment and identified deficiencies in the home, air sealing (draft proofing), and insulation upgrades to basements, walls and attics are procured and installed as necessary at no cost to the customer.

iv) Health and Safety Measures

A free carbon monoxide detector is installed in the home if there is none present during the energy assessment. In addition, DA's have access to a Health and Safety budget to address issues or barriers that are posing health and safety risks to residents and delivery agents that may otherwise prohibit participation in the offering.

Metrics

26. The metric for the Home Winterproofing offering is net annual natural gas savings, measured in m<sup>3</sup>.

Gross Measurement:

27. NRCAN HOT2000 software, used in General Mode, is currently required for estimating natural gas savings achieved from weatherization improvements of participants in the Home Winterproofing offering. Homes will be initially modelled based on the existing state of the home (pre-assessment) and again after upgrades have been installed in the home (post-assessment).



28. In the case of direct install prescriptive measures installed, the offering will reference the TRM as the basis for natural gas savings (m<sup>3</sup>). Projects must meet requirements as outlined in the version of the TRM applicable to the program year.

#### Impact Evaluation & Verification

29. Enbridge Gas recommends that verification of project files may be appropriate for this offering. Specifically, verification would ensure that Enbridge Gas's tracking data for the projects are aligned with the information reported by DA's in the field. Furthermore, verification adjustments may be appropriate to account for the installation (or removal) of prescriptive measures.

30. Consistent with historical stakeholder consensus, free ridership is set at zero for all low income program offerings.

#### Process Evaluation

31. Over the term of the plan, Enbridge Gas will explore process evaluation topics based on the evolving needs of the offering in the pursuit of continuous improvements to program design and delivery. The approach to process evaluation is discussed in Exhibit E, Tab 4, Schedule 5.

### **Affordable Housing Multi-Residential Offering**

#### Background

32. The AHMR offering was created to provide enhanced economic incentives and technical support to multi-residential buildings that house the province's most vulnerable populations. These buildings are typically government funded or non-profit social housing but increasingly include privately owned multi-residential housing. While similar to the Commercial Program offerings, the AHMR offering

provides incremental economic incentives to assist affordable housing providers overcome often larger capital cost constraints necessary to drive offering participation.

33. One of the biggest challenges in this market is the situation of split incentives whereby the building owner makes a significant financial investment in equipment or building upgrades, with limited or no ability to recoup their costs (i.e. through rental increases to tenants). Tenants, who are the ultimate energy consumers, do not have the same motivation to reduce their consumption. Participating building owners must sign an agreement to forgo Above Guideline Increase as a requirement to participate in the offering. Without the ability to recoup investment costs through rental increases, enhanced economic incentives can strengthen the business case to undertake an energy efficiency project.

34. Affordable housing and privately owned multi-residential building owners and property managers often do not have the staff to understand the technical aspects of their building or what energy improvements are needed in the building. With Enbridge Gas's technical support to assist building owners and property managers to better understand the energy efficiency options available to them, and enhanced incentives to buy-down the project costs, Enbridge Gas can help these customers realize meaningful energy savings while improving the comfort of the building for tenants.

#### Objective

35. The objective of the Affordable Housing Multi-Residential ("AHMR") offering is to reduce natural gas consumption and improve the energy efficiency of multi-residential buildings in the affordable housing market.

### Target Market

36. The AHMR offering will target:

- all social and assisted housing providers including non-profit social housing providers, non-profit housing co-operatives, non-profit housing corporations, supportive housing, and shelters.
- owners/managers of privately owned multi-residential buildings that meet the eligibility criteria supporting high incidence of low income tenants.

### Offering Details

37. The AHMR offering includes a mix of prescriptive, custom, and direct install measures depending on the needs of the customer. The offering also funds an energy assessment component for an in-depth evaluation of the building's energy usage to assist building owners and property managers who are unsure of where to start.

38. The AHMR offering will be delivered through:

- i) Enbridge Gas Energy Solutions Advisors ("ESA")  
ESAs work directly with social housing providers and eligible private building owners. ESAs maintain on-going relationships with social housing providers and key accounts to develop custom solutions, adopting a holistic, or "building as a system" approach wherever possible. ESAs will also work with municipalities and building associations to build awareness and identify opportunities.
- ii) Third Party Agents  
Third party agents are contracted by Enbridge Gas to install the direct install measures for eligible customers.

iii) Business Partners

Business partners are engaged to support identification of opportunities. These include equipment distributors; HVAC contractors; manufacturer representatives; engineering firms and energy consultants.

Incentives/Enablers

39. The AHMR offering includes prescriptive, custom, and direct install incentives, and includes the provision of energy assessments.

*Prescriptive Incentives*

40. The following prescriptive incentives are detailed in reference to the approved gas saving estimates reflected in the current Technical Resource Manual ("TRM").

<b>Affordable Housing Multi-Residential - Prescriptive Measures</b>	<b>Incentive Levels</b>
Condensing Water Heaters	\$0.80 - \$1.00/annual m <sup>3</sup>
Condensing Make-Up Air Unit (MUA)	\$0.60 - \$1.90 per CFM
Energy Recovery Ventilator (ERV)-No existing ERV or not required by code	\$2.75 - \$4.00 per CFM
Energy Recovery Ventilator (ERV)-Improved Effectiveness	\$1.25 - \$1.75 per CFM
Heat Recovery Ventilator (HRV)-No existing HRV or not required by code	\$2.15 - \$3.30 per CFM
Heat Recovery Ventilator (HRV)-Improved Effectiveness	\$0.75 - \$1.50 per CFM
In-Suite Energy Recovery Ventilator (ERV)-No existing ERV or not required by code	\$175 - \$250 per unit
In-Suite Energy Recovery Ventilator (ERV)-Improved Effectiveness	\$60 - \$190 per unit
In-Suite Heat Recovery Ventilator (HRV)-No existing HRV or not required by code	\$150 - \$225 per unit
In-Suite Heat Recovery Ventilator (HRV)-Improved Effectiveness	\$40 - \$150 per unit

*Custom Incentives*

41. Custom incentives are available to support more complex and/or multi-measure energy improvement projects and are determined using project and site-specific inputs. Measures supported through the custom offering include, but are not limited to:

- Boilers
- Control Systems
- Building Automating Systems (“BAS”)
- Advanced Building Automation Systems (“ABAS”)

42. The proposed standardized incentive rate for gas savings achieved through custom projects is \$1.00 per cubic meter up to 50% of the fully installed project cost to a maximum project incentive of \$200,000.

*Direct Install Incentives*

43. Direct install measures provide turnkey energy solutions at low or no cost to the customer. Measures can include heat reflector panels and showerheads. Direct install incentives will cover up to 100% of the equipment and installation cost.

*Energy Assessment Incentive*

44. Social housing providers and privately owned multi-residential building owners that meet eligibility criteria are able to apply for an incentive toward the energy assessment of the building.

45. Enbridge Gas will fund the cost of a building assessment up to \$8,000 per building.

Assessment features may include:

- Examination of all HVAC, controls, and lighting systems and building envelope (windows, insulation, etc.). Identifies all types and costs of energy use, with an emphasis on natural gas.
- Inventory of opportunities and quantification of energy savings including estimated potential and calculated savings for each opportunity providing engineering calculations and/or modelling (RETScreen or equivalent).

- Provision of estimated costs for potential projects including return on investment or simple payback for recommended opportunities.

### Metrics

46. The metric for the AHMR offering is net annual natural gas savings, measured in m<sup>3</sup>.

### Gross Measurement:

47. Custom Projects: This offering will employ several customized approaches in the calculation of natural gas savings (m<sup>3</sup>) including engineering calculations and energy modelling, as determined reasonable by Enbridge Gas's technical experts. In the case of modelling analysis, specific tools may be used such as, eQUEST, EnergyPlus, CANQUEST, Integrated Environmental Solutions ("IES") and Tas Engineering. For commonly implemented measures, standard calculators have been developed such as e-tools to ensure that common baseline assumptions and calculation methodology are applied across similar types of projects.

48. Prescriptive and Direct Install Measures: Natural gas savings claims (m<sup>3</sup>) will reference the current version of TRM applicable to the program year.

### Eligibility Criteria

49. Participants must be an Enbridge Gas low income qualified\* multi-unit residential building ("MURB")<sup>8</sup> customer.

\*In order to be eligible for participation in the offering, buildings must fall under one of the following classifications:

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<sup>8</sup> Property used for residential purposes that typically has seven or more self-contained units, though some buildings may deviate from this general description.

Social and Assisted Housing, for the purpose of Enbridge Gas DSM Low Income programming includes:

- a. Non-profit providers of social or assisted housing under a federal, provincial or municipally funded program, and includes, without limitation, non-profit corporations governed by the Housing Services Act, 2011 (as amended or any successor legislation);
- b. Public housing corporations owned by municipalities directly or through local housing corporations;
- c. Non-profit housing co-operatives as defined in the Co-operative Corporations Act;
- d. Non-profit housing corporations that manage or own residential (including multi-residential) buildings developed under the “Affordable Housing Program”; and
- e. Non-profit organizations, or municipal or provincial governments that manage or own residential (including multi-residential) supportive housing, shelters and hostels.

OR

Privately owned multi-residential building that can demonstrate one of the following criteria:

/u

- 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

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

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

#### Impact Evaluation & Verification

50. Enbridge Gas recommends that third-party verification studies (also known as Custom Project Savings Verification studies, or “CPSV” studies) are appropriate for this offering since most gross measurement claims are developed by Enbridge Gas. However, since Enbridge Gas has been effectively and reasonably calculating project savings for several years as evidenced by minimal verification adjustments made to the low income results through the course of repeated annual audits, Enbridge Gas submits that less rigorous and multi-year CPSV studies are appropriate in an effort to reduce participant survey fatigue and manage evaluation costs.

51. Consistent with historical stakeholder consensus, free ridership is set at zero for all low income program offerings.<sup>9</sup>

#### Process Evaluation

52. Over the term of the plan, Enbridge Gas will explore process evaluation topics based on the evolving needs of the offering in the pursuit of continuous improvements to program design and delivery. The approach to process evaluation is discussed in Exhibit E, Tab 4, Schedule 5.

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<sup>9</sup> EB-2021-0002, Application, Proposed Framework, Exhibit C, Tab 1, Schedule 1 , p. 17.