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BY EMAIL

September 13, 2023

Asha Patel
Technical Manager, Regulatory Applications
Enbridge Gas Inc.
P.O. Box 650
Scarborough ON M1K 5E3
asha.patel@enbridge.com

Dear Ms. Patel:

**Re: Enbridge Gas Inc. (Enbridge Gas)
2021 Demand Side Management Deferral and Variance Account Disposition
Application
OEB File Number: EB-2023-0062**

On March 17, 2023, the OEB published its eTools Boiler Tool Validation study (eTools validation study).¹ This study, conducted for the OEB by DNV GL, undertook a billing analysis to assess the accuracy of eTools to estimate natural gas savings following the implementation of energy-efficiency boiler upgrades. The eTools validation study recommended that an 84% realization rate (eTools study realization rate) be applied to evaluate aggregate eTools boiler gross savings, after the implementation of the following two adjustments:

- a. eTools advancement projects should not utilize the current 73% thermal efficiency default value, rather site-specific values (supported by documentation) should be utilized. If documented site-specific values are not available, the efficiency values identified in this study, 80.1% for space heating and 81.8% for domestic hot-water heating, should be utilized by implementers and evaluators.
- b. Site-specific documentation verifying any anticipated controls or setpoint changes should be gathered by Enbridge after boiler system commissioning. If documentation verifying controls changes are unavailable, then the installed systems should be assumed to utilize the same controls and setpoints as the existing systems.²

¹ EB-2015-0245, eTools Boiler Validation Study, March 17, 2023

² Ibid

School Energy Coalition (SEC) requested Enbridge Gas Inc. to recalculate the claimed cumulative cubic meters saved and 2021 shareholder incentives assuming that all recommendations of the eTools validation study had been implemented prior to the beginning of 2021.³ In its response to this interrogatory, Enbridge Gas Inc. provided updated calculations for the claimed 2021 cumulative natural gas volume savings and shareholder incentive amounts to show the impacts of applying the eTools study realization rate.⁴ Enbridge Gas Inc. did not indicate whether the additional adjustments documented in items a) and b) above were implemented prior to applying the eTools study realization rate, as recommended in the eTools validation study.

The OEB requires that Enbridge Gas Inc. provide the following information:

- 1) Confirmation whether Enbridge Gas Inc. applied the two eTools adjustments noted above during 2021 program implementation.
- 2) Confirmation whether Enbridge Gas Inc. applied the two recommendations noted above to all applicable 2021 projects when calculating the impacts included in its interrogatory response to SEC.⁵
- 3) If Enbridge Gas Inc. has incorporated the two recommendations noted above, provide the date when Enbridge Gas Inc. incorporated the recommendations as part of its program implementation.

If the recommended adjustments were not applied to all 2021 applicable projects when calculating the updated shareholder incentive amounts and claimed natural gas volume savings as part of the SEC.⁶ interrogatory response, the OEB requires Enbridge Gas Inc. to file updated calculations that incorporate the recommended eTools adjustments.

The OEB requests that Enbridge Gas file a written response to this letter no later than **September 20, 2023**, along with any supporting calculations or spreadsheets.

Please direct any questions relating to this application to Alexander Di Ilio, Senior Advisor at 416-440-7718 or alexander.diilio@oeb.ca.

Yours truly,

Nancy Marconi
Registrar

c: Dennis M. O'Leary, Applicant's Counsel
All intervenors in EB-2023-0062

³ EB-2023-0062, Interrogatories to Applicant from School Energy Coalition, June 23, 2023

⁴ EB-2023-0062, Interrogatory Response from Applicant, Exhibit I.SEC.1, July 14, 2023

⁵ Ibid

⁶ Ibid