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December 14, 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-2009-0238
Norfolk Power Distribution 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.

Norfolk Power Distribution Inc. (NPDI)

LRAM/SSM Claim: EB-2009-0238

**Information Requests of the
Vulnerable Energy Consumers Coalition (VECC)**

Question #1

Reference: Exhibit 1, Page 3

Preamble: NPDI states:

“The total LRAM amount sought for recovery is \$168,596, of which \$28,659 is related to Third Tranche programs, \$130,336 is a result of OPA programs and \$9,600 is carrying charges. A summary of CDM load impacts by program and customer class is listed in Appendix 1.”

- a) Does NPDI agree that the OEB Guidelines Section 7.5 indicate that CDM savings and LRAM claims should be based on the “Best Available” input assumptions at the time that the LRAM claim was prepared?
- b) Does NPDI agree that in the case estimation of 2005 -2008 KWh savings, this means using the best available 2007 and 2008 input assumptions, which were and are those of the OPA Measures and Input Assumptions List? If not explain why not.
- c) Indicate whether or not the LRAM claim for 2005, 2006, 2007 and 2008 related to third tranche programs is based on using the OEB TRC Guide values for CFLs, showerheads and PTs, or the OPA 2007 EKC Calculator and/or OPA 2008/2009 Measures values.
- d) Indicate whether or not the EnerSpectrum independent review of 2009 lost revenue associated with 2005-2008 OPA Programs used the latest OPA input assumptions for residential mass market measures and Affordable/Social housing (notably CFLs, SLEDs and PTs) as demonstrated in the following OPA documents:
 - i. OPA 2007 EKC Program Calculator
 - ii. OPA 2008/2009 Measures and Assumptions list (now adopted by the OEB)

- e) With respect to the SSM Claim, does NPDI agree that the Board's Guidelines indicate that Assumptions used from the beginning of any year will be those assumptions in existence in the immediately prior year? For example, if any input assumptions change in 2007, those changes should apply for SSM purposes from the beginning of 2008 onwards until changed again.

Question #2

Reference: Exhibit 1, Appendix 1

- a) Provide a schedule based on Appendix 1 for the *Residential Sector and GS<50 kw* CDM programs that breaks down by measure the components of the **as filed** LRAM claim and the total kWh and kW for each year 2005-2008 (including showing separately carry forward of prior years' savings). Note: the input assumptions (unit kwh savings and #units) should be listed for each measure and foot noted as to source.
- i. Third tranche Programs
 - ii. OPA Funded programs
- b) Provide a Schedule that provides the details of the calculations of the SSM claim for the Residential and GS<50 kW classes, including again for each measure the unit input assumptions
- c) Provide a reconciliation of the Residential and GS<50 kW Sectors kWh savings and LRAM and SSM amounts in the Schedules in the responses to parts a and b with those shown in Exhibit 1, Tables 1- 3
- d) Provide a schedule that shows the derivation of the Residential and GS<50kw Rate riders based on the kWh savings breakdown and associated carrying costs provided in response to parts a)-c) of this IR. Reconcile this with the Table at Exhibit 1 Appendix 2 and Exhibit 1, Tables1-3

Question #3

References: Exhibit 1, Appendix 4 - Enerspectrum Report, Page 5

Preamble: EnerSpectrum states:

“For all programs/projects, the load impacts were derived based on the most recently published OPA Assumptions and Measures list

were used in LRAM calculations in accordance with OEB’s direction letter, Conservation and Demand Management (“CDM”) Input Assumptions Board File No.: EB-2008-0352, January 27, 2009. This is also consistent with the precedent in the OEB Decision Order EB-2009-0192 October 8, 2009 (Horizon Utilities) that directed LRAM calculations use the most current available input assumptions for all CDM programs. Load impacts from third tranche programs were augmented by OPA results (Attachment A)”.

a) Reconcile the above with the statement at Page 3:

“The OEB issued GUIDELINES FOR ELECTRICITY DISTRIBUTOR CONSERVATION AND DEMAND MANAGEMENT, EB-2008-0037 were applied to prepare this LRAM/SSM application”.

b) Confirm for each of the Residential CDM Programs for each year, which source(s) of input assumptions underpin the claimed kWh and kW savings. *(Note entries below are illustrative only)*. Indicate for OPA- Funded Programs whether the 2007 Every Kilowatt Counts (EKC) Calculator or the OPA Measures for 2008 was used.

LRAM Claim	Third tranche Incl. 2006 Carryover	Rate funded	OPA Funded	Verification(s)
2006	OEB Guide	OEB Guide	OPA EKC Calculator	EnerSpectrum
2006	OEB Guide	OEB Guide	OPA EKC Calculator	EnerSpectrum
2007	OEB Guide	OEB Guide	OPA EKC Calculator	EnerSpectrum
2008	OPA Measures	OPA Measures	OPA Measures	EnerSpectrum
SSM Claim				
2006	OEB Guide	OEB Guide	OPA EKC Calculator	EnerSpectrum
2006	OEB Guide	OEB Guide	OPA EKC Calculator	EnerSpectrum
2007	OEB Guide	OEB Guide	OPA EKC	EnerSpectrum

			Calculator	
2008	OPA Measures		OPA Measures	EnerSpectrum

- c) Confirm that the attachment (untitled) to the EnerSpectrum report is a list of the input assumptions used to prepare the residential and GS<50Kw kWh and kW load and corresponds to the Table of Contents of the Enerspectrum Report Exhibit 1, Appendix 4, Attachment A,.
- d) **If not** provide the detailed input assumptions for all mass market measures including CFLs, PTs and SLEDs.
- a. # units
 - b. kWh and kW savings
 - c. Free ridership
 - d. Cost of measure
 - e. Measure life
 - f. Source(s)/authority(ies) for assumption(s)
- e) If EnerSpectrum has used input assumptions for mass market measures that are different than the OPA 2008/2009 Measures and Assumptions List, provide a revised version of the LRAM calculation schedules provided in response to VECC IR #2 parts a and b) adjusted to reflect the OPA 2008/2009 measures and input assumptions list and free-ridership rates specified by the OPA for CFLs and PTs and SLEDs.
- f) Provide revised calculation of LRAM carrying charges.
- g) Provide revision to the LRAM rate rider calculation for the Residential and GS<50 kW classes

Question #4

Reference: Exhibit 1, Appendix 4,-EnerSpectrum Report - Table of Contents

Preamble: The Table of Contents of the Enerspectrum Report lists the following Attachments and Appendices:

Attachments

- a. Attachment A – CDM Load Impacts by Class and Program
- b. Attachment B - Foregone Revenue by Class and Program

- c. Attachment C - SSM Amounts by Class and Program
- d. Attachment D - LRAM and SSM Totals by Class
- Appendices – LRAM and SSM Supporting Material
- f. Supporting Documentation for Third Tranche Programs
- g. OPA Sponsored Programs 2006 and 2007
- h. Guidelines for Electricity Distributor CDM EB-2008-0037
- i. NPDI OEB CDM Annual Reports

- a) Provide a copy of the listed material except Items h and i (which are available on the OEB Web site).

Question #5

Reference: Exhibit 1, Appendix 4,-EnerSpectrum Report - Recommendation #4

Preamble: “4. Monitor OPA information and reports pursuant to its email of July 14, 2009 to all LDC conservation officers and program managers. The OPA stated that “2008 results are still preliminary and are subject to change” If final program results for NPDI subsequently change for any OPA program, updates or adjustments may need to be considered for the LRAM and SSM amounts calculated in this report.”

- a) Provide a copy of the July 14, 2009 Letter and Results pertaining to Norfolk Power.
- b) Provide an update on the current status and comment how this affects NPDI's LRAM/SSM claim.