

Janet Fraser

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

bhydroregulatorygroup@bchydro.com

May 1, 2012

Mr. William J. Andrews
B.C. Sustainable Energy Association (BCSEA)
1958 Parkside Lane
North Vancouver BC V7G 1X5

Dear Mr. Andrews:

RE: Project No. 3698622
British Columbia Hydro and Power Authority (BC Hydro)
BC Hydro Amended F2012 to F2014 Revenue Requirements Application
(Amended F12-F14 RRA)
Information Request No. 1 on BCSEA Evidence

BC Hydro encloses its Information Request No. 1 to BCSEA Evidence (Exhibit C10-13).

For further information, please contact Fred James at 604-623-4317 or by e-mail at bhydroregulatorygroup@bchydro.com.

Yours sincerely,



Janet Fraser
Chief Regulatory Officer

fj/ma

Enclosure (1)

Copy to:

British Columbia Utilities Commission
Commission.Secretary@bcuc.com

BCUC Project No. 3698622 (Amended F12-F14 RRA) Registered Intervener
Distribution List.

British Columbia Hydro and Power Authority

**Information Request No.1 to
BC Sustainable Energy Association and Sierra Club of British Columbia
(BCSEA)**

Project No. 3698622

**British Columbia Hydro and Power Authority
Amended F2012 to F2014 Revenue Requirements Application**

- 1.0 Mr. Plunkett's evidence, at page 6, lines 19 to 23, states that "BCSEA-SCBC engaged me to assess the adequacy of the electric energy-efficiency program savings and expenditures contained in BC Hydro's [Application]."**
- 1.1 Please confirm Mr. Plunkett was not engaged by BCSEA to review whether BC Hydro's expenditures on DSM in F2012 and F2013 are cost-effective in accordance with B.C.'s Demand-Side Measures Regulation, and whether the expenditures are reasonable for achieving the reductions in demand attributable to the demand-side measures. If not confirmed, please provide a copy of Mr. Plunkett's retainer that demonstrates such terms of engagement.
- 2.0 Mr. Plunkett's evidence, at page 13, line 19, states that "Portfolio performance falls into a range spanning four savings tiers." Mr. Plunkett has used a threshold of 1.5% of total retail electric energy sales as his threshold between Tier 1 and Tier 2.**
- 2.1 Please confirm that the four Tiers used by Mr. Plunkett do not divide the states/provinces presented into quartiles.
- 2.2 Please explain the basis for selecting 1.5 per cent as the threshold between Tier 1 and Tier 2.
- 3.0 Mr. Plunkett's evidence, at page 33, line 20, refers to a BC Hydro decision to "curtail energy-efficiency investment". Mr. Plunkett's answer to the question, at lines 22 to 23, refers to BC Hydro's reluctance to scale up efficiency resource acquisition.**
- 3.1 What is the evidence referring to with respect to a decision to curtail energy-efficiency investment?

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- 4.0 Mr. Plunkett's evidence, at page 35, lines 6 to 8, states that, "I do not agree with BC Hydro's contention that the proposed DSM program portfolio budget cuts will not jeopardize its ability to meet the modest electricity savings goals it proposes for F2013-2014." The answer at lines 10 to 18 does not adequately explain the basis for the statement. BC Hydro's response to BCUC IR 1.453.4 explained that there has been no reduction in DSM program expenditures or incentives attributable to "budget cuts".**
- 4.1 Please explain what budget cuts Mr. Plunkett refers to?
 - 4.2 Given BC Hydro's responses to BCUC IRs 1.453.4 and 1.453.5, would Mr. Plunkett agree that BC Hydro has not jeopardized its ability to achieve its demand reduction goals for F2013 and F2014? If not, please explain and provide support for your response.
- 5.0 Mr. Plunkett's evidence, at pages 40 to 45, discusses uniformity of program designs across utilities and energy sources.**
- 5.1 Please confirm that the LiveSmart BC program is not BC Hydro's program.
 - 5.2 Please confirm that BC Hydro, FortisBC (electric), and FortisBC (gas) participate in and fund the Province's LiveSmart BC program, already resulting in integration of residential retrofit measures, which Mr. Plunkett suggests results in lower program costs.
 - 5.3 Given BC Hydro's response to BCUC IR 2.196.4, please confirm that BC Hydro and FortisBC (gas) have already integrated elements of their commercial sector programs.
 - 5.4 Is it Mr. Plunkett's position that each of BC Hydro's existing residential DSM programs could effectively "piggyback" on an existing FortisBC (gas) DSM program this year (F2013)? If so, please explain and provide support for your answer. For example, which FortisBC (gas) DSM program could be fully integrated with BC Hydro's refrigerator buy-back and consumer electronics programs? If not, is it not true that Mr. Plunkett's recommendation would result in BC Hydro forfeiting cost-effective savings in F2013?
 - 5.5 Please confirm that Mr. Plunkett's recommendations with respect to uniformity of program designs across utilities and energy sources is not intended to be criticism of BC Hydro's DSM programs in F2012 and F2013, but rather is intended to be a goal that the utilities should strive for over the long-term. If not confirmed, please explain in detail precisely which of BC Hydro's programs could realistically and pragmatically be improved and how they could be improved in this manner during the F2012 to F2013 period.