

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Energy Board (STAFF)

Interrogatory

Issue 16

Reference:

Exhibit E, Tab 4, Schedule 4

Question(s):

Enbridge Gas provides some background related to its efforts to coordinate delivery and training of energy efficiency and conservation activities with the IESO.

- a) Please discuss specifically what Enbridge Gas requests related to “regulatory support in a DSM Framework that is adaptive to allow parties to be responsive to opportunities as they arise.” Does this refer to the ability to access certain funding earmarked for collaboration efforts? Please discuss the process for how this would work and highlight the benefits and discuss any risks and how they can be addressed to ensure ratepayer funds are used prudently.
- b) Enbridge Gas requests that the OEB include a clear priority that the attribution of benefits between electricity and natural gas be maintained from the simplified approach first approved by the OEB in the 2006 generic proceeding: that all the natural gas savings are attributed to rate-regulated natural gas utilities and vice versa for electricity savings. Please discuss if there have been instances where this hasn’t been the practice.
- c) Please discuss what needs to happen (i.e., OEB approval, formal agreement with IESO, etc.) in order for Enbridge Gas to continue its coordinated work with the IESO, including the Capability Building and Training, Commercial Sector; Midstream Prescriptive, Commercial Sector; DCKV; Adaptive Thermostats.
- d) Please discuss if Enbridge Gas and the IESO will continue to partner on the Sustainable Schools Benchmarking Program if the Whole Building P4P offering receives OEB-approval.
- e) Please discuss what source of funding Enbridge Gas accesses to support its coordinate efforts with the IESO. Please list the funding source for all activities listed in Exhibit E, Tab 4, Schedule 4.

- f) Please discuss the timelines to finalize the province-wide coordinated delivery model between Enbridge Gas and the IESO for the single-family low-income offerings.
- g) Please discuss if the IESO has indicated its interest or ability to offer coordinated or joint delivery of the proposed Whole Building P4P offering.
- h) Please discuss, to the extent possible, Enbridge Gas's understanding of the IESO's timing related to the on-reserve Indigenous CDM program for commercial and institutional buildings owned and operated by Band-Council. Please discuss the amount of time required by Enbridge Gas to coordinate delivery so that on-reserve customers can address electricity and natural gas opportunities at the same time.

Response

- a) The reference was not intended to refer to funding for collaboration efforts. Enbridge Gas has requested a continuation of the operational flexibility from the current framework. It is important to allow for flexibility to respond to opportunities as they arise, especially in an evolving environment. This includes potential opportunities with IESO and the CDM plan, but there are also potential opportunities with the Federal, Provincial and Municipal governments, with many initiatives that are aimed at emission reductions. The DSM framework and governance structure should not be such that there was insufficient flexibility afforded to capturing opportunities or lengthy regulatory process that would preclude the Company from being able to realize value for ratepayers.
- b) Since the attribution policy as stated was introduced, Enbridge Gas is not aware of any particular instances where this has not been the practice.
- c) For Enbridge Gas to continue to coordinate programming with the IESO, Enbridge Gas needs the OEB to approve its proposed plan, including programs and RIF funding, to provide it with the flexibility to test and implement opportunities. Enbridge Gas and the IESO already have a mutual desire to coordinate and integrate its programming where it makes sense.
- d) Enbridge Gas views the Whole Building P4P offering as an evolution of its partnership with the IESO and Sustainable Schools Program by offering schools comprehensive energy management that incorporates the elements of Sustainable Schools. If the Whole Building P4P offering is approved, it would not be expected that Enbridge Gas and IESO would continue to partner on this initiative. However, as noted in Exhibit I.10f.STAFF.63b, the IESO and Enbridge Gas have a mutual

desire to coordinate the Whole Building P4P offering and the IESO's Energy Performance Program.

- e) For its coordinated efforts with the IESO, Enbridge Gas accesses funds from its program budgets or from its Research, Pilot and Collaboration budgets. In the following, Enbridge Gas provides the sources of funds for existing initiatives listed in Exhibit E, Tab 4, Schedule 4.

Capability Building and Training: This is jointly funded from the Custom offer budgets for Legacy Enbridge Gas (LEG) and Legacy Union Gas (LUG).

Energy Manager Program: This is jointly funded from the LEG Collaboration and Innovation Fund and the LUG Pilot/Collaboration budget.

Midstream Prescriptive: This is jointly funded through the Prescriptive offer budgets for LEG and LUG.

Demand Control Kitchen Ventilation: This is jointly funded through the Direct Install offer budgets for LEG and LUG.

Sustainable Schools Benchmarking Program: This is jointly funded from the LEG (Run it Right) and LUG (Runsmart) budget.

Adaptive Thermostats: This is funded through the LEG and LUG Adaptive Thermostats budgets.

- f) Please see interrogatory response to Exhibit I.10a.EGI.STAFF.30.
- g) Please see interrogatory response to Exhibit I.10f.EGI.STAFF.63.
- h) The IESO is currently procuring for a delivery agent for its on-reserve program and expects it to be in market by Q2, 2022. Once a delivery agent is procured, Enbridge Gas and the IESO will explore collaboration opportunities so that on-reserve customers can address both gas and electric conservation opportunities.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Anwaatin Inc. (Anwaatin)

Interrogatory

Issue 16

Reference:

Updated Application, Exhibit B, Tab 1, Schedule 1, paras 4 and 13
Updated Application, Exhibit E, Tab 1, Schedule 6, para 1

Question(s):

Please provide the following information in tabular form for 2020 (actuals), 2021-2022 (forecast), and 2023-2027 (proposed):

- Total amount of all charges incurred by EGI under Part 1 of the *Greenhous Gas Pollution Pricing Act*¹.
- Total amount of all charges incurred by EGI under Part 2 of the GGPPA.
- Total amount of savings under Part 1 of the GGPPA as a result of DSM programming.
- Total amount of savings under Part 2 of the GGPPA as a result of DSM programming.

Response:

Enbridge Gas has provided the information in the table below, with the exception of the following:

1. The forecast amount of all charges incurred by Enbridge Gas under Part 2 of the GGPPA for the period of 2023 – 2027. Enbridge Gas does not complete long-range volume forecasts of emissions covered under part 2 of the GGPPA beyond 2022.
2. The amount of savings under Part 2 of the GGPPA as a result of DSM programming. The amount Enbridge Gas pays under Part 2 of the GGPPA is related to the Company's own emissions from fuel combustion at the storage and transmission compressor stations. DSM programming, which is targeted at customers, does not provide any savings for Enbridge Gas under Part 2 of the GGPPA.

¹ S.C. 20108, c. 12, s. 186 (the **GGPPA**)

	\$millions							
	Actual	Forecast		Proposed ¹				
	2020	2021	2022	2023	2024	2025	2026	2027
Total Charges Incurred by EGI Under Part 1 of the GGPPA ²	807	1,361	1,680	2,203	2,724	3,242	3,777	4,309
Total Charges Incurred by EGI Under Part 2 of the GGPPA ³	2	5	4	N/A	N/A	N/A	N/A	N/A
Total Amount of Savings Under Part 1 of the GGPPA as a Result of DSM Programming ⁴	6	8	10	14	17	21	24	28
Total Amount of Savings Under Part 2 of the GGPPA as a Result of DSM Programming	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

¹ The increasing Federal Carbon Charge rate which the federal government proposed to increase by \$15/tCO_{2e} annually starting in 2023, until reaching \$170/tCO_{2e} in 2030 was used to forecast 2023-2027.

² 2021: EB-2020-0212, EGI 2021 Federal Carbon Pricing Program Application - Interrogatory Responses (December 8, 2020), Exhibit I.EP.3, Attachment 1 and Attachment 2. Forecasting period is April 2021 – March 2022.

2022: EB-2021-0209, EGI 2022 Federal Carbon Pricing Program Application (September 29, 2021), Exhibit B, Tab 1, Schedule 5, and Exhibit B, Tab 2, Schedule 5. Forecasting period is April 2022 – March 2023.

2023 – 2027: volume forecasts provided in the response to Exhibit I.1.EGI.SEC.1d were used to forecast costs. Forecasting period is January – December. Based on the 2022 volume forecasts from EB-2021-0209, a value of approximately 65% was used to forecast the portion of total volumes subject to the Federal Carbon Charge. The company-use volumes from EB-2021-0209 were used to forecast the long-range facility-related costs subject to Part 1 of the GGPPA.

³ 2020: EB-2021-0209, EGI 2022 Federal Carbon Pricing Program Application (September 29, 2021), Exhibit C, p. 8.

2021: EB-2020-0212, EGI 2021 Federal Carbon Pricing Program Application (September 30, 2020), Exhibit B, Tab 1, Schedule 5, and Exhibit B, Tab 2, Schedule 5.

2022: EB-2021-0209, EGI 2022 Federal Carbon Pricing Program Application (September 29, 2021), Exhibit B, Tab 1, Schedule 5, and Exhibit B, Tab 2, Schedule 5.

⁴ Based on DSM program gas savings provided in the response to Exhibit I.1.EGI.CCC.3.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Building Owners and Managers Association (BOMA)

Interrogatory

Issue 16

Reference:

EB-2021-0002, Exhibit E, Tab 4, Schedule 4, Page 4

Question(s):

Are attribution issues resolved to allow full collaboration between Enbridge and the IESO? Are there any other impediments to collaboration?

Would Enbridge support a formal working group with the IESO to jointly address challenges and opportunities related to progression towards the low carbon future?

Is there funding capacity to support worthy community-led programs?

Response

- a) As outlined in evidence in the Proposed Framework (see Exhibit C, Tab1, Schedule 1, page 22 of 66), with respect to energy savings, Enbridge Gas is proposing a continuance of the attribution approach previously outlined by the OEB in the 2015 - 2020 DSM Framework for programs coordinated jointly between the IESO and Enbridge Gas, wherein all gas savings are attributed to the gas utility and all electricity savings are attributed to the IESO/CDM program.

Beyond continuance of this simplified attribution policy, in line with the Guiding Principle outlined in the Proposed Framework that states: "Enbridge Gas should not have a disincentive to coordinate DSM efforts with external energy conservation and carbon reduction initiatives"¹. In order to ensure that any such coordination efforts (including those with the IESO) do not potentially disadvantage the Company, Enbridge Gas expects that any evaluation activities pertaining to such joint programming should consider the entire program effort as a whole and avoid attempts to divide or allocate contributions or outcomes of the overall program effort.

¹ EB-2021-0002, EGI Multi-year Plan and Framework Application (Updated September 29, 2021), Exhibit C, Tab 1, Schedule 1, p. 8.

- b) With consideration of the OEB's stated objectives for natural gas ratepayer funded DSM, Enbridge Gas program managers are in frequent and ongoing communication with their counterparts at the IESO to investigate and discuss opportunities to coordinate the delivery of DSM programs with CDM programs where possible. Enbridge Gas does not believe it necessary to establish any formal working group as the appropriate personnel at both the IESO and Enbridge Gas are already fully engaged in this effort.

- c) As outlined in evidence at Exhibit 4, Schedule 1, page 4 of 5, Enbridge Gas has proposed funding to support community based efforts through the establishment of a Municipal Energy Solutions team and budget allocations to support the development and execution of local, municipal or community-led programming.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Consumers Council of Canada (CCC)

Interrogatory

Issue 16

Reference:

Exhibit E, Tab 1, Schedule 2, pages 8-9
Exhibit C, Tab 1, Schedule 1, pages 22-23

Question(s):

In May 2021 the Federal Government through Natural Resources Canada launched the Canada Greener Home Grant Program. The \$2.6 billion program is providing grants of up to \$5000 for 700,000 homeowners to assist in facilitating energy retrofits. In addition, homeowners will have access to EnerGuide evaluations (worth up to \$600).

In addition, the Federal Government announced an allocation of \$4.4 billion to the Canada Mortgage and Housing Corporation (CMHC) to help homeowners complete deep home retrofits through interest loans worth up to \$40,000.

The evidence states that EGI anticipates opportunities to coordinate with external parties in support of these efforts through coordinated approaches with in-market DSM offerings. EGI's residential program is focused on energy retrofits. The overall budget for the plan term is over \$250 million.

- a. Please describe how EGI has been, or intends to, specifically coordinate with Natural Resources Canada and CMHC regarding its Whole Home Program;
- b. In light of the amount of money available from the federal government for retrofits did EGI consider reducing its proposed budget for the Whole Home Program. If not, why not?
- c. Has EGI entered into any partnership agreements with the federal government regarding its proposed residential programs? If not, why not? If so, please provide those agreements. Please explain how the attribution of natural gas savings will be determined with respect to those partnerships.

Response:

a - c) Please see response to Exhibit I.10a.EGI.STAFF.31.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Issue 16

Reference:

Enbridge's Residential program offerings

Question(s):

- (a) How and when is Enbridge going to update its residential program offerings to account for the federal government's Greener Homes Grant?
- (b) Is there a possibility that Enbridge would re-arrange the mix of its portfolio (e.g. reduce residential programs and increase commercial/industrial programs) due to the Greener Homes Grant? If it did so, when would it refile its application?
- (c) Seeing as the Greener Homes Grant has a funding cap of \$5,000, would it be possible for Enbridge to contract with the federal government to have the federal government administer the residential budget and therein (i) increase the eligible activities that an Ontario gas customer could implement, (ii) decrease administration costs, and (iii) eliminate confusion and overlap? Does Enbridge believe this would be prudent? Please speak separately to the issue of feasibility and prudence.
- (d) Please describe the discussions that Enbridge has had with the federal government regarding its Greener Homes Grant.
- (e) Is there an expected end date or budget cap for the Greener Homes Grant?

Response

a – d) Please see response to Exhibit I.10a.EGI.Staff.31a.

e) Per the Fall 2020 Economic Statement, the Greener Homes Grant program will "Provide \$2.6 billion over 7 years, starting in 2020-21."

ENBRIDGE GAS INC.

Answer to Interrogatory from
Environmental Defence

Interrogatory

Issue 16

Reference:

Enbridge's Residential program offerings

Question(s):

- (a) Please describe the nature of the federal government's commitment to provide \$40,000 in interest free green loans for home retrofits. Please provide any documentation Enbridge has on this future program.
- (b) Could the loan be repayable through Enbridge bills (e.g. the open bill program)? If not, please describe the barriers in detail. If it is unclear, please describe the potential issues and barriers.
- (c) Once this program is rolled out it will presumably increase the uptake of eligible measures. Does Enbridge agree? If not, please explain.
- (d) How and when will Enbridge adjust its free rider rates and targets for programming impacted by the federal government's proposed loan program?

Response

- a) Enbridge Gas does not have access to any information on this program beyond what has already been made public.

Please see: <https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/canada-greener-homes>

As published on September 10, 2021, the CMHC-SCHL website states:

To help homeowners and build on these measures, the 2021 Federal Budget proposed \$4.4 billion over 5 years, starting in 2021-2022 to help up to 200,000 homeowners complete deep home retrofits through interest-free loans of up to \$40,000.

Details are anticipated to be announced later this fall on the Greener Homes interest-free loan that incorporates and builds on the energy audits and grants available.

- b) Yes.
- c) Enbridge Gas's customer research indicates that access to financing is not a common barrier to participation in our Residential offerings. As such, Enbridge Gas does not believe that financing will increase participation in our program offerings.
- d) As an evaluation activity, updates to free ridership will be assessed and prioritized in the EAC. Enbridge Gas does not anticipate adjusting targets for programming impacted by the federal governments proposed loan program.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Energy Probe Research Foundation (EP)

Interrogatory

Issue 16

Reference:

Exhibit E Tab 4 Schedule 4 Page 6

Preamble:

13. Throughout the term of the DSM Plan, Enbridge Gas is anticipating opportunities to work with other external parties, including government agencies, municipalities and consumer organizations to optimize funding, resourcing, administration and marketing of complimentary programming to drive incremental participation and leverage efficiencies. Discussions on some of these potential efforts have already been initiated, however Enbridge Gas is not yet able to make details of any arrangements public as they are not final.

Question(s):

- a) Please provide an update for the IESO/LDCs
- b) Please provide an Update for the Federal Government Agencies
- c) Please provide an Update for Ontario Municipalities

Response:

- a) Please see response to Exhibit I.1.EGI.ED.4a.
- b) Please see response to Exhibit I.10a.EGI.STAFF.31a.
- c) Over the past two years Enbridge Gas has either been involved directly or indirectly through a regional group (ie: Region of Durham represents multiple municipalities) with over 100 municipalities. Examples of our engagement activities with municipalities includes the following:
 - Participated on community energy advisory task forces and committees
 - Provided funding for home retrofit support studies
 - Provided letters of support for FCM funding applications

- Provided financial support for energy plan development
- Participated in the development of green standards
- Participated in future visioning exercises regarding emission reductions

Enbridge Gas continues to work with many Ontario municipalities to find and drive alignment with our DSM program offers, looking for opportunities to partner, increase participation and optimize funding, resourcing and administration costs.

Collaboration discussions are ongoing with municipalities, however no agreements have been signed at this time.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Ontario Sustainable Energy Association (OSEA)

Interrogatory

Issue 16

Reference:

Exhibit D-1-1, Page 26 of 26

Preamble:

Municipalities are developing community energy plans to meet local policy objectives. In its application, Enbridge states that:

“Over the past few years, many Municipalities have reached out to Enbridge looking for support to develop their community energy plans, sit on committees, and attend Council meetings. Recognizing that this was an emerging trend that would continue to grow, a new team was established to focus on energy plan development and implementation with Municipalities. Existing team members were moved from other areas of Energy Conservation to staff this new group. As we start down this exciting path, it is clear that in addition to an external facing team, a significant amount of data analysis and analytics will be required at the municipal level in order to work with communities to determine how to best implement the ideas and plans that have created. This is a completely new way of looking at data for Enbridge as we have historically focused on the customer location in DSM and not at the community level. One incremental FTE has been identified to support the additional data analysis and analytics required.”

OSEA is interested in understanding more about Enbridge’s new energy plan development team and expanded data analytics capability.

Question(s):

- a) Please provide further details on the new data analysis approach for community level DSM programs. Please provide examples of the changes Enbridge anticipates for its new data analysis approach over the Multi-year DSM program.
- b) Does Enbridge expect or intend to share data analysis and analytics with Municipalities and community energy plan developers? If so, please describe at a

high-level Enbridge's engagement approach for sharing this information with Municipalities.

- c) Has Enbridge surveyed or engaged Municipalities on their specific data analysis and analytics needs? If yes, please provide a summary of Enbridge's survey/engagement results. If not, please explain why Enbridge has not directly engaged Municipalities on this issue and confirm whether Enbridge will be engaging Municipalities going forward.
- d) Please describe the key opportunities and barriers for community energy plans in Enbridge's proposed DSM Plan. Specifically, please discuss how Enbridge's new data analysis will support community energy plan development and objectives.

Response

- a) Today, the data Enbridge Gas provides to municipalities is mainly at an aggregate level and mainly relates to building or residential consumption data or historical DSM participation data. In Exhibit E, Tab 4, Schedule 1, page 5 incremental funding is requested to not only "fund the creation of tools enabling easier and faster access" to this data, but also to provide additional program measure data, and customer demographic and psychographic data to help target the right measures to the right customers. These trends and the continued evolution and expansion of data requests will continue through the term of the DSM plan as Municipalities implement and refine programs specific to their communities.
- b) Enbridge Gas engages directly with municipalities to support the development and enacting of municipal energy plans. Through this engagement, the Company, within the confines of the Company's data sharing parameters does and will continue to provide data to municipalities and their contracted agents (community energy plan developers). Going forward, as Enbridge Gas both supports and collaborates with municipalities the Company will continue to share data, analysis and analytics with municipalities and their contracted agents as it is requested or through the company's effort to align our program with a specific municipalities' energy planning goals.
- c) Enbridge Gas's understanding of municipal data needs has been developed through individual consultation with various municipalities, participation on energy committees, through working directly with them on the creation of collaborative programs and initiatives, and through independent interviews completed by Ipsos and Kennedy Consulting. Please see Exhibit I.17.EGI.PP.48b. Through these interactions Enbridge Gas has worked with municipalities to understand the types of data that would support them in the achievement of their GHG reduction targets.

- d) Following the creation of a community energy plan, municipalities will then strive to execute their plans. This requires the design and launch of numerous local initiatives and programs aimed to drive GHG reductions. In Enbridge Gas's experience the main barriers to implementation have been the following:
- A large gap between ambitious goals and in market programs that customers can participate in today makes it difficult to set realistic projections and focus on areas that will have the greatest impact. With improved data regarding past DSM participation and historical consumption patterns programs can be developed to target neighborhoods where the impact will be greatest.
 - A lack of funding to develop programs that can be stacked with existing programs like Enbridge's. Better data analytics will provide the intel needed to focus program development on appropriate technologies and enable the Municipality to focus on the one or two key priorities that will deliver results most quickly so limited financial resources can be directed most efficiently. It will also assist in the development of focused, data driven business cases to provide Councils when seeking financial support.
 - A lack of program design experience/resources has also been a barrier. Data at the right level of granularity is needed to design programs that have the greatest likelihood of success. Otherwise, program design is informed by people's perceptions and personal preferences, rather than based on market adoption rates, equipment availability and market economics.
 - The ability to deliver targeted marketing to the specific audience that programs are intended for. Successful targeted marketing relies on data to ensure outreach efforts have the most likelihood of success, rather than blanket marketing which covers an entire municipality. Data informs which audience is being targeted as well as what medium will be most successful at reaching them.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue 16

Question(s):

Please provide a list of all current partnerships that Enbridge has and segment by the following categories:

- Funding partner
- Delivery partner
- Co-program Partner (e.g. joint program or co-branding)
- Marketing partnership
- Other categories as Enbridge deems appropriate

Response:

Please see list below:

Funding Partner (Interpretation: 3rd party funding of an Enbridge program)

- Presently, Enbridge does not have any funding partners for its programs.

Delivery Partner (Interpretation: common delivery of separate programs)

- Refer to Exhibit I.1.EGI.ED.4a, which provides a listing of IESO partnerships for co-delivery.

Co-Program Partner (Interpretation: a joint program by two partners)

- Regional Municipality of Durham – Home Energy Concierge (*anticipated launch Q4 2021*)

Marketing Partnership (Interpretation: common marketing and cross-promotion of separate programs)

- BOMA Race2Reduce
- Climate Challenge Network - Sustainable Schools Program
- Climate Challenge Network - Greening Health Care
- Climate Challenge Network - Mayors MegaWatt Challenge

- City of Toronto - BetterHomesTO
- City of Toronto - Tower Renewal Green Champions
- Humber College and Municipalities – Home Efficiency Retrofit Orientation workshops. Sessions in 2021 to date have included:
 - City of Toronto & City of Ottawa - April 10
 - Region of Peel | Caledon - April 22
 - City of Markham - June 3
 - City of Brampton - October 7
 - City of Sault St. Marie - October 13
 - City of Burlington - October 14
 - City of Markham October 21

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue 16

Question(s):

- a) Please provide a summary of all DSM partnerships planned for 2023-2027.
- b) Please provide a table of all DSM programs proposed for 2023-2027 and beside each program, please provide a list of the partners (including for funding or delivery) that will be leveraged.

Response:

a - b)

Please see response to Exhibit I.1.EGI.ED.4 for a list of planned partnerships, Exhibit I.10a.EGI.STAFF.30 for additional details on partnership with the IESO, and Exhibit I.10a.EGI.STAFF.31a for details on partnership with NRCan.

ENBRIDGE GAS INC.

Answer to Interrogatory from
Pollution Probe (PP)

Interrogatory

Issue 16

Question(s):

Please provide a list of all new incremental (i.e. did not exist previously) partnerships and programs Enbridge intends to pursue for 2023-2027, including IESO coordination, leveraging climate change program funding, etc.

Response:

Please see response to Exhibit I.1.EGD.ED.4a and Exhibit I.10a.EGI.STAFF.31.