

# PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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December 22, 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-2009-0270

North Bay Hydro Distribution Limited – 2010 Electricity Distribution Rate

**Application** 

Please find enclosed the interrogatories of VECC.

Thank you.

Yours truly,

Michael Buonaguro Counsel for VECC Encl.

# NORTH BAY HYDRO DISTRIBUTION LTD.

#### **2010 RATE APPLICATION**

#### EB-2009-0270

## **VECC'S INTERROGATORIES (ROUND #1)**

#### GENERAL

#### Question #1

**Reference:** Exhibit 1, page 36

- a) Please provide a description of all of North Bay Hydro's supply points and indicates which ones are fully embedded within Hydro One Networks Distribution.
- b) How many Hydro One delivery points are embedded in North Bay's distribution system and what rate schedules are currently applied to each?

## Question #2

**Reference:** Exhibit 1, page 45

a) To what does North Bay attribute the large increase in call volume in 2009?

#### Question #3

**Reference:** Appendix 1-H, 2008 Audited Financial Statements

- a) With respect to pages 15 and 25, please provide a copy of the North Bay Hydro Service note. What is the outstanding balance owing as of December 31, 2009 and is any repayment scheduled for 2010?
- b) With respect to page 24, please outline the types of construction activity undertaken by North Bay Hydro for the City in 2009. Are the types of activities performed expected to change for 2010 and, if so, how?

#### RATE BASE

## **Question #4**

**Reference:** Exhibit 2, page 9

a) Please provide an update regarding the status of the Pinewood project. Were phases 1-4 converted by December 1, 2009 as planned?

#### Question #5

**Reference:** Exhibit 2, page 16

- a) Please provide a summary of 2007, 2008, 2009 and 2010 capital spending broken down by the same categories as used for the table on page 16.
- b) Please confirm that the capital spending set out here is the gross spending, prior to any allowance for capital contributions.
- c) With respect to lines 11-12, does the 2010 capital spending include any expenditures for the system improvements, expansion or connection related to renewable generation projects? If so, please identify the expenditures.

## **Question #6**

**Reference:** Exhibit 2, pages 10 and 59

a) Page 10 states that the cost of smart meters is not included in the revenue requirement. However, page 59 indicates that smart meter spending is part of the capital spending for 2010 that is incorporated into rate base. Please reconcile.

## **Question #7**

**Reference:** Exhibit 2, pages 15-17

a) Please provide a schedule that sets out the annual spending (both gross and net contributions) for 2007-2010 on Primary Services, Secondary Services and Subdivisions. Please also indicate the number of new connections for each year associated with each.

**Reference:** Exhibit 2, page 144

- a) What is the source of the \$0.06072 / kWh value used for the Cost of Power?
- b) Are any of North Bay's distribution customers registered as Market Participants and billed directly for commodity costs by the IESO?
- c) If the response to part (b) is yes, what is their forecast use for 2010 and has it been excluded from the calculation of the commodity cost used to determine the working capital allowance?
- d) Please confirm that a material portion of North Bay's sales are to non-RPP customers (per Exhibit 9, page 16). If the \$0.06072 value used for the commodity cost is based on the RPP price, please undertake the following:
  - Using the same source, estimate the commodity cost for non-RPP customers
  - Estimate an average commodity cost for all sales based on the weighted average of the RPP and non-RPP forecast costs.
  - Re-estimate the Total Commodity cost for 2010.
- e) What is the basis for the Jan Apr 2010 and May Dec 2010 transmission rates used in Table 2-23?

## **Question #9**

**Reference:** i) Exhibit 2, Appendix 2-A

- a) With respect to page 8, what actions has North Bay taken and/or is planning in response to the recommendations that it undertake a condition asset survey of the old vintage lines and adopt a pole testing program?
- b) With respect to Table 2.11, what is the comparable level of capital spending that North Bay is proposing for 2010 for each category (please include cross references to where in Exhibit 2 the values can be found)?

## **LOAD FORECAST & OPERATING REVENUE**

#### Question #10

**Reference:** Exhibit 3, page 3

- a) Please provide a schedule setting out the rates and volumes by customer class supporting the 2010 test year revenues reported here.
- b) Please clarify whether the rates used in part (a) included:
  - Smart Meter charges
  - LV charges
  - Discounts for transformer ownership where applicable.
- c) Please reconcile the 2010 revenues (both Other Operating Revenue and Distribution Revenue {at current rates}) reported here with the values in Exhibit 6, page 3.

#### Question #11

**Reference:** Exhibit 3, pages 8-18

- a) In its EB-2007-0680 Report (page 33) the Board directed Toronto Hydro to work with other parties to understand differences in load forecast methodologies employed. Has North Bay had any discussions with Toronto Hydro regarding changes it may be implementing in its load forecast methodology? If yes, what was the outcome and how are they reflected in North Bay's current approach?
- b) Is North Bay aware of the fact that for its 2010 Rate Application (EB-2009-0139), Toronto Hydro has changed its load forecasting methodology to one that uses class specific models to forecast sales on a class specific basis? If yes, please comment as to why the Toronto data supports such analysis while (as discussed on pages 8-9) North Bay's data does not.
- c) What other regression models (using alternative explanatory variables) were tested? Please provide a description of each and a summary of the results similar to that shown on page 15.
- d) What was the basis/source for the Population forecast used?
- e) Which 2009 Ontario Economic Outlook was used and what were the projected GDP growth rates for 2009 and 2010?

- f) With respect to the table on page 17 (Table 6), please calculate the predicted "weather normal" sales for 1999-2009 by using the "weather normal variables" as opposed to actual weather HDD and CDD values in the model.
- g) Why has the 10-year weather normal average been used (page 17)?
- h) With respect to pages 17-18, please provide schedules detailing the calculation of the 2.5 GWh and 7.6 GWh savings attributed to CDM in 2009 and 2010 respectively. In the response please provide details on the individual programs contributing to the assumed savings in terms of the number of participants, free ridership and unit savings for each measure.
- i) What was North Bay's average loss factor for the 1999-2008 period used to develop its forecast model?

**Reference:** Exhibit 3, pages 19-25

- a) Please confirm whether the actual and forecast of customer/connection counts shown in Tables 3-10 and 3-12 are mid-year values or year-end values.
- b) What is the most recent actual customer count for each class and on what month of 2009 are they based?
- c) Please confirm that the calculation of the geometric mean annual growth rate in Table 3-14 really only considers the average use values for 1999 and 2008. If this is not the case, please explain more fully how the value is calculated.
- d) Please provide the Hydro One information relied on in order to determine the weather sensitivity by rate class (page 22).
- e) Given that residential uses include lighting, cooking and refrigeration, why is it reasonable to assume that the Residential class is 100% weather sensitive (per page 22)?
- f) Please provide a schedule setting the average weather normalized use per customer for each class based on the data provided by Hydro One Networks for North Bay's 2007 Cost Allocation filing and indicate the year the data is based on.
- g) Please apply the same methodology as used by North Bay to weather normalize 2010 usage and determine the weather normalized use by customer class for 2008 using the predicted total weather normalized

purchases as determined in Question 11, part (f) and the actual non-weather normalized used by class for 2008. Please provide a schedule that sets out the results in terms of total weather normalized use by customer class and per customer weather normalized use by customer class for 2008.

h) Please re-do Table 3-18 assuming that the Residential and GS<50 classes are 50% weather sensitive. Note: The purpose of this question is to test the sensitivity of the results to the assumptions regarding class weather sensitivity.

#### **Question #13**

**Reference:** Exhibit 3, page 26

- a) Please explain the reduction in the Affiliate Administration Fee revenue in 2010 as compared to 2008 and 2009.
- b) Is the reduction in Interest and Dividend Income (Investments and Bank Deposits) in 2010 solely due to lower interest rates or are there other factors involved? If so, please describe.
- c) Please provide a schedule that sets out the SSS Admin Fee revenues for the years 2007-2010.

## **OPERATING COSTS**

#### **Question #14**

**Reference:** Exhibit 4, page 8

a) Please provide the inflation rate forecast from the Ontario Economic Outlook used as the reference for North Bay's GDP forecast (per Exhibit 3, page 14).

#### Question #15

**Reference:** Exhibit 4, page 24-25

a) Do the Smart Grid and FIT/MFIT spending reported here represent North Bay's Green Energy Plan as it is required to file under the GEGEA? Alternatively, is the spending (particularly that associated with Smart Grid) aimed at supporting North Bay's development of a Green Energy Plan?

- b) Please outline the specific planned activities associated with the \$40,000 Smart Grid spending on Planning Requirements in 2010.
- c) Please reconcile the statement on page 25 that smart meter deployment will be completed in early 2010 with that at Exhibit 2, page 10 which has a 2011 completion date.
- d) How did North Bay determine that the Real Time Operating Pilot-Industrial and Residential should be pursued at this time?
- e) What is the basis for the \$45,000 cost attributed to the FIT/MFIT programs?

**Reference:** Exhibit 4, page 42

- a) Please breakdown the impact of "Labour" as a cost driver and show each of the following items separately: i) annual wage escalation, ii) changes in staff complement, and iii) changes due to level of capital activity.
- b) Please explain why the increased spending on Tree Trimming initiated in 2009 carries on in 2010.
- c) The table suggests that increased spending on Preventative Maintenance is almost \$130,000 over 2008 levels in 2010. Please provide a brief summary of the activities involved and their associated costs.
- d) The table suggests that increased spending on Training in 2010 will be \$100,000 higher than in 2008. Please outline the types of training being undertaken and the number of staff involved.

#### Question #17

**Reference:** Exhibit 4, pages 50-51

- a) What is the basis for North Bay's estimate of \$10,000 for intervenor costs?
- b) Why is North Bay proposing to amortize its forecast IFRS transition costs over four years as opposed to recording them in a deferral account per the Board's EB-2008-0408 Report (page 27) issued July 2009?

**Reference:** Exhibit 4, page 53

- a) What low income bill assistance initiatives does North Bay have in place for 2009? What was the cost of these 2009 initiatives?
- b) Absent the OEB's LEAP, what are North Bay's plans for 2010?

## Question #19

**Reference:** Exhibit 4, page 57

a) Please explain the significant increase in overtime costs forecast for 2010 over 2009.

## **Question #20**

**Reference:** Exhibit 4, page 59

- a) Please confirm that the numbers set out in Table 4-16 are the number of actual employees for each year.
- b) Please provide a separate schedule that sets out the number of approved fulltime positions as of December 31<sup>st</sup> of each year. If there are any approved part-time positions, please note them separately.

#### Question #21

**Reference:** Exhibit 4, page 62

a) Please reconcile the employee number reported in Tables 4-16 and 4-17 for 2010 with the staff level requirements identified in Appendix A-2, Exhibits 4.1 and 4.2.

#### **Question #22**

**Reference:** Exhibit 4, page 70

 a) What is the basis for the charges North Bay applies to Retailers? Do the charges to Retailers cover North Bay's costs (Note – In responding please address both incremental costs and average embedded costs, including allocation of overheads?

## **Question #23**

**Reference:** Exhibit 4, page 79

a) Please confirm that none of North Bay's depreciation expense is recovered through overhead burdens charged to OM&A or capital programs.

#### Question #24

**Reference:** Exhibit 4, page 80

a) Do the tax calculations for 2010 reflect the May 2009 budget changes that, effective July 1, 2010, eliminate the small business deduction surtax? If not, please provide an updated tax calculation.

## **COST OF CAPITAL**

#### Question #25

**Reference:** Exhibit 5, Appendix 5-A

- a) If North Bay Hydro wanted to pay off the promissory note with the City, are there any impediments to North Bay Hydro borrowing from a third party such as a commercial bank? For example, would it require the "guarantee" or "permission" of its shareholders to undertake such borrowing?
- b) If the response to part (b) is yes, is there any reason to expect these impediments would prevent it from undertaking 3<sup>rd</sup> party borrowing? For example, if a "guarantee" was required from the shareholders, is there any reason to expect such a guarantee could not/would not be provided?

#### **REVENUE DEFICIENCY**

#### Question #26

**Reference:** i) Exhibit 6, page 3

a) Based on the responses to the first round of interrogatories from all parties
please prepare a schedule that sets out all the adjustments/revisions that

North Bay has acknowledged as being required to the currently requested 2010 revenue requirement and the impact of each. For each revision, please provide a cross reference to the relevant interrogatory response.

# **RATE DESIGN**

## Question #27

Reference: Exhibit 8, page 2

a) Please reconcile the proposed revenue by customer class and the total 2010 revenue reported here with the expected values reported in Table 8-16.

## **Question #28**

**Reference:** Exhibit 8, page 3

- a) Please provide a schedule that sets out the derivation of the fixed and variable revenue by customer class reported in Table 8-4, including the volumes and rates used for each class.
- b) Please provide a schedule that sets out the current (2009) LV adder by rate class.

#### Question #29

**Reference:** Exhibit 8, Appendix 8-C

- a) The proposed 2010 rates for some classes (e.g. Residential, GS<50 and USL) do not include a specific line item for the "Low Voltage Cost Rate Rider". Please explain why.
- b) If necessary, please revise the bill impact calculations set out inn Appendix 8-A. What is the basis for the Hydro One Networks' rates used on page 9?

#### LRAM/SSM

#### Question #30

**References:** Exhibit 10, pages 10 and 13 - Table 3;

Exhibit 10, Appendix B, page 7 Table 2

**Preamble:** The Application states:

"The total LRAM amount for the period 2005 to 2008 is \$321,318 calculated as the sum of the products of the CDM related load reductions and the corresponding variable rates by class. The total after-tax SSM amount, calculated in accordance with the Guidelines is \$124,447. The carrying charges as per section 3.3 total \$17,237."

- a) Provide a schedule for the Residential Sector and GS<50 kW CDM programs that breaks down by measure the components of the as fled LRAM claim and the total kWh and kW for each year 2005-2009 (including showing separately carry forward of prior years' savings)
  - i. Third tranche Programs
  - ii. OPA Funded programs
  - iii. Other e.g. Post third tranche Rate funded programs Include for each measure the number of participants and the kWh saved (gross and net) and free ridership assumptions.
- b) Provide a Schedule that provides the details of the calculation of the SSM claim for the Residential and GS<50 kw classes. Reconcile to Exhibit 10 Table 6.
- c) Provide a reconciliation of the Residential and GS<50 kW Sectors kWh savings and LRAM amounts in the Schedules in the responses to parts a and b with those shown in Exhibit 10, page 16, Table 4.
- d) Based on Exhibit 10, Table 5, provide the as filed Carrying Cost Calculation/Schedule for the Residential and GS<50kW classes LRAM and (Separately) SSM claim.
- e) Provide a schedule that shows the derivation of the Residential and GS<50kW Rate Riders based on the kWh savings breakdown and carrying costs provided in response to parts a)-d) of this IR. Reconcile this with Exhibit 10, Table 7.
- f) Update Exhibit 10, Table 8 as required to show the as filed bill impacts for the Residential and GS<50 kW classes</li>

**Reference:** Exhibit 10, page 4/5

**Preamble**: The Application states:

"On March 28, 2008 the Board issued a document under the name of Guidelines for Electricity Distributor Conservation and Demand Management EB-2008-0037 (the "Guidelines"). The Guidelines replace the policies and guidelines previously issued by the Board in respect of CDM activities by electricity distributors as articulated in the following documents:

- the Framework Report
- the Total Resource Cost Guide issued in September 2005; and
- the portions of the "Filing Requirements for Transmission and Distribution Applications" that pertain to CDM-related applications"
- a) Does NBHDL agree that the OEB Guidelines Section 7.5 indicate that savings and LRAM claims should be based on the "Best Available" input assumptions at the time that the LRAM claim was prepared?
- b) Is NBHDL aware that on January 29, 2009, The Board issued a letter to all distributors that inter- alia adopted the OPA 2008/2009 Measures and Input Assumptions as the main source of input assumptions for LRAM/SSM claims.
- c) Does NBHDL agree that in the case of 3<sup>rd</sup> tranche and other rate funded programs, the estimation of 2005 -2008 kWh savings, means using the best available input assumptions, which are those of the OPA 2008/2009 Measures and Input Assumptions List? If not explain why not.<sup>1</sup>
- d) Confirm whether the independent review of 2009 lost revenue associated with 2005 -2008 Third Tranche and post-Third Tranche Program savings used the latest OPA Measures and Assumptions input assumptions for residential mass market measures and Affordable/Social housing (notably CFLs, Low Flow Showerheads, SLEDs and PTs) as demonstrated in the following OPA documents:
  - i. OPA 2007 EKC Program Calculator and/or
  - ii. OPA 2008/2009 Measures and Assumptions list (now adopted by the OEB)

<sup>&</sup>lt;sup>1</sup> See Board Decision EB-2009-0158 EB-2009-0192 Horizon Utilities

- e) Provide details of the adjustments that the independent review made to the 2005-2008 input values used in the NBHDL Annual reports, in particular any adjustments to the above measures.
- f) Provide a Copy of the 2006 and 2007 OPA Every Kilowatt Counts Program Calculators.
- g) Confirm whether NBHDL reported to the OPA on the 2006 and 2007 EKC campaigns using Mass Market measures assumptions (particularly CFLs, SLEDs and PTs) specified in the OPA 2006 and 2007 EKC Program Calculators
- h) Confirm whether the 2006-2007 LRAM claim for OPA programs is based on the OPA 2008 Measures and Input assumptions for CFLs, Low Flow Showerheads, SLEDs and PTs.or the 2006 and 2007 EKC calculators. If not explain clearly in detail the basis of this portion of the claim.
- i) With respect to the SSM Claim, does NBHDL 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.

**References:** Exhibit 10, page 22 and Appendix A and C:

Exhibit 10, Appendix B - Bob Mason and Associates Report

**Preamble:** The Application states:

"As per section 3.2.2 of the Guideline completed "Input Assumptions" are included in Appendix 10-C. The templates included in the 2008 Annual Report are duplicated with some changes and new ones developed for the years 2005 through 2007. Each of the input assumption is a Custom Project thus the free ridership is 30%. NBHDL utilized the inputs and assumptions provided by the Board for all measures including proxies. The remainder are Custom Projects which normally include proxies as part of the justification."

a) Provide a Table in the format below that shows for each of the <u>Residential</u> and <u>GS<50kW Programs</u> for each year, which source(s) of input assumptions underpin the claimed kWh and kW savings. (Note entries below are

<u>illustrative only</u>). Indicate for OPA- Funded Programs whether the 2007 Every Kilowatt Counts (EKC) Calculator or the OPA Measures and Assumptions List for 2008 was used.

LRAM	Third tranche	Other	OPA Funded	Verification(s)
Claim	Incl. 2006 Carryover	Rate funded		
2005	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2006	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2007	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2008	OPA Measures	OPA Measures	OPA Measures	Bob Mason & Associates
SSM Claim				
2006	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2006	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2007	OEB Guide	OEB Guide	OPA EKC Calculator	Bob Mason & Associates
2008	OPA Measures	OEB Guide	OPA Measures	Bob Mason & Associates

- b) Based on the templates in Appendix A and Appendix C Provide a summary by measure **by year** of the input assumptions used to prepare the <u>Residential and GS<50kW</u> kWh and kW load impacts and associated LRAM and SSM claims. In particular provide the detailed input assumptions for all mass market measures including CFLs, showerheads, pipe wrap aerators, SLEDs and PTs.
  - i. kWh and kW savings
  - ii. Free ridership
  - iii. Cost of measure
  - iv. Measure life
  - v. Source(s)/authority(ies) for assumption(s)
- c) Provide a Copy of the Bob Mason and Associates Final Report.

Reference: Exhibit 10 Appendices A, B and C

a) Confirm/correct/complete the following Input Assumptions and kWh savings Comparison Table (based on Exhibit 10, Tables 2 and 3 and Appendices A, B and C in the format below for Residential Mass Market measures and Social Housing. Include any missing programs related to CFLs, Showerheads, Aerators, Pipe wrap, PTs and Seasonal Lights: NOTE VALUES ARE ILLUSTRATIVE ONLY -USE ACTUAL DATA

Program	Efficient Measure	Participants As filed	As Filed unit kw savings assumption	As filed Free Ridership	Net Kwh Per Filed LRAM Claim	OPA 2007 EKC Calc or 2008 Measures List	Free Ridership	Adjusted Net kwh OPA 2008 Measures List
2005								
Residential 3 <sup>rd</sup> Tranche								
Water Heater	CFIs 13/15w	1320	106.7	10%		43	30%	
tune up								
	Tank Wrap	448						
	Aerators	416						
	Showerheads	315						
	Pipe Wraps	587						
Residential 3 <sup>rd</sup>								
Tranche TOTAL 2005 kwh								
2006								
Residential								
Third Tranche	CFIs 13/15w		106.7	10%		43	30%	
OPA EKC Spring	E Star CFI 15w		104	10%		43	30%	
	PTs		216	10%		159	10%	
OPA EKC Fall	E Star CFI 15w		104	10%		43	30%	
	PTs		216	10%		55	54%	
OPA EKC Fall	SLED Xmas Lights		45	5%		43	30%	
OTHER	CFLs							
GS<50kw								
Third Tranche Social Housing	CFIs 13/15w		106.7	10%		43	30%	
OPA Affordable/Social Housing	CFIs 13/15w		106.7	10%		43	30%	
Residential 3 <sup>rd</sup> Tranche TOTAL 2006 kwh GS<50kw 3 <sup>rd</sup>								
Tranche TOTALkwh								
OPA Programs TOTAL2006 kwh								
2007								
Third Tranche	13/15 watt CFL		109.0	10%		43	30%	

EKC 2007	E Star CFI 15w		43	30%		43	30%	
	E Star CFL 20w+		62	22%		43	30%	
Cool Savings	PTs		55	54%		55	64%	
OTHER	CFLs							
Residential 3 <sup>rd</sup>								
Tranche								
TOTAL 2007 kwh								
GS<50kw								
Third Tranche Social Housing	CFIs 13/15w		106.7	10%		43	30%	
OPA	CFIs 13/15w		106.7	10%		43	30%	
Affordable/Social Housing								
3 <sup>rd</sup> tranche								
GS<50kw TOTAL 2007 kwh								
OPA Programs TOTAL2007 kwh								
2008								
Residential								
Third Tranche	CFIs 13/15w		106.7	10%		43	30%	
Third Tranche	CFIs 13/15w							
Social Housing								
OTHER	CFLs							
Residential 3 <sup>rd</sup>								
Tranche TOTAL 2008 kwh								
3 <sup>rd</sup> tranche								
GS<50kw TOTAL								
2008 kwh TOTAL								
Residential 3 <sup>rd</sup>								
Tranche								
CUMULATIVE								
KWH SAVINGS								
TOTAL GS<50kw								
3 <sup>rd</sup> Tranche								
CUMULATIVE KWH SAVINGS								
TOTAL								
Residential OPA								
CUMULATIVE								
KWH SAVINGS				1				
TOTAL GS<50kw OPA								
CUMULATIVE								
KWH SAVINGS								
	1	1		1	1			

- b) Provide a revised version of the schedules for third tranche and other rate funded CDM provided in response to VECC IR #30 parts a) and b) adjusted to reflect the OPA 2008/2009 measures and input assumptions list for CFLs and PTs provided in part a) of this IR.
- c) Adjust the as filed Carrying costs to reflect the revised LRAM amounts resulting from the answer to part b.
- d) Provide a Summary table showing the Third trance and OPA KWh Load Impacts and LRAM amounts for the as filed and revised claim based on the response to parts a-c of this IR

**Reference**: Exhibit 10, pages 16-20, Tables 4, 5 and 7

a) Provide the revised kWh, LRAM/ Rate rider calculations using the complete set of updated 2008/2009 OPA assumptions from the 2008/2009 Measures and Assumptions List for the Third Tranche and Post third tranche Residential and GS<50 kW Sector LRAM claim.</p>

b) Provide Revised Bill impacts using the complete set of updated OPA assumptions from the 2008/2009 Measures List for the Residential Sector LRAM claim.

## Question #35

**Reference:** Exhibit 10, page 10, Section 1.6

**Preamble:** The Application states

"The 2006-2008 OPA Conservation Results for NBHDL distributed by the OPA in July 2009 is the source for LRAM recovery for 2006 and 2007. The energy quantities were "final" for 2006 and 2007, but "Preliminary" for 2008. NBHDL has ignored the "Preliminary" results for 2008 but will include them in future LRAM filings. The NBHDL results were residential for the following programs: Every Kilowatt Counts, Cool Savings Rebate, Secondary Fridge Retirement, Great Refrigerator Roundup, Affordable Housing and Social Housing. The gross kWh savings for 2006 are 2,140,857 and for 2007 1,621,442. These results only pertain to LRAM recovery and are shown in Table 3 of section 2.3."

- a) Provide a copy (or Summary) of the Residential Sector/Mass market (and If applicable Social Housing Sector) Report(s) that NBHDL provided to OPA, including the detailed breakdown of measures, unit savings, participants and other assumptions.
- b) Provide any correspondence and Attachments from OPA confirming its acceptance of the Reports(s).
- c) Provide any correspondence from OPA regarding the 2008 OPA Program results.