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(416) 767-1666

November 21, 2011

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
Submission of VECC Interrogatories EB-2011-0167
Festival Hydro Inc.

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We
have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

 cc: Festival Hydro Inc.
        Ms. Debbie Reece

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ONTARIO ENERGY BOARD

IN THE MATTER OF
the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by
Festival Hydro Inc. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective May 1, 2012.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Revenue to Cost Ratios

VECC Question # 1

Reference: 2012 IRM Revenue to Cost Ratio Workform

Preamble: On Sheet 5:Re-based Billing Determinants & Rates of the Workform, the Re-based Billed kWh shown for the Large User class differs from the 65,544,852 kWh shown at Exhibit 3, Tab 2, Schedule 1, Page 23 (Summary of Forecast Data) in EB-2009-0263.

a) Please reconcile.

VECC Question # 2

Reference: Manager's Summary, Pages 6-7, Revenue to Cost Ratio Adjustments

Preamble: Festival includes a Table in the evidence on Page 6 of the Manager's Summary that shows the 2012 Proposed Revenue to Cost Ratios in Column C as per the Board's Decision in EB-2009-0263 (2010 COS). In Column D, Festival provides the 2012 Proposed Revenue to Cost Ratios in the current application. Column E provides the difference between Column C and D. There is a 0.1% variance in the residential class and a 0.8% variance in the GS>50 kW class.

a) Please explain the rationale for choosing to keep the ratio for GS>50 kW class the same at 81.39% rather than adjusting it downwards to 81.31% as per the Board's Decision in EB-2009-0263.

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 3

Reference: Manager's Summary, Page 10

Preamble: Festival filed for LRAM/SSM recovery for the years 2005 to 2009 as part of its 2011 IRM Application.

a) Please confirm that the LRAM amounts Festival is seeking to recover in this application are new amounts not included in past LRAM claims.

b) Please confirm the 2010 load forecast used to calculate the LRAM Rate Riders does not account for CDM impacts.

VECC Question # 4

Reference: Appendix B, LRAM & SSM Report by Burman Energy Consultants Group Inc.**,** Page 3

Preamble: The evidence indicates "The most recent 2010 published program evaluation results were used to calculate 2010 LRAM amounts." "Input assumptions and free ridership rates are identified in Attachment D (for OPA Programs)…."

a) Please confirm the source of the input assumptions in the LRAM calculations for OPA programs.

b) If the OPA results used are not 2010 OPA Program results, please indicate when the OPA results for the 2010 Programs will be available and how this may affect the LRAM?

c) Attachment D, OPA Conservation and Demand Management Program Results references Festival Hydro Inc. on page 1 of the spreadsheet and Whitby Hydro LRAM at the bottom of page 1. Please explain.

d) Please make any adjustments to update the LRAM claim as required.

VECC Question # 5

Reference: Appendix B, LRAM & SSM Report by Burman Energy Consultants Group Inc., Attachments A and B

Preamble: Attachments A and B show the OPA program results for 2010 and 2011 by customer class for the years implemented for each program.

a) Please provide the net and gross program results and foregone revenue for the residential programs separately for each year implemented.

b) Please provide the following details of the OPA EKC campaigns for each year, that add to the data shown in attachment A: # of units, measure life, unit and total kWh savings. Reconcile to the revenue for each year.

VECC Question # 6

Reference: Appendix B, LRAM & SSM Report by Burman Energy Consultants Group Inc.

a) For each program for each year, at the program/measure level, please confirm the number of units, measure life, LRAM free ridership, annual energy savings (kWh/a), annual peak demand savings (kW/a) and contribution to LRAM.

a) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 and 2007 separately including the measure life, unit kWh savings and free ridership for Compact Fluorescent Lights (CFLs) and Seasonal Light Emitting Diodes (LED). Confirm some of these assumptions were changed in 2007 and again in 2009 and compare the values.

b) Demonstrate/confirm that savings for 2005 Mass Market Measures and EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim beginning in 2010.

c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2010.

d) Identify all Mass Market Measures (CFLS etc) installed in 2005 and 2006 with measure lives of 4 years or less for which savings have been claimed in any prior claim.

e) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired.

VECC Question # 7

Reference: Manager's Summary, Page 12

Preamble: Burman Energy has calculated Festival's LRAM claim to be $191,653.

a) Please provide the LRAM totals for Third Tranche and OPA Programs by rate class separately for 2010 and 2011.

b) Please provide the calculation of the LRAM Rate Riders for each applicable rate class for 2010 and 2011 separately.

c) Does the LRAM claim include carrying charges?
   i) If yes, please provide the calculation.
   ii) If no, please explain.