



February 1, 2012

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: London Hydro Inc.  
Response to VECC Interrogatories  
2012 Electricity Distribution Rate Application (EB-2011-0181)**

Please find attached the London Hydro Inc. response to Vulnerable Energy Consumers Coalition (VECC) interrogatories regarding the above application.

Two copies of this letter and response to Board Staff interrogatories filing have been forwarded to your attention via courier.

If you require any additional information or clarification, please do not hesitate to contact either myself, at (519) 661-5800 Ext. 5750 or Dave Williamson at (519) 661-5800 Ext. 5745.

Yours truly,

Mike Chase, CMA. MBA  
Director of Finance and Regulatory Compliance  
London Hydro

**EB-2011-0181**

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF**

the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), as amended;

**AND IN THE MATTER OF** an Application by  
London Hydro Inc. for an order or orders  
approving or fixing just and reasonable  
distribution rates to be effective May 1, 2012.

**Responses to Interrogatories of the Vulnerable Energy Consumers Coalition  
(VECC)**

Lost Revenue Adjustment Mechanism (LRAM)

**VECC Question # 1**

**Reference:** Manager's Summary, LRAM Rate Rider, Pages 15 to 18

Preamble: London Hydro seeks an LRAM claim of \$291,445 including carrying charges, associated with 2009 and 2010 CDM programs funded by the OPA.

- a) Please confirm that the LRAM amounts London Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.

**Response:**

Correct, London Hydro has never received any recoveries for either LRAM or SSM. The amounts being applied for in the London Hydro Application are new amounts.

- b) Confirm that persisting savings for programs prior to 2009 are not included in the LRAM amount.

**Response:**

London Hydro does not include any persisting savings programs prior to 2009 in the LRAM amounts in this Application. London Hydro is not seeking SSM recoveries in this Application.

- c) Please confirm when London Hydro's load forecast was last approved by the Board? Please discuss how any CDM savings have been accounted for in London Hydro's approved load forecast.

**Response:**

Please see London Hydro's Interrogatories response to Board Staff's IR#12 d).

**VECC Question # 2**

**Reference:** Manager's Summary, LRAM Rate Rider, Page 16

Preamble: On Page 16, the evidence indicates that the 2010 OPA Program results are estimates and the LRAM will be updated for final OPA 2010 results once the final report has been released.

- a) When does London Hydro expect to receive the 2010 OPA Final Results?

**Response:**

Please see London Hydro's Interrogatories response to Board Staff's IR#12 a).

However, to re-identify London Hydro's situation, London Hydro has repeatedly requested and demanded for the OPA to provide final 2010 program evaluation results. On January 23, 2012, during this intervener responses process, OPA finally delivered to London Hydro a copy of the 2010 OPA Final Evaluation results.

- b) If London Hydro has received the 2010 OPA Final Results, please update the LRAM claim accordingly.

**Response:**

Please see above Response. As well, further information updated for 2010 OPA CDM actual results is reflected in Board Staff IR response Q# 12 a and VECC IR response Q#4 a.

**VECC Question # 3**

**Reference:** Appendix E, London Hydro IRM 2012 LRAM Recovery - Letter

Preamble: On Page 1 of the Letter, London Hydro indicates that in this application, London Hydro is applying to the Board to recover an LRAM amount of \$468,172, including carrying costs, which differs from the LRAM amount of \$291,445.

- a) Please explain/confirm the scope and amount of the LRAM recovery London Hydro is applying for in this application.

**Response:**

- a) London Hydro regrets this error, and submits that the Application was seeking for a LRAM recovery amount of \$291,445. Since the delivery of the OPA 2010 Final Evaluation report this past week, the LRAM that London Hydro is requesting to be sought is in the amount of \$355,473 (including carrying charges).

**VECC Question # 4**

**Reference:** Manager's Summary, LRAM Rate Rider, Page 17, Table 5

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data shown in Table 5 & Appendix F: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues in Table 5.
- b) List and confirm OPA's latest input assumptions for Every Kilowatt Counts (EKC) programs including the measure life, unit kWh savings and free ridership rate for Compact Fluorescent Lights (CFLs) and Seasonal Light Emitting Diodes (LED).
- c) Confirm these values were used for CFLs and LEDs in the LRAM claim for lost savings in 2010 and 2011.

**a) Response: Table is Updated with OPA 2010 Actual Final CDM Results data.**

London Hydro Inc.

OPA CDM Program Load Impacts (2009 and 2010)

2009 Data from OPA Verified Results -per link

<http://www.powerauthority.on.ca/evaluation-measurement-and-verification/resources-assumptions-lists>

2010 Data from OPA 2010 Final CDM Results: Summary (Copy included in IR Response 08 12 a)

\*London Hydro is not requesting LRAM /ESM for Programs in 2006, 2007, and 2008

Class/Program	Year Program Implemented	Activity Results (#)	Net Lifetime Energy Savings	2009		2009		2010		2010		TOTAL		TOTAL		2009				2010				Total Revenue	Carrying Charges Total	2010 Billing Determinate	Rate Rider	
				NET		GROSS		NET		GROSS		NET		GROSS		Load Impact	kW or kW	Rate per Unit	Rebate	Load Impact	kW or kW	Rate per Unit	Rebate					
				kWh	kV																							
<b>RESIDENTIAL</b>																												
Great Refrigerator Roundup	2009	2,066	5,903,343	1,243,000	186.5	2,333,000	362.2	1,243,000	186.5	2,333,000	362.2	2,496,000	373.0	4,666,000	724.4	1,243,000	kWh	\$ 0.0943	\$ 11,774.90	1,243,000	kWh	\$ 0.0942	\$ 17,050.60	\$ 35,425.50				
Cool Savings Robots	2009	9,367	24,346,500	778,000	52.4	1,821,000	172.1	778,000	52.4	1,821,000	172.1	1,556,000	102.8	3,642,000	2,344.2	778,000	kWh	\$ 0.0943	\$ 11,253.40	778,000	kWh	\$ 0.0942	\$ 11,047.60	\$ 22,473.00				
Every Kilowatt Counts Power Savings Event	2009	104,885	13,187,302	1,333,000	134.7	3,687,000	374.1	1,287,000	134.7	3,534,000	358.8	2,650,000	283.4	7,021,000	733.0	1,333,000	kWh	\$ 0.0943	\$ 15,347.90	1,287,000	kWh	\$ 0.0942	\$ 18,417.40	\$ 37,753.30				
Great Refrigerator Roundup	2010	2,198	not provided	0	0.0	0	0.0	1,272,000	194.7	2,395,000	380.0	1,272,000	194.7	2,395,000	380.0	0			\$ -	1,272,000	kWh	\$ 0.0942	\$ 18,062.40	\$ 18,062.40				
Cool Savings Robots	2010	5,474	not provided	0	0.0	0	0.0	1,223,000	808.4	2,842,000	1,820.0	1,223,000	808.4	2,842,000	1,820.0	0			\$ -	1,223,000	kWh	\$ 0.0942	\$ 17,366.60	\$ 17,366.60				
Every Kilowatt Counts Power Savings Event	2010	17,286	not provided	0	0.0	0	0.0	538,000	47.9	1,165,000	110.0	538,000	47.9	1,165,000	110.0	0			\$ -	538,000	kWh	\$ 0.0942	\$ 7,653.80	\$ 7,653.80				
<b>Residential Total</b>				3,374,000	833.6	7,841,000	1,308.4	6,352,000	1,884.6	13,890,000	4,203.2	9,726,000	2,718.2	21,721,000	6,116.6	3,374,000			\$ 48,248.20	6,352,000			\$ 90,198.40	\$ 138,446.60	\$ 3,098.33	\$ 141,544.93	146,514,235	\$ 0.00192
<b>General Service &lt; 50 kW</b>																												
OPA Energy Retrofit Incentive Program	2009	n/a	not provided	639,324	86.5	958,357	132.0	639,324	86.5	958,357	132.0	1,279,847	173.0	1,916,714	264.0	639,324	kWh	\$ 0.0094	\$ 6,015.28	639,324	kWh	\$ 0.0091	\$ 5,823.30	\$ 11,838.58				
High Performance New Construction	2009	15,707,756	4,638,765	235,000	182.9	335,000	147.1	235,000	182.9	335,000	147.1	470,000	205.8	670,000	294.2	235,000	kWh	\$ 0.0094	\$ 2,203.00	235,000	kWh	\$ 0.0091	\$ 2,198.50	\$ 4,347.50				
Power Savings Blitz	2009	not provided	not provided	3,260,000	835.7	3,432,000	879.7	3,260,000	835.7	3,432,000	879.7	6,520,000	1,674.4	6,864,000	1,753.4	3,260,000	kWh	\$ 0.0094	\$ 30,644.00	3,260,000	kWh	\$ 0.0091	\$ 29,666.00	\$ 60,310.00				
OPA Energy Retrofit Incentive Program	2010	16	not provided	0	0.0	0	0.0	116,414	20.3	229,436	39.4	116,414	20.3	229,436	39.4	0	kWh	\$ 0.0094	\$ -	116,414	kWh	\$ 0.0091	\$ 1,059.36	\$ 1,059.36				
High Performance New Construction	2010	8	not provided	0	0.0	0	0.0	839,000	367.8	1,188,000	530.0	839,000	367.8	1,188,000	530.0	0	kWh	\$ 0.0094	\$ -	839,000	kWh	\$ 0.0091	\$ 7,634.90	\$ 7,634.90				
Power Savings Blitz	2010	2780	not provided	0	0.0	0	0.0	7,467,000	2,439.0	7,485,000	2,460.0	7,467,000	2,439.0	7,485,000	2,460.0	0	kWh	\$ 0.0094	\$ -	7,467,000	kWh	\$ 0.0091	\$ 67,349.70	\$ 67,349.70				
Multifamily Energy Efficiency Robots	2010	22	not provided	0	0.0	0	0.0	1,244,000	105.4	1,689,000	140.0	1,244,000	105.4	1,689,000	140.0	0			\$ -	1,244,000	kWh	\$ 0.0091	\$ 11,320.40	\$ 11,320.40				
<b>Total General Service &lt; 50 kW</b>				4,154,324	1,025.1	4,725,357	1,159.3	13,001,337	3,357.3	15,326,733	4,328.2	17,936,261	4,877.6	20,092,160	5,347.0	4,154,324			\$ 38,868.28	13,001,337			\$ 185,592.17	\$ 164,460.45	\$ 3,533.40	\$ 167,993.85	407,620,354	\$ 0.00041
<b>General Service: 50 kW to</b>																												
OPA Energy Retrofit Incentive Program	2009	n/a	not provided	8,443,048	1,141.5	12,644,219	1,741.5	8,443,048	1,141.5	12,644,219	1,741.5	16,806,096	2,283.0	25,288,426	3,482.3	8,443,048	kV	\$ 1.6023	\$ 1,829.10	8,443,048	kV	\$ 1.6052	\$ 1,832.41	\$ 3,661.51				
Demand Response 1	2009	0.59628291	not provided	204,000	4,647.7	204,000	4,647.7	0	0.0	0	0.0	204,000	4,647.7	204,000	4,647.7	4,648	kV	\$ 1.6023	\$ 7,447.01	0	kV	\$ 1.6052	\$ -	\$ 7,447.01				
Demand Response 2	2009	0.07955074	not provided	1,944,000	3,953.9	1,944,000	3,953.9	3,963,000	0.0	0	0.0	5,907,000	3,953.9	1,944,000	3,953.9	3,959	kV	\$ 1.6023	\$ 5,056.70	0	kV	\$ 1.6052	\$ -	\$ 5,056.70				
Demand Response 3	2009	3.25847014	not provided	37,000	4,508.4	37,000	4,508.4	141,000	0.0	0	0.0	178,000	4,508.4	37,000	4,508.4	4,508	kV	\$ 1.6023	\$ 7,223.81	0	kV	\$ 1.6052	\$ -	\$ 7,223.81				
Loblaw & York Region Demand Response	2009	0.02632025	not provided	0	774.7	0	774.7	0	0.0	0	0.0	0	774.7	0	774.7	775	kV	\$ 1.6023	\$ 1,241.30	0	kV	\$ 1.6052	\$ -	\$ 1,241.30				
OPA Energy Retrofit Incentive Program	2010	16	not provided	0	0.0	0	0.0	1,195,093	210.5	2,335,373	404.1	1,195,093	210.5	2,335,373	404.1	0	kV	\$ 1.6023	\$ -	210	kV	\$ 1.6052	\$ 337.82	\$ 337.82				
Demand Response 1	2010	0	not provided	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	kV	\$ 1.6023	\$ -	0	kV	\$ 1.6052	\$ -	\$ -				
Demand Response 2	2010	0	not provided	0	0.0	0	0.0	3,363,249	3,390.6	3,363,000	3,390.0	3,363,249	3,390.6	3,363,000	3,390.0	0	kV	\$ 1.6023	\$ -	3,391	kV	\$ 1.6052	\$ 5,442.52	\$ 5,442.52				
Demand Response 3	2010	7	not provided	0	0.0	0	0.0	140,523	7,171.3	141,000	7,170.0	140,523	7,171.3	141,000	7,170.0	0	kV	\$ 1.6023	\$ -	7,171	kV	\$ 1.6052	\$ 11,511.62	\$ 11,511.62				
Loblaw & York Region Demand Response	2010	0	not provided	0	0.0	0	0.0	0	832.3	0	830.0	0	832.3	0	830.0	0	kV	\$ 1.6023	\$ -	832	kV	\$ 1.6052	\$ 1,335.93	\$ 1,335.93				
<b>Total General Service 50 to 4,399 kW</b>				10,628,048	14,228.2	14,829,219	14,828.2	17,845,910	12,746.3	19,103,593	10,353.1	26,473,361	26,374.5	33,932,739	28,363.7	14,228			\$ 22,797.92	12,746			\$ 20,460.31	\$ 43,250.23	\$ 1,028.67	\$ 44,281.90	3,344,476	\$ 0.01123
<b>Large User</b>																												
OPA Energy Retrofit Incentive Program	2009	n/a	not provided	2,768,028	374.3	4,145,431	571.0	2,768,028	374.3	4,145,431	571.0	5,536,096	749.6	8,290,881	1,142.0	2,768,028	kV	\$ 1.9302	\$ 722.43	2,768,028	kV	\$ 2.2532	\$ 844.07	\$ 1,566.50				
OPA Energy Retrofit Incentive Program	2010	14	not provided	0	0.0	0	0.0	108,171	19.0	213,191	36.6	108,171	19.0	213,191	36.6	0	kV	\$ 1.9302	\$ -	19	kV	\$ 2.2532	\$ 42.96	\$ 42.96				
<b>Large User</b>				2,768,028	374.3	4,145,431	571.0	2,876,199	393.3	4,358,622	607.6	5,644,267	768.6	8,504,072	1,178.6	2,768,028			\$ 722.43	393			\$ 887.03	\$ 1,609.46	\$ 37.31	\$ 1,646.77	402,694	\$ 0.00403
<b>Total Load Impacts from OPA programs</b>				20,905,000	16,461	31,541,000	18,466	40,875,449	18,382	52,679,000	22,674	61,780,448	35,338	84,220,001	41,001	7,329,326			\$ 110,631	20,166,477			\$ 237,198	\$ 347,775	\$ 7,639	\$ 355,413		

b)

Information obtained from:

**2009 Data from OPA Verified Results -per link**

**<http://www.powerauthority.on.ca/evaluation-measurement-and-verification/measures-assumptions-lists>**

Information pertaining to Seasonal Light Emitting Diodes (LED) was not found to be included in OPA's Verified Results for Program in year 2009.

In regards to 2010 OPA Program results for London Hydro, the report just delivered to London Hydro does not provide details as to EKC program (specifics as to either CFLs or LED). London Hydro is requesting the OPA to both include all the 2010 OPA Program results, the ERIP/ Retrofit Program is missing many transactions, and to provide details for each OPA Program.

OPA 2009 CDM Program (LED Results):

### OPA Conservation & Demand Management Programs

Measure Results at End-User Level

For: London Hydro Inc.

#	Initiative Number	Initiative Name	Program Name	Program Year	Results Status	#	Measure Name	Unit Savings Assumptions							LDC Specific Results							
								Gross Summer Demand Savings (kW)	Gross Annual Energy Savings (KWh)	Gross Lifetime Energy Savings (KWh)	Net Summer Demand Savings (kW)	Net Annual Energy Savings (KWh)	Net Lifetime Energy Savings (KWh)	Aggregate Net-to-Gross Adjust	Effective Useful Life (EUL)	Activity Results (#)	Gross Summer Demand Savings (kW)	Gross Annual Energy Savings (KWh)	Gross Lifetime Energy Savings (KWh)	Net Summer Demand Savings (kW)	Net Annual Energy Savings (KWh)	Net Lifetime Energy Savings (KWh)
613	37	Every Kilowatt Counts Power Savings Event	Consumer	2009	Final	17	Installed CFLs - Spring Campaign - Participant Spillover	0.003	101	811	0.000	13	106	13.1	8.0	265,810	0.84	26,959	215,675	0.11	3,535	28,284

c)

London Hydro used the values and inputs as provided by the OPA Final Evaluation results. With regard to 2009 Every Kilowatt Counts Power Savings Event Installed CFL's, Spring Campaign, Participant Spillover, the OPA evaluation results were provided to London Hydro. These results were understood to be conducted on the behalf of the OPA.

London Hydro was not provided values for LEDS in the OPA Final Evaluation for 2009 or specific details as to 2010 OPA Final Evaluation results for each program.

London Hydro is not applying for 2011 LRAM recovery in this Application.

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