



PUBLIC INTEREST ADVOCACY CENTRE
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December 17, 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-2011-0188
Northern Ontario Wires 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: Northern Ontario Wires Inc.
Ms. Monica Malherbe

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
Northern Ontario Wires 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: Tab 4, LRAM Support

Preamble: NOW seeks an LRAM claim of \$62,021.02 for energy savings related to 2006 to 2011 OPA CDM Programs over the claim period 2006 to 2011.

- a) Please provide a summary of past LRAM claims.
- b) Please confirm that the LRAM amounts NOW is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) The Burman Energy Repot indicates that no adjustments were made to incorporate impacts for any kW/kWh reductions assumed in current Board approved load forecasts. When was NOW's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in NOW's approved load forecast.
- d) Does the LRAM claim include carrying charges?
 - i) If no, please explain.
 - ii) If yes, please provide the calculation.

VECC Question # 2

Reference: Tab 4, LRAM Support

- a) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 including the measure life, unit kWh savings and free ridership rate 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 that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs & Seasonal LEDs 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 2009.

VECC Question # 3

Reference: Tab 4, LRAM Support

Preamble: Burman Energy indicates that input assumptions and free ridership rates for the 2010 program were not provided in the September 16, 2011 OPA 2010 Final CDM Results Summary. These input assumptions will be updated once the 2010 Final CDM Results Detailed report is released.

- a) Please provide a copy of the OPA 2010 Final CDM Results Summary for NOW.
- b) When does NOW expect to receive the OPA 2010 Final CDM Results Detailed report that provides the input assumptions at the measure level?
- c) How will these results impact the LRAM claim?

VECC Question # 4

Reference: Tab 4, LRAM Support

- a) Please provide the rationale for seeking an LRAM claim for lost revenue in 2011 when OPA verified results are not available for 2011.
- b) Please provide the input assumptions used to calculate the energy savings for the OPA programs implemented in 2011 as shown on Attachment A.
- c) Please update the LRAM rate riders for lost revenue up to the end of 2010.