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October 28, 2005

BY EMAIL & COURIER

Mr. John Zych
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2601
Toronto ON M4P 1E4

Dear Mr. Zych:

Board File No. RP-2004-0203
Draft Guideline for Annual Reporting of CDM Initiatives
Comments of Energy Probe

Enclosed, please find 7 hard copies of the Comments of Energy Probe Research Foundation (Energy Probe) in respect of the Draft Guideline for Annual Reporting of CDM Initiatives, as outlined in the Board's letter of October 13, 2005. An electronic copy in MS Word format will be filed.

Should you have any questions or require additional information, please do not hesitate to contact me.

Yours truly,

Tom Adams
Executive Director

cc: Interested Parties (by email)

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Ontario Energy Board

Draft Guideline for Annual Reporting of CDM Initiatives

**COMMENTS OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

October 28, 2005

Draft Guideline for Annual Reporting of CDM Initiatives

EB-2004-0203

COMMENTS OF ENERGY PROBE

1. Energy Probe supports the Board's plan to establish a guideline for the annual reporting of CDM initiatives.
2. It is the submission of Energy Probe that the guidelines if unamended, will not produce the information required to independently verify the effectiveness of the programs undertaken by local electricity distribution companies (LDCs).
3. Please amend the guideline to require LDCs to provide the following information as part of their annual report under Section 2, *Evaluation of Overall Plan*:
 - ✓ Overall sales volumes and trends pre-DSM on a gross and per customer by customer class basis corrected for weather and end-user price;
 - ✓ Overall sales volumes and trends post DSM on a gross and per customer by customer class basis corrected for weather and end-user price;
4. Please amend the guideline to require LDCs to provide the following information as part of their annual report under Section 3, *Discussion of the Programs*:
 - ✓ A description of the methodology for assessing savings achieved per program including but not limited to third party audits;
 - ✓ An assessment of the free rider rate for programs and the methodology used to determine the free rider rate; and
 - ✓ Attribution methodology applied to jointly implemented programs.