



**PUBLIC INTEREST ADVOCACY CENTRE
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January 16, 2012

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-2011-0197
Thunder Bay Hydro Electricity Distribution 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: Thunder Bay Hydro Electricity Distribution Inc.
Ms. Cindy Speziale

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
Thunder Bay Hydro Electricity Distribution 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: Manager's Summary Page 7 to 9

Preamble: Thunder Bay Hydro indicates that at this time it seeks an LRAM claim of \$242,551 for lost revenues from 2005 to 2007 programs, a continuation of LRAM for 2008 and LRAM for 2009 and 2010 CDM programs.

- a) VECC is not clear on the timeframe that is used to calculate the lost revenue for CDM programs in each year. Please confirm the scope of the LRAM claim.
- b) Please provide a complete summary of all prior LRAM requests.
- c) Please confirm that the LRAM amounts Thunder Bay Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.
- d) Please provide the CDM program names for the acronyms GRR, ERIP and PSB.
- e) Please discuss why Thunder Bay Hydro did not have a 3rd party verify its CDM results.

VECC Question # 2

Reference: Manager's Summary Page 8, Table – LRAM Summary

- a) Please provide a list of all CDM programs by year and indicate the funding source (OPA, Third Tranche, etc.), rate class, and source of the input assumptions used in the LRAM calculation.

- b) Please provide the following details for each CDM Program by year at the measure level that adds to the data shown in the Table on Page 8 of the Manager's Summary: # units, unit and total kWh energy savings, lifetime, and free ridership rate. Reconcile to the lost revenues shown in the Table.
- c) 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.
- d) Demonstrate that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs & Seasonal LEDs have been removed from the LRAM claim in 2010.
- e) Adjust the LRAM claim as necessary to reflect the measure lives and energy savings for any/all measures that have expired.