

SEC INTERROGATORY #34

INTERROGATORY

[A/1/3, p. 34] Please file all communications expressing “concerns regarding the EC’s decision to not factor secondary attribution”, and all communications from the EC or OEB Staff “dismissing” those concerns.

RESPONSE

Upon receipt of the draft participant survey instrument in November 2016, Enbridge provided comments, as requested of all EAC members, which included highlighting that the draft survey only outlined a single question to assess longer term impacts of the utility’s influence on the participant’s decision to move forward. Despite the scope of work specifying that a “question sequence” was planned to assess and capture this attribution. Further the EC had previously provided the TEC with a number of examples of research questions for secondary attribution but did not incorporate these. Despite the Company’s comments, the single question included in the EC’s draft went unchanged following input from the utilities. The EC proceeded finalizing the participant survey unchanged in this regard and advised the EAC that final documents were posted on the SharePoint on December 15, 2016 (Enbridge was erroneously omitted from this communication and learned of the finalization of document from Union Gas).

The scoring methodology for the NTG survey was also finalized and similarly posted to the SharePoint on December 15, 2016. Nowhere in the scoring methodology did the EC indicate that they would not be including secondary attribution in the NTG estimates. Further, at no time previously had the EC stated that secondary attribution was not to be factored in the NTG estimates. To the contrary, as outlined in DNV’s memo to the TEC during the NTG development stage, DNV differentiated the two types of attribution and addressed capturing both (see the attachment to EP Interrogatory #5, found at Exhibit I.EGDI.EP.5).

It was not until the EC delivered it’s draft report to the EAC in late May 2017 did it become apparent that the EC’s proposed free-ridership value did not factor secondary attribution, despite the EC quantifying a value for secondary attribution in its finding.

Enbridge provided comments on the draft report expressing concerns regarding this omission and during the EAC meeting on June 22, 2017 both utilities repeated these concerns and highlighted that these actions were not in line with the scope of work.

Witnesses: D. Bullock
D. Johnson

Ultimately, the EC made no change to the free-ridership values to include both types of attribution.

Witnesses: D. Bullock
D. Johnson