

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15 (Schedule. B) (the “Act”);

AND IN THE MATTER OF an application by Enbridge Gas Inc. pursuant to section 36(1) of the Act for an order or orders approving the Demand Side Management Plan for 2027-2030.

INTERROGATORIES

FROM THE

SCHOOL ENERGY COALITION

A-SEC-1

[Exhibit A, Tab 3, Schedule 1, Page 2] Please confirm that the definition of “Gross Savings” should refer only to savings correctly claimed by the Applicant, reflecting actual savings realized by a measure using appropriate assumptions, and after adjustment for any realization rate found in audit.

A-SEC-2

[A-3-1, p. 4] Please advise whether the definition of “TRC-Plus Benefits” is, in light of changes to carbon pricing and the OEB’s Issues List order in this proceeding, still correct in the view of the Applicant. For greater certainty, please confirm the Applicant’s view that none of the benefits so defined, including those in the 15% adder, relate to reductions in carbon emissions.

B-SEC-3

[B-1-1, p. 3] Please provide a list of all material changes to the proposed 2027-2030 DSM Plan that the Applicant made due to input from the SAG. For each such change, please provide a reference to the notes for the relevant SAG meeting or meetings where the SAG members provided such input on which the Applicant relied.

B-SEC-4

[B-1-1, p. 3 and C-1-4, p. 14] Please provide a list of all material changes to the proposed 2027-2030 DSM Plan that the Applicant did not make despite input from the SAG. For each such change, please provide a reference to the notes for the relevant SAG meeting or meetings where the SAG members provided such input on which the Applicant declined to rely.

B-SEC-5

[B-1-1, p. 3] Please describe the extent, if any, to which the Applicant is proposing that the OEB, in establishing the SAG, was delegating all or part of its decision-making authority and responsibility to the SAG. If no delegation is claimed, please advise why parties to this Application should reduce their questions because of the SAG involvement, and why those questions should be “rendered moot”.

B-SEC-6

[B-1-1, p. 6] Please provide a table breaking down the proposed budget for each year into four categories:

- a. Direct incentives paid to customers.
- b. Indirect incentives paid to customers through their suppliers
- c. Marketing costs paid to third parties, including advertising, marketing materials, and similar costs.
- d. All other costs, including all internal staff, corporate cost allocations, overheads, etc.

C-SEC-7

[C-1-1, p. 2] Please confirm that the Applicant requires that the OEB must approve its Application without any material amendments, failing which it will have to “reconsider and potentially revise” its DSM Plan, resulting in an inability to continue to deliver some or all programs on January 1, 2027.

C-SEC-8

[C-1-1, p. 2-3] Please file the “Natural Gas Policy Statement” referred to. Please provide a reference that shows that the government’s policy is to maintain an “economically viable natural gas network” for residential energy consumers throughout the province.

C-SEC-9

[C-1-1, p.4] Please confirm that, under the proposed change to the DSM Framework relating to WAML, the Applicant would no longer be responsible for ensuring that measures remained cost-effective if the WAML was changed outside of the utility’s control, whether or not the Applicant knew or should have known that the measure would not last as long as necessary to be cost-effective.

C-SEC-10

[C-1-1, p 5] Please advise under what circumstances, if any, the Applicant should be required to respond to changes in Input Assumptions and Adjustment Factors in order to maintain or improve cost-effectiveness and overall savings.

C-SEC-11

[C-1-1, p. 7] Please confirm that the proposed change to Section 7.3 of the Framework means that all of the incentive associated with a collaborative program should be allocated to the Applicant, regardless of the level of contribution by the Applicant to that program.

C-SEC-12

[C-1-1, p. 8] Please explain the rationale for reporting annual and cumulative gross savings, when by definition gross savings are not caused by the DSM programs of the Applicant.

C-SEC-13

[C-1-1, p. 13] Please explain why a change to input assumptions or adjustment factors should result in a reduction of future targets, rather than an adjustment by the Applicant of its DSM offerings.

C-SEC-14

[C-1-2, p. 3, Note 8, D-7-1, p. 3] Please describe what relief, decision or guidance the Applicant is seeking with respect to incentives for natural gas equipment.

C-SEC-15

[C-1-2, p. 5, 7] Please confirm that, in light of the OEB's decision on the Issues List, the Applicant is no longer claiming that the OEB lacks jurisdiction to include a value for carbon in DSM planning, and no longer claiming that the OEB lacks the expertise to do so.

C-SEC-16

[C-1-6, p. 5, 8] Please advise when, if at all, the residential one-window program is expected to expand to include categories of non-residential customers. If that is expected, please describe the steps to be taken, and the categories of non-residential customers that are expected to be covered.

C-SEC-17

[C-1-6, p. 11] Please describe what relief, decision or guidance the Applicant is seeking with respect to CGHAP programming and/or the Applicant's involvement in delivering that program.

D-SEC-18

[D-1-1, p. 11] Please provide a copy of the full Outreach Toolbox.

D-SEC-19

[D-2-1, p 11-12] Please provide, for each of these categories of target adjustments, all known or expected circumstances in which currently proposed targets are likely to be adjusted.

D-SEC-20

[D-2-2, p. 6, D-3-1, p. 2-5] Please explain why the ratepayers should fund any DSM measure in which the benefits are less than the cost. For each measure for which that is the case, please provide the rationale for including that specific measure in the DSM Plan.

D-SEC-21

[D-2-2, p. 8, D-3-1, p. 10-13] Please provide a table showing the cost per cumulative cubic meter reduction for each offering and each year, assuming that 100% of targets are met, shareholder incentives are paid based on that achievement, and program level and portfolio costs are allocated to each offering pro rata.

D-SEC-22

[D-2-3, p. 4, 8-11] Based on the proposed budgets for each year in the Plan, please provide a table showing the shareholder incentive at 75%, 100% and 125% of target achievement, plus a column comparing the 75%, 100%, and 125% incentives under the current DSM Plan.

D-SEC-23

[D-2-3, p. 6] Please explain why the Applicant should be eligible for a shareholder incentive for any offering that is not cost effective.

D-SEC-24

[D-3-1, p. 2-5] Please restate Tables 1-4 with shareholder incentives at 100% target achievement included in the TRC costs, TRC-Plus ratio, and PAC ratio.

D-SEC-25

[D-3-1, p. 2-5] Please provide the spreadsheet calculations underlying Tables 1-4 as presented.

D-SEC-26

[D-7-1, p. 4] Please provide a copy of the Ipsos survey, including results and reporting.

D-SEC-27

[D-7-1, p. 7] Please provide a detailed breakdown of the \$1.129M of planned spending on the Campaign Toolkit, broken down by year.

D-SEC-28

[D-8-2, p. 6] Please provide a detailed breakdown of the \$13.229M of planned spending on Research, Development and Market Data, broken down by year.

D-SEC-29

[D-9-1, p. 2] Please provide a more detailed explanation of the change to process evaluations “focusing on targeted inquiries that addressed specific offering-related questions”.

D-SEC-30

[D-9-2, p. 5] Please explain why a change to NTG assumptions/results should result in a reduction of future targets, rather than an adjustment by the Applicant of its DSM offerings. Please confirm that one of the biggest factors impacting actual net to gross is program design and delivery, which is in the control of the Applicant. Please explain how the proposed NTG approach to results and targets provides an incentive to the Applicant to design and deliver programs with better NTG outcomes (i.e. lower free ridership and/or higher spillover).

D-SEC-31

[D-10-1, Attach 2, p. 1-3] For each of Tables 1 through 3, please add a column showing the most recent NTG value applied to each line item (offering or category).

E-SEC-32

[E-2-1, p. 7] Please provide the research and/or data underlying the statement “...many Canadians are prioritizing immediate concerns with the cost of living and housing over

longer-term investments in energy conservation”. Please file any internal reports, analyses, memoranda, or similar materials dealing in whole or in part with the impact of this trend on the viability of residential DSM offerings.

E-SEC-33

[E-2-7, p. 2] Please compare the Energy Education and Outreach Offering to previous residential behavioural programs proposed by the Applicant, whether or not approved by the OEB.

E-SEC-34

[E-4-1, p. 14, Notes 34, 35] Please provide a copy of the Enbridge Gas School Board Energy Planning Survey, and the engagement letter with Ipsos related to that survey.

E-SEC-35

[E-4-3, p. 5] Please confirm that the “special bonus offers” and “volume-based incentives” would be available to school boards implementing measures in multiple schools.

E-SEC-36

[E-4-4, p. 2] Please confirm that schools would generally be eligible for the Commercial/Industrial Direct Install Offering despite the school board itself having volumes exceeding the 100,000 cap.

E-SEC-37

[E-4-4, p. 7] Please provide a description of the measure “Hybrid RTUs”.

E-SEC-38

[E-4-6, p. 2] Please advise whether participation by a school in the previous Sustainable Schools program within the last five years disqualifies that school from participating in the EBCx Offering.

E-SEC-39

[E-4-6, p. 8] Please provide details on who designed the custom calculator, and who has or will verify that it produces reliable and correct results.

F-SEC-40

[F-1-1, Sched 3] For each affected rate class, please provide columns (e) through (l) for a general service customer with 30,000, 40,000, and 50,000 cubic meters of annual billing units.

Respectfully submitted on behalf of the School Energy Coalition this May 21, 2026.

Jay Shepherd
Counsel for the School Energy Coalition