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By electronic filing

March 18, 2011

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
27th floor
Toronto, ON M4P 1E4

Dear Ms Walli,

Ontario Power Authority
Board File No.: EB-2010-0279
Our File No.: 339583-000094

Please find attached the Interrogatories of Canadian Manufacturers & Exporters ("CME") for The Green Energy Coalition ("GEC").

Yours very truly,

A handwritten signature in black ink, appearing to read 'Vincent J. DeRose', is written over a printed name.

Vincent J. DeRose

\slc
enclosure

c. David Poch (GEC)
Miriam Heinz (OPA)
Fred Cass (Aird & Berlis)
Intervenors EB-2010-0279
Paul Clipsham (CME)

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IN THE MATTER OF sections 25.20 and 25.21 of the *Electricity Act*, 1998;

AND IN THE MATTER OF a Submission by the Ontario Power Authority to the Ontario Energy Board for the review of its proposed expenditure and revenue requirements and the fees which it proposes to charge for the year 2011.

**INTERROGATORIES OF
CANADIAN MANUFACTURERS & EXPORTERS ("CME")
TO THE GREEN ENERGY COALITION ("GEC")**

Reference: Exhibit K, Tab 2, Schedule 1

1. At page 7, Mr. Neme identifies two (2) possible interpretations of the Minister's Directive. The first is that the Minister expects 6 TWh of lifetime savings through 2014, and the second is that the Minister expects the LDCs to collectively reduce system load by 6 TWh in 2014. To this end, Mr. Neme notes that if the first interpretation is accurate, then the OPA's plan appears consistent with the Directive.

CME wishes to understand the impact, if any, that a finding by the Board that the first interpretation is correct would have on Mr. Neme's evidence. Therefore, the following questions are premised on the first interpretation being correct. Within this context:

- (a) At page 8, Mr. Neme states "[...] OPA's planning failures make it impossible for the Board or any other party to assess the adequacy and appropriateness of OPA's proposed 2011 revenue requirement." If the first interpretation is accurate, does Mr. Neme maintain this view? If so, please explain.
- (b) If the first interpretation is accurate, does Mr. Neme maintain the view that the Board should require the OPA to re-file its 2011 Revenue Requirements plan with sufficient evidence to demonstrate *prima facie* that:
 - (a) It has a plan to meet the 2015 LTEP persisting annual energy savings target;
 - (b) It has identified all cost-effective opportunities to exceed and/or accelerate achievement of the 2015 LTEP savings targets, and has a plan to acquire the additional savings and/or accelerate achievement of the 2015 LTEP savings targets; and
 - (c) Its staffing, consulting and other resources proposed in its 2011 revenue requirements are consistent with the plans to meet or exceed the 2015 LTEP savings targets.

If Mr. Neme is of the view that this information should be filed regardless of whether the first interpretation of the Minister's Directive is correct, please provide a further explanation of why this incremental information with respect to 2015 LTEP is necessary.

2. At page 9, Mr. Neme states that “a growing number of jurisdictions have been moving responsibility for EM&V to organizations other than those charged with delivering efficiency programs.” Within this context, would you please:
- (a) Identify those jurisdictions that have moved responsibility for EM&V to organizations other than those charged with delivering efficiency programs.
 - (b) If available, provide additional information on how those jurisdictions have implemented that change. For instance, in the jurisdictions identified by Mr. Neme, are the organizations responsible for EM&V private companies, public organizations or quasi-public (i.e. crown corporations) organizations?
 - (c) If Mr. Neme is in possession of any reports, articles or any literature that addresses why some jurisdictions have moved responsibility for EM&V to organizations not delivering efficiency programs, please produce copies.