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December 22, 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

Dear Ms. Walli:

**Re: EB-2008-0205
Oshawa PUC Networks Inc. – 2009 Electricity Distribution Rate Application
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)
Part 1: LRAM/SSM Claim**

Please find enclosed the Interrogatories of the Vulnerable Energy Consumers Coalition (VECC) on the Applicant's evidence in the above-noted proceeding regarding its 2006/2007 LRAM/SSM Claim.

Note that we may have further questions on other aspects of the evidence by the deadline for filing interrogatories.

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

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

cc: Oshawa PUC Networks Inc.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15, Sch.B, as amended;

AND IN THE MATTER OF an Application by Oshawa PUC Networks Inc. pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for the delivery and distribution of electricity.

Oshawa PUC Networks Inc. 2009 Distribution Rate Adjustment Application

Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)

LRAM/SSM Evidence

Question 1

Reference: Request for LRAM and SSM Adjustments Page 4

- a) Is Oshawa PUC aware of the document "Guidelines for Electricity Distributor Conservation and Demand Management (EB-2008-0037) dated March 28, 2008"? If so please provide Oshawa's interpretation of the requirement for an independent evaluation of results set out on Page 28.
- b) Has Oshawa retained a consultant to conduct such an evaluation for its 2006 and 2007 programs whether ratepayer or OPA- funded? If not why not?.
- c) If Oshawa has retained a third party to conduct such an evaluation for its 2006 and 2007 programs, when will the report be filed?
- d) If Oshawa has not retained a third party to conduct an evaluation of its 2006 and 2007 programs what is the basis of the verification of the results for the 2006/2007 LRAM/.SSM claims?

Question 2

Reference: Request for LRAM and SSM Adjustments Page 5 and Page 8 -2006 Programs

- a) With regard to the gross savings for measures installed in 2006 provide a copy of the direction(s) from OPA that set out the measure input assumptions and the *full set of assumptions* for
 - i. Spring 2006 Campaign
 - ii. Summer/Fall 2006
- b) For 3rd tranche MARR 2006 programs provide a copy of any correspondence with the Board that indicates acceptance of the results.
- c) For OPA-funded 2006 and 2007 Programs provide a copy of any correspondence that indicates OPA has accepted the results.

Question 3

Reference: Request for LRAM and SSM Adjustments Page 11

- a) With respect to the replacement of bulk residential meters with individual units provide a copy of the Enerspectrum input assumptions and savings estimates including sources of data
- b) With respect to the 15w CFL socket replacement, provide a copy of the Enerspectrum assumptions and savings estimates, including sources of data.
- c) With respect to LED traffic light replacement confirm that the units were fully operational in 2007 and how many months of operation were achieved in 2007?
- d) With respect to LED traffic light replacement confirm if the units operated beyond December 2007 and whether they were/are fully operational in 2008.
- e) For the following measures provide a copy of the OEB CDM TRC Guide (dated October 2006) Section 5 with the annual kwh savings highlighted
 - i. Dimmer Switches,
 - ii. Outdoor Motion Detectors
 - iii. Programmable Thermostats and
 - iv. Baseboard Programmable Thermostats

Reconcile any differences with the kwh savings shown in the Table on pages 8-9.

Question 4

Reference: Request for LRAM and SSM Adjustments Page 12 and Pages 20-23

- a) Provide annual totals for kwh savings for each of 2006 and 2007.
- b) Explain why the effectiveness of the 2006 measures should not be prorated to reflect actual operation during 2006.
- c) Provide an estimate of the prorated effective kwh savings for 2006 based on estimated timing of installations and operation.
- d) For 2007 provide an estimate of effective kwh savings assuming that measures/units installed in 2006 continue in 2007 and that new measures/units installed in 2007 are partially effective based on estimated dates of installation.

- e) Provide a schedule that translates the prorated net effective kwh for each year to arrive at an LRAM amount for each of 2006 and 2007 in a similar format to the Table on page 7
- f) Provide an estimate of the savings and LRAM for 2006 using the OPA input assumptions for the Spring summer/Fall 2007 campaigns as shown on page 10

Question 5

Reference: Request for LRAM and SSM Adjustments Page 10

- a) Provide similar schedules to the OPA 2007 programs shown on page 10 for the OPA 2006 Spring Summer /Fall campaigns
- b) Provide similar schedules for the 2006 OEB 3rd tranche MARR programs
- c) To each schedule including OPA 2007 programs add a column that shows the effective net kwh savings and reconcile any differences with the estimates in the Table on page 12 and the Tables shown on Pages 20-23

Question 6

Reference: Request for LRAM and SSM Adjustments Page 17

- a) Provide a complete expanded schedule that shows the details of the Net TRC calculations for the SSM claim.(An example would be Hydro Ottawa EB-2008-0188 Attachment E
- b) Provide a list of all key assumptions-avoided cost, discount rate etc.