

IN THE MATTER OF the Ontario Energy Board Act,  
1998, R.O. 1998, c. 15 Schedule B of the Energy  
Competition Act, 1998;

AND IN THE MATTER OF an application by Toronto  
Hydro Electric System Ltd. for recovery of amounts  
related to Conservation and Demand Management  
Activities

### Interrogatories of the School Energy Coalition

1. Ref. Manager's Summary, p. 14:

With respect to THESL's application to recover an LRAM for programmes undertaken by the Ontario Power Authority, the evidence states "In calculating the LRAM claim for 2007 OPA programs, THESL has relied on savings data obtained directly from the OPA, as contained in Exhibit 3. This savings data matches the values used by THESL in calculating the OPA program LRAM component. In the case of some specific programs where THESL felt it had a more accurate estimate of realized savings...THESL used values lower than those reported by the OPA for the calculation of its LRAM claim" [p. 14]

Questions:

- (a) Confirm that the above statement means that (for programs other than those where THESL has stated it has used its own savings data) THESL has used program assumptions used by the OPA for free ridership and participation rates.
  - (b) Please provide details of programs where THESL has used program assumptions or savings data that differ from the OPA.
  - (c) Please provide a reconciliation showing what the LRAM related to OPA programs would be assuming OPA assumptions were used for all programs.
2. With respect to VECC IR #1, please also provide the same information for the general service programs, where applicable.