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May 08, 2013

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
Submission of VECC Interrogatories EB-2013-0070
PowerStream Inc.

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Janigan', is written over a horizontal line.

Michael Janigan
Counsel for VECC
Encl.

cc: PowerStream Inc.
Colin Macdonald

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
PowerStream Inc. seeking approval for a
conservation and demand management (“CDM”) program –
Direct Install Refrigeration Program.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Executive Summary

Preamble:

- a) Please provide a table that shows PowerStream’s original projected net peak demand and net energy savings by program (consumer/low income, commercial & institutional, industrial) for the period 2011 to 2014 through the delivery of Provincial Programs and % achievement of its targets (MW & GWh) compared to its current projections .
- b) Please confirm PowerStream’s current shortfall in demand (MW) and energy savings (GWh) through the delivery of Provincial Programs.

VECC Question # 2

Reference: Executive Summary

Preamble: PowerStream indicates its strategy for addressing this projected shortfall is two-fold: improve the design and delivery of the provincial Programs and seek approval for a Board-Approved Program.

- a) Please discuss the specific improvements needed to improve the design and delivery of the provincial Programs.
- b) Please quantify the corresponding contribution to the projected shortfall (MW, & GWh) as a result of achieving the improvements detailed in part (a).

VECC Question # 3

Reference: Executive Summary

Preamble: PowerStream indicates less than 1% of its GS<50 kW customers have participated in ERII. Of all ERII participants, only 2% have included refrigeration measures.

- a) Please provide more details on PowerStream's approach and delivery experience related to the uptake of the ERII initiative.
- b) Please provide PowerStream's original demand and energy savings targets for ERII for the years 2011 to 2014 compared to actual and updated forecasts.

VECC Question # 4

Reference: 1 Background

- a) Page 1 - Please provide a copy of PowerStream's 2011 verified results from the OPA.
- b) Please confirm the date of the OPA's latest Measures and Assumptions List and confirm this list was used unless otherwise specified.
- c) Page 1 - Please provide the calculation of PowerStream's internal estimates for 2012 preliminary results and updated 2013 and 2014 outlook, and include all assumptions.
- d) Page 2 - Please identify/discuss the several additional rounds of changes currently in the process.
- e) Please provide the calculation of PowerStream's estimate of its lower than forecasted results by program area resulting from the issues related to current Provincial Programs and the overall change management process.
- f) If all of the needed modifications to the current Provincial Programs were implemented by June 1, 2013, please quantify the impact on PowerStream's forecasts for 2012, 2013 and 2014.

VECC Question # 5

Reference: 2 Program Development Process

- a) Please provide a list of the ten program concepts identified for possible development.
- b) The evidence indicates the list was narrowed down to four for further consideration and the DIR Program was identified as the preferred candidate.

Please provide a description of the three program concepts not selected and include the high level assessment (market and technology) and program design developed for each of the three.

- c) Please discuss the reasons why the three program concepts in part (c) were not selected.
- d) Please discuss if the three program concepts not selected were part of the stakeholder consultation process. If not, why not.

VECC Question # 6

Reference: 3.2 PowerStream Market Potential

Preamble: PowerStream estimates the market potential for these refrigeration measures in its service territory is approximately 18 MW and 666 GWh of lifetime energy savings.

- a) Please provide this calculation.
- b) Please provide a breakdown of the number of other smaller commercial businesses with product refrigeration in PowerStream's service territory (florists, medical laboratories, school cafeterias, convenience stores, etc.)

VECC Question # 7

Reference: 3.3 Current Program Participation and Barriers

Preamble: PowerStream indicates of all of its ERII participants, only 2% have included refrigeration measures. PowerStream identifies typical barriers that include lack of knowledge, time and capital resources.

- a) Please discuss PowerStream's view as to how the current ERII initiative within the Provincial C&I Program could be modified to better address these barriers.

VECC Question # 8

Reference: 4 Program Design, 4.2 Participant Eligibility

- a) Participants must have an annual demand of less than 250 kW. Please confirm the basis for this threshold.
- b) Please discuss PowerStream's knowledge of the number of facilities eligible for participation in the program that are leased.

VECC Question # 9

Reference: 4 Program Design, 4.3 Offer to Customer

- a) Please provide a calculation & breakdown of total costs based on the following activities: direct marketing, free electricity audit, customized report, action plan and work order, scheduling and measure installation (including materials) of the refrigeration measures, quality assurance visit and customer survey.
- b) Please discuss if PowerStream considered other design options for the DIR Program that covered less than 100% of the refrigeration measure and installation costs. Provide any analyses.

VECC Question # 10

Reference: 6 Value Proposition, 6.3 Benefits to PowerStream

Preamble: The evidence indicates this program addresses approximately 43% of PowerStream's current projected shortfall against its energy target.

- a) Please provide this calculation.

VECC Question # 11

Reference: 7.1 Consultation with OPA

Preamble: PowerStream indicates the only concern raised by OPA staff was the uncertainty regarding the persistence of energy savings from coil-cleaning.

Please discuss how these concerns have been addressed and incorporated into the design and forecasted results of the Program.

VECC Question # 12

Reference: 7.1 Consultation with OPA

Preamble: With respect to program delivery, OPA staff raised questions about what the optimal delivery approach might be in terms of contractual arrangements with the

refrigeration channel.

- a) Please provide further details on the questions raised, the preferred optimal delivery approach and the impact on the Program design, if any.

VECC Question # 13

Reference: 8.3 Budget

- a) Please provide a description of fixed program costs compared to variable program costs.
- b) Please confirm the number of incremental CDM staff need to carry out the Program by year based on headcount and FTEs.
- c) Please provide the total cost of the incremental staff based on salaries and benefits.
- d) Has PowerStream considered the use of a variance account to record the difference between the funding awarded for Board-Approved CDM Programs and the actual spending incurred to carry out these programs?
- e) Is PowerStream aware of other utilities in Ontario that are deploying this same program within the same timeframe? If so, please indicate how many and which LDCs?
- f) Table 8 – Please provide a further breakdown to show the derivation of the program costs in parts (a), (b), (e) and (f).

VECC Question # 14

Reference: Appendix B, OPA Assessment and Support Letter, Page 2

- a) Please explain why the Province's Audit Funding initiative fails to address the knowledge and opportunities barrier regarding limited awareness of energy use and opportunities and costs of refrigeration equipment.

VECC Question # 15

Reference: Appendix E, Evaluation Plan, Page 6, Table 3 Estimated participation, Page 6

- a) Please provide a breakdown of the projected number of partial and full participants between restaurants and grocers.

- b) Please provide the cost for the years 2013 and 2014 related to the projected number of partial participants only.
- c) Please provide the cost for the years 2013 and 2014 related to the projected number of full participants only.