

SEC INTERROGATORY #5

INTERROGATORY

[A/1/3, p. 12] Please describe all instances in which OEB staff “directed” the EC to take material actions without consulting with the EAC.

RESPONSE

Enbridge can only comment on actions that were apparent to the Company. Examples of material actions include:

On June 6, 2016 the EAC received documents from OEB Staff including a memo from the EC outlining changes the EC was now proposing for the NTG Study in tandem with its integration with the CPSV verification effort. The original NTG study’s objective outlined that “the overall goal of this evaluation is to develop transparent free ridership and spillover factors for custom commercial and industrial programs, to be used for future programs.”¹ The June 6th memo outlined a free-ridership and spillover evaluation to be applied to 2015, whereby the sample designs would change as well as the calculation methodology. Evidently Board Staff had instructed the EC to revise the approach and objective of the NTG Study from that previously presented to the TEC dated March 2, 2016. No consultation with the EAC precipitated this direction.

Sometime between mid-November and mid-December, 2016, OEB Staff / EC decided, contrary to the tasks outlined in the scope of work, that they would not undertake interviews with utility staff (specifically program energy advisors) to inform the NTG study participant questionnaire (survey instrument) and proceeded to finalize the survey instrument, despite that this important task was outlined in the scope of work. No consultation with the utilities or the EAC preceded this decision.

During a conference call with the EAC on September 27, 2017, Board Staff communicated that they had instructed the EC to undertake research to identify a proxy deemed spillover value to be applied to the utilities’ 2015 program results, notwithstanding the fact that the spillover study was still ongoing and incomplete. Board Staff indicated that, rather than wait for the final results of the EC’s spillover research, the decision had been made to instead find and apply a deemed value to approximate spillover effects based on a spillover value in another jurisdiction and to then finalize the 2015 program results verification. No consultation with the utilities or the EAC preceded this decision.

¹ EB-2017-0324, Application and Evidence, Exhibit B, Tab 5, Schedule 1, page 5 of 48

Witnesses: D. Bullock
D. Johnson