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February 14, 2008

BY EMAIL & BY COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2007-0791 Ontario Power Authority  
Fiscal 2008 – Expenditure, Revenue and Fees Submission for Review  
Interrogatories of Energy Probe**

Pursuant to the Board's Decision on Issues, issued on February 11, 2008, please find the Interrogatories of Energy Probe Research Foundation (Energy Probe). An electronic version of Energy Probe's Interrogatories will be provided in both PDF and Word formats.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: Miriam Heinz, Ontario Power Authority (By email)  
Fred Cass, Aird & Berlis LLP (By email)

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**Ontario Energy Board**

**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 2008.

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**INTERROGATORIES OF  
ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

**February 14, 2008**

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**ONTARIO POWER AUTHORITY**  
**Review of Proposed 2008 Expenditure and Revenue Requirements, and Fees**  
**EB-2007-0791**

**ENERGY PROBE RESEARCH FOUNDATION**  
**INTERROGATORIES**

**Interrogatory # 1**

**Ref: Exhibit B, Tab 1, Schedule 1, page 3.**

**Please provide concrete and measurable indicators of success in reference to stakeholder and OEB acceptance of the OPA's IPSP, especially in reference to Phase 1 of OEB's hearings on the IPSP.**

**Interrogatory # 2**

**Ref: Exhibit B, Tab 1, Schedule 1, page 3.**

**Please describe how and by what criteria "current IPSP developments" are being monitored to achieve success.**

**Interrogatory # 3**

**Ref: Exhibit B, Tab 1, Schedule 1, page 4.**

**Please explain how the OPA "will monitor planning choices, trends and technological and regulatory developments in other jurisdictions for incorporation into future local area supply planning."**

**Interrogatory # 4**

**Ref: Exhibit B, Tab 1, Schedule 1, page 4.**

**Please explain how "measures of success" for "solutions" on local area supply concerns "have been developed."**

#### **Interrogatory # 5**

**Ref: Exhibit B, Tab 1, Schedule 1, page 4.**

**Please explain what specific steps are being taken by the OPA to “streamline approval processes” at the local level in relation for the “installation of electricity infrastructure, lack of zoning for electricity infrastructure in official plans, and ... [the problem of duplication].”**

#### **Interrogatory # 6**

**Ref: Exhibit B, Tab 1, Schedule 1, page 5.**

**Please describe what specific “measures of success” i.e. what criteria and/or evaluation methodologies are being/will be used to assess the “streamlining of local [electricity installation] approval processes” for purposes of “integrating” provincial infrastructure into “municipal planning” initiatives.**

#### **Interrogatory # 7**

**Ref: Exhibit B, Tab 1, Schedule 1, pages 5-7.**

**Going beyond the details of Table 1 (p. 6), please explain why the 2008 budget for Strategic Objective # 1 i.e. \$10.445 million is adequate and appropriate. How and why will the budget for activities related to this Strategic Objective likely change in 2009?**

#### **Interrogatory # 8**

**Ref: Exhibit B, Tab 2, Schedule 1, page 2, Table 1.**

**Please explain the rationale/methodology for arriving at/calculating the standardized “free rider rate” of “30%.”**

#### **Interrogatory # 9**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 3-4.**

**Please explain why 66 FTE personnel for 2008 are adequate and appropriate, which means the OPA intends to double its personnel complement in support of Strategic Objective # 2.**

**Interrogatory # 10**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 4-9.**

**Please explain in detail how the OPA determines the impetus or demand for new programs that it will be introduced in 2008, specifically those programs identified in Tables 3, 4 and 5.**

**Interrogatory # 11**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 5-6.**

**Please explain how the OPA verifies the Net MW savings identified in Table 3 for each of the 12 programs cited.**

**Interrogatory # 12**

**Ref: Exhibit B, Tab 2, Schedule 1, page 6, Table 3, Program # 7.**

**Please define the term “assist” in Table 3, Program # 7.**

**Interrogatory # 13**

**Ref: Exhibit B, Tab 2, Schedule 1, Table 4, page 7.**

**Please explain how Program # 2 “Electricity Conservation on Ontario Farms Program” will be integrated with OEB’s effort to mitigate “stray voltage” especially on dairy farms in Ontario.**

**Interrogatory # 14**

**Ref: Exhibit B, Tab 2, Schedule 1, page 9, line 8.**

**Please define the goal: “build marketplace capability” in reference to the Conservation Fund.**

**Interrogatory # 15**

**Ref: Exhibit B, Tab 2, Schedule 1, page 10, line 2.**

**Please provide the program evaluation results for the “44 pilot projects” the OPA has carried out since 2005. What is the basis for pursuing conservation “pilot projects?” What criteria are used to carry forward with conservation “pilot projects?”**

**Interrogatory # 16**

**Ref: Exhibit B, Tab 2, Schedule 1, page 10.**

**Please explain why pilot programs for “limited or niche applications” are necessary.**

**Interrogatory # 17**

**Ref: Exhibit B, Tab 2, Schedule 1, page 10.**

**Please identify when the EM&V “metrics” will be available “to inform [OPA] internal decision-making” on the Conservation Fund.**

**Interrogatory # 18**

**Ref: Exhibit B, Tab 2, Schedule 1, page 10.**

**Please explain why the Technology Development Fund is organized under the institutional rubric of Conservation when “TDF does not apply solely to Conservation initiatives.”**

**Interrogatory # 19**

**Ref: Exhibit B, Tab 2, Schedule 1, page 11.**

**Please describe any additional plans to outsource development of “new and emerging technologies” related to Conservation or any other OPA function.**

#### **Interrogatory # 20**

**Ref: Exhibit B, Tab 2, Schedule 1, Table 6, page 12 and page 23, lines 6-12.**

**Please justify the frequent use (weekly) of market research field-testing related to conservation awareness adopted by the OPA. What specific value is there in knowing aggregate public opinion on a weekly basis, when it is well accepted in the market research profession that market/public opinion does not perceptibly change inside 7 days, in the absence of major or catastrophic events? What actual marketing programs have been adopted by the OPA in reference to mass market Conservation programs e.g. the EKC program.**

#### **Interrogatory # 21**

**Ref: Exhibit B, Tab 2, Schedule 1, page 13.**

**Specifically define and explain: “situational assessment,” “target setting and program prioritization,” and “portfolio finalization.”**

#### **Interrogatory # 22**

**Ref: Exhibit B, Tab 2, Schedule 1, page 14.**

**Please explain in a complete and comprehensive fashion the nature, scope and methodologies used in OPA’s Evaluation, Measurement and Verification system for Conservation programs, and how the nature, scope and methodologies will change in 2009. Please respond in a fashion that describes OPA’s EMV activities beyond “tracking” activities and the description provided on page 15, lines 1-7 and lines 10-29. Will formal evaluations be available to the public on OPA’s Internet website.**

#### **Interrogatory # 23**

**Ref: Exhibit B, Tab 2, Schedule 1, page 16.**

**Please explain how the OPA will be able to overcome the difficulties cited on page 16, lines 21-29 in 2008.**

**Interrogatory # 24**

**Ref: Exhibit B, Tab 2, Schedule 1, page 17.**

**Please report on OPA's ability to meet Conservation program MW savings targets identified in EB-2006-0233 i.e. 40-50 MW in "mass markets" and 225-250 MW in "business markets."**

**Interrogatory # 25**

**Ref: Exhibit B, Tab 2, Schedule 1, Table 13 page 26.**

**Please indicate whether EM&V activities by the OPA for Conservation are principally a new programs development function carried out on an *a priori* basis or a *post facto* Conservation program evaluation function. Is "cost-effectiveness" the primary criterion for evaluation in either case?**

**Interrogatory # 26**

**Ref: Exhibit B, Tab 2, Schedule 1, pages 28-29.**

**Please account for OPA's decision to make Conservation and Strategic Objective # 2 the largest spending envelope for the organization in 2008 (\$26.445 million). and previously.**

**Interrogatory # 27**

**Ref: Exhibit B, Tab 3, Schedule 1, page 5, lines 27-28.**

**Has the OPA considered expanding its plans for outsourcing electricity development in 2008 and 2009 i.e. beyond current plans?**

**Interrogatory # 28**

**Ref: Exhibit B, Tab 4, Schedule 1, page 5.**

**To what extent does the OPA intend to involve itself in emissions trading program going into the future?**



**Interrogatory # 29**

**Ref: Exhibit B, Tab 5, Schedule 1, page 3.**

**Please explain how the Finance and Business Services Group is organizing and ensuring capacity on the evaluation management function in 2008.**

**Interrogatory # 30**

**Ref: Exhibit B, Tab 5, Schedule 1, pages 11-12.**

**Please report the results of opinion polls that indicate “OPA is widely viewed as an authoritative source of information on electricity,” and please report the research that indicates OPA has the “majority approval” of key stakeholders.**

**Interrogatory # 31**

**Ref: Exhibit B, Tab 5, Schedule 1, pages 15 and 19.**

**Please explain why OPA personnel turnover figures for 2007 have been higher than expected.**

**Interrogatory # 32**

**Ref: Exhibit C, Tab 1, Schedule 1, page 1.**

**Please explain why the firm, Morrison Park Advisors, continues to be hired as an outside consultant on stakeholder relations without a competitive bid. Why is the contract with Morrison Park Advisors for three years?**

**Interrogatory # 33**

**Ref: Exhibit D, Tab 1, Schedule 1, page 1.**

**Please explain the circumstances that led the OPA to choose a \$0.346/MWh. usage fee against Ontario electricity customers starting Jan. 1, 2008. What are OPA’s future plans for this provincial ratepayer user fee? Will OPA and the implementing LDCs require a rate rider to pay the fee?**