

SEC INTERROGATORY #27

INTERROGATORY

[A/1/3, p. 22] Please provide evidence that the EAC reached a consensus to include spillover questions in the NTG study. Please explain why those questions were to be “less rigorous”.

RESPONSE

Enbridge presumes SEC is inquiring about secondary attribution, as it is secondary attribution and not spillover that is discussed in the referenced section of the evidence.

Following distribution of the participant survey instrument to the EAC for comment, the utilities and some members of the EAC submitted comments. The utility submitted its comments, including questions for clarification on November 25, 2016. There was however no further opportunity provided for discussion with the EAC to review these comments or discuss any changes or improvements to the survey instrument. Instead, the EC sent out an email to the EAC (omitting Enbridge in that communication) on December 15th indicating that the survey instrument had been finalized and was posted on the SharePoint. Regardless, in both the draft distributed by the EC and the final version utilized by the EC in interviewing participants, there was only a single question designated to assessing the longer term effects of the program.

This is counter to the approach outlined in the scope of work regarding assessing the longer term impact of the program on participants. This approach was initially endorsed and captured as an agreement item by the TEC on July 30, 2015 as follows:

The primary objective of the free ridership estimation will be to capture the effect of the program(s) on the current project. The effect on the current project of prior and indirect program experience will be captured in a secondary, less rigorous question sequence. The work plan will propose specifics for operationalizing this approach.¹

In discussions with the TEC, DNV termed these two types of attribution: Primary Attribution and Secondary Attribution (see pages 5 to 7 of the memo from DNV submitted as an attachment to the response to EP Interrogatory #5, found at Exhibit I.EGDI.EP.5)

¹ EB-2017-0324, Exhibit B, Tab 5, Schedule 2, page 129, Memo from DNV to TEC.

Witnesses: D. Bullock
D. Johnson

Enbridge is of the view that the differentiation between the primary objective and the secondary objective with respect to the overall survey outlined above logically supports that in relative terms, more effort and rigour would address the primary objective and less to assessing the longer term, prior and indirect program experience.

Witnesses: D. Bullock
D. Johnson