



***PUBLIC INTEREST ADVOCACY CENTRE
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November 07, 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-2011-0183
Milton Hydro 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: Milton Hydro Distribution Inc.
Mr. Cameron McKenzie

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
Milton Hydro 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)

Revenue to Cost Ratio Adjustment

VECC Question # 1

Reference: 2012 IRM Revenue Cost Ratio Adjustment Workform

- a) Please reconcile the re-based billed customers or connections shown on Sheet 3 of the above Workform, to the customers/connections provided in EB-2010-0137 Draft Rate Order for 2011 rates, Appendix D: 2011 Test Year Update Load Forecast.
- b) Please confirm Milton's Revenue to Cost ratios for 2012 as approved in EB-2010-0137, with references.
- c) Please provide a reference to the evidence in EB-2010-0137 that supports the Revenue Requirement from Rates, \$13,177,109, shown on Sheet 5 of the 2012 IRM Revenue Cost Ratio Adjustment Workform.

Lost Revenue Adjustment Mechanism

VECC Question # 2

References: Manager's Summary, Page 27, Table 17
Appendix O, Page 17, Table 16

Preamble: Table 17 in the Manager's Summary provides a summary of 2005 to 2010 LRAM Amounts by CDM Program year. The total LRAM claim for Year 2008 of \$44,603 provided in Table 17 differs from the details provided in Appendix O regarding the total 2008 LRAM claim by customer class of \$32,088. Please reconcile.

VECC Question # 3

References: Manager's Summary, Page 1
Appendix P

Preamble: The Manager's Summary indicates that the annual LRAM amounts are based on Milton Hydro's average annual variable distribution rates as shown in Appendix P.

Please provide a sample calculation of the average annual variable distribution rates.

VECC Question # 4

References: Manager's Summary, Page 2

The evidence indicates that carrying charges amount to \$8,511. Please explain how Milton calculated these carrying charges.

VECC Question # 5

Reference: Appendix O, Lost Revenue Adjustment Mechanism

- a) For each OPA CDM program for each year, at the program/measure level, please tabulate the number of units, measure life, LRAM free ridership, annual energy savings (kWh/a), annual peak demand savings (kW/a) and contribution to LRAM.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 including the measure life, unit kWh savings and free ridership 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.
- c) Demonstrate that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2010.
- d) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.

VECC Question # 6

Reference: Manager's Summary, Page 27
Appendix O, Lost Revenue Adjustment Mechanism, Page 1

Preamble: At the first reference, the evidence indicates that the rate riders were determined by dividing the total class specific LRAM amount by the most recent OEB

Approved volumetric forecast which is Milton Hydro's 2011 Cost of Service Electricity Distribution Rate Application. At the second reference, the evidence indicates...." Milton Hydro has not filed a revised forecast until its 2011 Cost of Service Application."

Please provide the rationale for using the 2011 OEB Approved forecast to calculate the LRAM rate riders.