

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #1 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 3 of 24,**

The Canadian Energy Efficiency Alliance (The Alliance) acknowledges Hydro One's extensive experience in developing, delivering and implementing CDM programs. Please provide completed evaluations of all programs and sample copies of presentations, or other documentation that have been provided to North American utilities which have emulated any of its programs.

**Response**

Please refer to Exhibit I, Tab 9, Schedule 7 for Hydro One Annual CDM Reports.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #2 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 3 of 24,**

While the Alliance complements Hydro One in participating in the redevelopment of the Ontario Power Authority (“OPA”)-Contracted Province-Wide Conservation and Demand Management Programs (OPA Programs), what process was followed to develop these programs? Please respond commenting on the following aspects of the process and the resulting program designs:

- a) What limitations, if any, did Hydro One encounter in participating in redeveloping the OPA programs including availability of resources, timely access to information, particularly respect to the proposed program designs, projected program budgets, cost/benefit analysis of plans, programs and specific measures as well as estimated targets. Please file all copies of such documents provided by the OPA except for any currently posted on the OPA web site.
- b) What evaluations of earlier OPA programs were provided to Hydro One? Please file copies of all evaluations of OPA programs provided to Hydro One.
- c) What market research completed by the OPA or contracted for by the OPA was shared with Hydro One? Please file copies of all market research reports provided to Hydro One.
- d) Did Hydro One have access to the results of pilot programs funded under the Conservation fund? What role did the reports and lessons learned have in the selection and development of the programs included in the OPA programs? Please provide copies of any documents provided by the OPA except for any currently posted on the OPA web site.
- e) The OEB’s CDM Code requires each LDC to file a CDM Strategy and provides a template for doing so, which Hydro One appears to have conformed to in its application. Did the OPA provide similar documentation to Hydro One? If so please file any shared OPA documents that would approximate what is included in the OEB template requirements.

**Response**

- a) As a member of various working groups, Hydro One assisted in the design of OPA-contracted programs. The working documents associated with this effort have not been finalized and are not available for distribution at this time. Please refer to the OPA letter dated January 26, 2011 in Exhibit I, Tab 1, Schedule 4, Attachment 1.
- b) The list of evaluation documents that OPA provided Hydro One is presented in the table below.

Initiative	Program Year*
Great Refrigerator Roundup	2007
Cool & Hot Savings Rebate	2007
Every Kilowatt Counts	2007
Summer Savings	2007
Demand Response 1	2007
Great Refrigerator Roundup	2008
Cool Savings Rebate	2008
Every Kilowatt Counts Power Savings Event	2008
Summer Sweepstakes	2008
Electricity Retrofit Incentive	2008
Toronto Comprehensive	2008
Power Savings Blitz	2008
Demand Response 1	2008
Demand Response 3	2008
LDC Custom - Hydro One Networks Inc. - Double Return	2008
Great Refrigerator Roundup	2009
Cool Savings Rebate	2009
Every Kilowatt Counts Power Savings Event	2009
<b>peaksaver</b> <sup>®</sup>	2009
Electricity Retrofit Incentive	2009
Toronto Comprehensive	2009
Power Savings Blitz	2009
Multi-Family Energy Efficiency Rebates	2009
Demand Response 1	2009
Demand Response 2	2009
Demand Response 3	2009
LDC Custom - Thunder Bay Hydro - Phantom Load	2009
LDC Custom - Toronto Hydro - Summer Challenge	2009

*\*2009 Evaluation reports were received December 10, 2010*

- 1
- 2 c) Market Research reports
- 3 Any OPA market research study that has been shared with Hydro One has also been
- 4 posted on the OPA's website.
- 5
- 6 d) Pilot Programs
- 7 Any OPA pilot program information that has been shared with Hydro One has also
- 8 been posted on the OPA's website.
- 9
- 10 e) CDM Strategy
- 11 Hydro One relied on the CDM Code to develop its Strategy Document.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #3 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 4 of 24,**

At line 6, Hydro One notes that the cost effectiveness of all OPA Programs has been verified by the OPA. Please provide copies of the document(s) that verifies their cost effectiveness including details of the calculations, assumptions and sources of assumptions.

**Response**

It is Hydro One's understanding that these documents are in the process of being finalized.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #4 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 4 of 24,**

At line 14, Hydro One asserts that all requested Board Approved Programs pass the Code required tests (Total Resource Cost (TRC) Test and Program Administration Cost (PAC) Test). Please provide the results of these tests including details of the calculations, assumptions and sources of assumptions.

**Response**

Please refer to Exhibit I, Tab 1, Schedule 7, part b, Schedule 18 part b, Schedule 25, part b, Schedule 33, part b, Schedule 39 part b and Schedule 48 part b.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #5 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 4 of 24,**

Has Hydro One completed any Participant Cost Tests on its requested programs? If so please provide the results of these tests including details of the calculations, assumptions and sources of assumptions. If not, how can Hydro One be sure that participants will benefit from its requested programs?

**Response**

Hydro One completed the Participant Cost (PC) Test for each of the proposed initiatives. For results and details please refer to Exhibit I, Tab 1, Schedules 7, 18, 25, 33, 39 and 48.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #6 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 4 of 24,**

Is a Hydro One aware of, or have a copy of any Participant Cost Tests completed by the OPA or others with respect to the OPA Programs or any of its previous programs? Please file any related documentation.

**Response**

Hydro One is aware of Participant Cost Tests completed by the OPA with respect to the OPA programs. During the development of the Business Cases for the OPA-contracted programs, the OPA posted several versions of their Resource Planning Tool files on a portal made available to LDC members of the various working groups. These files showed cost-effectiveness results from various perspectives, including the Participant Cost Test. Subsequent to obtaining their Board approval, the OPA has since restricted access to this portal.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #7 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 6 of 24,**

At line 14, Hydro One notes that the OPA programs are expected to help achieve approximately 80% of the Hydro CDM targets. This contrasts to evidence in the same exhibit on page 2 which cites the third party contractor's estimate that the OPA programs will only result in 71% of Hydro One's target. Please provide the rationale for the difference of 7%?

**Response**

Please refer to Exhibit I, Tab 9, Schedule 6.



**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #8 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 6 of 24,**

At line 27, Hydro One outlines how its budgets were estimated based on an estimated percentage of Hydro One's participation. Given the vast size of Hydro One's territory, does Hydro One anticipate added costs to deliver programs? How will these be accounted for? Given that the OPA funding agreement was not final at the time of filing evidence, what contingencies have been built into the requested fund for either OPA programs or requested programs?

**Response**

Due to the vast size of our service territory, Hydro One does anticipate added costs to deliver programs. Given the structure of the OPA funding framework, both Customer Incentive payments and Participant Based Funding payments are pass-through costs - i.e., LDCs are required to submit invoices on a monthly basis for these expenses in order to receive payment by the OPA.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #9 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 8 and 9 of 24**

Figure 3 illustrates Hydro One's share of the province wide budget, total peak (kW) reductions and total energy (kWh) reductions. Where the budget data has not been broken down by program, please provide the detail or the rationale for not doing so? Has the OPA provided that level of detail to Hydro One? If so please file a copy of the information. In particular, differentiate program budgets which are pure demand response with zero energy (kWh) reductions shown.

**Response**

The following table shows the requested budget information by initiative (excluding the Low Income Program):

<b>OPA Province-wide Programs</b>	<b>Estimated Budget (\$ Million)</b>	<b>MW</b>	<b>GWh</b>
Consumer Program	18.2	16	238
Res DR (Peaksaver)	40.5	35	101
<b>Total Consumer</b>	<b>58.7</b>	<b>50</b>	<b>339</b>
Commercial Program	75.4	65	397
SC DR (Peaksaver)	0.7	1	2
Commercial DR1/DR3	2.7	13	0
<b>Total Commercial</b>	<b>78.8</b>	<b>78</b>	<b>399</b>
Industrial ERIP	3.4	3	31
Industrial Accelerator Program	11.9	9	98
Industrial DR1/DR3	4.1	20	0
Capability Building	9.0		
<b>Total Industrial</b>	<b>28.4</b>	<b>32</b>	<b>129</b>
<b>Grand Total</b>	<b>166.0</b>	<b>160</b>	<b>867</b>

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #10 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 8 and 9 of 24**

Ministerial conservation-related directives since the passage of the Green Energy and Green Economy Act to both the OPA and the Board have ensured that LDC targets include both peak reductions and energy reductions. In Hydro One's view, how has this impacted both the design and selection of OPA programs and its requested programs, particularly with respect to programs and budgets allocated to demand response programs which deliver no energy saving results. Figure 3 appears to indicate the allocation of significant resources to these programs. Does Hydro One support the apparent preference for demand response over energy savings?

**Response**

Hydro One is not aware of such preference. Our OEB-allocated targets include both demand and energy components and the province-wide programs were designed to meet both.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #11 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 8 and 9 of 24**

At line 10, (p 9), Hydro One illustrates its approach to allocation of budgets for the OPA programs – based on a \$/kW (peak demand reduction). What would the allocation of the same budget be if a allocation based on \$/kWh (energy reductions) was used?

**Response**

Hydro One's projected budget would be approximately \$172 million (excluding funding for Low Income Programs) had the allocation been based on a \$/kWh instead of a \$/kW.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #12 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 10 of 24**

The Alliance agrees with Hydro One that Board approved programs are required in order to meet its targets. In section 4.1, Hydro One indicates that the OPA expects its OPA contracted programs will achieve 1037 MW of the combined total of the LDC target of 1330 MW target. If this is the case OPA programs will deliver 77% {calculated} of the LDC expected results.

- a) Please replicate this calculation on a kWh basis.
- b) Why does Hydro One anticipate that 80% of its kW results will come from OPA programs? Please provide specific calculations and related assumptions used, including information from the consultant reports and any other information Hydro One used to determine that 80% was the correct portion of its target that OPA programs would be able to deliver.
- c) Please replicate Hydro One's anticipated share of the total LDC target on a kWh basis.
- d) Does Hydro One know how will the results and budgets associated with the OPA's delivery of transmission connected be accounted for, given that even transmission connected customers are located within LDC service territories with a large portion in terms of energy use are in Hydro One territory.

**Response**

- a) According to the OPA letter dated Jan 26, 2011 (attached in Exhibit I, Tab 1, Schedule 4), the OPA expects its OPA contracted programs will achieve more than 5,400 GWh of the combined total of the LDC target of 6,000 GWh target. The OPA programs are projected to deliver 91% of the Province-Wide Energy Savings Target.
- b) Please refer to Exhibit I, Tab 9, Schedule 6.
- c) Hydro One expects to achieve 894GWh energy savings from OPA-Contracted programs.
- d) No, Hydro One does not know.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #13 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 10 of 24**

In determining what requested Programs to design, or in the actual development of those programs what limitations if any did Hydro One face? Please respond with respect to the following: availability of resources, timely access to information, particularly respect to proposed OPA program designs, project program budgets, and cost/benefit analysis of plans, programs and specific measures as well as estimated targets.

**Response**

Hydro One believes that it has been able to design programs that will complement the OPA Contracted programs and enable Hydro One to deliver its CDM targeted reductions. These new Board-Approved programs will be available early in the four year period and make significant contributions to Hydro One targets. Therefore Hydro One believes that it has not faced any critical limitations.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #14 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 10 of 24**

Does Hydro One anticipate the need for any changes to the Board's CDM Code as a result of having gone through the first iteration of program design?

**Response**

Hydro One will deliver the Board-Approved CDM Programs within the parameters of the current CDM Code.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #15 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 10 of 24**

At line 16, Hydro noted that it had reviewed a range of programs as potential OEB approved programs. Please provide the results of the extensive review and the rationale for Hydro One's choices.

**Response**

Please refer to Exhibit I, Tab 9, Schedule 12.



**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #16 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 10 of 24**

Please file the cost/benefit analyses for the six selected programs, including calculations, assumptions and sources for assumptions.

**Response**

Please refer to Exhibit I, Tab 1, Schedule 7, part b, Schedule 18 part b, Schedule 25, part b, Schedule 33, part b, Schedule 39 part b and Schedule 48 part b for details on how each of the initiative savings were derived, as well as TRC and PAC calculations.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #17 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 12 of 24**

At line 22, Hydro One notes that programs like Double Return Plus empower customers to manage and reduce their own peak as well as save energy. As a result it has high positive TRC and PAC ratios (ref /Figure 4) and delivers both demand and energy savings. Does Hydro One have similar data with respect to programs that reduce demand with no energy savings, either from the OPA or from other programs in North America? If so, please file.

**Response**

Please refer to Exhibit I, Tab 3, Schedule 26.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #18 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 16 of 24**

Regarding Municipal and Hospital Energy Efficiency Performance, In its submission in EB- 2010-0215, Toronto Region Conservation Authority shared its lessons learned from performance based conservation:

- i. performance based conservation delivers far greater energy savings than previous approaches to energy (and water) conservation,
- ii. the larger part of the savings is found in low/no cost improvements,
- iii. successful and sustainable conservation has more to do with good management than with technology,
- iv. conservation programs have to support building managers with information, tools and resources so that they can recognize the unique set of conservation opportunities in their facilities,
- v. benchmarking can identify buildings with high conservation potential, inform target setting and point to where savings are to be found in each building, and
- vi. monthly savings reporting flags variances in predicted savings, identifies measures which do not perform as intended, verifies savings which have been achieved and guides continuous improvement

Has Hydro One reviewed this material, and if so, how has it been taken into account in the development of the Municipal and Hospital Energy Efficiency Performance Program?

- a) How will the Municipal and Hospital Energy Performance Program relate to the Green Energy and Economy Act requirements for energy management plans in the broader public sector?
- b) What additional resources would be required to apply this program to the entire public sector, including Ontario government facilities within Hydro One's territory?
- c) What is the reason for only requiring the customers to commit to participation until December 31, 2014? What resources would be required to extend this deadline given that in the same TRCA submission found that savings are still to be found after five years of participation in such programs?

1 **Response**

2  
3 Hydro One is aware of the lessons learned noted by TRCA. They are very similar  
4 messages found in other documentation supporting performance based conservation. It is  
5 in line with our understanding of the barriers and issues faced by the broader public  
6 sector including Municipalities and Hospitals and the minimal participation to date from  
7 these sectors in the technology based programs available to date.

8  
9 a) As Energy Management Plans have not yet been regulated for the broader public  
10 sector, the initiative seeks to be Complimentary to the Green Energy Act  
11 requirements and to assist participants in meeting the requirements where possible.  
12 Our past and current work with Municipalities in particular has led Hydro One to  
13 understand that a large majority of Municipalities and smaller medical facilities (as  
14 found in Hydro One service areas) are in higher need of assistance in understanding  
15 and implementing energy efficiency best practices and technologies.

16  
17 b) Hydro One has not done this analysis.

18  
19 c) The reason for only requiring the customers to commit to participation until  
20 December 31, 2014 is that there is no commitment to funding for programs beyond  
21 this date to offer initiative elements or continued conservation support to the  
22 participant beyond that date. Participants will be encouraged to incorporate long term  
23 energy efficiency and conservation goals as part of the best practices review and the  
24 Energy Management Plans they commit to completing as part of the initiative. It is  
25 the intention of the initiative to assist in transforming the sector to embed  
26 conservation and energy efficiency as part of their management, operational and  
27 technical best practices. Hydro One would hope that the segment continue on beyond  
28 the terms of the initiative.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #19 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 19 of 24**

At line 12, Hydro One notes that it remains a winter peaking utility. Please describe how the requested programs address winter peaks. Please describe any shortcomings in the OPA programs with respect to saving energy or reducing peak in winter.

**Response**

The proposed Board-approved initiatives as well as the OPA-contracted programs are, by and large, aimed at achieving energy savings that will have an impact on both summer and winter peaks. It is, however, true that the demand response programs are aimed at summer peaks only.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #20 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 21 of 24**

In Figure 6, Hydro One illustrates how low income customers are eligible for the OPA approved programs. Do any of these programs other than the Appliance Retirement Initiative **not** require a portion of the cost of the project or measure to be paid by the customer? With respect to requested programs, does either of the residential programs require the cost of the project or measure to be paid by the customer?

**Response**

Yes. Many initiatives within the Consumer Program portfolio do not require a financial investment by the customer. These initiatives include the Appliance Exchange Event(s), Customer Enabling Initiatives (web-based access to Home Energy Audit) and the Residential Demand Response (peaksaver) programs.

With respect to the requested programs, neither of these two residential programs requires the cost of any project or measure to be paid by the customer.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #21 List 1**

**Interrogatory**

**Ref: Exhibit B, Tab 1, Schedule 2 Page 23 of 24**

At line 10, Hydro One notes that it has worked with the OPA in an effort to improve existing programs. Please outline any improvements in programs that Hydro One suggested to the OPA but were not included. Are there additional improvements required to the programs?

**Response**

Hydro One was a member of various working groups working closely with the OPA and other LDCs to assist with the design of the OPA-contracted programs. There were no suggestions by Hydro One at these working groups that were not properly considered and assessed.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #22 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 1 of 58**

Is this exhibit exactly as provided by the OPA, or is it a summary developed by Hydro One? If it is a summary, please file the full document.

**Response**

Exhibit C, Tab 1, Schedule 1, is a summary prepared by Hydro One. As stated in Exhibit I, Tab 1, Schedule 4, Attachment 1, this exhibit is consistent with the key elements of the program designs.



**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #23 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 4 of 58**

At line 6, the incentives for a number of energy saving measures are listed. Has Hydro One examined the contribution of the incentive to the total cost of the measure in geographically diverse areas of its service territory? If so, is Hydro One concerned about program uptake in areas which such products are relatively higher priced than the average? What has been Hydro One's experience to date with similar OPA initiatives run in 2006?

**Response**

To the best of Hydro One's knowledge, an examination of the contribution of the incentive to the total cost of the measure in geographical diverse areas across the province has not been carried out.

Any coupon program run from 2006 to date, have been centrally managed and fulfilled by the OPA and the results from these programs are reported by the OPA to the LDC on an aggregate level (by LDC) and have not been broken down further on a regional or geographic basis.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #24 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 34 of 58**

At line 22, the ERIP program is described as focusing on equipment replacement. In its submission to EB-2010-0215, the Toronto Region Conservation Authority said “it is now well documented that prescriptive measures [equipment replacement] can not only fail to achieve optimal savings, but in some cases actually lead to an increase in consumption”. Has Hydro One’s research or program evaluations found similar issues?

**Response**

Hydro One has not undertaken this research, but is aware of the TRCA findings that Replacement programs in some cases can lead to an increase in energy consumption.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #25 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 40 of 58**

In a discussion of the Demand Response 1 – **Commercial** program, at line 23, the exhibit indicates that “an **Industrial** Program Change Management Committee has been established to manage change to the DR initiative in an organized and ongoing manner”? Is Hydro One aware if this committee applies to commercial DR? Is Hydro One aware of any other “change management committees” for OPA programs? If so, please list and describe their function.

**Response**

Hydro One would like to make the following correction in its submission:

Exhibit C, Tab1, Schedule 1, page 40, line 23 please replace the last sentence with the following:

“In addition, an **Industrial/Commercial** Program Change Management Committee will be established to manage change to the DR initiatives in an organized and ongoing manner.”

As for the plan for other change management committees, Hydro One understands that every OPA-contracted program will have a change management committee similar to the Demand Response committee mentioned above.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #26 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 41 of 58**

At line 13, the exhibit indicates that “DR1 is to achieve maximum cost effective peak demand reduction **and energy savings**”. Is Hydro One aware of any expected targets for energy savings from Demand Response OPA programs? If so, why do none of the OPA programs for DR include energy saving targets for Hydro One?

**Response**

The DR1 program is a demand response initiative aimed at reducing peak demand only. However, incidental energy savings can occur in those cases where customers may reduce their peak load as opposed to shifting load. This occurrence is not highly probable and, therefore, the program energy savings will be relatively insignificant. This explains why there are no energy savings values shown for DR1 in Figure3.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #27 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 1, Page 53 of 58**

At Line 3, the Exhibit says that “Ontario has not had a full functioning **energy** management initiative for industrial customers...except for ERIP”. Did Hydro One have programs that applied to its industrial customers under MARR? Has Hydro One worked with Union Gas or Enbridge Gas with respect to their industrial programs?

**Response**

Yes, Hydro One had programs that applied to its industrial customers under MARR.

Yes, Hydro One has discussed and is in discussions with Union Gas regarding industrial programs.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #28 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 2, Page 47 of 67**

At line, 10, the description of initiative elements asked that the memorandum of understanding include “annual benchmarking and monitoring of electrical energy use”. Did Hydro One consider including a requirement to benchmark other fuels to ensure that electrical savings were not achieved with a disproportionately high impact on other energy forms? Did Hydro One consider the electrical savings associated with reduced water use? If not, why not? Could the program be revised to include other energy forms and water?

**Response**

As a best practice, participants will be encouraged to benchmark all fuel types and water usage. Hydro One will also encourage participants to target reductions in these areas.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #29 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 2, Page 59 of 67**

At line 3, Hydro One cited “bringing demand response and energy efficiency together” as evidence of non-duplication of an OPA program for its Double Return Plus. Was this improvement suggested to the OPA for its DR programs? If not, why not? If so, in Hydro One’s view, why wasn’t it acted on?

**Response**

Please refer to Exhibit I, Tab 1, Schedule 45.

**Canadian Energy Efficiency Alliance (CEEA) INTERROGATORY #30 List 1**

**Interrogatory**

**Ref: Exhibit C, Tab 1, Schedule 2, Page 60 of 67**

At line 9, Hydro One cites the requirement for an Action Plan by the customer. How will this link with the Energy Management Plans required under the Green Energy and Green Economy Act?

**Response**

Hydro One intends to leverage GEGEA Energy Management Plans as a basis for the customers action plans when available.