

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, as amended;

AND IN THE MATTER OF an application by Enbridge Gas Inc. pursuant to Section 36(1) of the *Ontario Energy Board Act, 1998*, S.O. 1998, for an order or orders approving its Demand Side Management Plan for 2022-2027.

INTERROGATORIES OF THE

SCHOOL ENERGY COALITION

TO ENERGY FUTURES GROUP

[The allocation of interrogatories to specific issues is not intended to limit the meaning of the questions or their scope, and such allocation should not be used to interpret the intent of the questions. Most interrogatories relate to multiple issues.]

3. Is Enbridge Gas's 2023-2027 DSM plan consistent with energy conservation industry best practices in Ontario and other relevant Canadian and U.S. jurisdictions?

3.SEC.1.GEC/ED

[Ex. L.GEC/ED.1, p. 10-12] Please comment on

- a) whether the savings rates cited are calculated on a comparable basis,
- b) whether the utilities listed are representative of typical savings rates in U.S. jurisdictions, and
- c) the extent, if any, to which the lower Enbridge savings rates can be attributed to Enbridge's long history of successful DSM programs.

5. Is Enbridge Gas's proposed DSM policy framework, including guiding principles and guidance related to budgets, targets, programs, evaluation, and accounting treatment appropriate?

5.SEC.1.GEC/ED

[Ex. L.GEC/ED.1, p. 19-20, 28, 32] Please provide the expert's view on whether it is appropriate to make shareholder incentives conditional on actual measured reductions in natural gas use in Ontario, and if so

- a) Whether any such requirement should apply by rate class or grouping of customers,

- b) Whether any such requirement should be weather normalized, or measured by average use per customer, or normalized for variations in Gross Domestic Product, or adjusted for any other reason.

Without limiting the generality of the above, please provide the expert's view on making the shareholder incentive otherwise allocable to any rate class conditional on the average gas use per customer in that rate class declining on a weather normalized basis.

5.SEC.2.GEC/ED

[Ex. L.GEC/ED.1, p. 23, 38, 40] Please comment on whether the conflicting goals of Enbridge – increasing load and rate base vs. reducing load through energy efficiency – are a barrier to success in Enbridge DSM programs, including but not limited to the proposed Building Beyond Code and Low Carbon Transition programs. Please provide the expert's view on whether

- a) assigning responsibility for delivery of DSM programs to an independent entity that has no incentive to increase load or rate base, or
- b) leaving DSM program delivery with Enbridge but creating an independent supervisory body to whom the Enbridge DSM group would report,

could improve the effectiveness of DSM programs in Ontario. Please provide examples of this type of structure with which the expert has experience in other jurisdictions. Please comment on the extent, if any, to which such a structure necessarily must include both gas and electric conservation, as in some U.S. structures.

5.SEC.3.GEC/ED

[Ex. L.GEC/ED.1, p. 24] Please advise whether Residential Savings in Table 5 includes all of Rates M1 (Union South) and 01 (Union North), which include substantial numbers of and volumes for commercial and industrial customers.

6. Does Enbridge Gas's proposed budget, including program costs and portfolio costs result in reasonable rate impacts while addressing the OEB's stated DSM objectives in its letter issued on December 1, 2020, including having regard to consumers' economic circumstances.

6.SEC.4.GEC/ED

[Ex. L.GEC/ED.1, p. 16-17] Please provide the calculations behind Tables 2 and 3. Please advise whether future budgets in the tables are adjusted by both inflation and increases in customer numbers.

6.SEC.5.GEC/ED

[Ex. L.GEC/ED.1, p. 17] Please provide the expert's view on how the Board should approach setting reasonable rate impacts for non-residential customers, such as schools.

9j. Is Enbridge Gas's proposed Long Term Greenhouse Gas Reduction target appropriate?

9j.SEC.6.GEC/ED

[Ex. L.GEC/ED.1, p. 31] Please confirm the expert's understanding that meeting the proposed Long-Term GHG Reduction metric does not require Enbridge to actually reduce the production of GHGs by its customers or by Enbridge.