

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 cost consequences of Integrated Resource Planning (“IRP”) Plans for IRP Pilot Projects in the Town of Parry Sound, and the City of Sarnia and Town of Plympton-Wyoming.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

1. [Ex. A/2] Please describe the differences, if any, between the load and peak load forecasts for the two pilot project areas underlying this Application, and the load and peak forecasts for those same areas that are part of the Applicant’s forecasts in EB-2022-0200 and EB-2021-0002.
2. [B/1/1, p 9 and 13] Please provide the numerical data behind Figures 3, 5 and 6.
3. [B/1/1, p. 14] Please confirm that the proposed IRPA also defers the replacement of the high risk steel mains discussed. If that is not the case, please describe how the IRPA impacts, if at all, the replacement of high risk steel mains.
4. [D/1/1, p.2, 11 et seq.] Please confirm that the incremental HER+ incentives (from \$10K to \$15K max) will be funded by the IRP budget, but the base incentives will continue to be funded by DSM and/or NRCan as they would have in the normal course. If that is not the case, please provide more detail on the proposed funding attribution.
5. [D/1/1, p. 17] In EB-2021-0002, Schedule B of the Decision dated November 15, 2022, the OEB set out a table of incentives for measures related to the joint NRCan/EGI offering for residential customers. Please file a revised copy of that table applicable to the pilot projects in this Application.
6. [D/1/1, p. 9, 20] Please describe the stakeholder engagement with the one large institutional customer described, preferably without identifying the customer.
7. [D/1/1, p. 20] Please confirm that commercial direct install will cover 100% of the incremental cost of efficient equipment, and not 100% of the total cost of the measure. If

this is not the case, please describe the rationale for covering more than the incremental cost. Please identify in this response measures that are considered to be 100% incremental.

8. [D/1/1, p. 28] Please expand Table 11 to include each of the measures in Table 10.
9. [D/1/1, p. 32] Please explain why the Applicant is proposing a cap on the two electrification technologies, but no cap on the number of gas heat pumps, hybrid heating options, or thermal storage.
10. [D/1/1, p. 32] For the electrification measures, please break them down by year in the same manner as the “advanced technologies”.
11. [D/1/2, p. 7] Please confirm that commercial/industrial in this context includes institutional.
12. [D/1/3] With respect to the proposed collection of hourly data:
 - a. Please explain in detail why hourly data is needed for IRPAs and not for traditional facilities solutions.
 - b. Please explain why 100% hourly data is required for Parry Sound, rather than a statistically valid sample.
13. [E/1/1] For each of the tables of costs in this exhibit, other than Table 6 and Table 13, please detail all costs that are:
 - a. Compensation and related overheads of Enbridge personnel (together with the budget that would otherwise include these costs);
 - b. Charges from affiliates, including but not limited to Enbridge Inc., (together with the budget that would otherwise include these costs); or
 - c. Capitalized overheads.
14. [E/1/1, Attachments] How, if at all, has the reduced risk of stranded assets as a result of the use of an IRPA been valued? If the value has been assumed to be zero, please explain why that is appropriate.
15. [F/1/1] Please describe stakeholder engagement the Applicant has carried out, if any, with local school boards in Parry Sound and Sarnia.

Respectfully submitted on behalf of the School Energy Coalition this October 19, 2023.

Jay Shepherd
Counsel for the School Energy Coalition