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**ONTARIO ENERGY BOARD**

October 27, 2005

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Ontario Energy Board  
Mr. Peter H. O'Dell, Assistant Board Secretary  
P.O Box 2319  
26<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, Ontario M4P 1E4

**RE: Comments on the Draft Guidelines for Annual Reporting of CDM Initiatives –  
RP-2004-0203**

Dear Mr. O'Dell:

On behalf of the NEPPA CDM committee, representing 11 LDC's customers between Brantford and Fort Erie, I respectively submit the following comments for your review. Generally the scope of our interest lies primarily in the clarification of the information requested and the intent on the general use.

On a quarterly basis we are providing statistical information regarding overall plan expenditures and related energy and demand savings. The information is collected in a standardized format that would provide the desired functionality to collect overall Provincial statistics. The annual report from our understanding will be used to "fill in the gaps" and provide further drilled down data on expenditures and savings related to specific customer segments. Without the information being collected in a standardized format, evaluation back to our Final Approved CDM plan, will be difficult.

During the course of our third tranche CDM plan, programs were developed and received final approval based on a balanced plan. Without prior knowledge of reporting requirements, both quarterly and annual, overall portfolio and expected energy savings were not known. A preferred approach would be to have OEB reporting requirements known prior to plan development. This would allow for data and records to be accumulated in a fashion to meet reporting requirements.

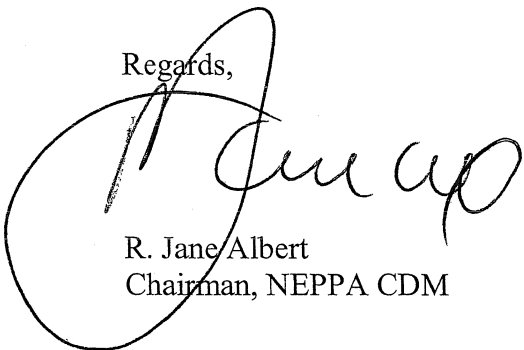
Many of our programs are still in the development and delivery stages. Clarification on program status, planned expenditures, expenditures to date, and timelines for completion would assist the OEB in managing overall CDM activities. However, much of the data requested is premature. The following are overall comments.

- 1) This entire request for data at the end of 2005 is premature. This type of quantifiable information could be available for the end of 2006 since we now have a clearer understanding of the regulatory requirements.
- 2) For smaller utilities with relatively low budgeted expenditures for C&DM initiatives the time, effort and administrative costs for this type of reporting detail will certainly have a significant impact on the actual time and dollars spent on productive C&DM activities to benefit customers (when compared to the total budget available).
- 3) An annual report providing a description of the programs underway (or completed), an estimate of the number of customers involved and an estimate of energy and demand savings where they are reasonably quantifiable would be a reasonable approach to the reporting required at the end of 2005.
- 4) In 2006 reporting requirements should be communicated early in the year so data and records can be documented as an ongoing part of the program. (Keeping in mind the value of those requirements versus the time, effort and expenditures that are not available for providing C&DM services directly for our customers).

The NEPPA members strongly advocate a sustainable conservation culture. The need for reporting is understood, however the exercise should provide usable information to drive ongoing development that support the necessary ongoing financial support.

On behalf of the 11 NEPPA members, we submit our comments respectively.

Regards,



R. Jane Albert  
Chairman, NEPPA CDM