

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

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November 22, 2010

VIA E-MAIL/RESS

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-2010-0143 Wasaga Distribution Inc, 2011 IRM Adjustment Interrogatories of Vulnerable Energy Consumers Coalition (VECC)

Please find enclosed VECC's interrogatories regarding the above Application.

Yours truly,

Original signed

Michael Buonaguro Counsel for VECC

Encl. Cc. J Tackaberry CGA. Manager Finance & Admin Services WDI <u>itackaberry@wasgadist.ca</u>

EB-2010-0143 Wasaga Distribution Inc 2011 IRM Adjustment -VECC IRs

LRAM SSM

VECC IR# 1

References: Appendix A Burman Report Page 4 and Appendix C

Preamble: For SSM, a distributor may recover 5% of the net benefits (TRC) created by CDM portfolio investments. As set out in the CDM Guidelines, program net benefits are determined by the present value of the avoided electricity costs over the technology's/program's life minus the present value of program costs. All results are net of free ridership. Incentive payments identified by Wasaga Distribution are excluded from these calculations. For all programs/projects, the OEB Total Resource Cost Guide, Section 5, Assumptions and Measures List September 8, 2005 were used in TRC calculations in accordance with OEB's direction letter, Conservation and Demand Management ("CDM") Input Assumptions Board File No.: EB-2008-0352, January 27, 2009.

 a) Confirm that the current CDM Guidelines and Policy Letter as referenced above specify that SSM

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....

- b) When (year and date) did the OPA change its Input assumptions (unit savings and free ridership) for CFLs under the Every Kilowatt Counts Campaigns?
- c) Provide a copy of the SeeLine EKC calculators before and after the change Confirm /Show how the EKC assumptions compare to the latest OPA Mass Market and CI Measures and Input Assumptions.
- d) Provide a copy of the spreadsheet showing the SSM calculation as filed. Reconcile to Attachment C.
- Provide a calculation of the 3rd tranche SSM using the OPA EKC input assumptions for CFLs from January (2007?) following the change in input assumptions. Provide a revised version of Attachment C

VECC IR# 2

References: Appendix Burman Report Page 5 and Appendix Attachments A and E

Preamble: For all programs/projects, 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 and consistent with recent Decision and Order EB-2009-0192 for Horizon Utilities Corporation that directed LRAM calculations use the most current available input assumptions for all CDM programs.

a) For LRAM the Guidelines and Policy Letter of January 27, 2009 Specify that *LRAM*

The input assumptions used for the calculation of LRAM should be the best available at the time of the third party assessment referred to in section 7.5. For example, if any input assumptions change in 2007, those changes should apply for LRAM purposes from the beginning of 2007 onwards until changed again....

- b) Confirm the Input assumptions for the following 3rd tranche CDM programs
 - Lighten your Electricity Bill CFL Giveaway –# units and unit kwh savings, lifetime and free ridership for <u>each year 2005-2009</u>.
 - SLEDs 5w–# units and unit kwh savings, lifetime and free ridership for <u>each year</u> <u>2005-2009</u>.
 Reconcile both CFLs and SLEDs to net 60,415 total kwh and 6.4 kw peak and to Attachment E
 - Project Porchlight –# units and unit kwh savings, lifetime and free ridership for each year 2008-2009.
 Reconcile to Porchlight CFLs 252,720 total kwh and 5.85 kw peak and to Attachment E
- c) Explain if/why the free-ridership assumption for CFLs is maintained at 10%.
- d) If the lifetime for CFLs is less than the 4 years for SSM purposes, explain why free ridership should be increased and/or a persistence factor applied.

VECC IR# 3

References: i) Appendix A Burman Report Attachment D ii) Sheet J2.6 LRAM/SSM) Page 6 (Table)

 a) Based on the response to Questions 1-2 provide a calculation of the revised LRAM/SSM schedules for 3rd tranche programs (including Carrying charges) and recalculate the rate riders

VECC IR# 4

References: Appendix Burman Report Page 5 and Attachment B

Preamble: OPA sponsored programs also represent lost revenue through their successful implementation and are included in LRAM calculations.

- a) Provide details of the OPA EKC campaigns from 2006-2009 that add to the data shown in Attachment B- Residential lines 21 and 27 Every Kilowatt counts–
 - i. # units
 - ii. unit and total kwh savings,
 - iii. operating hours,

iv. lifetime and v. free ridership for <u>each year 2006-2009</u>

b) Reconcile to the revenue for each year and the Total Revenue.