



***PUBLIC INTEREST ADVOCACY CENTRE
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November 10, 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-2011-0163
Chatham-Kent Hydro 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: Chatham-Kent Hydro Inc.
Mr. Andrya Eagen, Senior Regulatory Specialist

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
Chatham-Kent Hydro 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)

LRAM

VECC Question # 1

Reference: Application, Section 7, LRAM/SSM Report and Calculation

Preamble: Chatham-Kent's application includes an LRAM claim for OPA CDM Programs for the years 2009 and 2010.

- a) Please provide a summary of the LRAM recoveries and associated CDM programs approved by the Board to date for Chatham-Kent.
- b) Please confirm that the LRAM amounts Chatham-Kent is seeking to recover in this application are new amounts not included for past LRAM recoveries.
- c) 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.
- d) Demonstrate that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2010.
- e) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2010.
- f) For each OPA CDM Program in 2010, tabulate the number of units, measure life, LRAM free ridership, annual energy savings (KWh/a), contribution to LRAM, and assumption source *at the measure level*, as was done for the 2009 OPA CDM

Programs.

- g) Appendix A, Table 7 shows a “0” under the “measure life” column for each program/measure in 2009 and 2010.
 - i) Please explain.
 - ii) Provide a corrected Table 7 if required.