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December 8, 2010

VIA E-MAIL/RESS

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
27th Floor; 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: EB-2010-0101 Niagara-On-the-Lake Distribution Inc 2011 IRM Adjustment
Interrogatories of Vulnerable Energy Consumers Coalition (VECC)**

Please find enclosed VECC's interrogatories regarding the above Application.

Yours truly,

Original signed

Michael Buonaguro
Counsel for VECC

Encl.

cc Jim Huntington, President
Niagara-on-the-Lake Hydro Inc.

EB-2010-0102 Niagara-on-the Lake Hydro Inc. 2011 IRM Adjustment -VECC IRs

LRAM/SSM

VECC IR# 1

References: i) Managers Summary Pages 7-10
ii) Appendix Burman Report Page 6 and Attachments A, B and E

Preamble: For all programs/projects, the most recently published OPA assumptions and measures list were used in LRAM calculations in accordance with OEB's direction letter, Conservation and Demand Management ("CDM") Input Assumptions Board File No.: EB-2008-0352, January 27, 2009 and consistent with recent Decision and Order EB-2009-0192 for Horizon Utilities Corporation that directed LRAM calculations use the most current available input assumptions for all CDM programs.

- a) For LRAM the Guidelines and Policy Letter of January 27, 2009 Specify that
LRAM

*The input assumptions used for the calculation of LRAM should be the best available at the time of the third party assessment referred to in section 7.5.
For example, if any input assumptions change in 2007, those changes should apply for LRAM purposes from the beginning of 2007 onwards until changed again.....*

Please confirm that the claim has been prepared in accordance with these Guidelines i.e. only OPA 2010 Prescriptive Measures and Assumptions have been used. If not, list all exceptions and the basis for them.

- b) Confirm the Input assumptions for the following 3rd tranche CDM programs
- **Mass Media Coupons-15w CFLs**—# units and unit kWh savings, lifetime and free ridership for each year 2005-2009.
 - **CFL Distribution 2007**—# units and unit kWh savings, lifetime and free ridership for each year 2007-2009.
 - **LED Christmas Light Trade-in**—# units and unit kWh savings, lifetime and free ridership for each year 2005-2009.

Reconcile both CFLs 2005 and 2007 to net **27,890** and **5,184** total kWh and SLEDs to **50,540 kWh** (Attachment A) and all to Attachment E.

- Pstats – Space Cooling - # units and unit kWh savings, lifetime and free ridership for each year 2005-2009.

Reconcile claimed Savings to **66,013** kWh net. Explain why gross and net savings are the same.

- c) Explain if/why the free-ridership assumption for CFLs is maintained at 10%.
- d) If the lifetime for CFLs is less than the 4 years for SSM purposes, explain why free ridership should be increased and/or a persistence factor applied.

VECC IR# 2

References: i) Appendix Burman Report Attachment D
ii) Sheet J2.6 LRAM/SSM) Managers Summary Pages 10 and 11 (Table)

- a) Based on the response to Question 1 provide a calculation of the revised LRAM/SSM schedules for 3rd tranche programs (including Carrying charges) and recalculate the rate riders

VECC IR# 3

References: i) Spreadsheet LRAM Support
ii) Appendix Burman Report Page 5 and Attachments B and F

Preamble: OPA sponsored programs also represent lost revenue through their successful implementation and are included in LRAM calculations. Lost revenue from results attributable to Niagara-on the-Lake Hydro funded programs were also included in the LRAM calculations.

- a) Provide details of the OPA EKC campaigns from 2006-2009 that add to the data shown in Attachment B- Residential line 36 Every Kilowatt Counts Power Savings Event
 - i. # units
 - ii. unit and total kWh savings,
 - iii. operating hours,
 - iv. lifetime and
 - v. free ridershipfor each year 2008-2009
- b) Reconcile to the OPA Results under the spreadsheet Tab OPA Assumptions Lines 9-18, 40-53 and lines 132 -153 and to the lost revenue for each year and the Total Revenue.