



June 13, 2011

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli,

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

Please find attached Brantford Power Inc.'s CDM Strategy, updated as directed by the Board.

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

*Original signed by*

Heather Wyatt  
Manager of Regulatory Compliance & Governance, Board Secretary

cc. George Mychailenko, Chief Executive Officer  
Mark Simpson, Manager, Metering and Settlement

**Brantford Power Inc.**

**(ED-2003-0060)**

CDM 2011-2014 Strategy Filing

Dated June 13, 2011

# Brantford Power Inc.

## Update to CDM Strategy filed November 1, 2010

Dated June 13, 2011

1. **Distributor's Name:** Brantford Power Inc. ("BPI"), ED-2003-0060 is filing this Conservation and Demand Management ("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), the Board's November 11, 2010 letter to BPI, the Board's February 18, 2011 letter to Licensed Distributors and the Board's May 20, 2011 letter (the "May 20 Letter") to Licensed Electricity Distributors. 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:** 11.38 MW per the Local Distribution Company ("LDC") CDM Targets for Electricity Distributors issued by the Board on November 12, 2010.
3. **Total Reduction in Electricity Consumption (kWh) Target:** 48,920 MWh per the LDC CDM Targets for Electricity Distributors issued by the Board on November 12, 2010.
4. **CDM Strategy**

### 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 Residential, 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 ("TOU") rate implementation. The OPA advised that the CDM targets assigned to all electricity distributors should include approximately 308 MW 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.

At the time of this amended filing, there are OPA initiatives, or portions/processes of OPA initiatives, in each OPA program segment that are not available to the LDC for launch and/or delivery. BPI has noted these initiatives in Section 5 of this amended filing.

BPI's annual forecasted targets using only the OPA Contracted Province-Wide programs are noted in Table 1, Annual Savings/Budget by Year.

Annual	2011	2012	2013	2014
Forecast Savings - Peak Demand Reduction – MW	2.487	2.432	3.468	2.200
Forecast Savings - Electricity Consumption Reduction - MWh	3,238	7,322	10,876	14,783
OPA Budget	\$2,254,679	\$2,110,488	\$2,233,382	\$1,950,619

Table 1, Annual Savings/Budget by Year

In Table 1, the Peak Demand Reduction and the Electricity Consumption Reduction were obtained by using the OPA's resource planning tool with its measures and assumptions and an estimate of the local uptake on each of the OPA Contracted Province-Wide programs. The OPA Budget is the sum of the Program Administration Budget ("PAB"), the estimated Participant Based Funding ("PBF"), and the estimated Customer Incentives ("CI").

BPI's forecasted, cumulative targets using only the OPA Contracted Province-Wide programs are noted in Table 2, Cumulative Savings/Budget by Year

Cumulative	2011	2012	2013	2014
Forecast Savings - Peak Demand Reduction – MW	2.487	4.918	8.386	10.586
Forecast Savings - Electricity Consumption Reduction - MWh	3,238	10,560	21,436	36,218
OPA Budget	\$2,254,679	\$4,365,167	\$6,598,549	\$8,549,168

Table 2, Cumulative Savings/Budget by Year

## 5. OPA Contracted Province-Wide CDM Programs

### 5.1. Program Descriptions

#### Residential Programs

The list of OPA Contracted Province-Wide Residential 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, Residential Initiatives.

Name	Years	Description	Target Customers
Conservation Instant Coupon Booklet Initiative and Bi-Annual Retailer Event Initiative - Initiative Schedule B1	2011-2014	In-store discounts on energy efficient products	Residential
Midstream Electronics Initiative - Initiative Schedule B1	2011-2014*	Retail promotion of energy efficient televisions	Residential
Midstream Pool Equipment Initiative - Initiative Schedule B1	2011-2014*	Retail promotion of "right sized" pool equipment	Residential
HVAC Incentives Initiative - Initiative Schedule B1	2011-2014	On-line rebates on high efficiency replacement of heating/cooling systems	Residential
Appliance Retirement Initiative - Initiative Schedule B1	2011-2014	Free pick-up/decommissioning of old, working inefficient appliances	Residential
Appliance Exchange Initiative - Initiative Schedule B1	2011-2014	Room air conditioner and dehumidifier exchange events at retailers	Residential
Home Energy Assessment Tool Initiative - Initiative Schedule B1	2011-2014*	On-line, home energy assessment and recommendations on how energy consumption can be reduced	Residential
Residential New Construction - Initiative Schedule B2	2011-2014	Incentives for builders to construct efficient, smart, and integrated new homes or for the major renovations to older homes	Residential
Residential Demand ("DR") Response	2011-2014*	Free, installed direct load control devices and in-home display systems/capability. Non-DR offers: subsidized in-home display systems/capabilities	Residential

\* At the time of this filing, the OPA had not made this initiative available to the LDC.

Table 3, Residential Initiatives

BPI's plan is based upon the assumption that there will be sufficient funding available to manage and promote the OPA Contracted Province-Wide Residential Programs. Due to the fact that the OPA did not have all the Residential Program Initiatives available on January 1, 2011 and that as of this filing, the OPA has not made a number of Residential Initiatives available, the total expected reductions are forecasts. As a result of the OPA's delays, BPI was not able to launch any Residential Initiative on January 1, 2011. BPI will make any necessary adjustments to our Residential Initiatives plan in our annual reports in compliance with the Conservation and Demand Management Code.

The total Peak Demand Reduction, the total Electricity Consumption Reduction and the total OPA Program Budget for the initiatives to be offered by BPI are noted in Table 4, Residential CDM Program Totals.

TOTAL for the years 2011-2014	Forecasted Peak Demand Reduction: 2.248 MKW	Forecasted Electricity Consumption Reduction: 12,771 MWh
OPA Program Administration Budget: \$913,299.78	OPA Participant Based Funding Estimate: \$1,757,848	OPA Customer Incentive Budget Estimate: \$946,008

Table 4, Residential CDM Program Totals

## 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
Energy Audit - Initiative Schedule C1	2011-2014	An incentive program designed to encourage commercial and institutional facilities to undertake assessments to identify reductions in electricity demand and consumption	Commercial Institutional
Efficiency: Equipment Replacement Incentive - Initiative Schedule C2	2011-2014	An incentive program designed to encourage high-efficiency electricity retrofits to existing structures	Commercial Institutional
Direct Install Lighting and Water Heating - Initiative Schedule C3	2011-2014	A retrofit incentive program for small business customers in the General Service < 50kW	Commercial Institutional
Direct Service Space Cooling Refrigeration Initiative – Initiative Schedule C5	2011-2014*	An initiative that provides incentive towards servicing of rooftop and ground-mounted air conditioners with a capacity of 25 tons or less	Commercial Institutional
New Construction and Major Renovation - Initiative Schedule C4	2011-2014	An initiative, which provides incentives for energy efficient new building design as well as installation of energy efficient measures	Commercial Institutional
Existing Building Commissioning - Initiative Schedule C6	2011-2014	Commissioning of chilled water plants for customers with a demand > 50 kW and facilities larger than 50,000 sq ft	Commercial Institutional
Small Commercial Demand Response (“DR”)	2011-2014*	Free, installed direct load control devices and in-home display systems/capability. Non-DR offers: subsidized in-home display systems/capabilities	Commercial Institutional
Demand Response 1 (“DR1”) - Initiative Schedule D5	2011-2014	An initiative where distribution-connected electricity customers voluntary provide DR capabilities to reduce peak demand and increase system reliability	Commercial Institutional
Demand Response 3 (“DR3”) - Initiative Schedule D6	2011-2014	An initiative where distribution-connected electricity customers provide firm, contract DR capability to reduce peak demand and increase system reliability	Commercial Institutional

\* At the time of this filing, the OPA had not made this initiative available to the LDC.

Table 5, Commercial & Institutional Initiatives

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 the OPA did not have all the Commercial & Institutional Program Initiatives available on January 1, 2011 and that as of this filing, the OPA has not made a number of Commercial & Institutional Initiatives available, the total expected reductions are forecasts. As a result of the

OPA's delays, BPI was not able to launch any Commercial & Institutional Initiative on January 1, 2011. BPI will make any necessary adjustments to our Commercial & Institutional Initiatives plan in our annual reports in compliance with the Conservation and Demand Management Code.

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 Totals.

TOTAL for the years 2011-2014	Peak Demand Reduction: 3.596 MW	Electricity Consumption Reduction: 17,207 MWh
OPA Program Administration Budget: \$965,121.13	OPA Participant Based Funding Estimate: \$213,360	OPA Customer Incentive Budget Estimate: \$2,652,146

Table 6, Commercial & Institutional CDM Program Totals



## 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
Efficiency: Equipment Replacement Incentive - Initiative Schedule C2	2011-2014	An incentive program designed to encourage high-efficiency electricity retrofits to existing structures	Industrial
Preliminary Engineering Study, Detailed Engineering Study, Project Incentive and Monitoring & Targeting – Initiative Schedules D1 & D2	2011-2014	New component aimed at improving the energy efficiency of equipment and production processes by offering capital incentive and enabling initiatives	Industrial
Energy Manager - Initiative Schedule D3	2011-2014	Access funding for customer-employed energy manager(s) for eligible consumers. Access funding for LDC-employed roving energy manager(s)	Industrial
Key Account Manager – Initiative Schedule D4	2011-2014	Join with other LDCs in close geographical proximity to apply for a shared Key Accounts Manager	Industrial
Demand Response 1 (“DR1”) - Initiative Schedule D5	2011-2014	An initiative where distribution-connected electricity customers voluntary provide DR capabilities to reduce peak demand and increase system reliability	Industrial
Demand Response 3 (“DR3”) - Initiative Schedule D6	2011-2014	An initiative where distribution-connected electricity customers provide firm, contract DR capability to reduce peak demand and increase system reliability	Industrial

Table 7, Industrial Initiatives

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 the OPA did not have all the Industrial Program Initiatives available on January 1, 2011, the total expected reductions are forecasts. As a result of the OPA’s delays, BPI was not able to launch any Industrial Initiative on January 1, 2011. BPI will make any necessary adjustments to our Industrial Initiatives plan in our annual reports in compliance with the Conservation and Demand Management Code.

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 Totals.

TOTAL for the years 2011-2014	Peak Demand Reduction: 4.742 MW	Electricity Consumption Reduction: 6,240 MWh
OPA Program Administration Budget: \$143,404.11	OPA Participant Based Funding Estimate: \$3,621	OPA Customer Incentive Budget Estimate: \$936,360

Table 8, Industrial CDM Program Totals

### Low Income Programs

BPI will offer the OPA-Contracted Province-Wide Low Income Program. The objectives for the Low Income Program are to: (a) improve the electric efficiency of the existing housing stock; (b) generate electric demand reductions and energy savings; (c) realize the adoption of conservation behaviours by all occupants of low-income households; (d) educate low income consumers in the management of their electricity use; (e) support utility service continuity amongst participants; and, (f) coordinate the delivery of electric and natural gas low income consumer offerings.

The Program is offered to Participants who reside in single-family low-rise buildings and mobile homes as defined within Part 9 of the Ontario Building Code (“OBC”). The Program is also eligible for Participants who reside in privately owned multi-family buildings as defined within Part 3 of the OBC.

As per the May 20 Letter, BPI has not provided any budget information.

## 6. Potential Board-Approved CDM Programs

At this time BPI does not have any specific Board-Approved programs in development. In order to meet its CDM targets BPI will develop and submit, as required, potential programs to the Board for approval.

## 7. Program Mix

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

## 8. CDM Programs Co-ordination

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, as appropriate, to deliver its portfolio of OPA Contracted Province-Wide CDM Programs, including a Low Income program.