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Ontario Energy Board
27th Floor
2300 Yonge Street
Toronto, ON
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December 9, 2010

Dear Ms. Walli,

RE: EB-2010-0067
2011 Electricity Distribution Rate Application for Burlington Hydro Inc.
Responses to Interrogatories

Please find attached the responses to interrogatories related to the 2011 IRM3 Electricity Distribution Rate Application from Burlington Hydro Inc ("BHI"), requesting new distribution rates effective May 1, 2011.

BHI has included two paper copies and one CD with all electronic files. BHI has also filed through the Board's web portal at www.err.oeb.gov.on.ca.

I can be reached at 905-332-2258 should anything further be required.

Yours truly,

original signed by

Joe Saunders
Director, Regulatory Compliance and Asset Management



Burlington Hydro Inc.
Response to Interrogatory from Board Staff
Question 1

Question:

Ref: Tax Sharing Model – B1.1 ReBased Bill Det & Rates

- a) Please explain why rates in columns D, E and F are not consistent with rates from Sheet “E1.1 Rate Reb Base Dist Rts Gen” of the 2011 IRM3 Rate Generator.
- b) If Burlington Hydro is of the view that the data included in the application is more appropriate to use, please explain why. If not, please re-file the referenced sheet with the correct rates and staff will make the necessary adjustment to the Tax Sharing model.

Response:

- a) Burlington Hydro inadvertently used the base rates prior to adjustments for cost allocation.
- b) Sheet B1.1 from the Tax Sharing Model has been updated and is attached to this response.



Name of LDC: Burlington Hydro Inc.
File Number: IRM3
Effective Date: May 1, 2011
Version : 1.0

Rate Class and Re-Based Billing Determinants & Rates

Last COS Re-based Year

2010

Last COS OEB Application Number

EB-2009-0259

Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B	Re-based Billed kW C	Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential	Customer	kWh	58,643	555,923,716		12.10	0.0165	
GSLT50	General Service Less Than 50 kW	Customer	kWh	5,028	183,112,615		25.14	0.0135	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	1,030	950,876,174	2,448,411	71.66		2.8286
USL	Unmetered Scattered Load	Connection	kWh	602	3,918,008		10.18	0.0176	
SL	Street Lighting	Connection	kW	14,673	9,421,002	26,120	0.60		4.3624
NA	Rate Class 6	NA	NA						
NA	Rate Class 7	NA	NA						
NA	Rate Class 8	NA	NA						
NA	Rate Class 9	NA	NA						
NA	Rate Class 10	NA	NA						
NA	Rate Class 11	NA	NA						
NA	Rate Class 12	NA	NA						
NA	Rate Class 13	NA	NA						
NA	Rate Class 14	NA	NA						
NA	Rate Class 15	NA	NA						
NA	Rate Class 16	NA	NA						
NA	Rate Class 17	NA	NA						
NA	Rate Class 18	NA	NA						
NA	Rate Class 19	NA	NA						
NA	Rate Class 20	NA	NA						
NA	Rate Class 21	NA	NA						
NA	Rate Class 22	NA	NA						
NA	Rate Class 23	NA	NA						
NA	Rate Class 24	NA	NA						
NA	Rate Class 25	NA	NA						

Burlington Hydro Inc.
Response to Interrogatory from Board Staff
Question 2

Question:

Ref: IndEco Third Party Report, Page 2

IndEco notes that the LRAM claim reviewed in the third party review document and applied for by BHI is for lost revenues that resulted from third tranche and 2006-8 OPA programs between January 1, 2009 and April 30, 2010.

- a) Please confirm that BHI has not included the lost revenues applied for in this application into its load forecast when new rates were last set.

Response:

- a) BHI has not included the lost revenues applied for in this application into its load forecast when new rates were last set.

Burlington Hydro Inc.
Response to Interrogatory from Board Staff
Question 3

Question:

Ref: IndEco Third Party Report, Page 2

IndEco notes that the LRAM claim reviewed in the third party review document and applied for by BHI is in part from 2009 OPA programs between January 1, 2009 and December 31, 2010, the results of which have been provided on a preliminary basis and that they will be updated when final program results become available. In the Board's Guidelines for Electricity Distributor Conservation and Demand Management issued on March 28, 1008, it states at section 5.3 that when applying for LRAM, a distributor should ensure that sufficient time has passed to ensure that the information needed to support the application is available.

- a) When does BHI expect to receive the final results for 2009 OPA program that ran between January 1, 2009 and December 31, 2010?
- b) Please provide the rationale for including preliminary program results in BHI's LRAM claim.
- c) Please describe the process for updating the information with the final 2009 OPA program results BHI receives from the OPA.
- d) Please provide a revised LRAM claim with the preliminary 2009 program results removed.

Response:

- a) BHI received the final results for 2009 OPA programs that ran between January 1, 2009 and December 31, 2009 in an email sent by James Yue (OPA) on December 1, 2010. An electronic version of this file has been included in this filing package with file name "Burlington_BoardStaffIR3_2006-2009FinalOPACDMResults_20101209.xls". The updated LRAM results as received from the OPA, are appended. The updated LRAM claim is provided in response c below.
- b) When the LRAM claim was filed on October 1, 2010 as part of BHI's 2011 3rd Generation IRM Electricity Distribution Rate Application, it appeared that the final 2009 OPA results would be available in ample time to update the LRAM claim. Furthermore, including preliminary information on 2009 OPA programs would produce a preliminary LRAM claim much closer to the final LRAM claim than would excluding 2009 OPA program results altogether. We also expected the changes between preliminary and final results to be relatively minor and easily integrated into an updated claim.

It was considered more beneficial to all parties involved to include 2009 OPA program results in this LRAM claim as opposed to including them in a future LRAM claim. For customers, rate increases are more moderate if LRAM is more quickly recovered. A timelier LRAM claim is fairer to customers – particularly those entering or leaving the service area – since it more closely ties rate impacts of conservation activities to those activities. For the utility it helps with cash flow, and overall financial situation since the carrying charges paid by the Board do not fully reflect the cost of carrying those funds, and it helps the utility to address these issues while they are timely and the staff responsible are available to answer any questions that arise. For the regulator it is also advantageous to deal with these matters expeditiously rather than drag them out over an extended time frame for the same reasons.

- c) In light of the fact that the final 2009 OPA program data are now available, BHI has updated the LRAM claim to reflect this new information.

The tables below show the original LRAM claim and the LRAM claim calculated using the final 2009 OPA program data, and the rate riders based on the revised LRAM claim.

Rate class	LRAM claim as originally filed	LRAM claim with final 2009 OPA program results
Residential	\$240,011	\$247,026
GS < 50kW	\$145,155	\$137,681
GS 50-4,999kW	\$22,624	\$28,744
Total	\$407,790	\$413,451

Rate class	Amounts with final 2009 OPA program results (2009 & 2010) LRAM \$	Billing units (2010)		Rate Riders LRAM \$/unit (kWh or kW)	Two Year Rate Rider Total \$/unit (kWh or kW)	Three Year Rate Rider Total \$/unit (kWh or kW)	Number of Years to Use 3	Proposed Rate Rider Total \$/unit (kWh or kW)	Existing Rate Rider Total \$/unit (kWh or kW)	Combined Rate Rider Total \$/unit (kWh or kW)
Residential	\$247,026	555,523,716	kWh	0.0004	0.0002	0.0001		0.0001	0.0003	0.0004
GS < 50kW	\$137,681	183,112,615	kWh	0.0008	0.0004	0.0003		0.0003	0.0001	0.0004
GS 50-4,999kW	\$28,744	2,448,411	kW	0.0117	0.0059	0.0039		0.0039	0.0103	0.0142
USL	0	3,918,008	kWh	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000
Street Lighting	0	26,120	kW	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000
Total	\$413,451									

At the level of precision used (4 decimal places), there is no change in the rate rider for the residential or GS<40kW rate classes. The proposed rate rider for the GS 50 – 4,999 kW class increases slightly from 0.0031 in the application as filed to 0.0039 \$/kW/month

- d) The two tables below show the original LRAM claim with the preliminary 2009 OPA data removed, and the resulting rate riders. Note that these tables are provided only in response to Board staff interrogatory question 3d. The revised LRAM claim and rate riders found in the response to Board staff interrogatory question 3c are those that BHI wishes the Board to approve.

Rate class	LRAM with preliminary 2009 OPA program results omitted
Residential	\$195,568
GS < 50kW	\$20,910
GS 50-4,999kW	\$17,449
Total	\$233,927

Rate class	Amounts with preliminary 2009 OPA program results omitted (2009 & 2010) LRAM \$	Billing units (2010)		Rate Riders LRAM \$/unit (kWh or kW)	Two Year Rate Rider Total \$/unit (kWh or kW)	Three Year Rate Rider Total \$/unit (kWh or kW)	Number of Years to Use 3	Proposed Rate Rider Total \$/unit (kWh or kW)	Existing Rate Rider Total \$/unit (kWh or kW)	Combined Rate Rider Total \$/unit (kWh or kW)
Residential	\$195,568	555,923,716	kWh	0.0004	0.0002	0.0001		0.0001	0.0003	0.0004
GS < 50kW	\$20,910	183,112,615	kWh	0.0001	0.0001	0.0000		0.0000	0.0001	0.0001
GS 50-4,999kW	\$17,449	2,448,411	kW	0.0071	0.0036	0.0024		0.0024	0.0103	0.0127
USL	0	3,918,008	kWh	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000
Street Lighting	0	26,120	kW	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000
Total	\$233,927									

Burlington Hydro Inc.
Response to Interrogatory from Vulnerable Energy Consumers Coalition
Question 1

Question:

LRAM

References: Tab 7 Indeco Report, pages 3-4 and Table 1

- a) When (year and date) did the OPA change its Input assumptions (unit savings and free ridership) for CFLs under the Every Kilowatt Counts Campaigns?
 - b) Provide a copy of the SeeLine EKC calculators before and after the change.
 - c) Confirm/Show how the EKC assumptions used in this claim compare to post (2006?) OPA EKC calculator change and to the latest OPA Mass Market Measures and Input Assumptions.
 - d) What is meant by OPA 2009? Does this refer to OPA LDC Program evaluations? If so provide the Letter with the date of this evaluation and the detailed extract(s) for Burlington Hydro OPA Residential Programs.
 - e) What persistence factors have been applied to the 2006 EKC programs and Measures, specifically CFLs and SLEDs?
-

Response:

- a) The table below lists the CFLs found in each of the three EKC campaigns (2006, 2007 and 2008). It is clear from the table that the OPA changed input assumptions for CFLs under the EKC campaigns between each of the 2006, 2007 and 2008 campaigns.

Measure type	Program Year	Energy Efficiency Measure	Measure life	Gross annual energy savings (kWh/yr)	LRAM Free Ridership
CFLs	2006 Fall	Energy Star® CFL	4.0	104	10%
CFLs	2006 Spring	Energy Star® CFL	4.0	104	10%
CFLs	2007	15 W CFL	8.0	43	22%
CFLs	2007	20 W+ CFLs	8.0	62	22%
CFLs	2008	Energy Star® Qualified CFLs	8.0	53	48%
CFLs	2009	Standard CFL (single pack)	8.0	53	24%
CFLs	2009	Standard CFL (multi (6) pack)	8.0	258	24%
Flood CFLs	2007	Project Porchlight CFLs	8.0	43	24%
Flood CFLs	2008	Energy Star® Qualified Compact Fluorescent Floods (Indoor & Outdoor)	7.0	88	63%
Other CFLs	2008	ENERGY STAR Decorative CFLs	4.0	30	61%
Other CFLs	2008	ENERGY STAR Dimmable CFLs	6.0	98	62%
Other CFLs	2009	Energy Star Specialty CFL	6.0	63	24%

- b) Copies of the SeeLine EKC calculators for the 2006 Fall and Spring EKC Campaigns are appended. We do not have EKC calculators for 2007, 2008, and 2009.
- c) The EKC assumptions used in BHI's 2009-2010 LRAM claim are those provided in the '2006-8 Final+2009 Preliminary OPA CDM Results Burlington Hydro Inc.' provided by the OPA on 13 August 2010. These assumptions are the same as those listed in the table found in response to VECC IR Question #1a. A comparison to the latest OPA Mass Market Measures and Input Assumptions, released by the OPA on 1 January 2010 is provided in the table below. Free-rider rates are not provided by the OPA 2010 Measures and Assumptions list.

The table below indicates that the lifetime energy savings (which consider both the annual energy savings and the measure life) calculated using either set of assumptions are similar.

		As provided by the OPA on 13 August 2010 in the '2006-8 Final+2009 Preliminary OPA CDM Results Burlington Hydro Inc.' and used for the LRAM claim			As provided by the OPA on 1 January 2010 in the 2010 Measures and Assumptions list		
Program Year	Energy Efficiency Measure	Measure life	Gross annual energy savings (kWh/yr)	LRAM Free Ridership	Measure life	Gross annual energy savings (kWh/yr)	LRAM Free Ridership
2006 Fall	Energy Star® CFL	4	104.4	10%	8	44.35	NA
2006 Spring	Energy Star® CFL	4	104.4	10%	8	44.35	NA
2007	15 W CFL	8	43.0	22%	8	44.35	NA
2007	20 W+ CFLs	8	62.1	22%	8	62.8	NA
2007	Project Porchlight CFLs	8	43.0	24%	8	44.35	NA
2008	Energy Star® Qualified CFLs	8	53.0	48%	8	54	NA
2008	Energy Star® Qualified Compact Fluorescent Floods (Indoor & Outdoor)	7	87.6	63%	7	87.6	NA
2008	ENERGY STAR Decorative CFLs	4	30.4	61%	5	31.23	NA
2008	ENERGY STAR Dimmable CFLs	6	97.8	62%	5	91.98	NA
2009	Standard CFL (single pack)	8	53	24%	8	54	NA
2009	Standard CFL (multi (6) pack)	8	258	24%	NA	NA	NA
2009	Energy Star Specialty CFL	6	63	24%	NA	NA	NA

Notes:

1. An average value of the energy savings for 20W, 23W, 25W and 27W CFLs found in the 2010 M&A list was used for the comparison to the 20W+ CFLs found in the 2007 EKC program.
2. An average value of the energy savings for 11W, 15W, 20W, 23W, 25W and 27W CFLs found in the 2010 M&A list was used for the comparison to the Energy Star Qualified CFLs found in the 2008 EKC program.

- d) OPA 2009 refers to the Excel spreadsheet containing the final 2006-2008 OPA Conservation Program results for Burlington Hydro. This spreadsheet was provided by the OPA to Burlington Hydro in an email from Raegan Bunker (OPA) dated 10 November 2009.
- e) Persistence factors of 100% were applied to the 2006 EKC programs and measures, including CFLs and SLEDs. This is consistent with the program-specific persistence factors contained in the '2006-8 Final+2009 Preliminary OPA CDM Results Burlington Hydro Inc.' provided by the OPA on 13 August 2010.

**Instructions for Calculating Total Resource Cost Test Results
2006 Fall Every KiloWatt Counts Campaign**

Part 1

a. Enter Discount Rate (refer to page 5 of the Ontario Energy Board Total Resource Cost Test Guide, Revised October 2, 2006.)

Discount Rate **4.00%**

b. Enter number of coupons redeemed by technology.

Products	Number of Coupons
Baseboard Programmable Thermostats	7503
Dimmers	24900
Energy Star CFL's	538753
Motion Sensor Light Switch	8931
Programmable Thermostat	50430
Seasonal LED Lights	477143

c. Enter program dollars (refer to page 10 of the Ontario Energy Board Total Resource Cost Test Guide, Revised October 2, 2006.)

Program Costs: **\$ 5,089,954**

Part 2

Program Total Resource Cost Test Results

Calculation of Program TRC Benefits

Sum of TRC Benefits for all technologies

Calculation of Program TRC Costs

Sum of TRC Costs for all technologies plus Program Costs

Calculation of Program TRC Net Benefits

= TRC Benefits - TRC Costs

Fall EKC		
Technology	Number of Participants	Free Ridership
Compact Fluorescent Bulbs	1540834	10.00%
LED Christmas Lights (indoor or outdoor) Replacing 5w Christmas Lights C-7 (25 Lights)	238572	5.00%
LED Christmas Lights (indoor or outdoor) Replacing Incandescent Mini Lights	238572	5.00%
Programmable Thermostat - Space Heating, Existing Single Family Detached	8724	10.00%
Programmable Thermostat - Space Cooling, Existing Single Family Detached	22694	10.00%
pStat Baseboard	1876	10.00%
Dimmer	24900	10.00%
Motion Sensor	8931	10.00%

Fall EKC					
Technology	Summer Peak kW Savings	Winter Peak kW Savings	Annual kWh Savings in Year	Measure Life	Lifecycle kWh Savings
Compact Fluorescent Bulbs	0	31895.26	144,776,723	4	579,106,892.71
LED Christmas Lights (indoor or outdoor) Replacing 5w Christmas Lights C-7 (25 Lights)	0.00	4306.22	9554788.58	30	286,643,657.25
LED Christmas Lights (indoor or outdoor) Replacing Incandescent Mini Lights	0.00	1586.50	3650143.95	30	109,504,318.50
Programmable Thermostat - Space Heating, Existing Single Family Detached	0.00	1358.39	11513315.75	18	207,239,683.52
Programmable Thermostat - Space Cooling, Existing Single Family Detached	3329.14	0.00	3249482.27	18	58,490,680.77
pStat Baseboard	0.00	1688.18	2475371.00	18	44,556,678.05
Dimmer	0.00	2016.90	3114990.00	10	31,149,900.00
Motion Sensor		1085.12	1679921.10	20	33,598,422.00
Total	3329.14	43936.55	180,014,736		1,350,290,233

Fall EKC					
Technology	TRC Benefits	Incremental Equipment Costs	Program Costs	TRC Net Benefits	TRC B/C Ratio
Compact Fluorescent Bulbs	\$34,383,833.38	\$2,496,150.40		\$31,887,683	13.77
LED Christmas Lights (indoor or outdoor) Replacing 5w Christmas Lights C-7 (25 Lights)	\$17,309,646	\$453,286		\$16,856,360	38.19
LED Christmas Lights (indoor or outdoor) Replacing Incandescent Mini Lights	\$6,596,632	\$453,286		\$6,143,346	14.55
Programmable Thermostat - Space Heating, Existing Single Family Detached	\$11,994,681	\$471,117		\$11,523,564	25.46
Programmable Thermostat - Space Cooling, Existing Single Family Detached	\$5,998,031	\$1,225,449		\$4,772,582	4.89
pStat Baseboard	\$2,804,393	\$101,291		\$2,703,102	27.69
Dimmer	\$1,927,894	\$448,200		\$1,479,694	4.30
Motion Sensor	\$1,283,000	\$56,265		\$1,226,735	22.80
Utility Program Costs			\$ 5,089,954.38		
Total	\$82,298,110	\$5,705,044	\$5,089,954	\$71,503,112	16.17

**Instructions for Calculating Total Resource Cost Test Results
2006 Summer Every KiloWatt Counts Campaign**

Part 1

- Enter Discount Rate (refer to page 5 of the Ontario Energy Board Total Resource Cost Test Guide, Revised October 2, 2006.)
- Enter number of coupons redeemed by technology.
- Enter program dollars (refer to page 10 of the Ontario Energy Board Total Resource Cost Test Guide, Revised October 2, 2006.)

Part 2

Total Resource Cost Test Results by Technology

Where applicable technology savings assumptions were generated using the Ontario Energy Board Measures List data.
A composite technology savings estimate was derived based on various products eligible for coupon redemption and electricity market share.
For a full discussion of the derivation of the estimates, contact the Ontario Power Authority.
Savings and equipment cost are adjusted in the TRC calculation by the free ridership rate.

	Energy Savings Winter Peak (kW.h)	Energy Savings Winter Mid (kW.h)	Energy Savings Winter Off Peak (kW.h)	Energy Savings Summer Peak (kW.h)	Energy Savings Summer Mid (kW.h)	Energy Savings Summer Off Peak (kW.h)	Energy Savings Shoulder Mid (kW.h)	Energy Savings Shoulder Off (kW.h)	Summer On Peak (kW)	Free Ridership	EE Technology Life	Incremental Equipment Cost, \$
CFL	15.43	7.71	20.27	0.00	11.71	13.90	17.40	17.63	0	10%	4	\$ 2.50
Ceiling Fan	9.66	11.04	25.91	8.38	12.57	26.05	20.95	26.05	0.014	10%	20	\$ 25.00
Timer	27.06	13.53	35.56	0.00	20.53	24.39	30.52	30.91	0	10%	20	\$ 12.50
Programmable Thermostat	23.9	25.4	59.6	14.8	9.7	30.6	24.1	30.0	0.050	10%	18	\$ 65.00

Calculation of TRC Benefits

= energy/demand savings X avoided cost X participants X (1-free ridership)

Calculation of TRC Costs

= equipment cost X participants X (1-free ridership)

Calculation of TRC Net Benefits

= TRC Benefits - TRC Costs

Part 3

Program Total Resource Cost Test Results

Calculation of Program TRC Benefits

Sum of TRC Benefits for all technologies

Calculation of Program TRC Costs

Sum of TRC Costs for all technologies plus Program Costs

Calculation of Program TRC Net Benefits

= TRC Benefits - TRC Costs



TOTAL RESOURCE COST TEST CALCULATOR
2006 Summer Every KiloWatt Counts Campaign

Part 1. Enter Data Here (in yellow shaded area: cells C22 and C26:C30)

LDC Information	
Discount Rate	4.00%

Products Sold	
CFLs	1,338,276
Ceiling Fans	12,415
Timers	37,518
Program Thermostats	16,320
Program Costs	\$5,318,155

Part 2. Results by Technology

Total Resource Cost Test Results by Technology (2007 \$'s)							
Technology	TRC Benefits	TRC Costs	TRC Net Benefits	TRC Benefit Cost Ratio	Summer Peak kW Savings	Net Annual kWh Savings	Net Lifecycle kWh Savings
CFLs	\$29,746,946	\$2,710,009	\$27,036,937	10.98	-	125,325,265	501,301,060
Ceiling Fans	\$1,963,957	\$279,338	\$1,684,620	7.03	159.41	1,570,994	31,419,882
Timers	\$7,424,336	\$422,078	\$7,002,258	17.59	-	6,162,332	123,246,630
Programmable Thermostats	\$4,071,010	\$954,720	\$3,116,290	4.26	734.40	3,202,080	57,637,436

Part 3. Program Results

Total Resource Cost Test Results for Program (2007 \$'s)	
TRC Benefits	\$43,206,249
TRC Costs	\$9,684,299
TRC Net Benefits	\$33,521,950
Benefit Cost Ratio	4.46
Total Summer Peak kW Savings	893.81
Total Annual kWh Savings	136,260,670
Total Lifecycle kWh Savings	713,605,008

Burlington Hydro Inc.
Response to Interrogatory from Vulnerable Energy Consumers Coalition
Question 2

Question:

LRAM

References: Tab 7 Indeco Report, page 3 and Appendix A

Preamble: IndEco finds that appropriate measure specifications were used to calculate program energy savings. For the calculation of LRAM claims, values provided by the 2010 OPA Measures and Assumptions list were used for prescriptive measures (OPA 2010a).

- a) For LRAM the OEB 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.....
Confirm/discuss how the claim is in conformity with this Guideline.
- b) Confirm the Input Assumptions used by IndEco for the following 3rd tranche and post third tranche CDM programs:
- Residential EKC 2006 and 2007 – list of measures, # units and unit kwh savings, lifetime and free ridership for each of 2009-2010.
 - 2005 Public Education and Outreach program – list of measures, # units and unit kwh savings, lifetime and free ridership for each of 2009-2010.
- If any of the Input assumptions have changed from BHs OEB approved LRAM Claim 2005-2008 please indicate the change(s).
- c) For each of the above measures in the current claim, provide the comparable input values from the OPA 2010 Mass Market Measures and Assumptions List.
- d) For CFLs installed in 2005/2006 explain why the unit savings is maintained at 104 kwh and the free-ridership is maintained at 10% in the current claim (for 2009 and 2010).

Response:

- a) The claim is in conformity with this Guideline. It uses the best available input assumptions for each measure of each program. In some cases, input assumptions for a particular measure are available from multiple sources. In these cases, information is taken from the sources highest in the information hierarchy. The information hierarchy (from greatest to least confidence) for LRAM calculations is:
1. Information or results from an OPA conducted or sponsored evaluation of the specific program
 2. Information or results from a third-party evaluation of the specific program
 3. Information or results from a site-specific assessment of the application of the technology, including on-site measurement or survey of the specific customer
 4. Manufacturer specifications for energy use/demand of a specific technology installation
 5. Information from the OPA's most current measures and assumptions lists
 6. Information from earlier OPA measures and assumptions lists
 7. Information from the OEB's TRC guide list of measures and assumptions.

Where there is a program specific evaluation, as there is for each of the OPA's programs, that evaluation provides more specific and appropriate input values than the generic ones in the measures and assumptions lists. As noted by the OPA, the results provided in their report are in accordance with OPA practices and policies for reporting progress against the provincial conservation goals.

- b) The table below contains the requested input assumptions used by IndEco for the 2006 and 2007 Residential EKC programs, as well as for the 2005 Public Education and Outreach program. The same input assumptions were used for these measures to calculate the LRAM claims in both 2009 and 2010.

No input assumptions were changed from BHI's OEB-approved LRAM Claim 2005-2008.

Program	Energy Efficient Measure	Number of units	Measure life	Free-rider rate	Gross annual energy savings (kWh/a)
2006 EKC	Energy Star® Compact Fluorescent Light Bulb	18,328	4.00	10%	104.4
2006 EKC	Electric Timers	514	20.00	10%	183.0
2006 EKC	Programmable Thermostats	224	15.00	10%	216.0
2006 EKC	Energy Star® Ceiling Fans	170	20.00	10%	141.0
2006 EKC	Energy Star® Compact Fluorescent Light Bulb	27,176	4.00	10%	104.4
2006 EKC	SLEDs	6,541	30.00	10%	30.8
2006 EKC	Programmable Thermostats	431	18.00	10%	522.1
2006 EKC	Dimmers	341	10.00	10%	139.0
2006 EKC	Indoor Motion Sensors	122	20.00	10%	209.0
2006 EKC	Baseboard PStat	26	18.00	10%	1,466.3
2007 EKC	15 W CFL	32,784	8.00	22%	43.0
2007 EKC	20 W+ CFLs	5,337	8.00	22%	62.1
2007 EKC	Project Porchlight CFLs	6,899	8.00	24%	43.0
2007 EKC	Energy Star Ceiling Fan	264	10.00	45%	89.8
2007 EKC	Solar Lights	4,209	5.00	87%	32.8
2007 EKC	Outdoor Motion Sensor	421	10.00	45%	159.8
2007 EKC	Dimmer Switch	268	10.00	45%	23.7
2007 EKC	Energy Star Light Fixtures	127	16.00	45%	122.9
2007 EKC	SLEDs	8,686	5.00	51%	13.7
2007 EKC	T8	250	18.00	23%	37.2
2007 EKC	Programmable Thermostat	257	15.00	45%	75.1
2007 EKC	Power Bar with Timer	116	10.00	23%	72.4
2007 EKC	Lighting Control Devices	1,349	10.00	45%	72.2
2005 Public education and outreach	15W CFL	3,159	8.00	30%	44.4
2005 Public education and outreach	LED Christmas lights	659	5.00	30%	13.5
2005 Public education and outreach	LED Christmas lights	658	5.00	30%	4.8
2005 Public education and outreach	PStat - Space Heating, Existing Single Family Detached	67	11.00	30%	2,151.0
2005 Public education and outreach	PStat - Space Cooling, Existing Single Family Detached	175	11.00	30%	203.0
2005 Public education and outreach	Timer - Outdoor - Light	120	10.00	30%	68.1
2005 Public education and outreach	Timer - Indoor - Light	36	10.00	30%	64.0
2005 Public education and outreach	Timer - Indoor - Air conditioners	36	20.00	30%	97.9
2005 Public education and outreach	Ceiling Fan	74	10.00	30%	122.6

- c) The table below shows a list of input values for the above measures taken from the OPA 2010 Mass Market Measures and Assumptions List. The 2010 OPA Measures and Assumption list does not provide free-rider rates.

The final OPA results of the evaluations of the 2006 and 2007 EKC program provide little or no information on the measures found within these programs. Consequently, for some measures, particularly programmable thermostats, it was difficult to respond to VECC's IR #2c to compare the inputs used with the values in the OPA Measures and Assumptions list. Assumptions had to be made on the basis of the limited information provided in the OPA results, the program, and the measures found in the Measures and Assumptions list. We do not have confidence in considering the input values listed below as being comparable to the inputs used in the claim, and consider the values from the OPA evaluation to be more meaningful than the assumed values from the Measures and Assumptions list.

Program	Energy Efficient Measure	Measure life	Free-rider rate	Gross annual energy savings (kWh/a)
2006 EKC	Energy Star® CFLs	8	NA	44.35
2006 EKC	Electric Timers	10	NA	143.54
2006 EKC	Programmable Thermostats	11	NA	203
2006 EKC	Energy Star® Ceiling Fans	10	NA	122.58
2006 EKC	Energy Star® CFLs	8	NA	44.35
2006 EKC	SLEDs	5	NA	13.5
2006 EKC	Programmable Thermostats	11	NA	2151
2006 EKC	Dimmers	10	NA	23.65
2006 EKC	Indoor Motion Sensors	10	NA	63.95
2006 EKC	Baseboard PStat	11	NA	63.15
2007 EKC	15 W CFL	8	NA	44.35
2007 EKC	20 W+ CFLs	8	NA	62.8225
2007 EKC	Project Porchlight CFLs	8	NA	44.35
2007 EKC	Energy Star Ceiling Fan	10	NA	122.58
2007 EKC	Solar Lights	5	NA	4.8
2007 EKC	Outdoor Motion Sensor	10	NA	159.38
2007 EKC	Dimmer Switch	10	NA	23.65
2007 EKC	Energy Star Light Fixtures	16	NA	166.37
2007 EKC	SLEDs	5	NA	13.5
2007 EKC	T8	18	NA	27.92
2007 EKC	Programmable Thermostat	11	NA	63.15
2007 EKC	Power Bar with Timer	10	NA	53.39
2007 EKC	Lighting Control Devices	10	NA	106.812
2005 Public Education and outreach	15W CFL	8	NA	44.35
2005 Public Education and outreach	LED Christmas lights	5	NA	13.5
2005 Public Education and outreach	LED Christmas lights	5	NA	4.8
2005 Public Education and outreach	PStat - Space Heating, Existing Single Family Detached	11	NA	2151
2005 Public Education and outreach	PStat - Space Cooling, Existing Single Family Detached	11	NA	203
2005 Public Education and outreach	Timer - Outdoor - Light	10	NA	68.1
2005 Public Education and outreach	Timer - Indoor - Light	10	NA	64
2005 Public Education and outreach	Timer - Indoor - Air conditioners	NA	NA	NA
2005 Public Education and outreach	Ceiling Fan	10	NA	122.6

- d) No CFLs installed in 2005 had unit savings of 104 kWh or free-ridership of 10%. CFLs installed in 2006 with unit savings of 104 kWh and free-ridership of 10% were only those found in the 2006 Spring and Fall EKC campaign. Assumptions for these CFLs were taken from the OPA's final program evaluation results reported in the '2006-8 OPA Conservation program results'. These evaluated results have been adopted in accordance with Board recommendations that "The Board would consider an evaluation by the OPA or a third party designated by the OPA to be sufficient." OPA advises that these estimates are prepared in a manner consistent with OPA current practice, and are the same values used to report progress against provincial conservation targets.

Burlington Hydro Inc.
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Question 3

Question:

LRAM

References: i) Managers Summary Page 6 line 21 (Table)
 ii) Sheet J2.5 LRAM
 iii) IndEco Report Tables 3 and 7

- a) Using as the only source of assumptions for the residential sector third tranche and post third tranche program, the OPA 2010 Mass Market Measures and Assumptions adopted by the Board in January 2009, provide a calculation of the residential sector 2009-2010 LRAM claim and supporting LRAM schedules (for 3rd tranche and post third tranche programs) (including Carrying charges) and recalculate the rate riders.
- b) Amend the residential rate riders as necessary.

Response:

- a) There were 6 residential third tranche/post-third tranche programs in BHI's claim: 2005 Public Education and Outreach; 2007 Public Education and Outreach; 2007 Staff Development; 2007 Municipal Building Retrofit; 2006 EKC; and 2007 EKC.

The 2009-2010 residential LRAM claim filed by BHI for the first four programs listed already used the OPA 2010 Mass Market Measures and Assumptions as the sole source of input assumptions. The 2006 and 2007 EKC programs used the inputs found in the final program results reported by the OPA in the 2006-2008 OPA Conservation Program results for Burlington Hydro.

The table below shows the 2009-2010 residential LRAM claim (including carrying charges) resulting from the use of the OPA 2010 Mass Market Measures and Assumptions for all six residential third tranche/post-third tranche programs.

	LRAM claim as filed	LRAM claim using only the 2010 M&A list for third tranche/post-third tranche programs
OPA programs	\$114,217	\$114,217
Third tranche programs	\$7,087	\$7,087
Post-third tranche programs	\$118,707	\$101,394
Total residential LRAM claim	\$240,011	\$222,699

- b) The changes suggested by VECC in IR question #3a would not change the proposed three-year residential rate rider.

	Amount	Billing units (kWh)	Proposed three- year rate rider
Residential LRAM claim as filed	\$240,011	555,923,716	0.0001
Residential LRAM claim using only the 2010 M&A list for third tranche and post-third tranche programs	\$222,699	555,923,716	0.0001

Burlington Hydro Inc.
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Question 4

Question:

REVENUE TO COST RATIO ADJUSTMENTS

References: i) Revenue Cost Ratio Adjustment Work Form, Sheet C1.1
 ii) Manager's Summary, page 3
 iii) 2010 Draft Rate Order, Appendix C, page 3

- a) Please reconcile the approved 2010 Revenue to Cost ratios by customer class as shown in Sheet C1.1 and the Manager's Summary with the 2010 values set out in the 2010 Draft Rate Order dated March 15, 2010.
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Response:

- a) The 2010 Draft Rate Order dated March 15, 2010 was the preliminary Draft Rate Order completed by Burlington Hydro Inc. ("BHI"). Once this document was provided to participants in the 2010 Cost of Service Application, BHI received a number of comments and items for clarification. These items were incorporated and included in the updated Draft Rate Order filed by BHI and dated March 23, 2010. The revenue to cost ratios included in Sheet C1.1 and the Manager's Summary are consistent with those filed in the updated Draft Rate Order, Appendix C, page 3.