



November 1st, 2010

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario
M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli,

**RE: BRANTFORD POWER INC.
CONSERVATION AND DEMAND MANAGEMENT CODE FOR
ELECTRICITY DISTRIBUTORS – CDM STRATEGY
EB-2010-0215**

Brantford Power Inc. is pleased to submit to the Ontario Energy Board its CDM Strategy, in compliance with the Conservation and Demand Management Code for Electrical Distributors issued September 16, 2010 that directed the company to file its CDM Strategy by November 1, 2010.

We would be pleased to provide any further information or details that you may require relative to the CDM Strategy.

Original signed by

George Mychailenko
Chief Executive Officer

cc. Heather Wyatt, Manager of Regulatory Compliance & Governance, Board Secretary
Mark Simpson, Manager, Metering and Settlement

Brantford Power Inc.

(ED-2003-0060)

CDM 2011-2014 Strategy Filing

November 1, 2010

Brantford Power Inc.

CDM Strategy Filing

November 1, 2010

1. **Distributor's Name:** Brantford Power Inc. ("BPI"), ED-2003-0060 is filing this CDM Strategy with the Ontario Energy Board ("the Board") in accordance with the Board's September 16, 2010 Issuance of the Conservation and Demand Management Code for Electricity Distributors (EB-2010-0215). This Strategy outlines how BPI will meet the electricity demand and consumption targets set out in its license.
2. **Total Reduction in Peak Provincial Electricity Demand (MW) Target:** 11 MW per the proposed CDM Targets for Electricity Distributors issued by the Board on June 22, 2010. BPI notes that this is a preliminary figure currently under review by the Board.
3. **Total Reduction in Electricity Consumption (kWh) Target:** 51,000,000 kWh per the proposed CDM Targets for Electricity Distributors issued by the Board on June 22, 2010. BPI notes that this is a preliminary figure currently under review by the Board.
4. **CDM Strategy**

4.1. High Level Description of CDM Strategy

BPI utilized the Ontario Power Authority's ("OPA") Resource Planning Tool, taking into consideration BPI's service territory's residential profile and past CDM program results, to forecast their reductions in Peak Provincial Electricity Demand and Electricity Consumption. The streamlined version of the Resource Planning Tool was used, as recommended by the OPA, along with the Board's 2009 Yearbook data to forecast the 2011-2014 results for the Consumer, Commercial & Institutional, and Industrial programs.

In developing this strategy we considered, but did not specifically provide for, the significant portion of the target that the OPA expects to result from smart meter and time-of-use rate implementation. This strategy does not take into consideration the significant portion of the target that the OPA expects to result from smart meter and time-of-use rate implementation. The OPA advised that the CDM targets assigned to all electricity distributors should include approximately 308MW of savings related to smart meters and time-of-use rates. This advice was based on a study commissioned by the OPA and filed with the Board as part of the Integrated Power Supply Plan proceeding.

In keeping with OPA advice on establishing 2011-2014 LDC targets, BPI expects to reach our target using a combination of OPA Province-Wide programs, Board-Approved programs, and Smart Metering/TOU.

BPI's annual targets are noted in Table 1, Annual Saving by Year

Annual Savings	2011	2012	2013	2014
Peak Demand Reduction – MW	2.37	3.92	5.61	8.21
Electricity Consumption Reduction - MWh	4,469	9,269	13,783	18,408

Table 1, Annual Savings by Year

BPI's cumulative targets are noted in Table 2, Cumulative Savings by Year

Cumulative Savings	2011	2012	2013	2014
Peak Demand Reduction – MW	2.37	3.92	5.61	8.21
Electricity Consumption Reduction - MWh	4,469	13,737	27,520	45,928

Table 2, Cumulative Savings by Year

5. OPA Contracted Province-Wide CDM Programs

5.1. Program Descriptions

Consumer Programs

The list of OPA Contracted Province-Wide Consumer Program initiatives to be offered, the years each initiative will be offered, a description of each initiative offered and the target customers for each initiative offered by BPI is noted in Table 3, Consumer Initiatives.

Name	Years	Description	Target Customers
Instant Rebates	2011-14	In-store discounts on energy efficient products	Residential
Midstream Electronics Incentive	2011-14	Retail promotion of energy efficient televisions	Residential
Midstream Pools Incentive	2011-14	Retail promotion of "right sized" pool equipment	Residential
HVAC Rebates	2011-14	On-line rebates on high efficiency replacement of heating/cooling systems	Residential
Appliance Retirement	2011-14	Free pick-up/decommissioning of old, working inefficient appliances	Residential
Exchange Events	2011-14	Room air conditioner and dehumidifier exchange events at retailers	Residential
Residential New Construction	2011-14	Incentives for builders to construct efficient, smart, and integrated new homes	Residential
Residential Demand Response	2011-14	Free, installed direct load control devices and in-home display systems/capability. Non-DR offers: subsidized in-home display systems/capabilities	Residential

Table 3, Consumer Initiatives

The total Peak Demand Reduction and the total Electricity Consumption Reduction for the initiatives to be offered by BPI is noted in Table 4, Consumer CDM Program Reductions.

TOTAL for the years 2011-14	Peak Demand Reduction: 2,370 KW	Electricity Consumption Reduction: 14,454 MWh
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Table 4, Consumer CDM Program Reductions

BPI's plan is based upon the assumption that there will be sufficient funding available to manage and promote the OPA-contracted Province-Wide Consumer Programs. Due to the fact that BPI's CDM Targets are currently under review and the funding formula has yet to be announced, the above listing of programs and total expected reductions are preliminary. Adjustments to this plan may be required when the Board's final CDM Targets are issued and OPA funding information is received. No budget projections have been included.

Commercial & Institutional Programs

The list of OPA Contracted Province-Wide Commercial & Institutional Program initiatives to be offered, the years each initiative will be offered, a description of each initiative offered and the target customers for each initiative offered by BPI is noted in Table 5, Commercial & Institutional Initiatives.

Name	Years	Description	Target Customers
Equipment Replacement (currently ERIP)	2011-14	The Electricity Retrofit Incentive Program is an incentive program designed to encourage high-efficiency electricity retrofits to existing structures.	Commercial Institutional
Direct Install – Lighting (currently Power Savings Blitz)	2011-14	Continuation of existing lighting retrofit incentive program (PSB) for small business customers in the General Service < 50kW.	Commercial Institutional
Direct Install – Space Cooling	2011-14	New initiative that provides incentive towards servicing of roof-top and ground-mounted air conditioners with a capacity of 25 tons or less.	Commercial Institutional
New Construction (currently HPNC)	2011-14	Inclusion of existing HPNC program, which provides incentives for energy efficient new building design as well as installation of energy efficient measures.	Commercial Institutional
Small Commercial Demand Response	2011-14	Free, installed direct load control devices and in-home display systems/capability. Non-DR offers: subsidized in-home display systems/capabilities	Commercial Institutional
DR1	2011-14	An initiative where distribution-connected electricity customers voluntary provide DR capabilities to reduce peak demand and increase system reliability	Commercial Institutional
DR3	2011-14	An initiative where distribution-connected electricity customers to provide firm, contract DR capability reduce peak demand and increase system reliability	Commercial Institutional
Building Commissioning	2011-14	Commissioning of chilled water plants for customers with a demand > 50 kW and facilities larger than 50,000 sq ft.	Commercial Institutional

Table 5, Commercial & Institutional Initiatives

The total Peak Demand Reduction and the total Electricity Consumption Reduction for the initiatives to be offered by BPI is noted in Table 6, Commercial & Institutional CDM Program Reductions.

TOTAL for the years 2011-14	Peak Demand Reduction: 3,970 KW	Electricity Consumption Reduction: 16,208 MWh
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Table 6, Commercial & Institutional CDM Program Reductions

BPI's plan is based upon the assumption that there will be sufficient funding available to manage and promote the OPA-contracted Province-Wide Commercial & Institutional Programs. Due to the fact that BPI's CDM Targets are currently under review and the funding formula has yet to be announced, the above listing of programs and total expected reductions are preliminary. Adjustments to this plan may be required when the Board's final CDM Targets are issued and OPA funding information is received. No budget projections have been included.

Industrial Programs

The list of OPA Contracted Province-Wide Commercial & Institutional Program initiatives to be offered, the years each initiative will be offered, a description of each initiative offered and the target customers for each initiative offered by BPI is noted in Table 7, Industrial Initiatives.

Name	Years	Description	Target Customers
Equipment Replacement (currently ERIP)	2011-14	Incentive program designed to encourage high-efficiency electricity retrofits to existing structures.	Industrial
Industrial Accelerator	2011-14	New component aimed at improving the energy efficiency of equipment and production processes by offering capital incentive and enabling initiatives.	Industrial
Energy Manager / Roving Energy Manager	2011-14	Access funding for customer-employed energy manager(s) for eligible consumers. Access funding for LDC-employed roving energy manager(s).	Industrial
Key Accounts Manager	2011-14	Join with other LDCs in close geographical proximity to apply for a shared Key Accounts Manager.	Industrial
DR1	2011-14	An initiative where distribution-connected electricity customers voluntary provide DR capabilities to reduce peak demand and increase system reliability	Industrial
DR3	2011-14	An initiative where distribution-connected electricity customers to provide firm, contract DR capability reduce peak demand and increase system reliability	Industrial

Table 7, Industrial Initiatives

The total Peak Demand Reduction and the total Electricity Consumption Reduction for the initiatives to be offered by BPI is noted in Table 8, Industrial CDM Program Reductions.

TOTAL	2011-14	1,880 KW	15,266 MWh
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Table 8, Industrial CDM Program Reductions

BPI's plan is based upon the assumption that there will be sufficient funding available to manage and promote the OPA-contracted Province-Wide Industrial Programs. Due to the fact that BPI's CDM Targets are currently under review and the funding formula has yet to be announced, the above listing of programs and total expected reductions are preliminary. Adjustments to this plan may be required when the Board's final CDM Targets are issued and OPA funding information is received. No budget projections have been included.

Low Income Programs

BPI intends on participating in the OPA-Contracted Province-Wide Low Income Program. Our strategy and forecasted reductions in provincial peak electricity demand and electricity consumption will be filed with the Board after this program has been finalized by the OPA and its details regarding funding and program initiatives are made available.

6. Potential Board-Approved CDM Programs

6.1. At this time BPI does not have any Board-Approved programs planned. In order to meet its proposed CDM targets BPI will develop and submit, as required potential Board-Approved programs.

7. Program Mix

7.1. Section 5 above illustrates the programs that will be delivered to all customer types in BPI's service territory, including residential, commercial, industrial, and institutional customers. The strategy was developed having regard to the composition of BPI's customer base.

BPI intends on participating in the OPA-Contracted Province-Wide Low Income Program once additional information has been made available regarding program options and funding.

8. CDM Programs Co-ordination

8.1. BPI has been working closely with other LDCs of similar size and/or geographical closeness in the administration, marketing and implementation of the current OPA Contracted Province-Wide programs being offered. Through this continued collaboration BPI expects to achieve efficiencies of delivery and cost savings in the future.

BPI will work closely with local Social Service Agencies, local municipal governments, natural gas distributors and other LDC's to deliver its portfolio of OPA-contracted Province-Wide CDM Programs, including an OPA-contracted Low Income program.