

SEC INTERROGATORY #19

INTERROGATORY

[A/1/3, p. 17] Please provide a list of “questions and decision points that went unanswered”. Please distinguish between utility complaints that were not accepted by all members of the EAC, and those that were just ignored completely by the EC, OEB Staff, or both.

RESPONSE

In this IR, SEC has asked Enbridge to distinguish whether questions and decision points were not accepted or ignored by the EC, OEB Staff or both. However, the reference, Exhibit A, Tab 1, Schedule 3, page 17 refers only to transparency and a credible process with respect to Board Staff. A full discussion of the EC’s response to Enbridge comments can be found in response to Board Staff Interrogatory #11, found at Exhibit I.EGDI.STAFF.11.

The majority of questions and decision points that went unanswered by Board Staff were requests made by Enbridge during discussions at EAC meetings. The oversight of not recording action items and takeaways during the 2015 evaluation process (action item tracking did not begin until August 15, 2017) and the fact that EAC meeting minutes were not maintained created uncertainty and confusion. Enbridge provides the following examples in response to this Interrogatory.

Retroactive Application of Net-to-Gross Study

Initially, the EC’s first Scope of Work, dated March 2, 2016, stated that “The primary objective of this project is a transparent, reputable study that produces strong, credible, and defensible NTG ratios to be used on a go-forward basis.”<sup>1</sup> This Scope of Work was produced when the TEC was managing the evaluation process.

Subsequently, after management of the evaluation process was transferred to Board Staff, Enbridge was told Board Staff would revisit this issue to determine if NTG should be applied retroactively. Enbridge posed questions about the retroactive application of NTG multiple times, via verbal comments at EAC meetings, comments to the December 14, 2016 Scope of Work, and a memo provided by Enbridge to the EAC and Board Staff on June 14, 2017.

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<sup>1</sup> EB-2017-0324, Application and Evidence, Exhibit B, Tab 5, Schedule 5, page 8

Witnesses: D. Bullock  
D. Johnson

This memo was provided as requested in response to SEC Interrogatory #26, found at Exhibit I.EGDI.SEC.26.

Enbridge discussed this issue in its evidence, on Page 22 of 48 of Exhibit A, Tab 1, Schedule 3, as follows:

Throughout the 2015 DSM EM&V process, in an effort to seek clarity on OEB Staff's position on the application of NTG Study application to 2015 DSM program results, the utilities continued to raise concerns regarding the change to the NTG study scope of work and how the study outcomes would be applied (including at subsequent EAC meetings). During the October 2016 EAC meeting, OEB Staff committed to consider the matter and respond.<sup>2</sup>

Enbridge was not privy to any discussion on the issue, and was only told via email on May 23, 2017 that Board Staff had directed the EC to apply the NTG results retroactively to 2015 DSM program results. It is Enbridge's opinion that Board Staff did not fully consider and respond to Enbridge's questions on this issue.

### Budgets

Despite the utilities having responsibility and accountability for an overall annual evaluation budget for their respective DSM portfolios, OEB Staff was not responsive in providing details on EM&V budgets for planned verifications or details regarding forecasted spending in a given year. As a result, Enbridge had no ability to monitor spending and therefore no ability to budget for utility lead activities.

### Omission of ESC Interviews Contrary to Scope of Work

Enbridge raised the scheduling of ESC interviews to Board Staff in mid-December 2016. Board Staff did not respond. However, the Company learned a decision had been made to omit this activity from the Scope of Work from the EC. Please see Enbridge's response to BOMA Interrogatory #10, found at Exhibit I.EGDI.BOMA.10 for more details and email attachment.

### Commentary Provided Directly from OEB Staff to EC

Despite requests from the EAC for Board Staff to share all undisclosed commentary they provided to the EC, Board Staff declined. Enbridge is unaware of the extent of comments. Please refer to Enbridge's response to SEC Interrogatory #17, found at Exhibit I.EGDI.SEC.17 for full discussion on this topic.

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<sup>2</sup> EB-2017-0324, Application and Evidence, Exhibit A, Tab 1, Schedule 3, page 22.

Witnesses: D. Bullock  
D. Johnson

Request for a Comprehensive Project Timeline

Despite Enbridge requests for a comprehensive schedule in order better facilitate resource planning, Board Staff did not provide a project timeline to the EAC for the 2015 evaluation process. This created confusion and, as the utility was not afforded the opportunity to provide input regarding the setting of timeframe requirements, there were challenges in meeting those deadlines. Enbridge is pleased that in the 2016 evaluation process, the EC has produced such a schedule and the process has been more efficient and effective.

Witnesses: D. Bullock  
D. Johnson