



# Ontario Energy Board Commission de l'énergie de l'Ontario

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## DECISION AND ORDER RELATED TO 2022 NATURAL GAS DEMAND SIDE MANAGEMENT ACTIVITIES

**EB-2021-0002**

### **ENBRIDGE GAS INC.**

Application for Multi-Year Natural Gas Demand Side Management  
Plan (2022 to 2027)

**BEFORE:** **Michael Janigan**  
Presiding Commissioner

**Anthony Zlatic**  
Commissioner

**Patrick Moran**  
Commissioner

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**August 26, 2021**

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## 1 INTRODUCTION AND SUMMARY

Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB) for approval of a new natural gas demand side management (DSM) policy framework, effective January 1, 2022 as well as approval of a new multi-year DSM plan, inclusive of budgets, programs and targets from January 1, 2022 to December 31, 2027.

In addition to the general approval of the proposed policy framework and multi-year DSM plan, Enbridge Gas requested the OEB approve its proposed DSM budget by July 30, 2021. Enbridge Gas also requested an interim decision by August 31, 2021 approving its proposed DSM activities in 2022, subject to necessary adjustments on a prospective basis following the OEB issuing its final Decision and Order in this proceeding.

The OEB approved separate six-year DSM plans for Enbridge Gas Distribution Inc. (EGD) and Union Gas Limited (Union) on January 20, 2016 (the 2015-2020 DSM Decision).<sup>1</sup>

Effective January 1, 2019, EGD and Union amalgamated to become Enbridge Gas Inc. Following the amalgamation, Enbridge Gas is maintaining the existing EGD and Union rate zones.

On July 16, 2020, the OEB approved a one-year extension of the 2020 DSM plans for the EGD and Union rate zones.<sup>2</sup>

Enbridge Gas proposed that the 2022 program year act as the starting point, or base year, for the programs, annual budgets, and targets that make up the new multi-year DSM plan. The remainder of the plan, from 2023 to 2027, would then build upon the activities in place in 2022 with the budgets and targets to support those activities being adjusted on an annual basis.

As part of its 2022 program year, Enbridge Gas has proposed to integrate the two legacy utility DSM plans, including programs, scorecards, metrics and budgets throughout the term of new multi-year DSM plan. Enbridge Gas requested the OEB provide interim approval of its 2022 DSM program activities by August 31, 2021 as a final decision from the OEB on this application is not likely until sometime in 2022.

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<sup>1</sup> [EB-2015-0029/0049, Decision and Order, January 20, 2016](#)

<sup>2</sup> EB-2019-0271

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Enbridge Gas has proposed a 2022 program year budget of \$136 million. This represents an increase from the OEB-approved 2021 DSM budget of approximately 3%.<sup>3</sup>

Enbridge Gas stated the importance of program continuity as an essential requirement for a successful, sustained energy conservation market. Enbridge Gas further noted that interim approval of the 2022 DSM activities would allow for customers, project partners and Enbridge Gas to proceed confidently with projects prior to a final decision from the OEB.<sup>4</sup>

Enbridge Gas requested that the OEB make it clear in its interim decision that Enbridge Gas will be able to recover all reasonable costs, expenses and commitments that were incurred and made in undertaking activities in 2022, including expenditures of up to 120 days after an OEB final Decision and Order is received. This is the minimum period that Enbridge Gas estimates will be required to wind down activities not ultimately approved by the OEB.<sup>5</sup>

Considering the need to fully review the Enbridge Gas multi-year DSM proposal, the OEB is of the view that the best path forward is to extend the currently approved 2021 DSM plans for one year. The OEB approves the continuation of the legacy utility 2021 DSM plans for the duration of 2022. The approved budgets for the 2022 DSM programs are \$67,757,376 for the EGD rate zone and \$64,349,541 for the Union rate zones.

The OEB approves the continuation of the performance scorecards as set out in the Appendices of this Decision. The scorecards, metrics and targets are consistent with those approved in the 2015-2020 DSM Decision and modified in the DSM Mid-Term Report.

The OEB approves the continuation of the annual shareholder incentive structure for each of the EGD and Union rate zones. The OEB also approves the continuation of the cost-effectiveness test as modified in the DSM Mid-Term Report.

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<sup>3</sup> The 2021 budget of \$132.1 million was approved as part of EB-2019-0271.

<sup>4</sup> Exhibit B, Tab 1, Schedule 1, p. 15, para. 47

<sup>5</sup> Exhibit B, Tab 1, Schedule 1, p. 16, para. 49

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## 2 PROCESS

Enbridge Gas filed a multi-year natural gas DSM plan application with the OEB on May 3, 2021, under section 36(1) of the *Ontario Energy Board Act, 1998*. Enbridge Gas is seeking approval of a new natural gas DSM policy framework, effective January 1, 2022 as well as approval of a new multi-year DSM plan, inclusive of budgets, programs and targets from January 1, 2022 to December 31, 2027.

In addition to the general approval of the proposed policy framework and multi-year DSM plan, Enbridge Gas requested the OEB approve its proposed DSM budget by July 30, 2021. Enbridge Gas also requested an interim decision by August 31, 2021, approving its proposed DSM activities in 2022, subject to necessary adjustments on a prospective basis arising from the OEB's final Decision and Order in this proceeding.

The OEB issued a [Notice of Hearing](#) on May 19, 2021.

The OEB issued [Procedural Order No. 1](#) on June 21, 2021, which among other things, set out a schedule for submissions related to Enbridge Gas's request for interim approval by August 31, 2021 of its 2022 DSM program year.

The OEB issued [Procedural Order No. 2](#) on June 22, 2021, which denied Enbridge Gas's request for early approval of its proposed 2022 to 2027 DSM budget. The OEB indicated that the proposed DSM plan requires a comprehensive review and that the proposed budget needs to be considered at the same time as the proposed programs and targets to assess reasonableness.

Consistent with Procedural Order No. 1, parties filed submissions related to Enbridge Gas's request for interim approval of its 2022 DSM program year. Enbridge Gas filed a reply submission on July 20, 2021.

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### 3 DECISION

The OEB approves the continuation of Enbridge Gas's 2021 DSM activities into 2022.

The approval provided in this Decision relates only to the 2022 DSM program year. The multi-year DSM term from 2023 through the end of 2027 will be subject to a full review in this proceeding.

The process to assess and consider Enbridge Gas's proposed DSM policy framework and multi-year DSM plan will likely take until the middle of 2022.

While noting Enbridge Gas has proposed to integrate its legacy utility programs as part of its proposed multi-year DSM plan, consistent with direction provided by the OEB in its December 1, 2020 letter, the OEB is mindful that the new program proposals, including new incentive structures, savings targets and scorecard design have not been tested. The current suite of programs, although operating under the legacy utility structure, has proven sufficiently cost-effective, are familiar to customers and provides an orderly transition to the next multi-year DSM term. This will limit market disruption and allow customers the ability to continue to address energy efficiency and energy conservation opportunities to reduce overall natural gas usage and better manage their energy bills while the OEB conducts its review of Enbridge Gas's application.

Approving the continuation of Enbridge Gas's 2021 DSM activities will allow the OEB to conduct a full, comprehensive review of Enbridge Gas's proposed new DSM policy framework, integrated suite of DSM programs, natural gas savings targets and request for approval of approximately \$800 million in ratepayer funding. While the OEB is not making any adjustments to the continuation of the 2021 programs into 2022, it will be reviewing the appropriateness of continuing those activities and proposed new activities for the proposed multi-year DSM term from 2023 through the end of 2027.

The OEB's DSM policy direction in place for the 2015-2021 period will apply to the 2022 program year. This will ensure that there is clarity with respect to the available shareholder incentive, how program performance will be measured and how Enbridge Gas will track and report its actual DSM activity for consideration by the OEB and parties as part of the application process related to the DSM deferral and variance accounts. The OEB will consider Enbridge Gas's proposed DSM framework and any additional policy updates that are necessary and relevant as part of the review of the broader multi-year DSM plan application.

The OEB approves a total 2022 DSM budget of \$132,106,917. This amount is the same as the 2021 DSM budget and should be used to support the continuation of existing 2021 DSM programs throughout 2022.

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The OEB approves the continuation of the OEB-approved 2021 DSM scorecards for 2022 (see 2022 DSM scorecards in the Appendices). Continuing with the current scorecard structure will provide definitive clarity on the targets for 2022. The proposed performance scorecards for 2023 onwards, including natural gas savings and participant targets, metrics, and adjustment factors will undergo a full review as part of this proceeding.

This decision related to the 2022 DSM program year will likely result in the need for some modifications to Enbridge Gas's proposed DSM plan for 2023 onwards. Enbridge Gas requested that the 2022 DSM program year act as the base year for the remainder of the new multi-year term. The OEB does not approve this request. Instead, following the completion of the OEB's review of the application, the 2023 program year will likely be the starting point for the new multi-year DSM plan. The OEB has provided a process below for Enbridge Gas to submit any updates to its pre-filed evidence based on this decision.

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### 3.1 Request for Interim Approval of 2022 DSM Activities

As part of its December 1, 2020, letter directing Enbridge Gas to file a new multi-year DSM plan, the OEB provided various options for Enbridge Gas to consider when assembling its multi-year DSM plan application. Among these options, the OEB indicated that Enbridge Gas may maintain some elements from its 2021 DSM plan or file an entirely separate standalone application for 2022. Ultimately, Enbridge Gas was given the flexibility to prepare its application as it considered best. The OEB did however request that Enbridge Gas indicate by when it required approval of its 2022 DSM plan to ensure program continuity.

Enbridge Gas proposed a full multi-year DSM plan, that was to begin on January 1, 2022, and end on December 31, 2027. Enbridge Gas indicated that, at a minimum, it required interim approval of its proposed 2022 DSM activities by August 31, 2021. This would provide the necessary time to have the new set of programs ready for market by January 1, 2022.

Intervenors and OEB staff were generally supportive of the OEB providing approval for Enbridge Gas to continue offering programs in 2022 while the OEB conducted its review process of Enbridge Gas's application. Most parties agreed that program activities currently in place for 2021 should continue for 2022 to ensure program continuity, limit market disruption and to avoid any gaps in program availability while allowing parties and the OEB to fully consider the new proposals from Enbridge Gas.

Some intervenors and OEB staff argued that the OEB should not provide interim approval for any new programs proposed by Enbridge Gas. They argued that to assess the reasonableness of the new programs, further review and analysis was required.

Some parties, including Environmental Defence, Green Energy Coalition and Pollution Probe suggested options that would allow for program continuity, but require Enbridge Gas to propose changes to revise the design of some programs, increase overall natural gas savings and adjust spending levels.

Other parties, including the Federation of Rental-housing Providers of Ontario, the Industrial Gas Users Association and London Property Management Association suggested that interim approval of 2022 DSM activities only be provided if Enbridge Gas assumed the risk of the proposed programs, and their associated budgets, potentially not being approved by the OEB in its final decision. Most parties shared the same general view that ratepayers should not bear any risk that Enbridge Gas's proposed programs were not approved.

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In its reply submission, Enbridge Gas noted that it did not simply roll forward its 2021 DSM plan into 2022 as it endeavored to respond to direction from the OEB and requests from various stakeholders to integrate the DSM program offerings of the two legacy utilities. In doing so, Enbridge Gas spent considerable time and effort determining the best approach that maintained the positive aspects of the legacy programs as part of an integrated suite of offerings included within its proposed multi-year DSM Plan. Enbridge Gas noted that this integration should bring increased regulatory efficiencies as well as provide a more seamless customer experience.

Enbridge Gas also indicated that two of the programs that parties have suggested are new, the Building Beyond Code and Energy Performance Program are simply enhanced versions that have a material overlap to previously approved programs offered by the legacy utilities. Additionally, Enbridge Gas submitted that although its proposed Low Carbon Transition program is new, it supports the Pan-Canadian Framework and Natural Resources Canada's road map for reduced space and water heating use through next generation technologies. Enbridge Gas submitted that there has been no specific problem identified about its new program offerings. Further, Enbridge Gas argued that the risk of providing interim approval of these programs was low should the OEB be able to provide a final decision early in 2022 as the budgets, targets and incentives assigned to these programs is relatively low. Enbridge Gas submitted that of greater concern would be the lost opportunities associated with not offering these programs, both from a customer's efficiency and conservation perspective as well as a utility learning perspective.

## Findings

The OEB approves the continuation of the existing OEB-approved 2021 DSM programs for 2022. The OEB agrees with parties that it is not appropriate to provide approval for new programs without having reviewed and tested the merits of the proposals.

Therefore, although best efforts have been made by Enbridge Gas to respond to OEB direction regarding filing a comprehensive multi-year DSM plan by May 1, 2020, and integrating its suite of program offerings following the merger of the legacy utilities, the OEB will not approve Enbridge Gas's proposed 2022 new or enhanced programs at this time.

Some parties suggested that Enbridge Gas be required to make immediate revisions to its proposed 2022 DSM plan, either to increase overall spending, increase natural gas savings targets, or both. The OEB does not agree. The budget levels approved for the 2021 DSM plans, which are the same that were in place for 2020, provide a reasonable funding level for the 2022 program year and will allow an orderly transition to the next multi-year DSM term.



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Although Enbridge Gas has indicated that the proposed 2022 DSM activities include combined versions of previously approved legacy utility programs, there is not a complete evidentiary record upon which the OEB can make findings for new proposals. The OEB's adjudication process will allow parties and the OEB to assess the reasonableness of Enbridge Gas's multi-year application. Only at that time can the OEB make findings that may approve new proposals. However, the OEB expects that Enbridge Gas will endeavor to deliver programs as cost-effectively and efficiently as possible.

To ensure that there is continued program availability in 2022 prior to the OEB's final decision, the OEB is of the view that it is reasonable for Enbridge Gas to continue delivery of its current OEB-approved 2021 DSM programs. This will allow customers to continue to make energy efficiency upgrades and address opportunities to conserve energy. The final program results and spending levels associated with the 2022 DSM programs will be subject to a separate OEB adjudicative process to determine the appropriateness of DSM deferral and variance account balances following the OEB's evaluation, measurement, and verification process. All DSM spending will be subject to the OEB's prudence review as part of the process to review and approve the DSM deferral and variance accounts.

### **3.2 2022 DSM Budget**

Enbridge Gas proposed a 2022 DSM budget of \$136 million which would represent an increase of approximately 3% from the OEB-approved 2021 DSM budget. Enbridge Gas proposed that the 2022 DSM budget act as the base year budget for the multi-year plan and that subsequent annual budgets would be increased using a formulaic escalator. Enbridge Gas further requested that the OEB provide clarity that it would be able to recover any reasonable costs incurred during the interim approval period, which could be up to 120 days following the OEB's final decision.

OEB staff indicated that providing interim approval of the 2022 DSM budget would minimize overall rate impacts for customers should a final decision not be available until the middle of 2022. School Energy Coalition noted that inherent in approval of the continuation of DSM programs is the authority to continue to spend ratepayer funds on those programs.

Some intervenors argued that the OEB should direct Enbridge Gas to proceed with delivering its programs in 2022 without any assurance of cost recovery.

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As part of its reply submission, Enbridge Gas also noted that as part of its 2022 Rate Adjustment application filed with the OEB on June 30, 2021,<sup>6</sup> DSM costs in 2022 are proposed to remain consistent with the OEB-approved 2021 DSM budgets of \$67.8 million for the EGD rate zone and \$64.3 million for the Union rate zones. Enbridge Gas noted that the rate order required to recover DSM costs equal to \$132.1 million is expected to be received in the Rate Adjustment proceeding.

## Findings

The OEB approves the continuation of the 2021 DSM budgets for the 2022 program year with no increases, including no increase for inflation. The OEB notes that the 2021 DSM budgets were also rolled forward from the 2020 DSM budgets with no increases. The EGD rate zone shall have a 2022 DSM budget of \$67,757,376 while the Union rate zones shall have a 2022 DSM budget of \$64,349,541. As these amounts are consistent with the amounts included in Enbridge Gas's 2022 Rate Adjustment application, no revisions are required and the rate order to make these amounts effective will be provided through the OEB's decision on the 2022 Rate Adjustment application.

The OEB does not agree with the positions of parties that suggested Enbridge Gas should bear the risk of not being able to recover reasonably incurred costs. It would be unreasonable to expect a regulated entity to proceed with undertaking delivery of a business portfolio that is responsible for administering more than \$130 million of ratepayer funding without certainty of cost recovery for reasonably incurred costs.

Enbridge Gas will continue to have access to the Demand Side Management Variance Account during the 2022 DSM program year. This includes access to the provision to increase spending up to 15% should program performance meet 100% of the scorecard targets on a pre-audit basis.

### 3.3 DSM Framework for 2022

Enbridge Gas proposed a new DSM policy framework to begin on January 1, 2022. The proposed DSM framework relies on the OEB's existing DSM framework and makes proposals that would amend certain sections while introducing some new items. The proposed DSM framework provides policy guidance related to DSM objectives, guiding principles and the central components of a DSM plan, including budgets, targets, shareholder incentive, programs, and evaluation. The final OEB decision on the 2015-2020 DSM plans provided the OEB's direction to the legacy utilities when implementing

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<sup>6</sup> EB-2021-0147

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its DSM programs. This guidance was confirmed and updated as part of the DSM Mid-Term Report.

OEB staff and intervenors that commented on what framework should apply in 2022 were consistent in that the OEB should not provide interim approval of any elements of Enbridge Gas's proposed framework. Rather, the OEB should continue to rely on the OEB's direction related to the 2015-2020 DSM plans until Enbridge Gas's proposed framework has been tested.

In its reply submission, Enbridge Gas noted that its proposed framework includes, in large part, the same concepts and approaches that are contained in the OEB's existing framework. Enbridge Gas indicated that if the OEB was to provide interim approval of its 2022 DSM plan, then it would only be reasonable to also provide interim approval of its proposed framework as the two correspond to one another. However, Enbridge Gas requested that the OEB provide clarity on what framework and performance metrics the 2022 DSM program year should be operated and evaluated under should a final decision not be provided by February 2022.

## Findings

The OEB finds that, consistent with the findings above, Enbridge Gas's 2022 DSM activities will be guided by the OEB direction provided in the OEB's 2015-2020 DSM framework, 2015-2020 DSM Decision and DSM Mid-Term Report. As the OEB has directed the continuation of existing 2021 DSM activities for 2022, and 2021 DSM activities were rolled forward from 2020, continuing to use the OEB direction provided for 2015-2021 DSM term ensures consistency and provides certainty for all stakeholders about which guidance should be followed relative to the 2022 DSM program year.

### 3.4 2022 Performance Scorecards and Targets

Enbridge Gas proposed new performance scorecards, metrics, metric weighting and targets as part of its application. The new scorecards were proposed to be effective at the start of the 2022 DSM program year and be used to assess the success of Enbridge Gas's programs. Performance scorecards for programs in subsequent years of the multi-year DSM plan would be structured in the same manner as the 2022 scorecards, but the targets determined based on an adjustment mechanism that considered prior year performance and current year budget.

Intervenors and OEB staff were consistent in their view that the OEB should not provide interim approval of Enbridge Gas's proposed new scorecards. They noted that the new

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scorecard design, metrics and targets were a departure from the current scorecards and that they require thorough review and consideration before Enbridge Gas proceeds with any program activity based on its proposed scorecards.

As part of its reply submission, Enbridge Gas stressed the need for clarity of the performance scorecards and targets that it should be working towards should a final decision not be provided by February 2022.

### **Findings**

The OEB approves the continuation of the performance scorecards from 2021 into 2022 as set out in the Appendices. The scorecards, metrics and targets are consistent with those approved in the 2015-2020 DSM Decision and modified in the DSM Mid-Term Report. The OEB requires time to fully review and consider the appropriateness of all aspects of the new scorecards, including metrics related to new programs as well as those related to legacy programs.

## 4 ORDER

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Enbridge Gas Inc.'s 2021 DSM Plans for the EGD and Union rate zones are extended for one year, effective January 1, 2022 to December 31, 2022.
2. Enbridge Gas Inc. shall use the performance scorecards provided in the Appendices of this Decision for its 2022 DSM programs.
3. Enbridge Gas Inc. may make updates to its pre-filed evidence related to its 2023-2027 DSM activities, in response to the OEB's Decision on 2022 DSM activities. Any updates to the pre-filed evidence shall be filed with the OEB and sent to all parties by **September 16, 2021**.

**DATED** at Toronto August 26, 2021

**ONTARIO ENERGY BOARD**

*Original Signed By*

Christine E. Long  
Registrar

## **Appendix A**

**EB-2021-0002**

**2022 Natural Gas Demand Side Management Plan Scorecards**

**EGD Rate Zone**

Appendix A – EGD Rate Zone

2022 Natural Gas Demand Side Management Plan Scorecards

EGD Rate Zone - 2022 Resource Acquisition Scorecard		Metric Target			
Programs	Metrics	Lower Band	Target	Upper Band	Weight
Home Energy Conservation Residential Adaptive Thermostats Commercial & Industrial Custom Commercial & Industrial Prescriptive Commercial & Industrial Direct Install Run-it-Right Comprehensive Energy Management (CEM)	Large Volume Customers Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 Large Volume Customers Resource Acquisition actual spend without overheads x 2022 Large Volume Customers Resource Acquisition budget without overheads x 1.02	150% of Target	40%
	Small Volume Customers Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 Small Volume Customers Resource Acquisition actual spend without overheads x 2022 Small Volume Customers Resource Acquisition budget without overheads x 1.02	150% of Target	40%
Home Energy Conservation (HEC)	Residential Deep Savings Participants (Homes)	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	20%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

EGD Rate Zone - 2022 Low Income Scorecard		Metric Target			
Programs	Metrics	Lower Band	Target	Upper Band	Weight
Home Winterproofing	Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	45%
Low-Income Multi-Residential	Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	45%
Low-Income New Construction	Number of Project Applications	75% of Target	2021 metric achievement / 2021 accrued program cost without overheads x 2022 program budget without overheads x 1.02	150% of Target	10%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

<b>EGD Rate Zone - 2022 Market Transformation Scorecard</b>		<b>Metric Target</b>			
<b>Programs</b>	<b>Metrics</b>	<b>Lower Band</b>	<b>Target</b>	<b>Upper Band</b>	<b>Weight</b>
School Energy Competition	Schools	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	10%
Run-it-Right	Participants	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	20%
Comprehensive Energy Management (CEM)	Participants	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	20%
Residential Savings by Design	Builders	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	10%
	Homes Built	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	15%
Commercial Savings by Design	New Developments	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	25%



## **Appendix B**

**EB-2021-0002**

**2022 Natural Gas Demand Side Management Plan Scorecards**

**Union Rate Zones**

Appendix B – Union Rate Zones

2022 Natural Gas Demand Side Management Plan Scorecards

Union Rate Zones - 2022 Resource Acquisition Scorecard		Metric Targets			
Programs	Metrics	Lower Band	Target	Upper Band	Weight
Home Reno Rebate Residential Adaptive Thermostat Commercial & Industrial Custom Commercial & Industrial Prescriptive Commercial & Industrial Direct Install	Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 Resource Acquisition actual spend without overheads x 2022 Resource Acquisition budget without overheads x 1.02	150% of Target	75%
Home Reno Rebate	Home Reno Rebate Participants (Homes)	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	25%

Note: Metric achievement is calculated using verified program savings used for LRAMVA purposes

Union Rate Zones - 2022 Low Income Scorecard		Metric Target			
Programs	Metrics	Lower Band	Target	Upper Band	Weight
Home Weatherization Furnace End-of-Life Aboriginal	Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	60%
Multi-family	Social and Assisted Multi-Family Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	35%
	Market Rate Multi-Family Cumulative Natural Gas Savings (m3)	75% of Target	2021 metric achievement (LRAM natural gas savings) / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.02	150% of Target	5%

Union Rate Zones - 2022 Large Volume Scorecard		Metric Target			
Programs	Metrics	Lower Band	Target	Upper Band	Weight
Large Volume Program for T2/R100 Customers	Cumulative Natural Gas Savings (m3)	75% of Target	Three-year rolling average (2019-2021) Rate T2/Rate 100 cost effectiveness x 2022 budget without overheads x 1.02	150% of Target	100%

\*Cost effectiveness = Final verified metric achievement used for LRAMVA purposes divided by final actual program spend for that year

<b>Union Rate Zones - 2022 Market Transformation Scorecard</b>		<b>Metric Target</b>			
<b>Programs</b>	<b>Metrics</b>	<b>Lower Band</b>	<b>Target</b>	<b>Upper Band</b>	<b>Weight</b>
Optimum Home	Homes Built (>15% above OBC 2017) by Participating Builders	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	50%
Commercial New Construction	New Developments Enrolled by Participating Builders	75% of Target	2021 metric achievement / 2021 actual program spend without overheads x 2022 program budget without overheads x 1.1	150% of Target	50%

<b>Union Rate Zones - 2022 Performance-Based Scorecard</b>		<b>Metric Target</b>			
<b>Programs</b>	<b>Metrics</b>	<b>Lower Band</b>	<b>Target</b>	<b>Upper Band</b>	<b>Weight</b>
RunSmart	Participants	75% of Target	2021 metric achievement / 2021 accrued program cost without overheads x 2022 program budget without overheads x 1.1	150% of Target	10%
	Savings (%)	75% of Target	2021 metric achievement / 2021 accrued program cost without overheads x 2022 program budget without overheads x 1.1	150% of Target	40%
Strategic Energy Management (SEM)	Savings (%)	75% of Target	2021 metric achievement / 2021 accrued program cost without overheads x 2022 program budget without overheads x 1.1	150% of Target	50%