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Request IR-1:

Reference: ENSC Evidence, page 15, lines 5-9. "Dunsky recommends, and ENSC concurs, that the UARB consider adopting a trigger mechanism whereby, if reported results fall below 75 percent of the original plan's forecast savings up to that point, ENSC would be required to file a corrective action plan designed to achieve the total approved energy savings target, within the approved multi-year budget."

a) If ENSC is required to file a corrective action plan, does ENSC agree that intervenors should be provided the opportunity to submit comments to the UARB regarding such a plan?

b) If ENSC is required to file a corrective action plan, is it ENSC's intention that this plan would need to be formally approved by the UARB before implementation? If not, why not?

Response IR-1:

a) Yes.

b) ENSC understands that it has the responsibility to deliver the UARB approved program energy savings, within budget, of a multi-year DSM plan. In the event of an energy savings shortfall (below 75%), the intent of the corrective action plan is to provide the UARB and stakeholders with an in-depth analysis along with the corrective actions that ENSC would take to overcome such a shortfall. The corrective action plan would be included in ENSC's annual progress report filed with the UARB, subject to comments filed by stakeholders, and further direction that the UARB may provide.

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Request IR-2:

Reference: ENSC Evidence, Figure 4.1, page 18.

ENSC is proposing investment levels of $42.3 million in 2013, $43.1 million in 2014, and $45.1 million in 2015 (currency expressed in 2013 dollars).

a) **Please confirm that, if approved, these investment levels would represent the maximum spending by ENSC for each year, and that there would be no carry-over of unspent amounts from year-to-year under the three year proposal.**

b) **Please also confirm that ENSC would not be entitled to any recovery for annual spending above the approved amounts, absent a subsequent approval by the UARB.**

Response IR-2:

a) ENSC is committed to achieving the program energy savings target within the approved investment level for each year of the multi-year period. Circumstances in the market may require ENSC's annual investment to vary up or down from the proposed amounts in order to achieve the targeted energy savings. ENSC would require recovery on all prudent spending in pursuit of achieving its targets as approved by the UARB.

b) Please refer to part a.

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Request IR-3:

Reference: ENSC Evidence, Pages 33-34, Lines 30-2: "ENSC is requesting approval from the UARB that the responsibility for filing the annual adjustment by October 1st of each year be transferred from NSPI to ENSC."

Given that this would be the first year that ENSC would be filing the annual adjustment, would ENSC have any objection to informally providing its proposed filing to stakeholders a few weeks prior to the formal filing with the UARB, in order to provide stakeholders with an opportunity to submit preliminary comments for ENSC's consideration?

Response IR-3:

Given that this would be the first year that ENSC would be filing the DSM rate rider adjustment, ENSC cannot say with certainty that its proposed filing could be completed several weeks in advance of the filing date. To the extent that early completion is possible, ENSC has no objections to informally providing it to stakeholders.

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Request IR-4:

Reference: ENSC Evidence, Appendix C, Section 5: "Preliminary Program Cost Allocation for 2013 – 2015"

Please confirm that ENSC is aware that under the terms of the Load Retention Tariff and Pricing Mechanism approved for Bowater Mersey, the DSM Cost Recovery Charge is applicable to that Tariff for the 2012 rate year only.

Response IR-4:

Confirmed.