



Additional Interrogatories of Commission Staff

TO: Prince Edward Island Energy Corporation
FROM: Cheryl Mosher, Senior Financial Advisor
DATE: June 17, 2022
RE: Electricity Efficiency & Conservation Plan (2022/2023 to 2024/2025)
DOCKET: UE41401

The Island Regulatory and Appeals Commission (the “Commission”), in assessing the reasonableness of the Electricity Efficiency & Conservation Plan 2022/2023 to 2024/2025 submitted by the Prince Edward Island Energy Corporation (“PEIEC”), requests responses to the following interrogatories:

22. In IR-2, Commission staff asked “*Has the current Plan achieved its intended purpose of reducing electricity consumption in the Province of Prince Edward Island?*” In response, PEIEC provided a table of reported energy and demand savings, but did not respond to the question posed by Commission staff.

Please provide a response to the question issued by Commission staff in IR-2, namely, has the current Plan achieved its intended purpose of reducing electricity consumption in the Province of Prince Edward Island? Please provide all supporting data, calculations and key assumptions.

23. The *Electric Power Act* defines “energy efficiency and demand-side resource measures” to mean “*any activities, techniques, standards or programs that are or may be used by the public utility to reduce the consumption of electric energy or modify when electric energy is consumed*” [emphasis added].

(a) With respect to each program in the proposed Plan, please identify whether it is intended to reduce the consumption of electric energy, or to modify when electric energy is consumed.

(b) Are there any programs in the proposed Plan that neither reduce the consumption of electric energy or modify when electric energy is consumed? If so, please provide justification for (i) including the program in the Plan, and (ii) recovering the cost of the Plan from utilities and utility customers.

24. In IR-4(a), Commission staff asked for a detailed analysis and thorough explanation (including supporting calculations and workbooks) as to why \$2.01 million was over-

collected from utility customers. In its response, PEIEC listed three factors that contributed to the over-collection, without any calculations or analysis as to what amount or portion of the over-collection was attributable to each factor.

Please provide this detailed analysis, including all supporting calculations and workbooks.

25. As stated in IR-5, the Commission must be satisfied that the proposed Plan includes a reasonable estimate of the financial benefits of the proposed Plan for each utility and its customers. In response to IR-5, PEIEC provided a table showing the utility investment and the present value of avoided costs. PEIEC did not provide any evidence of the financial benefits to customers.

Please provide a breakdown that clearly shows the financial cost and financial benefit for each utility's residential and general service customers. For the purposes of the calculation, assume that the average residential customer consumes 650 kWh per month (7,800 kWh per year) and the average general service customer consumes 10,000 kWh/50 kW per month (120,000 kWh/600 kW per year). Please provide all supporting calculations and assumptions.

26. In response to IR-7(b), PEIEC states that MECL customers will not be required to fund programs that are not available to them throughout the proposed Plan. However, PEIEC has also stated that utility funding is equivalent to approximately 20% of the overall Plan budget – the funding is not program specific.

Please explain this apparent discrepancy. Is the utility funding proposed by PEIEC determined based on program availability for each utility? If so, please provide all supporting calculations and key assumptions used to determine the funding required by each utility and its customers.

If not, then please explain how it is possible that utility customers will not pay for programs that are not available to them? What safeguards and adjustments are in place to ensure that each utility and its customers are only paying for programs that are available to them?

27. In response to IR-8, PEIEC states that it did not include utility costs in its cost-effectiveness screening. Has PEIEC discussed the operating and capital costs of implementing the proposed Plan with the affected utilities? If yes, please provide full particulars of these discussions. If not, please explain why PEIEC has not had these discussions with the affected utilities.
28. What, if any, consultation occurred between PEIEC and the affected utilities in the development of the proposed Plan? Please provide full particulars.
29. PEIEC's responses to IR-11 are not responsive to the specific questions issued by Commission staff. Please provide responses to IR-11(a), (b) and (c).
30. With respect to IR-15, are all utility customers required to fund all of the proposed programs – even those that they may not be eligible to participate in? If yes, please

provide justification for utility customers to pay for programs that they are not eligible to participate in.

31. In response to IR-20, PEIEC states that Econoler will assess the effectiveness of demand response activities “*by determining if the value of the peak load benefits to the utilities would exceed the cost of setting up and running the program.*” What costs are included in the assessment? Does PEIEC intend to include utility costs in the assessment of demand response effectiveness?
32. In response to IR-21, PEIEC did not provide any explanation for programs that did not perform as anticipated. Please refer to the table filed by PEIEC in response to IR-21, and provide an explanation for any program that did not perform as expected.

Additional interrogatories may follow.



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