

GEC INTERROGATORY #4

INTERROGATORY

Regarding Exh. A/Tab 1/Sch 3/p. 23, paragraph 58: Enbridge states that NTG ratios would have been 10% higher when secondary attribution is correctly included in the value. Please provide an estimate of how just changing the NTG to include secondary attribution effects would change the EC's estimates of first year savings, lifetime savings and the \$6.207 million shareholder incentive shown on Exh A/T1/S3 p. 4.

RESPONSE

As the Company has made clear in its evidence, Enbridge is of the view that the Board's Decision and Order (January 20, 2016) and Revised Decision and Order (February 24, 2016) in respect of the Company's 2015-2020 Multi-year DSM Plan (EB-2015-0049) does not provide that the net-to-gross factors which have been proposed by the EC are to be used in the evaluation of the Company's 2015 DSM program year results in a retroactive manner. To be clear, Enbridge does not believe the Board's direction is consistent with retroactive application of NTG values undertaken by the EC for the purposes of the evaluation of the Company's 2015 DSM results.

Notwithstanding the Company's view, for the purposes of providing a response to this interrogatory, Enbridge has taken the following steps:

- 1) Enbridge referenced the CCM values recommended by the EC which factored into their calculation of \$6,207,339 DSMI
- 2) Enbridge utilized the EC's calculation worksheet and applied the Secondary Attribution Ratios for each of the Commercial and Industrial Custom Project Domains outlined in Table 8-58 of the EC's 2015 Natural Gas Demand Side Management Custom Savings Verification and Free-ridership Evaluation dated October 12, 2017 and included with the EC's 2015 Natural Gas Demand Side Management Annual Verification report¹
- 3) Recalculating the EC's values with the inclusion of both the Primary and Secondary attribution finding of the EC provides an estimate of the impact of capturing all quantified attribution outlined in the NTG study on the EC's verified results.

¹ EB-2015-0245, Ontario Gas DSM Evaluation Contractor, 2015 Natural Gas Demand Side Management Annual Verification, Dec, 20, 2017, page F-2.

Witnesses: D. Bullock
D. Johnson

The following table summarizes the EC's values without inclusion of secondary attribution (in column A) as well as the re-calculations as outlined above with the inclusion of secondary attribution (column B).

	A Audit Opinion of EC without inclusion of secondary attribution	B Audit Opinion of EC with inclusion of secondary attribution estimates
CCM (lifetime) gas savings*	539,787,741 m ³	604,691,217 m ³
Shareholder Incentive (DSMI)	\$ 6,207,339	\$ 7,125,344

*Based on the information provided in the EC's calculation tool, the Company is unable to estimate the impact to first year savings.

Witnesses: D. Bullock
D. Johnson