

Sent by RESS Filing

Direct Dial: 416.862.4825  
File: 10234

December 17, 2021

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

Attention: Christine Long, Board Registrar

Dear Ms. Long:

**Re: LIEN's Interrogatories (Intervenor Evidence)**  
**Enbridge Gas Inc.'s Application for Multi-Year Natural Gas DSM Plan (2022-2027)**  
**Board File No. EB-2021-0002**

---

Please find attached LIEN's Interrogatories (Intervenor Evidence) in the above-noted matter, filed with RESS today.

Yours truly,



Matt Gardner  
*Certified as a Specialist in Environmental Law  
by the Law Society of Ontario*

Document #: 2074346

**LOW-INCOME ENERGY NETWORK (LIEN)**  
**INTERROGATORIES (INTERVENOR EVIDENCE)**  
**FOR ENBRIDGE GAS INC'S**  
**APPLICATION FOR MULTI-YEAR NATURAL GAS DSM PLAN**  
**(2022 TO 2027)**

**EB-2021-0002**

**DECEMBER 17, 2021**

**1 2.LIEN.IR#1 GEC**

***Ref: Evidence of Energy Futures Group – page 37 of 43***

Regarding Energy Futures Group (EFG)'s recommendation to increase the low-income budget from \$23M to \$24.8 M in 2023 and from \$24.9M to \$30.1M in 2027 and to focus the increased spending on weatherization measures only and not natural gas equipment measures, which should only be replaced when existing equipment fails:

- a) What is EFG recommending the existing gas equipment be replaced with -  
(i) at the time of failure, and (ii) if replaced before failure - for each of the Home Winterproofing and for the Affordable Housing Multi-Residential (AHMR) offerings?

**2 2.LIEN.IR#2**

***Ref: Exhibit L.OEBStaff.2 page 5-6 of 99***

Regarding the Mass Save Existing Building Incentive Structure, the Massachusetts program provides incentives to render the dwelling ready for weatherization by offering incentives to replace knob and tube wiring and remedy combustion and safety concerns:

- a) What are the specific pre-weatherization measures offered and the associated incentive for each?
- b) Is there a cap on the limit of total incentive for pre-weatherization measures per dwelling and if so, what is the cap?
- c) What is the average total cost of the upgrade and average total incentive per dwelling provided to upgrade the dwelling ready for weatherization? Please provide this data for the last five years, and if it is not available over this period, please provide what is readily available.

3 **2.LIEN.IR#2**

***Ref: Exhibit L.OEBStaff.2 page 73 of 99, footnote 21***

Optimal Energy Inc. (Optimal), in “Table 3: Low Income Overview”, summarizes and compares low-income program offerings in four jurisdictions: Enbridge Gas-Ontario, National Grid-Rhode Island, Centerpoint-Minnesota, and Ameren-Illinois. Optimal states in footnote 21 accompanying Table 3: *“The Ameren low income program costs per unit of savings are very low for two reasons: 1) Ameren offers extensive other low cost programs for low income, such as midstream retail products programs, and also counts a proportional share of market-based program participation as low income; 2) Ameren is a combined electric-gas utility and has significant gas funding budget caps, and therefore electric ratepayers cover a major share of programs costs; and 3) Much of Ameren’s spending and savings are related to joint programs with the state of Illinois that use significant state and federal funding to supplement Ameren’s contributions, while still allowing Ameren to claim full savings for the program.”*

- a) Please provide additional details or websites with information about each of the program offerings in each jurisdiction set out in Table 3 (excluding Ontario) as follows:
  - i. Single Family, Multi Family (National Grid-Rhode Island)
  - ii. Single Family, Multi Family, Rentals, Non Profit, Heating System Tune-up (Centerpoint, Minnesota)
  - iii. Single Family, Multi Family, Gas Kits (Ameren, Illinois)
- b) Please provide additional details about the “extensive other low cost programs” offered by Ameren, including
  - i. the Midstream retail products program, and
  - ii. joint programs with the State of Illinois.