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Request IR-1:

Reference: ENSC 2012 DSM Plan, Exhibit E-1, p.20, s.6.2 Guiding Principles.

a) ENSC has noted its primary goal is to meet IRP targets as a whole. Does ENSC consider that the IRP DSM Assumptions are prescriptive?

b) How does ENSC reconcile short-term IRP targets and long-term IRP targets?

c) Has ENSC ranked the "Guiding Principles" and if so, how?

d) Where the "Guiding Principles" are in conflict, how does ENSC determine which is accorded priority?

Response IR-1:

a) ENSC considers the IRP's DSM profile as a guide to assist in the development of its DSM Plan. ENSC recognizes that DSM is one component of an IRP and is subject to change with IRP updates over time. ENSC acknowledges the basic DSM assumption, within the IRP, that DSM " … encompasses conservation efforts and investments occurring both inside and outside of customer funded DSM programs, including:

- consumer behaviour and investments
- energy efficiency codes & standards
- other agencies
- NSPI
- DSM Administrator"

As such, ENSC's customer funded DSM programs are one component of the IRP's DSM profile and are not explicitly prescribed in the IRP DSM Assumptions.

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b) Short term targets (measured by incremental annual energy and demand savings), along with long term targets (measured by cumulative savings) are given in Figure 4.1, page 11 of ENSC's Evidence. The short term incremental annual savings targets are summed year-over-year to produce the long term cumulative savings targets and ENSC reconciles these in Figure 4.2, page 12 with the verified savings of 2008 and 2009, the evaluated savings of 2010, the approved DSM Plan savings for 2011 and the proposed savings for the 2012 DSM Plan.

c) No.

d) In a situation of conflict among guiding principles that would compromise either targets or long-term success, ENSC would give priority to meeting targets and long-term success. Otherwise, ENSC would strive to create a reasonable balance of maximizing access to efficiency programs while minimizing program cost, without compromising targets or long-term success.

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Request IR-2:

Reference: Exhibit E-1, p.17, s.3 Commercial & Industrial Programs

a) Please provide tables describing the program measures that form the 2012 DSM Plan for the Commercial and Industrial Programs (similar to the DSM technical tables, Appendix "A", Attachment 1 to NSPI's Evidence in P-884(2).

b) Please identify any measures for the Commercial and Industrial Programs which have been added to or deleted from the measures filed in the 2011 Plan.

Response IR-2:

a) Please refer to NPB IR-3 Attachment 1.

b) Although the mix of measures analyzed in the DSM Plan may change from year to year, measures that are eligible for incentives in 2011 will remain eligible in 2012.

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Request IR-3:

Reference: Exhibit E-1, p.17, s.5.2, Changes to DSM Screening and the proposal that the TRC test be applied at the program level not at the measure level.

a) Please elaborate on the "strategic or long-term benefits" referenced, providing specific examples, and reconcile with the Board's previous decision (2009 NSUARB 116, paras. 35-36).

b) To the extent any proposed measure in the 2012 Plan does not meet the TRC test, please provide the strategic or long-term benefits which ENSC believes would otherwise warrant its inclusion in the program.

c) Please provide the basis for the avoided cost of energy and capacity used in the TRC test, explaining any changes from 2011.

Response IR-3:

a) Below are examples of strategic and long term benefits:

- Commercial Retail: In this program, hardwired LEDs pass the TRC at 1.9, but screw-in LEDs fail at 0.9. ENSC has chosen to include screw-in LEDs to avoid frustrations in the marketplace and to account for the administrative cost savings involved. Despite the TRC ratios, the cost per first-year kWh is the same for both measures ($0.26 / kWh).

- Commercial Custom: In this program, retro-commissioning fails the TRC at 0.8. ENSC has chosen to include retro-commissioning because it is an integral component, encouraging building managers to more closely examine their buildings' performance and, as such, may generate spillover savings that cannot easily be attributed.

- Residential Existing Houses: In this program, solar hot water heaters are being promoted, despite a TRC of 0.4. ENSC has chosen to promote this measure as part of its long-term mandate, given its expectation of considerable cost efficiencies over time as market size grows and becomes more structured. ENSC expects its initial investment in this measure to be minimal, but hopes that it may lead to increased cost-effective opportunities in the future.

- Residential Existing Houses: In this program, ENERGY STAR® freezers fail the TRC at 0.8. ENSC has chosen to maintain promotion of this measure in its program, both because of the benefits of continued promotion of the ENERGY STAR® brand (spillover both to other products, in and outside of programs, as well as to future more stringent versions), and because the incentives required for this measure are anticipated to be very small.

- Residential Existing Houses: In this program, screw-in CFLs fail the TRC at 0.6. ENSC has chosen to maintain these measures because they are part of a strategy to provide customer value at the outset rather than presenting a home audit as only involving up-front costs.

Please also refer to CA IR-14, which discusses some of the strategic or long-term benefits that warrant inclusion of particular measures in the 2012 DSM Plan.

b) Please refer to NPB IR-36, which includes examples of measures in the 2012 DSM Plan that do not meet the TRC test.

c) Please refer to Multeese IR-5.

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Request IR-4:

Reference: ENSC 2012, DSM Filing, Exhibit E-1, Figure 2.4, 2010 DSM Plan Expenditures, p.9,

(a) Provide a variance analysis of budget versus actual DSM program expenditures by measure related to the Large Industrial class for each of the following DSM programs in the 2010 calendar year:

- **Prescriptive Rebate;**
- **Custom;**
- **New Construction;**
- **Small Business Direct Install (Lighting);**
- **Education and Outreach;**
- **Development and Research;**
- **ENSC Startup;**
- **All program costs combined;**

Response IR-4:

a) Please refer to Attachment 1.

Forecast versus Actual (Unaudited) DSM Spending for the Large Industrial Rate Class

Avon IR-4 Attachment 1

		Actual 2010 Expenditures[2]											
Rate Class	Forecast Costs[1]	Efficient Products	Existing Houses	New Houses	Low Income Households	C & I Prescriptive Rebate	C & I Custom	Small Business DI Lighting	Education & Outreach	Development & Research	Startup and Transition	Total Actual 2010 Expenditures[2]	Variance
Large Industrial	$ 800,000	$ -	$ -	$ -	$ -	$ 205,249	$ 450,417	$ -	$ 33	$ 118	$ 51,289	$ 707,106	$ (92,894)

Notes:

1. Forecast costs from Table 2, Column K in 2010 DSM Filing.
2. Actual expenditures are subject to audit.

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Request IR-5:

Reference: 2012 DSM Plan (E-ENSC-R-10), Exhibit E-1, Appendix B, Table 2:

Provide a breakdown of new construction versus retrofit in the Prescriptive Rebate program for Large Industrial Customers (if the new construction and retrofit categories continue to exist).

Please segregate the new construction component of the C&I Custom program for Large Industrial Customers, (if the new construction and retrofit categories continue to exist).

Provide a breakdown of the program cost of the Custom program allocated to the Large Industrial class, broken down according to the "Core Performance" and "Whole Building" paths.

Confirm whether the "Whole Building" path has the same meaning as the "new construction" component of the Custom program in previous DSM plans and whether the "Core Performance" path has the same meaning as the "retrofit" component of previous DSM plans (e.g. the 2011 DSM plan).

Provide the number of Large Industrial customers who, in 2010, accessed or indicated an intention to access:

(i) **The Business Energy Rebates (BER) program (or the equivalent program in effect at the time);**

(ii) **The Smart Lighting Choices (SLC) program (or the equivalent program in effect at the time);**

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(iii) The Core Performance path of the Custom program (or the equivalent program in effect at the time);

(iv) The Whole Building path of the Custom program (or the equivalent program in effect at the time).

Response IR-5:

For the Prescriptive Rebate program, the 2012 DSM Plan did not separately address new construction or retrofit opportunities for Large Industrial Customers. Therefore, a breakdown is not available.

For the C&I Custom program, the 2012 DSM Plan did not segregate the new construction component for Large Industrial Customers. Therefore, a breakdown is not available.

For the Custom program, the 2012 DSM Plan did not segregate the new construction component of the C&I Custom program for Large Industrial Customers as either Core Performance or Whole Building. Therefore, a breakdown is not available.

The Whole Building path and the Core Performance path are separate components of the C&I Custom program that address new construction opportunities.

i) One.

ii) The number of Large Industrial participants in the Smart Lighting Choices program is not available, as customer rate codes are not collected at the point of sale for eligible products.

iii) None.

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iv) None.

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Request IR-6:

Reference: DSM Plan 2010 (P-884(2)), Exhibit N-2, Appendix F, Table 2, page 2 of 16, line 15, columns E to K.

a) Provide data demonstrating the uptake, in 2010, of Large Industrial class members of each of the programs listed at DSM Plan 2010, Exhibit N-2, Appendix F, Table 2.

Response IR-6:

a) Please refer to Avon IR-4 Attachment 1.

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Request IR-7:

Reference: Exhibit E-1, Appendix "B",

a) With respect to the program spending listed in Table 2, please provide a table showing the program costs directly assigned to the Large Industrial Rate Class for the years 2009 through to 2012 (Plan).

b) Please explain the note one describing the allocation of enabling strategies.

c) With respect to Table 2(a), please provide a table showing the relative percentage share of program costs, by program, for the Large Industrial Class, for the years 2009 through to 2012 (Plan).

Response IR-7:

a) Please refer to Attachment 1 for the years 2010 through 2012. For 2008/2009 programs, the cost responsibility for the DSM programs assigned to the Large Industrial class reflects the cost of service methodology used in the allocation of generation-related fixed costs. This method does not differentiate between levels of participation in various programs by class. The costs assigned to the Large Industrial class for the 2008/2009 DSM programs were $150,000 per year, amortized over six years, for a total of $900,000.

b) The 2012 budgets for Enabling Strategies have been distributed among rate classes using the UARB-approved methodology for allocating Education & Outreach and Development & Research DSM costs in prior years. This methodology stipulates that costs will be pro-rated among classes, based on the number of customers within each.

c) Please refer to Attachment 2 for the years 2010 through 2012. Program costs were not tracked by customer class in 2008/2009.

Program Costs Directly Assigned to the Large Industrial Rate Class **Avon IR-7 Attachment 1**

COLUMN FORMULA	A	B	C	D	E	F	G	H	I	J	K J x 75%
	Program Costs by Rate Class										Program Costs Directly Assigned to Participating rate classes (75% of the total)[3]
Year	Efficient Products	Existing Houses	New Houses	Low Income Households	Energy Use Feedback	Prescriptive Rebate	Custom	Small Business DI Lighting	Enabling Strategies[2]	Total[3]	
2010 (Actual)[1]	$0	$0	$0	$0	N/A	$205,249	$450,417	$0	$151	$655,817	$491,863
2011 (Forecast)	$0	$0	$0	$0	N/A	$568,663	$894,855	$0	$172	$1,463,690	$1,097,768
2012 (Forecast)	$0	$0	$0	N/A	$0	$635,708	$1,233,145	$0	$414	$1,869,267	$1,401,950

Notes:
1. 2010 expenditures are subject to audit.
2. Enabling Strategies includes Education & Outreach and Development & Research.
3. Does not include ENSC start-up and transition costs.

Relative Shares of Program Costs Assigned to the Large Industrial Rate Class Before Accounting for the Municipal Class **Avon IR-7 Attachment 2**

COLUMN	**A**	**B**	**C**		**D**	**E**	**F**	**G**
	Relative Shares of Program Costs Before Accounting for the Municipal Class							
Program	Efficient Products	Existing Houses	New Houses	Low Income Households	Energy Use Feedback	C & I Prescriptive Rebate	C & I Custom	Small Business DI Lighting
2010 (Actual)[1]	0.0%	0.0%	0.0%	0.0%	0.0%	13.8%	12.5%	0.0%
2011 (Forecast)	0.0%	0.0%	0.0%	0.0%	0.0%	11.0%	11.0%	0.0%
2012 (Forecast)	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%	13.5%	0.0%

Notes:
1. 2010 expenditures are subject to audit.

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Request IR-8:

(a) Please describe and explain how ENSC tracks expenditures by customer class so as to reconcile the allocation of DSM costs between customer classes.

(b) What information was provided by NSPI to ENSC, and in what format, to facilitate historical tracking of expenditures by customer class?

Response IR-8:

a) Please refer to Multeese IR-18b.

b) ENSC was provided with NSPI's costs by program from January 1, 2010 to September 30, 2010.

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Request IR-9:

a) With respect to the program costs allocated to the Large Industrial Class, Table 2, please provide the details of how the total program cost in each category was derived.

b) Please explain to what extent, if any, the following factors impact upon ENSC's planned program costs for 2012 for each program in respect of the Large Industrial Class:

(i) Historical experience in programs to date;
(ii) Direct customer contact and surveys;
(iii) Consultants.

c) If historical experience in 2008-2009 was relied upon, please provide a variance analysis comparable to IR-4 for those years.

Response IR-9:

a) Please refer to Synapse IR-1, Confidential Attachment 1, filed electronically.

b) For programs in respect to the Large Industrial Class:

- Historical experience from 2010 programs, including incentives and measure costs, were used to inform ENSC's planned 2012 program costs.

- Direct customer contact and surveys were used to inform ENSC's planned 2012 program costs. Specifically, the results of the NMR Group, Inc. customer surveys regarding free ridership and spillover were used.

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- Consultants, including results from the NMR Group, Inc. report "Impact and Process Evaluation: Commercial and Industrial Custom Program 2010, February 25, 2011, Final Report" and Navigant Consulting, Inc. cost data were used to inform ENSC's planned 2012 program costs.

c) Historical experience in 2008-2009 was not relied upon to develop ENSC's planned 2012 program costs for programs with respect to the Large Industrial Class.

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Request IR-10:

a) What new construction does ENSC project will occur in 2012 for the Large Industrial Class? Please provide specific information on new construction projects for the Large Industrial Class for 2012.

b) Upon being assigned the administration of DSM from ENSC, did ENSC gain access to program plans related to new construction for Large Industrial Customers in 2010, 2011 and 2012?

c) Please provide details of such plans (cumulatively or redacted as appropriate to preserve customer confidentiality).

d) To what extent is there overlap between the Large Industrial new construction planned in the years 2010, 2011 and 2012?

Response IR-10:

a) ENSC is not currently aware of any new construction projects planned by customers in the Large Industrial class.

b) At the time of transition, NSPI provided to ENSC the documentation relating to development and delivery of the New Construction component of the C&I Custom program. Large Industrial customers are eligible to obtain incentives and technical services through that component.

c) Please refer to part a.

d) Please refer to part a.