

SEC INTERROGATORY #31

INTERROGATORY

[A/1/3, p. 29] Please confirm that program design, or program implementation, can materially affect the actual experienced level of free ridership for that program. Please provide details as to how the Applicant ensures that free ridership is minimized in its program design, and its program implementation.

RESPONSE

Enbridge understands that program design can have impacts on the potential for free ridership.

The Company believes however it's important to distinguish between actual free ridership and free ridership estimation by way of self-report survey methods. Due to the various issues outlined in Enbridge's evidence (a lack of focus on technical support, business partner influence, timing delays in the study, etc.) it believes there is a very significant gap between the actual level of free-ridership in its programs and the estimated value of free ridership as proposed by the study.

The Company has identified a number of efforts it has undertaken to mitigate the potential for actual free ridership in its program design and implementation. These are outlined in the Company's October 1, 2017 mid-term submission (EB-2017-0128) starting on page 4.

An example of how the Company minimizes free ridership through program implementation is its focus on customer engagement, technical support and education that reduces free ridership by helping the customer to identify projects in the first place.

An example of how the Company minimizes free ridership through program design is its detailed consideration of the base case. By taking this step it minimizes cases where equipment or technologies are now standard practice.

In addition to the above, because of its concerns with the limitation in measuring free ridership, Enbridge has been focusing some of its effort on improved documentation of programs efforts, such as prior studies or technical support that identified a project. To be clear, this is not expected to change the actual free ridership, but it is aimed to reduce the gap between the actual free ridership value and the measured value in future studies.

Witnesses: D. Bullock  
D. Johnson