

AGORA

Agora International Law PC
Bay Adelaide Centre West
333 Bay Street, suite 900
Toronto, ON M5H 2R2
Canada

Myriam Seers
mseers@agora.law
+1 416 886 7154

Sent by Email

June 30, 2023

Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4
Attention: Registrar

Dear Ms. Marconi:

**Re: EB-2023-0062 – 2021 Demand Side Management Deferral and Variance
Account Disposition Application by Enbridge Gas Inc. – SBUA
Interrogatories**

We are counsel to the Small Business Utility Alliance (SBUA). Please find enclosed SBUA's interrogatories regarding the application made by Enbridge Gas Inc.

Yours truly,



Myriam Seers
Agora

cc. All parties in EB-2023-0062

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. for an order
approving 2021 Demand Side Management Deferral and Variance Accounts
Disposition.

EB-2023-0062

**INTERROGATORIES
OF THE
SMALL BUSINESS UTILITY ALLIANCE**

Interrogatory No. 1

Reference: 2021 Natural Gas Demand-Side Management Annual Verification Report prepared
by the Evaluation Contractor, DNV. Exhibit A, Tab 3, Schedule 1, Page 4.

- A. Please provide a copy of the 2021 Natural Gas Demand-Side Management Annual
Verification Report prepared by the Evaluation Contractor, DNV.
- B. Please provide a summary of the recommendations made by DNV regarding the 2021
Demand Side Management programs. In this summary, please inform us which
recommendations have been made in previous years and what was the response by
Enbridge Gas Inc.
- C. Taking into account that at the moment of the report prepared by the Evaluation
Contractor, DNV, this company was studying and comparing *“the savings estimates from
Enbridge Gas Inc.’s digital tool (eTools) with those estimated by modeling site-level energy
usage from customer bills”* and, therefore, the Evaluation Contractor did not provide
conclusions regarding that investigation, please:

- i. Please inform us if the Evaluation Contractor finished the investigation regarding the comparison hereby mentioned.
- ii. If so, please inform us about the investigation's results.
- iii. Please provide a copy of the report or analysis delivered by the Evaluation Contractor.
- iv. Please inform us what is the relationship between the digital tool (eTools) and DSM shareholder incentives.

Interrogatory No. 2

Reference: Evaluation Advisory Committee. Exhibit A, Tab 3, Schedule 1, Page 2.

- A. Please provide a copy of the Evaluation, Monitoring, and Verification (EM&V) plan prepared by the Evaluation Advisory Committee.
- B. Please inform us if the EAC issued any report regarding the evaluation and audit of the DSM results.
- C. If so, please provide a copy of the report issued by the EAC.

Interrogatory No. 3

Reference: Custom Commercial Offering. Exhibit A, Tab 4, Schedule 1, Page 40.

- A. What technical assistance was offered to small commercial customers to address their specific needs in connection with the Custom Commercial Offering?
- B. What financial incentives were offered to small commercial customers specifically?

Interrogatory No. 3

Reference: Commercial & Industrial Direct Install Offering. Exhibit A, Tab 4, Schedule 1, Page 45.

Preamble: EGI states that “*converting quotes into sales was a continuing challenge given COVID-19 impacts to small business customers*”, regarding the Commercial/Industrial Direct Install Offering.

- A. How did EGI market the two measures, Air Curtains and Dock Door Seals, to small businesses customers? Specifically, how the question of installation costs was communicated to customers.
- B. Please discuss further how Enbridge Gas Inc. attacked the lack of “*awareness of efficient ventilation technology*”.
- C. Please discuss further if the bonus offered in 2020 in response to COVID-19 was useful or not.
- D. Please discuss what are the identified barriers mentioned in *the “Anticipated Offering Changes for 2022”*.

Submitted on behalf of the Small Business Utility Alliance this June 30, 2023.