

**ONTARIO ENERGY BOARD**

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

**AND IN THE MATTER OF** an application by Enbridge Gas Inc. for an Order or Orders approving the balances and clearance of certain non-commodity 2020 Demand Side Management Deferral and Variance Accounts into rates, within the next available QRAM.

**INTERROGATORIES**

**FROM THE**

**SCHOOL ENERGY COALITION**

1. [Ex. B/2/1, p. 3] Please confirm that the amount of \$7 million end of year balance in Table 1 is accounted for as a regulatory liability in the financial statements of the Applicant.
2. [B/2/1, p.5 and Appendix A4] Please confirm that, in 2020, the Applicant underspent by \$4.8 million on programs funded through Rate 6. Please advise the amount originally included in rates for Rate 6 in 2020, and the percent underspend that \$4.8 million represents. Please identify and quantify all amounts that were reallocated from Rate 6 programs to programs paid for by other rate classes, including the programs and their amounts, and the rate classes to which the amounts were reallocated.
3. [B/3/1, Appendix A1 and C/3/1, Appendix A1] Please confirm that, for a typical school with 40,000 m<sup>3</sup> annual volume,
  - a. That school in the EGD rate zone will receive a single credit adjustment of \$34.12, but an identical school in the Union south rate zone will pay a single debit adjustment of about \$20.20, and the same school in Union north rate zone will receive a single credit adjustment of \$87.28;
  - b. The programs available to those two identical schools in different rate zones are not materially different;
  - c. The amounts built into rates for DSM programs for the school in the Union rate zones are significantly higher than the amounts built into rates for DSM programs for that identical school in the EGD rate zone; and

- d. Shifting additional funds to residential programs increases the costs borne by schools in the Union rate zones, but does not increase the costs borne by schools in the EGD rate zone.
4. [C/2/1, p. 3 and Appendix A5] Please confirm that the \$894,000 incremental budget for Residential Adaptive Thermostats in the Union Rate zones is being charged to Rate 01 and Rate M1 at a unit rate of 0.0298 cents per cubic meter, increasing the cost for Rate M1 from 0.0207 cents per cubic meter to 0.0505 per cubic meter, and decreasing the credit for Rate 01 from 0.2662 cents per cubic meter to 0.2364 cents per cubic meter.
5. [C/2/1, p.10 and Appendix A4] Please confirm that, in 2020, the Applicant underspent by \$2.4 million on programs funded through Rate 01. Please advise the amount originally included in rates for Rate 01 in 2020, and the percent underspend that \$2.4 million represents. Please identify and quantify all amounts that were reallocated from Rate 01 programs to programs paid for by other rate classes, including the programs and their amounts, and the rate classes to which the amounts were reallocated.

Respectfully submitted on behalf of the School Energy Coalition this March 16, 2022.

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Jay Shepherd  
Counsel for the School Energy Coalition