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October 20, 2023

Ms. Nancy Marconi
Registrar
Ontario Energy Board
P.O. Box 2319
26th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

DELIVERED BY EMAIL

Dear Ms. Marconi,

RE: EB-2022-0335 – Enbridge IRP Pilot Projects

Please find enclosed the interrogatories filed on behalf of the Ontario Greenhouse Vegetable Growers in the above noted proceeding.

If any further information is required, please do not hesitate to contact the undersigned.

Yours very truly,



Michael R. Buonaguro
Encl.

Enbridge Gas Inc.

EB-2022-0335 – Enbridge IRP Pilot Projects

OGVG INTERROGATORIES

October 20, 2023

OGVG-1

Ref: Exhibit B Tab 1 Schedule 1 Page 8
Exhibit B Tab 1 Schedule 1 Page 12

Preamble: Both pilot projects are being brought forward in response to growth related needs, as opposed to in response to a need to replace deteriorating assets.

- a) To what extent, if any, will the results of the proposed pilot projects be relevant to future IRP projects where Enbridge is not dealing with growth related needs, but is instead exploring IRP options to address the pending need to replace assets in use as a result of the condition of the assets and concerns with respect to asset failure?

OGVG-2

Ref: Exhibit D Tab 1 Schedule 1 Page 15
Exhibit D Tab 1 Schedule 1 Page 20

Preamble: The intent of the ETEE HER+ offer is to provide as close to full cost incentive coverage for the selected measures as possible, however, the total incentive amount available to each customer is capped at 100% of the cost of the measure.

For the Parry Sound Pilot Project targeted measures, the proposed ETEE-version of the direct install offering will cover up to 100% of the energy efficiency project costs (including the equipment and installation costs of the project). Full cost coverage of the energy efficiency projects seeks to address the identified barrier of a lack of capital known to impact the participation levels of this target market segment [commercial and industrial customers].

For the Parry Sound Pilot Project targeted measures, the ETEE-version of the custom offering proposes to provide enhanced incentives up to twice that of the existing DSM offering (up to 50-75% of the full energy efficiency project costs including equipment and installation costs of the project) as described in Table 9.

- a) Does Enbridge expect that, for residential customers, most if not all customers will have 100% of the cost of their implemented measures covered by the proposed incentives, such that most if not all customers participating in the ETEE HER+ will not have to contribute to the cost of the measures they receive? If not, what level of expense, in dollars, does Enbridge expect the average residential customer to have to spend on their implemented measures?
- b) Does Enbridge expect that, for commercial and industrial customers, most if not all customers will have 100% of the cost of their implemented measures covered by the proposed incentives, such that most if not all customers participating in the ETEE version of the direct install program will not have to contribute to the cost of the measures they receive? If not, what level of expense, in dollars, does Enbridge expect the average commercial and/or industrial customer to have to spend on their implemented measures?
- c) For the ETEE-version of the custom offering, please discuss the feasibility of increasing the percentage of costs covered by the program to 100%, similar to the intent of the previously discussed programs in a) and b), while still implementing the proposed total hard per offering.

OGVG-2

Ref: Exhibit D Tab 1 Schedule 1 Page 24

Preamble: On a limited participant basis, the Company proposes to offer additional incentives for cold climate air source heat pumps (“ccASHP”) and ground source heat pumps (“GSHP”) in the Pilot Project ETEE-version of the HER+ offering for Parry Sound.

- a) To what extent does Enbridge expect the “Limited ETEE Offering for Electrification Measures” component of the Parry Sound Pilot to lead to the complete electrification of the participating customers, such that they disconnect from the Enbridge system entirely?
- b) For participants in the “Limited ETEE Offering for Electrification Measures”, please comment on the economics of remaining connected to the Enbridge system for non-space heating related natural gas consumption; for example, will it make economic sense for a customer that has been converted to an electric heat pump to maintain natural gas service (and therefore subject to Enbridge’s delivery rates) solely for use with a natural gas water heater rather than convert to an electric water heater?
- c) Please confirm that if participants in the “Limited ETEE Offering for Electrification Measures” component of the Parry Sound Pilot fully disconnect from the Enbridge system, Enbridge has no mechanism to recover any costs from the disconnected customer, including, for example, a contribution to Enbridge’s IRP costs.