



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

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January 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)
Final Submissions: EB-2010-0076
COLLUS Power Corp. – 2011 Electricity Distribution Rate Application**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition (VECC) in the above noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

cc: Mr. T. (Tim) E. Fryer CMA
Chief Financial Officer
COLLUS Power Corp

ONTARIO ENERGY BOARD

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

AND IN THE MATTER OF an Application by COLLUS Power Corp. pursuant to section 78 of the *Ontario Energy Board Act* for an Order or Orders approving just and reasonable rates for electricity distribution to be effective May 1, 2011.

FINAL SUBMISSIONS

On Behalf of The

VULNERABLE ENERGY CONSUMERS COALITION (VECC)

January 17, 2011

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Vulnerable Energy Consumers Coalition (VECC)
Final Argument

1 The Application

- 1.1 COLLUS Power Corp ("COLLUS", "the Applicant," or "the Utility") filed an application ("the Application") with the Ontario Energy Board ("the Board" or "the OEB"), under section 78 of the Ontario Energy Board Act, 1998 for electricity distribution rates effective May 1, 2011. The Application was filed in accordance with the OEB's guidelines for 3rd Generation Incentive Regulation, which provide for a formulaic adjustment to distribution rates and related charges.
- 1.2 As part of its Application COLLUS included an adjustment to the customer class revenue to cost ratios and a request to recover the impact of lost revenues associated with various conservation and demand management (CDM) activities (i.e., an LRAM recovery). The following sections sets out VECC's final submissions regarding these two aspects of the Application.

2 Revenue to Cost Ratio Adjustments

- 2.1 In response to interrogatories¹ from VECC and Board Staff COLLUS has corrected the 2010 rates to be used for USL and revised the volumes for Street Lighting. COLLUS has also confirmed the source of the GS>50 billing parameters and the basis for the proposed Revenue to Cost ratio for GS<50. With these clarifications and corrections, VECC submits that:
- The adjustments are in accordance with the Board's EB-2008-0226 and EB-2009-0220 Decisions, and
 - The Revenue-Cost Ratio Adjustment Work Form has been completed appropriately.

¹ VECC #1 & #2 and Board Staff #6

3 Lost Revenue Adjustment Mechanism (LRAM) Recovery

LRAM Claim-Third tranche CDM

- 3.1 COLLUS confirms that it is not seeking now, or in the future, an LRAM for Third Tranche CDM Programs. (VECC IRR# 3a)

LRAM Claim – OPA Funded CDM

- 3.2 VECC accepts for LRAM purposes, the OPA Verification of OPA-funded CDM programs.
- 3.3 VECC has reviewed Appendix A2 prepared by Burman Consulting and finds it supports the LRAM claim as filed.
- 3.4 The proposed Rate rider for recovery should be approved on the basis of a three year recovery period.

Table 1

COLLUS Power						
LRAM / SSM 2011 RATE RIDER CALCULATION MODEL						
Rate Class	Amounts (Up to 2009)		Metered Units (2009)		% of \$	
	LRAM	SSM			LRAM	
	\$	\$		Metrics		
Residential	114,630.63	0.00	121,128,423	kWh	57.00%	
GS < 50 kW	21,690.81	0.00	45,443,663	kWh	10.79%	
GS >50 - 4,999 kW	64,791.35	0.00	342,721	kW	32.22%	
Street Lighting	0.00	0.00	6,087	kW	0.00%	
Total	201,112.79	0.00				100.00%

Table 2

CLASS		One Year Rate Rider Total \$/unit (kWh or kW)	Two Year Rate Rider Total \$/unit (kWh or kW)	Three Year Rate Rider Total \$/unit (kWh or kW)
	Residential	0.000946	0.000473	0.000315
	GS < 50 kW	0.000477	0.000239	0.000159
	GS >50 - 4,999 kW	0.189050	0.094525	0.063017
	Street Lighting	0.0000	0.0000	0.0000
		1 Yr Amount Recovered per Year	2 Yr	3 Yr
57.00%	Residential	\$114,631	\$57,315	\$38,210
10.79%	GS < 50 kW	\$21,691	\$10,845	\$7,230
32.22%	GS >50 - 4,999 kW	\$64,791	\$32,396	\$21,597
0.00%	Street Lighting	-	-	-
100.00%	Annual Total	\$201,113	\$100,556	\$67,038

4 Recovery of Reasonably Incurred Costs

- 4.1 VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an award of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

All of which is respectfully submitted this 17th day of January 2011.