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December 11, 2009

**VIA MAIL and E-MAIL**

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

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**EB-2009-0259**  
**Burlington Hydro Inc – 2010 Electricity Distribution Rate Application**

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**BURLINGTON HYDRO INC. - 2010 RATE APPLICATION**

**(EB-2009-0259)**

**VECC'S INTERROGATORIES (ROUND #2)**

***(Note: The question numbering continues from Round #1)***

**Question #39**

**Reference:** VECC #7

- a) Please provide a schedule that for the years 2008, 2009 and 2010 breaks down the capital contributions received by USOA.

**Question #40**

**Reference:** VECC #9 d) and VECC #25 d)

- a) Based on the response to VECC #9 d), please update the 2010 rate base to reflect the delay in the wholesale metering spending from 2009 to 2010.

**Question #41**

**Reference:** VECC #10

- a) With respect to part (c), please provide a schedule that sets out:
- The total number of poles previously identified replacement as of the end of 2006, 2007, 2008 and 2009 (forecast).
  - The number of poles replaced during the year.
  - The number of (additional) poles identified as requiring replacement during the year.
- b) Have Burlington's practices with how it identifies poles requiring replacement changed since 2005? If so, please describe when and how the practices changed.
- c) With respect to part (i), please provide the annual spending for connections as requested in the original interrogatory.

#### **Question #42**

**Reference:** VECC #25 c)

- a) Please provide a schedule setting out Burlington's property taxes for 2007, 2008, 2009 and 2010 (forecast). Please explain any year over year changes that exceed 5%.

#### **Question #43**

**Reference:** VECC #19

- a) With respect to part (i), was there any bad debt expense incurred in 2006 – 2008 with respect to large customers? If so, what were the annual amounts?

#### **Question #44**

**Reference:** VECC #21

- a) With respect to the Billing Services Agreement:
- What is current (2009) amount that BESI is paying Burlington Hydro per bill and what was forecast 2010 amount (per bill) used for purposes of the 2010 Rate Application?
  - Please provide any analysis that Burlington Hydro has performed to determine either: (i) the current market value of its billing services or (ii) the current cost of providing billing services to BESI.

#### **Question #45**

**Reference:** VECC ##25 b) and Exhibit 6, Tab 1

- a) Please confirm that, in Exhibit 6, Tab 1, Schedule 1, the anticipated revenues from the SSS Admin Fee are included in the \$26,479,520 Distribution Revenues (at current rates) and not captured in the \$1,582,902 value for Other Operating Revenue (Net).
- b) What is the forecast revenue from SSS Admin Fees for 2010?

#### **Question #46**

**Reference:** VECC #28

- a) Please re-do the response to part (a) with the SSS Admin Fee excluded from the Monthly Fixed Rate.
- b) Please re-do the 2010 Cost Allocation Study with the following changes:
- Increase the Miscellaneous Revenues to be allocated by the SSS Admin Fee revenues.
  - Decrease the Total Distribution Revenue required by the amount of the 2010 SSS Admin Fee revenues.
  - Allocate the revised Total Distribution Revenues to customer classes using the class shared of distribution revenues determined from the response to part (a) above.

#### **Question #47**

**Reference:** Responses to Board Staff and VECC IRs Regarding LRAM/SSM Claim

**Preamble:** References are made throughout the IR Responses to Tables e.g. Table 14. VECC is having difficulty matching text references to Tables.

- a) Provide a list of Tables referenced in the Board Staff and VECC IR responses, including references to the Indeco Report, together with the title/and subject matter of each table.
- b) Check Table references in the VECC IR responses and correct these as necessary

#### **Question #48**

**References:** VECC # 32 and Board Staff #29

**Preamble:** The Response indicates:  
“In many cases, the (OPA) Measures and Assumptions List does not address the measures implemented by Burlington Hydro. In particular, many Burlington Hydro programs installed types of lighting fixtures that are not found on the OPA list”.

- a) For each of the Third Tranche and post Third Tranche CDM programs for the Residential and GS<50 kw classes, provide a list of measures that are **not** on the OPA list and for each measure provide the alternative set of assumptions and source(s) used by BHI/Indeco.
- b) For each measure identify the number of participants by year and the kWh savings.
- c) Map/reconcile the result of the response to part b) to the Tables Provided in response to VECC IR #32 part a)

#### **Question #49**

**References:** VECC IR 33 b) and Board Staff #29

**Preamble** The response indicates:  
 “For the OPA funded programs and the 2006, 2007 and 2008 Residential Coupon (EKC) programs, the OPA has conducted a program specific evaluation, and calculated results for those specific programs, and these became available after the most current Measures and Assumptions List. Those evaluation results are more appropriate than would be calculations based on the default assumptions in the Measures and Assumptions List, and so we have used those results, provided by the OPA.”

- a) Provide a copy of the data supplied to the OPA and the OPA reports and associated correspondence that supports BHIs OPA Component of the LRAM and SSM claims

#### **Question #50**

**References:** VECC IR 33 b) and Board Staff I#29

**Preamble:** Both responses state:  
 “As stated in the e-mail sent to Burlington Hydro with these results, the OPA states: “All results presented herein are considered final” and “The results provided in the enclosed report are in accordance with current OPA practices and policies for reporting progress against the provincial conservation goals.”

- a) Provide a copy of the “enclosed” report.

- b) Map/reconcile the result in the OPA report to the revised as filed LRAM claim for OPA 2005-2008 programs

### **Question #51**

**References:** VECC IR #33 c

**Preamble:** The response states:

c) The independent third party review used the “Best Available” input assumptions, in accordance with Board Guidelines. Those assumptions are the following:

- Program-specific inputs, provided by both BHI and its professional lighting expert to gauge what specific function each measure would have and for how long they would last in that capacity. For instance, annual operating times are from on-site inspections, and discussions with users of the equipment. Custom values for equipment cost were provided directly from pricing estimates provided by the lighting expert. All custom inputs were examined for their suitability in comparison to default prescriptive values.

- a) Provide a list of Program specific assumptions referred to and compare to the corresponding OPA Measures and Assumptions list values.
- b) Provide a Comparison Table of the Program- specific Assumptions and the participants and kWh savings compared to the OPA Measures and Assumptions list.
- c) Show how these fit into the final third tranche LRAM claim for the relevant sectors

### **Question #52**

**References:** VECC #33, Page 3 of 4, Footnote #5

**Preamble:** The main response states:

“The input assumptions in the independent third party review for the 13W CFL giveaway run through the 2007 Post Third Tranche Residential Coupon program used inputs for a 15W CFL from the 2008 OEB Measures and Assumptions list prorated to a 13W CFL. This measure has now been updated to use the energy savings

assumptions for a 15W CFL found in the 2008/2009 OPA Measures and Assumptions list when calculating its total energy savings and related LRAM claim.”

- a) Explain why for third tranche and post third tranche programs only the 13/15 W CFL giveaway input assumption was updated to reflect the OPA Measures and Assumptions List, rather than all screw-in CFLs.
- b) Does a 13/15 w CFL installed under third tranche programs save more or less than one installed under OPA Programs? Provide/compare the input assumptions for each?
- c) Is BHI/Indeco aware the OPA changed its input Assumptions for CFLs starting with the 2007 EKC campaigns? Provide and compare the OPA assumptions for 13/15 W CFLs for 2006 and for 2007-08 and provide a breakdown of the number of 13/15 w CFLs and associated kwh claimed by BHI in each of 2006, 2007 and 2008.
- d) Provide copies of material referenced in footnote 5. Indicate the affiliation and position of the individuals named and their relationship to BHI

### **Question #53**

**Reference:** VECC #33 d)

**Preamble:** The response states:

d) We received TRC calculators from the 2006 OPA for the Spring and Fall EKC program, along with spreadsheets of program results, but these were not used in our LRAM/SSM application. We are unclear as to whether or not it is these that VECC is requesting. We do not have any other 2007 OPA Every Kilowatt Counts Program Calculator. Copies of the 2006 TRC calculators provided by the OPA are attached.

- a) Provide copies of the OPA TRC calculators noted in the response

### **Question #54**

**Reference:** VECC #33 f)

**Preamble:** The response states:

f) The LRAM claim for 2005, 2006 and 2007 **third tranche** programs is based on the input assumptions in Table 14. As indicated in the Table, and as discussed above, the LRAM calculation for CFLs and programmable thermostats are *not* based on using the OEB Guide values or the OPA EKC Calculator.

- a) Identify and provide a copy of Table 14 - The Indeco report does not have a Table 14

### **Question #55**

**Reference:** VECC #33 g)

**Preamble:** The response states:

g) For CFLs and PTs, the 2008 claim for **OPA programs** is based on the program-specific inputs listed in the 2006-2008 OPA Conservation Results for Burlington Hydro provided by the OPA. In the application as filed, preliminary results from the OPA were used. In the amended tables that are in this document, the final results which only became available on 10 November are used. These differ from the OPA 2008/2009 Measures and Assumptions list in some cases. As indicated in the response to Question #33c, the program-specific inputs provided by the 2006-2008 OPA Conservation Results for Burlington Hydro are a more appropriate basis for estimating the savings and LRAM attributed to all applicable measures (including CFLs and PTs). Low Flow Showerheads are not part of BHI's 2008 claim for OPA programs.

- a) Provide copies of the 2006-2008 OPA Conservation Results for Burlington Hydro.
- b) Map the results to the as filed 2006-2008 LRAM claim from OPA programs.
- c) Map/compare to the LRAM Claim using OPA Measures and assumptions List as requested in VECC IR#35 part d Table 3.

### **Question #56**

**Reference:** VECC #34 b)

**Preamble:** Using input assumptions reflected in the 2008/ 2009 OPA



Measures and Assumptions list instead of the program-specific inputs provided in the 2006-2008 OPA Conservation Results for Burlington Hydro would decrease the estimated energy savings for CFLs, PTs and seasonal lights by 44%. However, as stated in the response to Question #33b, the program-specific inputs provided in the 2006-2008 OPA Conservation Results for Burlington Hydro are a more appropriate basis for estimating energy savings of OPA funded programs, and the Residential Coupon program. Inputs for the 2005 Public education and outreach program have been updated to be consistent with the 2008/2009 OPA Measures and Assumptions.

- a) Clarify which programs in Table 1 Column 1 are Third Tranche,, OPA and Post third tranche.
- b) Provide a modified version of Table 1 that has additional columns showing the Program specific OPA assumptions and results that BHI is relying on and provide extensive foot notes showing the sources of these assumptions.
- c) Comment on the apparent triple standard for input assumptions that BHI is proposing to apply to its CDM portfolio as opposed to the OPA 2008/2009 Measures and assumptions list.
  - i. Third Tranche and post third tranche programs- OPA 2008/2009 Measures list
  - ii. Third Tranche and post third tranche programs- BHI Independent lighting expert
  - iii. OPA programs -Program specific assumptions as per the OPA reports on BHI savings

### **Question #57**

**Reference:** VECC #35 a)

- a) With respect to PTs Explain the source of assumptions in the “as filed” column in Table 1.
- b) Explain why the mapping to the OPA measures and Assumptions List as noted in notes 2-5 provides different (higher) kWh savings).
- c) Did Indeco verify that the PT s were installed in the heating/ cooling applications corresponding to the OPA Measures and Assumptions list? Provide details of the verification.

- d) Provide a table showing the #PTs installed in each type of application.

**Question #58**

**Reference:** VECC #36

**Preamble:** “As a result of the availability of OPA’s final program results for 2008 and adjustments made in light of both the Board and VECC interrogatory questions, values for energy savings and both LRAM and SSM claims differ from those presented in the application as filed. The adjustments made are in Table 30.”

- a) Clarify if Table 30 is the same as Table 1 in the response to VECC #36.
- b) If not provide a copy of the referenced Table.