



***PUBLIC INTEREST ADVOCACY CENTRE  
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November 11, 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-2011-0206  
Whitby Hydro Electric Corporation**

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: Whitby Hydro Electric Corporation  
Ms. Ramona Abi-Rashed

**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  
Whitby Hydro Electric Corporation for an order or orders  
approving or fixing just and reasonable  
distribution rates to be effective January 1, 2012.

**Information Requests of the Vulnerable Energy Consumers Coalition (VECC)**

Revenue to Cost Ratio Adjustment

**VECC Question # 1**

**Reference:** 2012 IRM Revenue to Cost Adjustment Work Form

- a) On Sheet 5 (Re-based Revenue from Rates), the revenue requirement from rates of \$19,482,666 differs from the distribution revenue of \$19, 196, 426 shown in the RRWF (Page 8) in the Draft Rate Order (2010 Settlement for 2011 Rates). Please explain.

LRAM

**VECC Question # 2**

**Reference:** Appendix K, Lost Revenue Adjustment Mechanism (LRAM) Application, Proposed Rate Riders and Bill Impacts

- a) When will the OPA results for 2010 Programs be available and how may this affect the LRAM?
- b) Please provide the Annual Volume by rate class amounts used to calculate the current approved LRAM Rate Rider.
- c) Please explain the Annual Volume by rate class amounts used to calculate the Additional LRAM Rate Rider in this application.

### **VECC Question # 3**

**Reference:** Appendix L, Burman Energy Consultant Group Inc. LRAM Support

- a) For each program for each year, please confirm the number of units, measure life, LRAM free ridership, annual energy savings (kWh/a) and annual peak demand savings (kW/a) at the program/measure level.
- 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 starting in 2010.
- e) Please provide the rationale for including lost revenues for 2011 in the LRAM.
- f) Please re-do the LRAM for lost revenues to December 31, 2010.
- g) List all of the input assumptions including free-ridership, kWh savings and measure life for all Third Tranche programs and the sources of those assumptions used in the LRAM claim for 2006 to 2010 Programs.
- h) Identify all Mass Market Measures (CFLS etc) installed in 2005 and 2006 with measure lives of 4 years or less for which savings have been claimed in any prior claim.
- i) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired starting in 2010.