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*Via RESS e-filing – signed original to follow by mail*

Ms. Kirsten Walli, Board Secretary  
Ontario Energy Board  
PO Box 2319  
2300 Yonge St, 27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Conservation and Demand Management Input Assumptions  
OEB File No.: EB-2008-0352**

On November 4<sup>th</sup>, 2008 the Board released a proposal to adopt the Ontario Power Authority's (OPA) Measures and Assumptions List (OPA List), for use by distributors in preparing various Conservation and Demand Management (CDM) related applications. The Board invited stakeholders to provide comments on this proposal. Toronto Hydro-Electric System Limited (THESL) has set out its comments below.

THESL supports the proposal, and believes that it will reduce unnecessary duplication and simplify the CDM reporting process for utilities.

It would be beneficial for a regular set timeframe to be arranged with the OPA for future updates to the OPA List. This would permit utilities to time their applications so as not to begin an evaluation under an old set of input assumptions only to have an updated set released before the evaluation is completed. Under such circumstances, the proposal indicates that the evaluation would have to be re-started to make use of the most recent input assumptions. If the annual update were released every February (as was the case in 2008), or annually by the end of the first quarter, it would relieve this concern as utilities could avoid preparing CDM applications during the update window.

For the purposes of clarification in the case of LRAM, THESL understands the Board's proposal and CDM Guidelines as instructing utilities to use the latest available input assumptions at the time of the required third party assessment. While this is noted by the Board on several occasions (and reiterated in the CDM

Guidelines), the example provided on page 4 of the Board's letter appears to be contradictory. It implies that an update is necessary in cases where verification had been completed but a new set of input assumptions is later released in the same year. THESL seeks confirmation that using the most recent input assumptions at the time of the third party assessment is sufficient, regardless of any updates that may be released after an assessment has been completed.

Sincerely,

*[original signed by]*

Colin J. McLorg, Manager  
Regulatory Affairs