

BOARD STAFF INTERROGATORY #16

INTERROGATORY

Reference: Exhibit A, Tab 1, Schedule 3, p. 22

Preamble:

Enbridge states: A further example of concern where the intended scope of work was not followed in the EC's execution of the NTG study is in regards to the determination and consideration of secondary attribution.

Questions:

- a) Within Navigant's report provided at Exhibit B, Tab 6, Schedule 1, which Enbridge provides as expert evidence, Navigant documents how leading jurisdictions define NTG. Given only Massachusetts and not Illinois and California include secondary attribution in their calculation of NTG, why does Enbridge believe this factor should be included in its NTG estimate?
- b) How was the EC's decision not to consider secondary attribution inconsistent with best practice?

RESPONSE

a) & b)

First and foremost, the NTG Study Scope of Work called for the inclusion of Secondary Attribution. "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."¹ In addition see DNV's parking lot memo which addressed how DNV would approach capturing the two types of attribution (see attachment 1 provided with the response to Board Staff Interrogatory # 5, found at Exhibit I.EGDI.STAFF.5). The exclusion of Secondary Attribution in the determination of NTG is inappropriate and inconsistent with the NTG Study scope of work as outlined above. Enbridge asserts that secondary attribution must be included in the NTG values in accordance with the original resolution with the TEC and DNV, and as outlined in both DNV's original and updated scopes of work.

¹ EB-2017-0324, Application and Evidence, Exhibit B, Tab 5, Schedule 2, page 44 of 130

Witnesses: D. Bullock
D. Johnson

Beyond the clear justification outlined above, as outlined in the Navigant report, Massachusetts incorporates influence in its NTG estimation from previous program influence and the EC's decision not to consider secondary attribution in the NTG score is inconsistent with this practice. Massachusetts is a jurisdiction with programs that have been offered over a similar time frame to those in Ontario. In fact, the EC selected Massachusetts as an appropriate jurisdiction from which to obtain a proxy spillover ratio, which was then applied to the Ontario 2015 program results. Further, as Massachusetts was given ACEEE's highest rating for its energy efficiency policies, it seems appropriate to consider Massachusetts' policies to be among best practice and applicable to the circumstances in Ontario.

In addition, ACEEE's report "Recent Developments in Energy Efficiency Evaluation, Measurement, and Verification," October, 2017, states that "California and Massachusetts emerged as the overall EM&V leaders in the opinions of our experts." Given the leading nature of these states, a policy taken by one of the top two ACEEE rated states for evaluation actions is worthy of consideration.

Witnesses: D. Bullock
D. Johnson