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December 18, 2008

VIA MAIL and E-MAIL

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

RECEIVED

DEC 19 2008

ONTARIO ENERGY BOARD

File 9

Dear Ms. Walli:

**Re: EB-2008-0188 : Hydro Ottawa Limited – 2009 Rate Application
Vulnerable Energy Consumers Coalition (VECC)
Interrogatories Part 1: LRAM/SSM**

Please find enclosed the Interrogatories of the Vulnerable Energy Consumers Coalition (VECC) on the LRAM/SSM evidence of the Applicant in the above-noted proceeding.

Note that we have not received the Independent CDM audit/evaluation Report and further questions may arise from that evidence.

Note also that we may have questions on other aspects of the Application by the IR filing deadline.

We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC

cc: Hydro Ottawa Limited

**ONTARIO ENERGY BOARD
IN THE MATTER OF the *Ontario Energy Board
Act*, 1998, S.O. 1998, c. 15, Sched. B, as amended;
AND IN THE MATTER OF an Application by Hydro
Ottawa Limited for an Order or Orders approving
or fixing just and reasonable rates.**

**Interrogatories of the
Vulnerable Energy Consumers Coalition (VECC)
LOST REVENUE ADJUSTMENT MECHANISM ("LRAM")/SHARED SAVINGS
MECHANISM ("SSM")**

Question 1

References: EB-2008-0188 Attachment D pages 1-7

EB-2007-0713 Exhibit D3 Tab2 Schedule 1 Attachment #1 & Attachment #2

- a) Compare the supporting Tables for 2005 and 2006 CDM Programs with those filed in the 2008 Application to the previous application (second reference). Provide a list with explanations for all changes.
- b) Why are customer equipment costs not listed in Attachment D? Provide a list and explanation of *any changes* from EB-2007-0713 Exhibit D3 Tab 2 Schedule 1 Attachment #1
- c) Confirm that the data in Attachment D is the same as provided to Elenchus Research Associates for the review/verification/audit. If not, provide a list and explanation of all differences.

Question 2

Reference: EB-2008-0188 Attachment D pages 1-7

- a) Provide a Table of measure life assumptions for all residential/small commercial programs (and individual measures) in the same order as Attachment D. Indicate source(s) relied on. Comment on persistence of measures installed in 2005/2006 including the air conditioner retirement.
- b) Provide a comparison (differences only) of kw/kwh savings (gross and net), measure life and free ridership assumptions for all measures in Attachment D with those listed

in the 2009 OPA Measures and Input Assumptions List

www.powerauthority.on.ca/Page.asp?PageID=122&ContentID=6701&SiteNodeID=404.

Question 3

Reference Exhibit B Tab1Schedule 2 Page 5 Table 2

- a) For the Co-Branded Mass Market measures provide the breakdown of participants/units by measure and total participants and compare the latter to the 2005/2006 number of 472,832 shown in Table 1 of EB-2007-0713 (D3/2/1 pg 4).
- b) For the Electric Avenue provide the breakdown of participants/units between water heater measures and CFLs. Also provide the kwh savings for each. Compare to participation shown in Table 1 of EB-2007-0713 (D3/2/1 pg 4). Comment on why the 15 Education and Energuide Audit participants are/are not included.
- c) For Energy Audit Support and Incentives provide the 2007 *incremental* participants/units. Explain why # SLED exchanges are lower than the 2005/2006 number of 4,330 shown in Table 1 of EB-2007-0713 (D3/2/1 pg 4). Is Hydro Ottawa claiming LRAM/SSM for continuing savings from 2005/2006 exchanges and/or 2007 units only. Please explain.
- d) Overall Program Support -explain why the number of CFLs is lower than in Table 1 of EB-2007-0713 (D3/2/1 pg 4). Confirm there are no savings attributable to Program Support in the 2007 LRAM/SSM claim.

Question 4

Reference Exhibit B Tab1Schedule 2 Page 6 Table 3

- a) Provide a full explanation of the changes between the Residential kw/kwh savings shown in Table 3 and the corresponding values shown in Table 2 of EB-2007-0713 (D3/2/1 pg 6).
- b) Provide support for the Gross and Effective Net kw load reductions for each program/measure with specific reference to the OEB TRC Guide and/or the OPA Measures and Input Assumptions List -

www.powerauthority.on.ca/Page.asp?PageID=122&ContentID=6701&SiteNodeID=404.

Question 5

Reference: Exhibit B Tab1Schedule 2 Page 7 and Attachment E

- a) Confirm that Hydro Ottawa is not claiming an SSM for 3rd tranche CDM in 2007.
- b) Confirm that Hydro Ottawa is not eligible for an SSM for OPA-funded programs.

Question 6

Reference: Exhibit B Tab1Schedule 2 Page 9 Table 7 and Attachment E

- a) For the Residential Class provide a Schedule (or a version of Attachment E) corresponding to Column 3 of Table 7 that provides the details of 2007 programs in terms of participants, free ridership, costs and gross and net kw/kwh savings from 2007 programs. Provide the sources for the input assumptions.
- b) Indicate which, if any, programs/measures for which an LRAM is being claimed for 2007 are OPA-funded.
- c) Has Hydro Ottawa provided a report to OPA on OPA-funded 2007 programs/measures and has OPA confirmed/accepted the Report with/without review/verification. Provide a copy of the Report(s).

Question 7

Reference: Exhibit B Tab1Schedule 2 Pages 9 and 10

- a) Add a row(s) to Table 8 that provides the balances in the LRAM Account that supports the carrying cost calculations
- b) Provide a schedule (or additional columns) that maps the kwh/kw savings to the customer classes leading to the results in Table 9.

Question 8

Reference: Exhibit B Tab1Schedule 2 Page 11

- a) As noted earlier is Hydro Ottawa requesting a 2007 for OPA –funded programs? If so please comment on the requirements set out in the OEB Guidelines at page 28.
- b) Will the ERA Report be available before the deadline for IRs? Please confirm.