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May 21, 2009

VIA E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, ON
M4P 1E4

Dear Ms. Walli

**Re: EB-2008-0401 Toronto Hydro Electric System Limited
Recovery of Amounts Related to Conservation and Demand
Management Activities in the City of Toronto
Notice of Intervention and Request for Costs - Vulnerable Energy
Consumers Coalition (VECC)**

Please find enclosed the interrogatories of VECC in the above noted proceeding.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC
Encl.

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

AND IN THE MATTER OF an application for
recovery of amounts related to
Conservation and Demand Management activities.

**TORONTO HYDRO-ELECTRIC SYSTEM LIMITED APPLICATION FOR
APPROVAL AND RECOVERY OF AMOUNTS RELATED TO CDM IN 2009
RATES**

Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question #1

References: Managers Summary Page 1 and Tables 2-4

Preamble:

The requested LRAM relief is composed of the 2007 calendar year savings resulting from:

1. Third Tranche CDM programs implemented in 2005 and 2006;
 2. New Third Tranche CDM programs implemented in 2007;
 3. Ontario Power Authority ("OPA") CDM programs implemented in 2007.
- a. Provide schedules for each of the above components *for the residential sector* listing the complete list of input assumptions for all prescriptive measures implemented in 2007, including carry-over of third tranche 2005 and 2006
- i. Estimated gross and net *unit* savings kwh and kw
 - ii. Free-ridership
 - iii. Measure Life
 - iv. Source(s) of estimates (specific reference page# etc)
 - v. Year(s) Estimates applied to
- b. For the Residential Sector provide a schedule showing the details of calculation of 2007 net and gross savings underpinning each component of the 2007 LRAM claim as shown in Tables 2-4 on pages 6-8. Reconcile to the Tables.

- c. For the 2005/6 residential programs list the details of the mass market measures (including TAPs) and indicate what persistence factor(s) were applied to 2007. If no persistence factors were applied then provide a detailed explanation.
- d. For the Enbridge TAPs program list all input assumptions (unless provided in response to part a)). Provide a comparison of unit savings including water savings, to EGDI's 2007 Audit report.

VECC Question # 2

References: Managers Summary Tables 2 and 3 and Page 14: Exhibit 1 Preamble

The SSM and LRAM claim for 2007 Third Tranche programs was reviewed and audited by the SeeLine Group Ltd., which found that THESL's approach and calculation are accurate and consistent with the Board-approved decision in EB-2007- the CDM Guidelines.

- a) Exhibit 1 Section 3.3.1 indicates
 "According to the OEB guidelines⁷, LDCs must evaluate CDM programs using the best available information at the time of evaluation. In the case of an SSM, this means assumptions available in 2006. For LRAM purposes however, the OEB has directed that any updated input assumptions made available throughout 2007 be used".

Explain why the OPA assumptions for the 2007 residential programs are not the "best available".

- b) Why should not the OPA 2007 assumptions also apply to calculation of the 2007 LRAM and SSM for 3rd tranche MARR measures installed in 2005 and 2006.
- c) For the 2005-2007 measures including (but not limited to) the following, provide a table that compares the input assumptions and savings
 1. the OEB CDM TRC Guide (dated October 2006) Section 5
 2. The OPA 2007 EKC Spring/Summer/Fall calculator
 3. The OPA Measures and Input Assumptions List -

www.powerauthority.on.ca/Page.asp?PageID=122&ContentID=6701&SiteNodeID=404.

- i. Residential Load Control
- ii. CFL Screw in 13/14 W and 15w
- iii. SLEDs
- iv. Dimmer Switches

- d) Recalculate the residential 2007 LRAM for 3rd tranche measures installed in 2005 and 2006 using 2007 OPA input assumptions. Compare to as filed.
- e) Recalculate the residential 2007 SSM related to measures installed in 2005 and 2006 using 2007 OPA input assumptions. Compare to as filed.
- f) Recalculate the carrying charges in the format of Table 9. Compare to as filed.
- g) Recalculate the Residential Rate rider for 2005/2006 in the same format as Table 1.

VECC Question # 3

References: Managers Summary Table 4 and Page 14 and Exhibit 3

Preamble:

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.

- a) Provide the Complete list of residential sector input assumptions that underpin THESL's report to the OPA on 2007 measures and Programs.
- b) Provide details of the calculation of the residential sector savings estimates provided to OPA. Indicate and reconcile any differences relative to the input assumptions listed in part a). Compare to the results reported in the table in Section 3 Page 4 of the Report.
- c) Provide a copy of the TABIA Report on the SLED Exchange Program.

VECC Question # 4

References: Managers Summary Table 8

- a) Provide a Schedule that shows the details of the "as filed" calculation of the Residential Sector SSM for each of 2005/2006 carry forward measures/ programs and 2007 3rd tranche MARR funded Measures/Programs.

- b) List all key assumptions (measure life, savings, discount rate etc).
- c) Compare the key input assumptions to those used for OPA 2007 programs (including EKC Campaigns).
- d) Where there are significant differences between OPA assumptions and those used by THESL to calculate the SSM claim, recalculate the SSM claim using OPA assumptions.
- e) Recalculate the Residential SSM portion of the rate rider using 2007 OPA assumptions as requested on part d).