

ONTARIO ENERGY BOARD

Enbridge Gas Inc.

2022-2027 DSM Plan and DSM Framework

**INTERROGATORIES OF BUILDING OWNERS AND MANAGERS ASSOCIATION
(BOMA)**

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Ref: Enbridge Reply Evidence, Section 3.4.3.1. *Lifecycle vs. Annual Savings for Resource Acquisition Scorecards* pages 50-52

The evidence states agreement with “both Optimal and EFG that the most important objectives achieved by Enbridge’s portfolio align better with lifecycle savings than they do with annual savings” and “I am not opposed to lifecycle savings metrics in principle. However, I believe that Enbridge’s recommendation for annual savings in this proceeding is reasonable and I recommend that the OEB approve it.”

BOMA 1

For the commercial sector, does Mr. Weaver agree that, for either annual or lifecycle savings, verification of actual savings at the meter should be applied wherever practical to do so?

Mr. Weaver’s evidence goes on to state “On the other hand, I do have a practical concern with evaluation issues around measuring lifecycle savings. Converting from annual to lifecycle savings requires two calculations:

- One is a calculation multiplying annual savings by the equipment life. While this is straightforward, the data supporting equipment lives are poorly documented and rarely developed through actual measurements. This poses evaluation risks to Enbridge, when evaluators assign measure lives shorter than those Enbridge used to forecast lifecycle savings in its plan.
- Second, is a more complicated calculation of adjusting baselines for measures —like building insulation—with initial savings that change over time as underlying equipment—furnaces, in the insulation example—degrades or gets replaced with new, more efficient units. These calculations are far from straightforward and represent substantial evaluation risks to Enbridge when evaluators change assumptions from those Enbridge used to establish performance metrics.

BOMA 2

Again, just for the commercial sector, does Mr. Weaver agree that monitoring actual savings at the meter over multiple years, as is contemplated in Enbridge’s Performance Program, can simplify and reduce risks in program evaluation?

Ref: Enbridge Reply Evidence, Section 3.4.3.2. *Participation vs. Savings Metrics for Multi Year Scorecards* pages 52-53

The evidence recommends participation metrics on the basis of enabling early-stage activities like “validating new technology performance and economics; training contractors to be able to support installations and maintenance; building market awareness with trade allies, consumers, and other market actors; and working with code officials.” It goes on to state “These activities are not intended to generate large energy savings in the near term, but instead represent investments that

bear fruit in future portfolios. Enbridge's proposed participation metrics rightly focus on the early market building activities that indicate early-stage success.

BOMA 3

For the proposed Pay for Performance Program for commercial buildings:

1. Does Mr. Weaver agree that the activities referenced do not apply?
2. Does Mr. Weaver agree that the magnitude of projected gas savings and the requirement to meet the province's emissions reduction targets create some urgency to proceed with this initiative expeditiously rather than wait for "future portfolios"?
3. Would Mr. Weaver support a hybrid metric weighted towards savings?

Ref: Enbridge Reply Evidence, Sections 3.4.1.3. *Multi Year Components* page 48 and 3.5.2.1 *Performance Incentive Components* page 58

Mr. Weaver's evidence in 3.5.2.1 recommends "Reject EFG recommendation to shift focus of Low Carbon Transition program away from gas heat pumps" while in 3.4.1.3 states "evaluating the merits of those [Multiyear] offerings is beyond the scope of my evidence in this proceeding."

BOMA 4 Is Mr. Weaver recommending the gas heat pump initiative or just the Long-Term Scorecard for any Low Carbon Transition Program?