



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

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Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

December 15, 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-2011-0154**  
**Brant County Power 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,

A handwritten signature in blue ink, appearing to be 'M. Buonaguro'.

Michael Buonaguro  
Counsel for VECC  
Encl.

cc: Brant County Power Inc.  
Mr. Ed Glasbergen

**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  
Brant County Power 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)**

Lost Revenue Adjustment Mechanism (LRAM)

**VECC Question # 1**

**Reference:** Overview, Page 6, Lost Revenue Adjustment Mechanism (LRAM) Cost Claims

**Preamble:** Brant County Power seeks an LRAM claim of \$21,561 including carrying charges for 2010 OPA CDM Programs.

- a) Please provide a summary of past LRAM claims including the type (OPA and/or 3<sup>rd</sup> Tranche) and year of CDM programs included in each claim and the corresponding recovery period for lost revenue.
- b) Please confirm that the LRAM amounts Brant County Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) When was Brant County Power's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Brant County Power's approved load forecast.

**VECC Question # 2**

**Reference:** Appendix F, LRAM Filing, IndEco Report

- a) Confirm that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs & Seasonal LEDs are not included in the LRAM claim.
- b) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired beginning in 2010.

- c) Please revise Table 2 to show the cumulative net program energy savings and demand savings by rate class for each year.
- d) Please revise Table 5 to show the summary of requested LRAM amounts by rate class for each year.

**VECC Question # 3**

**Reference:** Appendix F, LRAM Filing, IndEco Report

Preamble: The most recently published OPA 2010 Final CDM Results Summary released September 16, 2011 were used to calculate LRAM amounts.

- a) When does Brant County Power expect to receive the OPA 2010 Final CDM Results Detailed that provides the input assumptions at the measure level?
- b) How will these results impact the LRAM claim?

**VECC Question # 4**

**Reference:** Appendix F, LRAM Filing, IndEco Report

- a) Please provide the rationale for seeking an LRAM claim for lost revenue for 2010 OPA CDM programs from January 1, 2011 to April 30, 2012 given that OPA verified results are not available for 2011 or 2012.
- b) Please update the LRAM rate riders for lost revenue to the end of 2010.