



***PUBLIC INTEREST ADVOCACY CENTRE
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March 9, 2011

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-2011-0011 Toronto Hydro Electric System Limited.
Application for Approval of CDM programs
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.

ONTARIO ENERGY BOARD

IN THE MATTER OF *the Ontario Energy Board Act, 1998*;

AND IN THE MATTER OF an Application by Toronto Hydro Electric System Limited
For an Order or Orders confirming the 2011 to 2014 Conservation and Demand
Management Strategy and approving funding for the 2011 to 2014 Board-Approved
Conservation and Demand Management Programs

Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

VECC IR#1

Reference: Appendix A

Preamble: Although not covered in the evidence, VECC assumes THESL will take full advantage of the OPA-Contracted CDM Programs:

- a) Provide The Ministers Directive Targets for THESL
- b) Provide the documentation regarding the OPA program Targets and Budget allocations to THESL
- c) Provide the Attachments to the OPA-THESL Master Agreement that detail the OPA Programs to be delivered by THESL
- d) Provide a table that shows by year, by sector and in total the OPA Program Targets and Budgets allocated to THESL and the contribution and percentage that these will contribute to the THESL overall CDM Targets
- e) Provide specifically information on the OPA Low Income program targets and budgets allocated to THESL
- f) Provide by year the anticipated peak savings, and energy savings achievements for *both* OPA Contracted and THESL Board-Approved CDM Programs for the 2011 to 2014 period.

VECC IR#2

Reference: No Reference

Preamble: In developing a CDM strategy a key step is to examine THESLs service territory and customer base from a CDM perspective.

- a) Provide copies of the report(s) and/or analysis that THESL prepared to understand its residential customer base. If not available provide information on, residential customer average uses for electric and non electric space and hot water.
- b) Provide all reports prepared for either OPA and/or THESL that establish the profile of THESLs Residential Customer base in terms of
 - i. numbers
 - ii. domicile- archetype

- iii. own/rent,
 - iv. income level
 - v. annual electricity consumption
 - vi. types of end use (profile)
- c) Provide similar Province-wide data to position THESL within the totals
- d) How will THESL customers access the programs- will there be a similar registration system to OPA and will customers need to register twice. (Once with OPA and Once with THESL)?.

VECC IR#3

Reference: Appendix A

Preamble: To achieve the remaining target, THESL will undertake the applied-for CDM programs.

- a) Summarize in a Table, by year, the savings and budgets for each program and the aggregate totals
- b) Provide a copy of the THESL Program Administration Budgets, including Staffing (FTE) by year and in Total
- c) Provide a copy of any consultant(s) report(s) on the Economic Potential for CDM in THESLs service territory.
- d) For each proposed program provide the completed detailed evaluation plan (NOT Template) showing the specific data that will be collected for each measure, each participant and for each program.
- e) For each proposed program, where applicable, describe in detail how THESL has estimated free ridership and describe how THESL will monitor free ridership.
- f) For each proposed program please describe how participation rates were estimated and provide any studies or data relied upon.
- g) Provide for each program a Summary of the Net TRC and Cost Effectiveness Screening of the Program
- h) Provide a Mapping of OPA and THESL programs by Sector to demonstrate the THESL programs are complementary/supplementary to OPA programs. Include target Participants, Incentives and other features

VECC IR#4

Reference: No Reference

Preamble: VECC wishes to understand i) the OPA Low Income program(s) to be delivered by THESL ii) how the Community Outreach program targets vulnerable consumers and iii) any supplementary Low Income programs being planned by THESL

- a) Provide the OPA/HON the definition of qualifying low income customers (e.g. Low Income Families that pay their own electricity bills with an annual income < Stats Canada LICO +125%)
- b) Provide a profile of THESL and Provincial Low Income customers
- c) What is THESLs percentage of residential Low income customers relative to the provincial total? Provide the data.
- d) Provide the proposed OPA Low Income budget allocated to THESL
- e) Why is this appropriate to THESLs customer profile?. Benchmark this budget to
 - i. The total Residential spend (OPA and HON)
 - ii. the Ontario gas utilities and
 - iii. other Canadian jurisdictions specifically, Manitoba BC and Quebec
- f) Is THESL planning to supplement the OPA LI Programs. Please provide more details of THESL LI programs.(timing budgets etc)

VECC IR#5

Reference: Appendix A

Preamble: It appears that THESL has screened Initiatives at the Program rather than Measure Level

- a) Why is Screening at a Program Level only appropriate? Please Discuss
- b) Provide details of TRC and PAC screening at a measure level for all measures in each program.

VECC IR#6

Reference: Tab 4-Community Outreach and Education Initiative

Preamble: The program objective is to proactively engage customers face-to-face, and deliver education and outreach to reach Toronto's diverse, often over-exposed and sometimes hard-to-reach population. A significant group includes a large population of vulnerable customers in designated priority neighbourhoods. Many of these residents are disconnected from mainstream marketing activity and programs because of economic, language and cultural barriers.

- a) Explain whether OPA has//has not a similar initiative under either its residential (mass market) or Low Income programs
- b) The program delivery is through four channels
 - In store retail campaign
 - Festive light exchange
 - Toronto Police partnership
 - School education and outreach

Provide estimated participants number of units (by type CFL etc) and average cost/incentive for the in-store and festive light programs

- c) Provide THESLs freeridership rates for In-store and festive lights components. What was the source of the estimates- include comparison to THESL Every Kilowatt Counts results
- d) Explain why there was no TRC Screening for in-store and festive light handout/rebates components (as opposed to educational components)
- e) Explain the impact of the government banning sales of incandescent bulbs (~2012) on the free-ridership for the in-store and festive light components.
- f) Is the program design aimed at Low income/vulnerable consumers? Compare the program to the desirable attributes for such programs as set out in the OEB Conservation Working Group Report –No cost, direct install etc..
- g) Is THESL seeking either an SSM or LRAM for this program? Discuss

VECC IR#7

Reference: Tab 5-Flat Rate Water Heater Conversion & Demand Response Program

- a) Based on the Table In section 1.3 Provide the current average demand, average consumption Kwh and annual cost for a typical FRWH customer.
- b) Provide the costs to the utility and to the customer for conversion and load control..Include the incentives
- c) Provide the post conversion estimated average demand, consumption and customer cost. Compare to the pre conversion consumption
- d) Confirm the data in Appendix A are for conversions from Unmetered to Metered FRWH customers. How does Load Control affect this comparison and Is Load control alone more or less cost-effective
- e) Provide the freeridership assumption(s) for the program
- f) Explain why tenants (directly) and/or rental premises are excluded from the program
- g) Is THESL seeking either an SSM or LRAM for this program? Discuss

VECC IR#8

Reference: Tab 8- In-Store Engagement and Education Initiative

Preamble: Building on six years of successful retail partnerships and retail-based events, THESL will continue to deliver its award-winning in-store educational outreach that has proven so successful in the past. A small energy efficient product giveaway is used as the “hook” (such as CFLs, LEDs, programmable thermostats etc.) to create excitement and ‘buzz’ and drive traffic to retail locations. An integrated communications strategy is developed to create awareness, provide details of the offer and event logistics (date, location, time). In addition to local mass market, direct mail drops and public relations strategies are used.

- a) Explain/discuss whether OPA has//has not a similar initiative under its residential (mass market) initiatives
- b) How will this program be branded promoted relative to OPA sponsored programs? Is it a Co-branded program or not?
- c) For handouts what freeridership assumption(s) have been made?
- d) Why are there no estimates of Kw and Kwh reductions attributable to the program?
- e) What coordination/collaboration is planned with Enbridge Gas Distribution?

VECC IR#9

Reference: No Reference

- a) Demonstrate how the costs of the programs will be allocated to THESLs Customer classes via the Global Adjustment
- b) Provide the annual cost of the programs 2011-2014 on a per customer basis for THESL residential customers given the proposed allocation of budgets for both OPA and THESL programs separately
- c) Provide an estimate of the impact of the total CDM spend on THESL residential customers with consumption of 250, 500, 750 and 1000 kwh per month assuming average load profiles.

VECC IR#10

Reference: Appendix B

- a) Confirm whether THESL planning to claim an SSM or LRAM for its CDM programs?
- b) If so will there be an independent audit or will OPA perform this function. Please discuss how accountability to ratepayers will be achieved.
- c) Will OPA and THESL conduct one set of E&V activities for all programs?
- d) How will E&V be coordinated with OPA?
- e) What is the annual cost of the E&V? Provide a breakdown by activity and year

VECC IR#11

General: No Reference

- a) Has OPA endorsed THESLs Programs as non-duplicative?
Provide the relevant correspondence
- b) Has THESL entered into a cooperative arrangement on Program Delivery with Enbridge Gas Distribution. If not why not. If so provide details
- c) When is THESL going to launch its programs and how will this mesh with OPA?