

Ms. Nancy Marconi  
Acting Registrar  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge Street  
Toronto, ON M4P 1E4

March 16, 2022

**EB-2022-0007 – 2020 DSM Deferral and Variance Account Disposition Application**  
**Pollution Probe Intervenor Request**

Dear Ms. Marconi:

In accordance with Procedural Order No. 1 for the above-noted proceeding, please find attached Pollution Probe's Interrogatories to the Applicant.

Respectfully submitted on behalf of Pollution Probe.



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cc: Asha Patel, Enbridge Regulatory (via email)  
All Parties (via email)  
Richard Carlson, Pollution Probe (via email)

**ONTARIO ENERGY BOARD**

**Enbridge 2020 Demand Side Management Deferral and  
Variance Account Disposition**

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**POLLUTION PROBE INTERROGATORIES**

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**March 16, 2022**

**Submitted by: Michael Brophy  
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Phone: 647-330-1217  
28 Macnaughton Road  
Toronto, Ontario M4G 3H4**

**Consultant for Pollution Probe**

Pollution Probe #1

[Ex. A, T2, Sch. 1]

Please confirm that without the DSMVA credits due to program underspending in 2020, the residual DSM account balances equate to a request for recovery from Ratepayers of \$7,452,097. If not correct, please explain.

Pollution Probe #2

[Ex. A, T2, Sch. 1]

Please confirm that 2020 was not a typical year for DSM program delivery and that the unusually large DSMVA credit was due to COVID-related factors in 2020. If not correct, please explain.

Pollution Probe #3

[Ex. A, T2, Sch. 1]

The legacy EGD 2020 DSM budget is larger than the legacy Union Gas 2020 DSM budget. Please explain why the underspend in the Union Gas 2020 DSM budget (i.e. DSMVA) is approximately three times greater than the EGD 2020 DSM budget (i.e. DSMVA). For example, was there factors beyond COVID impacts that affected the Union Gas DSM delivery more than the EGD DSM delivery.

Pollution Probe #4

[Ex. A, T3, Sch. 1]

- a) Please provide the scope of work for the 2020 Natural Gas DSM Annual Verification Report and the scope of work for the third-party Evaluation Contractor ("EC").
- b) Please provide a summary of any 2020 DSM activities or costs not covered by the 2019 Natural Gas DSM Annual Verification Report.

Pollution Probe #5

[Ex. A, T4, Sch. 1]

Please provide a comparison for EGD and Union 2020 DSM results with the following information in a table.

- Budget over/under spend in \$ and percent terms
- Cubic meter results above/below target in an absolute (m3) value and as a percent of target

Pollution Probe #6

[Ex. A, T4, Sch. 1]

Please explain what led to the underspend on Evaluation of (\$1,358,388) out of the budget \$1,744,228.

Pollution Probe #7

[Ex. A, T4, Sch. 1]

- a) Please explain what led to the underspend of approximately 5% for Collaboration and Innovation.
- b) Please provide what percent of the Enbridge Gas Technology Institute (“GTI”) Utilization Technology Development (“UTD”) is covered by DSM and what percent of the Collaboration and Innovation budget is used for that expense.
- c) Were any new partnerships developed as a result of the 2020 Collaboration and Innovation expenditure (or is it largely admin costs like memberships)? If yes, please provide a summary.
- d) Were any renewable energy technologies funded in 2020. If yes, please provide a summary.