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January 5, 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-2008-0188 : Hydro Ottawa Limited – 2009 Rate Application
Vulnerable Energy Consumers Coalition (VECC)
Updated Interrogatories: LRAM/SSM**

Please find the updated Interrogatories of VECC in the above noted proceeding, specific to the LRAM/SSM aspects of the application. These IRs will replace the IRs submitted on December 18, 2008.

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.**

**Updated 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 filed in the 2009 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 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 Attachment #1 pg 2). Comment on why the 15 Education and Energuide Audit participants are/are not included.
- b) 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 Attachment#1 pg 2). Is Hydro Ottawa claiming LRAM/SSM for continuing savings from 2005/2006 exchanges and/or 2007 units only. Please explain.
- c) Overall Program Support -explain why the number of CFLs is lower than in Table 1 of EB-2007-0713 (D3/2/1 Attachment#1 pg 2). 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 Tables 4 and 5 of EB-2007-0713 (D3/2/1 pgs 10-12).
- 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 **NOT** 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

Supplementary IR Elenchus Report

Question 9

Reference: ERA Report Pages 17-19

- a) For 2007 Residential Programs funded by OPA, provide a Schedule that compares the Freeridership, unit Energy Savings (kwh and kw) and measure life assumptions used by Hydro Ottawa to the OPA Measures and Input Assumptions Guide referenced earlier.
- b) Compute the gross and net savings using OPA assumptions and compare the result to the equivalent savings using Hydro Ottawa shown on Page 19
- c) Provide an Opinion as to which input assumptions are relevant for OPA- funded programs-OPA Assumptions or OEB TRC Guide plus other assumptions?
- d) Provide support or Working Papers for the Effectiveness Factor calculations for 2005/06 measures and comment on determination of the effective dates for Mass Market measures
- e) Comment on the duplication of savings and persistence of certain short life measures such as CFLs and EKC's
- f) Provide an estimate as to how much of the total Residential LRAM claim is attributable to each of CFLs and EKC's and given the nature/timing of the campaigns in 2006 discuss the impact of assumptions regarding freeridership, duplication and persistence for each measure