

**BY RESS & OVERNIGHT COURIER**

April 24, 2013

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge Street  
Suite 2700  
Toronto, Ontario  
M4P 1E4

Dear Ms. Walli:

**Re: Enersource Hydro Mississauga Inc.  
Lost Revenue Adjustment Mechanism (LRAM) Application  
EB-2013-0024**

Please find attached Enersource's responses to interrogatories in the above-captioned proceeding.

Two sets of hard copies of all the interrogatory responses will be sent to the Board in addition to filing this via RESS.

If you have any questions or concerns with this Application, please do not hesitate to contact me at (905) 283-4098.

Sincerely,

*(Original signed by)*

Gia M. DeJulio  
Director, Regulatory Affairs

cc. Dan J. Pastoric, Executive Vice-President and Chief Operating Officer  
All Intervenors EB-2013-0024 (Cover letter by email)



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 1**

**Board Staff**

Enersource has requested a total LRAM recovery of \$1,753,174, including carrying charges. Enersource's LRAM claim consists of two parts: an LRAM claim of \$867,440 associated with the persisting effects of 2005 to 2010 CDM programs in 2011, and an LRAM claim of \$850,881 associated with the persisting effects of 2005 to 2010 CDM programs in 2012. Enersource has also requested approval of \$34,853 which represents the applicable carrying charges on the entire LRAM amount. Enersource has requested recovery over a period of twenty months beginning on May 1, 2013 and ending on December 31, 2014.

- a) Please confirm that Enersource is not applying for recovery of any lost revenues associated with CDM programs where useful measure lives no longer exist.
- b) Please confirm that Enersource has not received any of the lost revenues requested in this application in the past. If Enersource has collected lost revenues related to programs applied for in this application, please discuss the appropriateness of this request.
- c) Please identify the CDM component that was included in Enersource's 2013 load forecast in EB-2012-0033.
- d) Please confirm that it is Enersource's understanding that on a go forward basis, all load impacts related to 2005 to 2010 CDM programs have been included in Enersource's 2013 load forecast, therefore negating any future LRAM applications related to 2005 to 2010 CDM programs.

**Response:**

- a) Confirmed. Enersource is not applying for recovery of any lost revenues associated with CDM programs where useful measure lives no longer exist.
- b) Confirmed. Enersource has not received any of the lost revenues requested in this application in the past. Prior LRAM applications received approval for recovery of lost revenues in 2005 to 2010. These were revenues lost for

programs delivered in and/or persisted into those years. This particular application is seeking recovery for the lost revenues that persisted into 2011 and 2012 due to programs that were delivered in 2010, or earlier.

- c) Table 1 below identifies the CDM adjustment that was included, and approved by the Board, in Enersource's 2013 load forecast in EB-2012-0033. The adjustment for conservation and demand side management in Enersource's 2013 load forecast was discussed at Exhibit 3, Tab 1, Schedule 2, pages 5 to 7 of Enersource's evidence in EB-2012-0033. The information in the following Table 1 is a summary of Table 3, provided at page 6 in the referenced evidence schedule in EB-2012-0033.

**Table 1: 2013 CDM Adjustment by Customer Class (kWh)**

Rate Class	2013 CDM Adjustment
Residential	(35,842,920)
Small Commercial	-
Unmetered Scattered Load	-
GS < 50	(39,519,293)
GS 50-499	(6,718,613)
GS 500-4999	(7,166,687)
Large User	(8,983,655)
Street Lighting	(20,915,195)
<b>Total</b>	<b>(119,146,362)</b>

- d) Confirmed. This application (EB-2013-0024) completes Enersource's LRAM applications related to 2005 to 2010 CDM programs.

**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 1**

**Building Owners and Managers Association - Toronto  
(BOMA)**

**Reference: Tab 2, Page 3 of 11**

Consistent with Enersource's prior LRAM applications, and as indicated in Enersource's evidence in EB-2011-0100, none of the load reductions resulting from the above programs were reflected in the load forecast underpinning 2011 and 2012 rates.

1. Does Enersource anticipate including expected load reductions in its load forecasts in the future? If so, when? If not, please explain why not?

**Response:**

1. Please see the response to Board Staff Interrogatory # 1c). This response explains the adjustment for conservation and demand management that was incorporated into Enersource's Board-approved load forecast in its 2013 cost-of-service rate application. Enersource anticipates including expected load reductions due to conservation and demand management in its load forecast in future cost-of-service rate applications.



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 2**

**Building Owners and Managers Association - Toronto  
(BOMA)**

**Reference: Tab 2, Page 5 of 11**

In accordance with the Board's CDM Guidelines, Enersource calculated the volumes lost from CDM programs using the latest input assumptions at the time of the third party assessment. For 2006 to 2010 OPA-funded programs, Enersource adopted the OPA's *"2006 – 2010 Final OPA Conservation Program Results – Enersource Hydro Mississauga Inc."*. These results are presented in Tab 3, Schedule 4. Enersource used the latest OPA Measures and Assumptions list to calculate lost volumes for the other CDM program measures where such information was available.

2. Please provide the original input assumptions at the time of program design or adoption and indicate the variance from the OPA latest Measures and Assumptions List.

**Response:**

2. Enersource employed the Measures and Assumptions list published by the Ontario Energy Board at the time of program design or adoption. This list can be found at the following link:

[http://www.ontarioenergyboard.ca/documents/cases/EB-2008-0037/Inputs\\_and\\_Assumptions\\_20080328.pdf](http://www.ontarioenergyboard.ca/documents/cases/EB-2008-0037/Inputs_and_Assumptions_20080328.pdf).

The link to the OPA's latest Measures and Assumptions list was provided at page 5 of Tab 2 and is repeated here:

<http://www.powerauthority.on.ca/sites/default/files/2011%20Prescriptive%20Measures%20and%20Assumptions%20List%20Version%201.0%20FINAL%20%28April%2006%2C%202011%29.pdf>.

Enersource has followed the Board's CDM Guidelines in determining this LRAM claim amount. These Guidelines recommend using the latest Measures and Assumptions List provided by the Ontario Power Authority (OPA).





**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 3**

**Building Owners and Managers Association - Toronto  
(BOMA)**

**Reference: Tab 2, Page 6 of 11**

For custom programs where published measures were not available, Enersource used the latest information based on customer-provided engineering calculations. This methodology is in accordance with the Board's CDM Guidelines and consistent with Enersource's applications in EB-2009-0400, EB-2010-0078, and EB-2011-5 0100 (sic), which were approved, as filed, by the Board.

3. In such cases, did Enersource or the OPA conduct any third party verification if customer provided engineering calculations? If not, why not?

**Response:**

3. There are no custom programs under Third Tranche, where published measures were not available, included in the LRAM claim amount in this application. As such, no other third party verification was required.



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 4**

**Building Owners and Managers Association - Toronto  
(BOMA)**

**Reference: Tab 2, Page 6 of 11**

For custom programs where published measures were not available, Enersource used the latest information based on customer-provided engineering calculations. This methodology is in accordance with the Board's CDM Guidelines and consistent with Enersource's applications in EB-2009-0400, EB-2010-0078, and EB-2011-5 0100, which were approved, as filed, by the Board.

4. Are CDM Staff at Enersource familiar with measurement and monitoring techniques based on metered data before project implementation, and thereafter, on annual measurement of savings such as those used in Enbridge Gas Distributions performance based programs?

**Response:**

4. Yes, CDM staff at Enersource are familiar with the various measurement and monitoring techniques based on metered data before project implementation and also on annual measurement of savings such as those used with the Enbridge Gas Distribution performance based programs.

Enersource, when reviewing custom projects for OPA Programs, followed the various measurement and verification options in accordance with the latest version of the International Performance Measurement and Verification Protocols (IPMVP) as stipulated by the OPA. However, the IPMVP allowed other options than those used with the Enbridge Gas Distribution performance based programs.



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 5**

**Building Owners and Managers Association - Toronto  
(BOMA)**

**Reference: Tab 3, Schedule 5, Page 1 of 9**

Enersource Hydro Mississauga Inc (Enersource), as part of its reporting commitment to the Ontario Energy Board (OEB), requested SeeLine Group Ltd. (SeeLine) to conduct an independent third party review of its 2011 and 2012 Lost Revenue Adjustment Mechanism (LRAM) claims as related to both the Third Tranche of Market Adjustment Revenue Requirement (MARR) programming activities and Board Approved Incremental Funding Programs with the intent of verifying the various input assumptions and calculations and ensuring that Enersource is using the correct values as provided by the Ontario Power Authority (OPA).

5. Did SeeLine Group Ltd. conduct any review of custom projects at the customer premises or of any project documentation submitted by the customer?

**Response:**

5. No, Seeline Group Ltd. did not conduct any review of custom projects at the customer premises or of any project documentation submitted. As noted in the response to BOMA Interrogatory # 3, there are no custom projects completed as Third Tranche programs included in the LRAM claim amount in this application.



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 1**

**Vulnerable Energy Consumers Coalition  
(VECC)**

**Reference: Tab 2, Page 1**

Preamble: In this application, Enersource seeks an LRAM claim of \$1,753,174 including \$34,853 in carry charges.

- a) Please provide a table to summarize all past LRAM claims.
- b) Please provide a list of all measures that have expired in 2011 and 2012.
- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired.
- d) Please provide the live excel spreadsheet for the 2006 – 2010 Final OPA Conservation Program Results – Enersource Hydro Mississauga Inc.

**Response:**

- a) The requested table is provided below.

**Table 1: Summary of Previous Enersource LRAM Claims**

OEB Docket	Application Type	Years of Lost Revenues	LRAM Claim Amount (\$)*
EB-2007-0706	2008 COS	2005, 2006, and to April 2007	370,246
EB-2009-0400	LRAM	May 2007 through 2008	742,910
EB-2010-0078	2011 IRM	2009	699,236
EB-2011-0100	2012 IRM	2010	856,957**
EB-2013-0024	LRAM	2011 and 2012	1,753,174

\* Includes carrying charges, with the exception of the EB-2007-0706 amount.

\*\* \$860,339 was approved in the Decision.

Please note that Enersource re-based for the 2008 rate year. No CDM was included in the load forecast approved by the Board in the proceeding.

- b) Table 2 summarizes the measures that have expired in 2011 and 2012. These measures and associated savings were not included in the LRAM claim amount in this application.

**Table 2: Measures Expired in 2011 and 2012**

Program/Measure	Program Year	Year Expired	Total Net Annual kW	Total Annual Net kWh	Source of Input Assumptions
LED Seasonal Lights	2005	2010	-	146,300	Updated OPA Measure List (April 6, 2011)
<b>Retailer EKC Program</b> Seasonal LED - 50% 5 WATT Christmas Lights C-7 (25 lights)	2005	2010	-	48,971	Updated OPA Measure List (April 6, 2011)
LED Exchange	2006	2011	-	83,186	Updated OPA Measure List (April 6, 2011)

- c) As noted in b) above, this LRAM claim has already been adjusted for all expired measures.
- d) The 2006 – 2010 Final OPA Conservation Program Results – Enersource Hydro Mississauga Inc. is found at Tab 3, Schedule 4. The live Excel spreadsheet version of this schedule was provided with the original evidence and application filed on February 15, 2013 and can be found on the Board's Webdrawer for this docket. A direct link to this Excel file is provided below:

<http://www.rds.ontarioenergyboard.ca/webdrawer/webdrawer.dll/webdrawer/rec/383675/view/>



**Enersource Hydro Mississauga Inc.  
Response to Interrogatories**

**Interrogatory # 2**

**Vulnerable Energy Consumers Coalition  
(VECC)**

**Reference 1: Tab 2, Page 5**

**Reference 2: Tab 3, Schedule 5, Third Party Verification Report**

Preamble: At reference 1, the evidence indicates Enersource used the latest OPA Measures and Assumptions list to calculate lost volumes. Enersource provided a link to the OPA's latest Measures and Assumptions list that is dated March 2011. At reference 2, SeeLine indicates it used the OPA 2011 Prescriptive Measures and Assumptions List, Version 1.0 Final (April 6, 2011).

- a) Please discuss if there are two different documents used in calculating lost volumes and if so, explain what the difference is between the two documents.
- b) Please confirm the date of the OPA's latest Measures and Assumptions list to be used and update the lost revenue calculations as required to reflect the latest version.

**Response:**

- a) The two references are to the same document. The OPA Measures and Assumptions list title page is dated March 2011. The information utilized for this LRAM application was taken from the table dated April 6, 2011, spanning pages 13 – 17 of the "March 2011" document.
- b) As noted in part a), Enersource utilized the table with the title "OPA Measures and Assumptions List – Prescriptive (as of April 6, 2011)", that was published in the 2011 Prescriptive Measures and Assumptions List, the title page of which is dated March 2011.

