



PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7
Toronto Office: 34 King St E Suite 1102 Toronto Ont. M5C 2X8

April 14, 2010

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-2011-0049 Norfolk Power Distribution. 2011 IRM Adjustment
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed VECC's interrogatories regarding the above Application.
We apologize for the late filing, we inadvertently missed the scheduled day for
interrogatories.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC

Encl.

CC Brad Randall; President and CEO Norfolk Power
brandall@norfolkpower.on.ca

EB-2011-0049 Norfolk Power 2011 IRM Adjustment -VECC IRs

LRAM/SSM

VECC IR# 1

References: Exhibit 1 Page 5 and Indeco Report page 3-4 and Tables 1& 2

- 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) What persistence factors have been applied to the LRAM for 2006 EKC programs and Measures, specifically CFLs?
- c) For SSM calculations what savings and lifetime estimates have been used for CFLs installed in 2006?
- d) If for example for 15w CFLs 104 kwh/yr and 4 years have been used, then recalculate the Residential and GS<50 kw SSM for all CFLs using 44 kwh and 8 years as the input assumptions.

VECC IR# 2

References: Tab 7 IndEco Report page 5 and Appendix A Table 12

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 CDM programs:

- Lighten Your Electricity Bill 2005 A/C Indoor Timer
- Residential EKC 2006 and 2007-- list of measures, # units and unit kwh savings, lifetime and free ridership for each of 2009-2010.
Note 2006-2007 EKC is listed as third tranche
- The Water Heater Replacement Program -replacement

of 40 and 60-gallon electric water heaters

- 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 the Water Heater Replacement Program provide the comparable Enbridge Gas Distribution Board-approved gas and electricity savings estimates.
- e) Provide a comparison table for NPI and EGD estimates.
- f) Confirm the replacement units were all gas or indicate how many of the replacement units were gas and how many electric.
- g) Explain why gas water heater conversion is an eligible CDM measure and provide examples/precedents where this measure has been approved by the OEB.