Demande de renseignements no 1 d'Option consommateurs à la Société en commandite Gaz Métro

Demande d'approbation du plan d'approvisionnement et de modification des Conditions de service et Tarif de Société en commandite Gaz Métro à compter du 1er octobre 2012 (Phase 2)

Dossier R-3809-2012 Phase 2

CUSTOMER AND VOLUME FORECAST 2012 ACTUAL AND 2013 FORECAST

- 1. References: i)
- A-0064, (R-3831-2012, GM-9, Doc 1), p. 1
- ii) A-0074 (R-3831-2012, GM-16, Doc. 1)
- iii) B-0164, GM-12,Doc 5

Preamble

OC has compiled the following Actual (A) and Forecast (F) Customer Volume Data for Class D Tarif 1 (based on extracts from the 2012 Annual Report (included in the current filing) and other pre-filed evidence)

| In | Reference (date(s)) | # Customers | Energy TJ | Volume 10 ³ m ³ | Revenues \$000 | Revenue c/m ³ |
|----|--------------------------------------|------------------------|--------------|--|------------------------|-----------------------------|
| 1 | ref (i) (Sept 2012) | 186,553 F 187,274 A | n/a | 1,857,112 F 1,848,354 A | 359070 F 353488 A | 19.335 F 19.124 A |
| 2 | ref (ii), pp. 2 and 4 (2011-2012) | 187,906 F 188,684 A | | 2,396,907 F 2,494,503 A | 673,816 F 650,655 A | n/a n/a |
| 3 | ref (ii), p. 2 (2012-2013) | 192,650 F | | 2,522,282 F | | |
| 4 | ref (iii) (Sept 2013) | 191,268 F | 71,962 F | 1,899,224 F | 361,824 F | 19.051 F |

- 1.1 Please confirm/correct sources and numbers. Input missing entries where available.
- 1.2 Please confirm/correct Forecast (F) and Actual (A).
- 1.3 Provide notes that explain clearly the basis of the entries e.g. average customers vs. year end.

- 1.4 In particular please explain the two sets of volume data in lines 2 and 3 relative to lines 1 and 4.
- 1.5 Provide an updated version of the Table with corrected designations, missing data and the explanatory notes.
- 1.6 Provide a complementary Table that updates the 2012 data and 2013 forecast and shows, for each of 2012 and 2013, the Actual and Forecast data that supports the requested updated revenue forecast, revenue requirement and rates for D1 Tarif 1 customers.
- 1.7 In the requested Table insert rows that show the change year over year in Customers, Volumes and Revenues on an absolute and % change basis.
- 2. Reference: i) B-0164,GM-12,Doc 5 ii) A-0064, (R-3831-2012, GM-9, Doc 1), p. 1

Preamble

In accordance with the Régie's Acceptance of OC's Budget Proposal and the comment "En conséquence, la Régie demande à OC de bien cibler son analyse sur ce sujet," (D-2013-018, p. 7), OC requests that GM provide, as an update to its evidence, its comprehensive 2013 customer and volume forecast. If that is not to be provided, OC requests the following information:

- 2.1 Please provide a Copy of the Régie's Filing Guidelines for Natural Gas Cost of Service Applications.
- 2.2 When was the last time that GM filed comprehensive evidence in support of a Test year customer and volume forecast for the Class D Tarif 1 rate class?
- 2.3 Please provide a copy of that evidence.
- 2.4 Please provide a forecast of customers and volumes for Class D Tarif 1 for 2013 on the same basis as provided above. This should include base year 2012

actuals and 2013 forecasts.

- 2.5 Please provide the main Working Papers, a complete list of input assumptions, key model statistics and charts showing the results including details on:
 - a) Heating Degree Day Forecast
 - b) Average Use (AU) per customer by end use (heating/hot water and total)
 - c) Weather Normalized Average Use per Customer (NAC).

Compare the NAC Results to the as filed 2013 volume data in reference (ii).

3. Reference: i) B-0164, GM-12, Doc 5

Questions:

3.1 Please provide the impacts in both % and \$ terms on the 2013 Revenue Forecast and Revenue Requirement of the following:

a) a hypothetical change of 1000 in Class D Tarif 1 Customer additions relative to the forecast in ref (i).

b) a hypothetical change of 100 m3 in Normalized Average Use per D Tarif 1 Customer (NAC) relative to the forecast in ref (i).

3.2 Please comment on the creation of an "Average Use True Up Variance Account AUTVA"¹ to capture differences in forecast and actual volumes.

¹ Ontario Energy Board Decision: Union Gas Limited EB-2012-0210, December 2012

TOTAL DISTRIBUTION COSTS (OM&A); COMPENSATION AND OTHER CHARGES

HISTORIC AND FORECAST DATA

4. References: i) A-0074 (R-3831-2012, GM-16, Doc1), Pages 9-12 (Tables) ii) B-0171, GM-12, Doc 12, Page 4

Preamble

OC requests that a version of the response be provided in Active Excel Spreadsheet Format.

Questions:

- 4.1 Please provide a version of the four Referenced Table(s) in ref (i) that provides the complete data on the following Distribution expenses line items (Salaires, Avantages sociaux, Autres dépenses, Frais corporatifs, totaux) from 1996-2013 (F) and (A).
- 4.2 Please provide a clear explanation (notes) of the basis of the entries/data in each line. In particular what is included in Other Expenses (*Autres dépenses*) and the drivers of these costs. Also explain clearly what is included in Corporate Charges and who these are paid to.
- 4.3 Please add the following rows at the bottom of the Requested Tables:

-Increase in Compensation and Other Costs year over year %

-Total Distribution Expenses (before Capitalization)

-Compensation and Other Costs, as a Percentage of Total distribution costs.

-Total Distribution Expenses (after Capitalization)

-Compensation and Other Costs, as a Percentage of Total distribution costs (after Capitalization).

4.4 Please add two (2) columns at the right of the requested table that show:

a) the average annual % increase for each Expense line and Total from 1996-2000; and

b) the average annual % increase for each line and Total from 2001-2012

4.5 Compare the actual data (for 2003-2012) in the tables on pp.11-12 in ref (i), as well as the projected data for 2013 in the table on p. 10 in ref (i) with those in ref

(ii) for the period 2003-2013 and reconcile any differences.

5. References: i) B-0171, GM-12 Doc 12, Page 5 (Chart) ii) A-0074 (R-3831-2012 Annual Report GM-16, Doc1), Pages 9 -12 (Tables)

Preamble

OC requests that a version of the response be provided in Active Excel Spreadsheet Format

Questions:

- 5.1 Please provide a chart similar to the Referenced Chart in ref (i) that uses the Distribution Expenses data in the requested table in Question 4.1 and shows from 2003-2013:
 - -Total Compensation per m3 distributed (current\$)
 - -Total Compensation per customer (current\$)
 - -Total Distribution Expenses per m3 distributed (current\$)
 - -Total Distribution Expenses per customer (current\$)

* Note that we do not require an update that includes the blue line of the chart (which excludes the pension fund), just the red line.

- 5.2 Compare the Chart in ref (i) to the new charts requested in 5.1 by plotting all 5 lines on a new chart, i.e. the four new lines and the line from the original chart. (Again, note that we do not require the blue line (which excludes the pension fund), just the red line.)
- 6 References: i) B-0171, GM-12, Doc 12 Page 4 (Table)
 ii) B-0171, GM-12 Doc 12, Page 6 (Chart)
 iii) A-0074 (R-3831-2012 Annual Report GM-16, Doc1), Pages 9 -12 (Tables)

Preamble 199

OC requests that a version of the response be provided in Active Excel Spreadsheet Format

<u>Questions</u>

- 6.1 Using the Quebec annual Inflation data in ref (i), please provide a chart similar to the referenced chart in ref (ii) that uses the Distribution Expenses data in the requested table in Question 4.1 and shows from 2003-2013:
 - -Total Compensation per m3 distributed (constant\$)
 - -Total Compensation per customer (constant\$)
 - -Total Distribution Expenses per m3 distributed (constant \$)
 - -Total Distribution Expenses per customer (constant\$)

* Note that we do not require an update that includes the blue line of the chart (which excludes the pension fund), just the red line.

- 6.2 Compare the Chart in ref (ii) to the new charts requested in 6.1 by plotting all 5 lines on a new chart, i.e. the four new lines and the line from the original chart. (Again, note that we do not require the blue line (which excludes the pension fund), just the red line.)
- 7 References: i) B-0171, GM-12 Doc 12, Page 4 (Table)
 ii) B-0171, GM-12 Doc 12, Pages 5 and 6 (Charts)
 iii) A-0074 (R-3831-2012 Annual Report GM-16, Doc1), Pages 9

 -12 (Tables)

Preamble

OC requests that a version of the response be provided in Active Excel Spreadsheet Format.

- 7.1 Please provide the approved annual escalator (CPI-X) for each year for the Incentive Plan 2001-2012.
- 7.2 Using the approved annual escalator, please provide two charts similar to the referenced Charts that uses the Incentive Plan escalator data, rather than Quebec Inflation in the response to show from 2003-2013:

-Total Distribution Expense per m3 distributed -Total Distribution Expense per customer.

* Note that we do not require an update that includes the blue line of the chart (which excludes the pension fund), just the red line.

- 7.3Compare the Charts in ref (ii) to the new charts requested in 7.2 by plotting all four lines on a new chart, i.e. the two new lines and the two original ones. (Again, note that we do not require the blue line (which excludes the pension fund), just the red line.)
- 7.4 Please provide two additional charts that use the Incentive Plan escalators to show

-Total Compensation per m3 distributed -Total Compensation per customer.

- 8 References: i) B-0171, GM-12 Doc 12
 - ii) A-0074 (R-3831-2012 Annual Report GM-16, Doc1), Pages 10 and 12 (Tables)
 iii) B-0175, GM-12, Doc 16, Page 1

Preamble

OC has compiled the following Actual (A) and Forecast (F) Customer Compensation and Other Data (based on extracts from Annual Reports and Pre-filed evidence)

| | | ensation and Other 13 (September 30) | r Distribution |
|------------------------|----------------------------|---|----------------------------|
| Cost Component | 2011- | 2011- | 2012- |
| - | 2012 | 2012 | 2013 |
| Headcount ³ | n/a | 1312 | 1386 |
| | 2011- 2012 ¹ | 2011- 2012 ² | 2012- 2013 ¹ |
| Salaries | n/a | \$107.5m | n/a |
| Benefits | n/a | \$47.1m | n/a |
| Other Expenses | n/a | \$47.6m | n/a |
| Capitalization | n/a | (\$41.0m) | n/a |
| Corporate Charges | n/a | \$ n/a | n/a |
| TOTALS from ref (ii) | 167.6 F | 161.2 A | 187.7 F |

| Total salary costs | n/a | 159.0 A | 183.82 F |
|-------------------------|-----|---------|----------|
| (masse salariale) | | | |
| from ref (iii), line 29 | | | |

Notes

- 1. ref (ii) p. 10, forecast values for Salaries, Benefits, Other Expenses, Corporate charges and Totals.
- 2. ref (ii) p. 12, actual values for Salaries, Benefits, Other Expenses, Capitalization, Corporate charges and Totals

Questions

- 8.1 Please provide a Version of the above table that includes the following
 - a) Confirmed/Corrected sources and numbers
 - b) Confirmed/Corrected Forecast (F) and Actual (A) Designations
 - c) Missing Entries for 2011-2012 and 2012-2013, labelled as n/a.
- 8.2 Please provide notes that explain clearly the basis of the entries e.g. average Headcount (FTE) vs. year end.
- 8.3 Reconcile the data to B-0175 and other parts of the evidence by appropriate references.
- 8.4 Please provide a separate breakdown of Other Expenses and Corporate Charges.

BENCHMARKING OM&A AND TOTAL COMPENSATION

9 Reference: No Reference

Preamble

OC wishes to compare GM's historic OM&A Expenses and Total Compensation costs during the IM period 2001-2012 with other natural gas distributors including a Canadian peer group.

- 9.1 Please provide copies of any/all benchmarking studies on OM&A, Compensation Costs that GM has commissioned.
- 9.2 Please provide copies of any/all OM&A benchmarking and/or Compensation Studies that GM has participated in and has access to as a result e.g. Canadian Gas Association, American Gas Association, CAMPUT. If copies are not available please provide source reference hyperlinks.

9.3 Please provide a copy of the latest Report by the Pacific Economics Group (PEG) on GM's productivity during the IM period.

PENSION COSTS 2013

10 References: i) B-0175, GM-12, Doc 16, line 22 ii) B-0216, GM-7, Doc 1, Page 5 iii) R-3773-2011, B-0010, GM-1 Doc 6 iv) D-2012-077, Paragraphs 85-100.

<u>Questions</u>

- 10.1 Please provide supporting evidence-- assumptions and calculations for the Pension Cost increase from \$20.449 million (2012A) to \$38.286 million (2013F), as per ref (i).
- 10.2 Reconcile the \$38.286 million forecast for 2013 in ref (i) with the data in Annex B of ref (iii).
- 10.3 Please provide Copies of the December 2011 Actuarial Evaluation of the Plan(s)
- 10.4 Please provide the Latest Actuarial Evaluation/ Report(s) on the Plan(s)
- 10.5 Please provide Copies of the Evidence filed in R-3773-2011 regarding the Plan(s) performance,
- 10.6 Please update the Table on Page 7 ref (iii) by adding columns to the right to show 2011 Actual, 2012 Actual (or Forecast) and 2013 Forecast
- 10.7 Please provide the Latest Report on Plan(s) performance and projection for 2013.
- 10.8 Provide a comparison of Plan Performance 2011/2012 to a Peer Group including Enbridge Gas Distribution, Union Gas Limited, Ontario Municipal Employees Retirement Plan and the Canada Pension Plan.
 If not available, compare the Plan Performance 2011/2012 to the published

performance of the Canada Pension Plan and Ontario Municipal Employees Retirement Plan 2011-2012.

- 10.9 Please provide an updated version of Annexe B of ref (iii) to reflect the latest actuarial assessment(s) and Plan performance during 2011 and 2012.
- 11 References: i) R-3773-2011, B-0010, GM-1, Doc 6, Paragraph 5.2, Table 17 & Annex B.

Preamble

Table 17 shows the following:

| Deferral accounts carryover credits related to the opening balance sheet and the restatement of the comparative year | | Method and period of depreciation adopted |
|--|------------------|---|
| Actuarial variances | \$ 107.2 million | Corridor method |
| Past service costs | \$ 5.9 million | Linear deprecation on the average remaining service |
| | | period of active employees (3 years) |
| Unamortized net transition asset | (13.0) million | Straight-line over 5 years |
| Variance between current method and actuarial method (account already exists under Canadian | \$ 32.3 million | Straight-line over 5 years |
| GAAP, but outside rate base) [Table 17] | | |

- 11.1 Please list the Accounting Orders including names and designations (in French and English) for the Pension-related deferral accounts.
- 11.2 Please confirm/amend the 2012 year end Balances for the Pension-related deferral accounts and provide an explanation for any differences from the amounts shown.
- 11.3 Please provide an estimate of the forecast balances for the Pension-related deferral accounts as of year-end 2013.
- 11,4 Please provide a schedule that shows how the 2013 pension expense forecast amount (\$38.286 million as per ref (i) of Q 10) is calculated from the rate base amounts.

12 References: i) R-3773-2011, B-0010, GM-1, Doc 6, Annex B ii) D-2012-077, Paragraph 88

Preamble

According to ref (ii):

[88] The Board agrees with S.E. / AQLPA in light of the reality of pension funds today, the regulatory treatment must take into account that returns remain very volatile from one year to the other. Indeed, in a context of establishing just and reasonable rates, given that the actuarial variances are derived from changes in assumptions and depend on market volatility, the Board does not recognize depreciation expense associated with these accounts, that is to say, the net balance of the PTPC. [Our translation]

Questions

- 12.1 Summarize the approach to recovery and treatment of Pension costs by GM in 2013 based on the Decision of the Régie (reference (ii), cited above),
- 12.2 Given the outlook in Annex B of reference (i) (updated per OCs request in Q10.9) comment on what other options for Regulatory Treatment(s) of the Pension Plan costs does GM consider appropriate for 2013 and beyond?

CORPORATE CHARGES AND AFFILIATE TRANSACTIONS FOR 2013

CORPORATE CHARGES

13. References: i) A-0074, (R-3831-2012 Annual Report GM-16, Doc1), Pages 10 and 12 (Tables)
ii) B-0175, GM-12, Doc 16, Page 1

- 13.1 Please provide a Table that provides a breakdown of Corporate Charges for 2013 together with complete explanatory notes.
- 13.2 Please provide a Table or Chart that shows the evolution of the Charges from 1992-2013.
- 13.3 Please provide any/all internal and external Reports that show the Methodology for allocation of Corporate Charges to the Total Enterprise and the share of this total allocation that was/is allocated to GM (at the time of the

report(s)).

- 13.4 Please provide a Copy of the Régie's document(s) governing Affiliate Relationships.
- 13.5 Please provide the latest Copies of all Service Level Agreements between GM and its Affiliates.
- 13.6 Please provide a Flowchart and a Table showing Inbound and Outbound Affiliate transactions/services and the associated costs for 2013.
- 13.7 For the Corporate Charges, reconcile the response in 13.6 to the first part of this request.
- 13.8 Please provide extracts from the last 3 Régie Decisions that reviewed and approved the Allocation of Corporate Charges and the amount(s) allocated to GM for recovery in rates.

ALLOCATION/RECHARGE OF COSTS BETWEEN GM AND AFFILIATES

14 Reference: B-0176, GM-12, Doc17, Page 2, line 6ff and Annex 1

Preamble

"Pour ce faire, la structure visant à 12 cumuler les coûts par projet est donc utilisée. Pour chaque projet, un objet de coûts (ordre de 13 travail, élément d'OTP) est créé dans SAP, auquel se rattache une règle d'imputation qui 14 détermine si le projet est imputable à la daQ ou aux ANR."

- 14.1 Does GM agree that best practices would dictate that the basis of allocation of costs between Affiliates should be *fully allocated costing* based on either time studies or proxy cost allocators using cost causality principles? Please discuss.
- 14.2 Please provide either a document that describes the allocation methodology, or in the alternative provide a detailed explanation including the SAP- based methodology for identifying and allocating costs at a project level. In particular, identify whether the allocations shown in Annex 1 are time-based

or cost-based and in either case confirm that the percentages are based on fully allocated costs.

- 14.3 Please explain the degree of rounding (often nearest 10%) in Annex1 if the estimates are SAP Accounting-based.
- 14.4 If the costs charged to affiliates are not fully allocated, please provide an estimate of the fully allocated costs based on 2013 overhead burden rates.
- 14.5 Please demonstrate using the President and Vice President level as illustration of how the SAP-costs were translated into the percentage allocations shown in Annex 1 page 1.
- 14.6 Please provide a Schedule that uses the percentage for each major category of employees (example line 28) and provides the calculations to produce the compensation recharges to ANR at lines 20 and 26 of Annex 1.
- 14.7 Please explain the charge to DAQ at line 28 column 6.

METHODOLOGY FOR THE DETERMINATION OF AN ASSUMED INTEREST RATE ON A LONG-TERM DEBT OBLIGATION

| 15 | Reference: | i) | B-0150, GM-11, Doc. 7 |
|----|------------|------|---|
| | | ii) | B-0150, GM-11, Doc. 7, Section 2, pp. 6-9 |
| | | iii) | B-0150, GM-11, Doc. 7, p. 3, lines 8-10. |

- 15.1 Please confirm that B-0150 discusses four different debts, including two existing debts, a 3rd hypothetical one, as well as a 4th planned one:
 - a) an existing \$150 M debt, issued on the Canadian public market that is expiring in April 2013 and which is currently allocated to the regulated business natural gas distribution business in Quebec (DAQ);
 - b) an existing \$150 M Series J debt, originally assigned to non-regulated activities, issued in July 2006 and expiring in July 2036, which would be used to replace the \$150 M debt expiring in April 2013 (described in a);

- c) a hypothetical \$150 M debt issued on the Canadian public market in April 2013 and expiring in 2036, which is used to determine the interest rate that should be assigned to the regulated activities for the \$150 M Series J debt (described in b);
- d) a planned US\$150 M debt issued in April 2013 and expiring in 2036, which will be entirely assigned to non-regulated activities.

If not, please explain.

- 15.2 Please confirm that each of the four debts described above is for \$150 M. If not, please explain.
- 15.3 Please confirm that the fourth debt described above is in US\$ and the other three are in Canadian \$. If not, please explain.
- 15.4 Please confirm that B-0150 explains how GM will estimate the cost of issuing a \$150 M debt on the Canadian public market in April 2013 and expiring in 2036. This cost is used to determine the interest rate that should be assigned to the regulated activities for the \$150 M Series J debt (described in b). If not please explain.
- 15.5 Please confirm that GM is proposing to charge regulated activities with the estimated cost of issuing \$150 M debt on the Canadian public market in April 2013 and expiring in 2036; and that any additional costs relating to the Series J debt will be passed on the non-regulated activities. If not, please explain.
- 15.6 As per reference (ii), please confirm that the proposed calculation method will be based on actual conditions of April 2013, as opposed to the estimated (before the fact) data used in reference (ii).
- 15.7 According to reference (iii), the existing \$150 M Series J debt was originally assigned to non-regulated activities (*initialement attribuée aux ANR*).
 - 15.7.1 Please confirm that this debt is <u>currently</u> assigned to the nonregulated activities. If not, please explain.
 - 15.7.2 Please confirm that GM is proposing to assign this \$150 M US Series J debt to the regulated activities as of April 2013. If not, please explain.
- 15.8 Please describe the benefits, if any, to Quebec ratepayers of the additional complexity, transaction costs and regulatory oversight required to implement the proposal described in B-0150.

- 15.9 With respect to its US investments or any other activities, does GM make use of currency/foreign exchange hedges available on the market? Please explain.
- 15.10 Has GM estimated the value of the natural hedge that the proposal described in B-0150 would provide to the non-regulated business?
 - 15.10.1 If yes, please explain and provide any numerical estimates, if available.
 - 15.10.2 If not, please explain why not.
- 15.11 Has GM estimated the cost to obtain a similar hedge on the market for its US investments? Please explain and provide any numerical estimates, if available.
- 15.12 Absent the Régie's approval for the proposal in B-0150, please confirm that GM would replace the \$150 M debt, issued on the Canadian public market that is expiring in April 2013 with another \$150 M debt, issued on the Canadian public market. If not please explain what alternative course of action will be taken.
- 15.13 Absent the Régie's approval for the proposal in B-0150, would GM bear the risk of currency fluctuation in its US business, buy a hedge on the markets, or undertake some other actions? Please explain.
- 15.14 Beyond neutralizing the effect of the proposal in B-0150 on regulated customers, what is Gaz Métro's position on compensating regulated customers for the value of the natural hedge, as well as the additional complexity, transaction costs and regulatory oversight required to implement the proposal. Please elaborate on Gaz Métro's position.

SHARING METHODOLOGY FOR OVER- AND UNDER-EARNING FOR 2013

16 Reference: i) B-0183, GM-12, Doc. 24, Section 1, pp. 3-6

Questions:

16.1 Please identify in detail all areas of operation where the Distributor has some discretion or flexibility and its actions can result in expenses being incurred in the current year or, instead, being deferred to the following year.

- 16.2 Please identify in detail all areas of operation where the Company has some discretion or flexibility and its actions can result in revenues being collected in the current year or, instead, being applied to the following year.
- 16.3 Please provide actual and forecast earnings for the years 2001 to 2012, showing how, had the proposed mechanism been in place at the time, it would have resulted in sharing of over- or under- earnings.

RATE IMPACT AND BILL IMPACTS

17 References: i) B-0196, GM-15, Doc. 2, Section 2.2.1, pp. 11-12

Preamble

According to col (1) of Table 1 in ref (i), p. 12, D1.1 customers (0-10950 m3/year) should be subject to a revenue variation of 7.3% according to the rate allocation. However, GM is proposing to apply a 7.7% variation to the these customers according to col (2). GM maintains that it is applying a "quasi-uniform" variation of 7.8% in order to maintain uniform rates of cross-subsidization at all blocks of D1.

Questions:

- 17.1 Please explain, using numerical examples, how a variance of 0.4% between the rate allocation and the proposed revenues for D1.1 customers in Table 1 will maintain uniform rates of cross-subsidization at all blocks of D1.
- 17.2 Please confirm that variance of 0 between the rate allocation and the proposed revenues for D1.1 customers in Table 1 would maintain uniform rates of cross-subsidization at all blocks of D1. If not, why not.
- 18 References: i) R-3752-2011 Phase 2, B-0191, GM-15, Doc 11.1, Tables 1 and 2, pp. 3-4
 - ii) R-3752-2011 Phase 2, B-0191, GM-15, Doc 11.2, Tables 1, p.3.

Preamble

OC is concerned with quantifying the rate increases and bill impacts. We are therefore asking for updates of tables provided in IRs in the 2012 Rate Case.

Questions:

- 18.1Please update Tables 1 and 2 in ref (i) in order to show the rate impact between the 2012 rate schedule and the proposed rate schedule for 2013 for F,C, T, E, D for each block of D1 (including the sub-blocks of D1.1).
- 18.2 Please update Table 1 in ref (ii) in order to show the bill impact of rate variations proposed for 2013 for certain typical residential and CII customers (*cas types*).

LOW-INCOME ENERGY EFFICIENCY PROGRAMS

19 Reference: i) B-0185, GM-13, Doc. 2, pp. 7-9

- 19.1 Of the 252 annual participants in the Bonification CII program projected for 2013-2015, please provide a breakdown of landlord participants and tenant participants (and any other types of participants).
- 19.2Please provide the energy savings associated with this CII program by type of participant.
- 19.3 Of the 10 annual participants in the Bonification Résidentielle program projected 2013-2015, please provide a breakdown of landlord participants, MFR homeowner participants, and tenant participants (and any other types of participants).
- 19.4Please provide the energy savings associated with this Bonification Résidentielle program by type of participant.
- 19.5 Please confirm that the participants in both the expanded Bonification CII program and the expanded Bonification Résidentielle program include the participants that were previously projected in the R-3790-2012 case concerning the integration of the FEE programs in the PGEE.
- 19.6 Please provide an update concerning progress with marketing efforts for Bonification Résidentielle and Bonification CII programs related to FEE

programs that were integrated in the PGEE.

- 19.7 At the present time, please quantify the number of participants to date in the Bonification Résidentielle and Bonification CII programs related to FEE programs that were integrated in the PGEE and approved by the Régie in 2012.
- 19.8 In the design of the expanded Bonification Résidentielle and Bonification CII programs, to what extent did GM review MFR programs in other jurisdictions to determine best practices? In particular, to what extent did GM consider experience from other jurisdictions in terms of identifying and attracting MFR participants and landlords to such programs, as well as establishing adequate financial aid levels in order to provide the incentive for higher levels of participation? Please explain.
- 19.9_To what extent has GM recently consulted with any landlords (in either the Residential or CII market) during the design of the expanded Bonification Résidentielle and Bonification CII programs to test the landlords' interest and to determine what level of supplementary financial assistance is sufficient? Please explain.
- 19.10 What strategies does GM plan to pursue in order to increase participation in the expanded Bonification Résidentielle and Bonification CII programs? How will these strategies differ from GM's promotion of MFR programs in the PGEÉ?
- 19.11 How does GM plan to market the expanded Bonification Résidentielle and Bonification CII programs? Please explain in detail, including any involvement of the GM sales force.
- 19.12 Please confirm that the same tenant protection described in R-3790-2012 will be available to MFR renters benefitting from the Bonification CII and Bonification Résidentielle program.
- 19.13 To what extent will GM focus its marketing efforts on landlords of buildings with MFR tenants? Please explain.
- 19.14 Please provide an update on GM's efforts to market the Bonification CII and Bonification Résidentielle program to participants given that these programs were already approved in the R-3790-2012 filing for certain FEE programs that were integrated into the PGEE.

- 19.15 In R-3790-2012 (GM-1, Doc. 1, p. 30 lines 10-11), GM indicated that it planned to use an external firm in order to qualify MFR clients in the Bonification Résidentielle and CII programs. Has SCGM selected this external firm? If so, please identify the firm and describe its capabilities to qualify MFR clients.
- 19.16 Will the firm be involved in the identification of MFR program participants (including Residential MFR homeowners, tenants in Residential MFR buildings and landlords of MFR buildings), or only in the qualification of preidentified MFR clients for lower-income eligibility? Please explain.
- 19.17 Please explain the process by which the firm will qualify the MFR clients.
- 19.18 Please describe how the firm will work with SCGM to identify MFR program participants (if applicable) and qualify MFR clients.