

ONTARIO ENERGY BOARD

**INTERROGATORIES FOR TORONTO HYDRO-ELECTRIC SYSTEM LIMITED
FROM THE CONSUMERS COUNCIL OF CANADA**

1. Please provide one schedule setting out all of the OPA programs that THESL is undertaking, all of its proposed "Board-Approved" programs, the cost of each of those programs and the expected CDM savings.
2. THESL is planning to spend \$56.3 million on its Board-Approved Programs. Please describe, in detail, the process that THESL undertook to develop the programs and the specific program budgets. How can the Board be assured that the programs have been developed in the most cost effective-way possible? Please explain why THESL has determined that \$56.3 million is an appropriate level of spending for its CDM spending.
3. Please explain the extent to which THESL worked with other LDCs in the development of its programs. If collaboration was not undertaken please explain why.
4. Please explain why THESL could not meet its CDM targets using a portfolio of OPA programs only.
5. Please provide a complete list of the residential programs (providing details on program design) that were considered by THESL and rejected. Please explain why those programs or program concepts were rejected.
6. Please provide detailed evidence to support the proposition that THESL's selection of programs represents the best way to achieve its CDM targets that have been established by the Board.
7. Please explain the relationship between THESL's existing CDM programs and the proposed programs? Please explain why the existing programs could not have met the proposed targets?
8. Please explain how THESL intends to differentiate between CDM related costs to be recovered from the Global Adjustment Mechanism and those recovered through rates. Please explain how THESL will "fully allocate" CDM costs in a way consistent with the Board's CDM Code.
9. Please provide a list of all THESL employees that have been involved in the development of its CDM programs and those employees that will be involved in any further program development. Please provide a list of employees that will be involved in the delivery of THESL's CDM programs. How are the costs of those employees accounted for in the 2011 proposed revenue requirement?
10. For each of THESL's proposed Board-Approved programs please describe, in detail, how the free-ridership rates were established. For each of the programs please explain how actual free-ridership will be determined.

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11. Please describe the process that THESL will undertake to update its input assumptions during the four-year plan term.
12. With respect to THESL's Water Heater Conversion Program would it not be more cost-effective to replace the electric flat rate water heaters to natural gas? If not, why not?
13. THESL has filed a draft evaluation (EM&V) plan, but states that "the eventual evaluation plan will be prepared by the independent auditor". In its decision on certain preliminary questions, in EB-2010-0331 and EB-2010-0332, the Board stated that "in the absence of a complete evaluation plan, for each program, the application is incomplete and the proceedings should be adjourned until the evaluations plan is filed". Please explain why THESL's application should be treated differently?