

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 GREEN ENERGY ECONOMICS 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.SBUA

[Ex. L.SBUA.1, p. 1, 4, 33] Please advise which of the expert's recommendations should be applied to customers that are not small businesses, but have similar loads and uses, such as schools.

3.SEC.2.SBUA

[Ex. L.SBUA.1, p. 9] Please explain why margins are relevant, rather than access to capital or limited building ownership rights. Please confirm that, if energy efficiency investments are cost effective over the long term, the barriers for small businesses are not their margins, but their access to capital and their inability to rely on a long payback period due to business uncertainties.

3.SEC.3.SBUA

[Ex. L.SBUA.1, p. 11] Please advise whether the expert is proposing use of utility capital to provide customer financing, or proposing facilitation by the utility of financing availability through third parties. Please discuss the advantages and disadvantages of both, in the latter case including if required pre-qualification systems, guarantees, or interest rate buydowns.

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.SBUA

[Ex. L.SBUA.1, p. 20, 29] Please specify the level of increased budget the expert is proposing to ensure that incentive levels for small business customers are increased and eligible measures are added. Please confirm that the expert is proposing that the increased budget would be recovered from the customer classes in which small business customers are included.

6.SEC.5.SBUA

[Ex. L.SBUA.1, p. 30] Please confirm that, in the Union South Rate Zone most of the small business customers are in the M1 rate class along with residential customers, and in the Union North Rate Zone most of the small business customers are in the 01 rate class along with residential customers, because in both cases the upper throughput limit is 50,000 cubic meters. Please calculate the bill impacts for those small business customers, and comment on the reasonableness of those impacts.