



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

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

November 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)
Submission of VECC Interrogatories EB-2011-0170
Halimand County 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,

A handwritten signature in blue ink, appearing to be 'M. Buonaguro'.

Michael Buonaguro
Counsel for VECC
Encl.

cc: Halimand County Hydro Inc.
Mr. Lloyd Payne

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
Halimand County 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)

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 1

Reference: Manager's Summary, Page 10

Preamble: Halimand applied for the recovery of LRAM in its 2010 COS rate application (EB-2009-0265) for the rate years 2006 to 2009 attributable to CDM programs implemented in 2005 to 2007.

- a) Please confirm that the LRAM amounts Halimand is seeking to recover in this application are new amounts not included in past LRAM claims.

VECC Question # 2

Reference 1: Appendix J, IndEco Report, LRAM Claim, Page 3

Reference 2: Guidelines for Electricity Distributor Conservation and Demand Management (EB-2008-0037), Page 18

Preamble: Page 3 of the IndEco Report indicates "As part of its 2010 Cost of Service application, HCH incorporated load reductions associated with its entire CDM portfolio into its load forecast."

- a) Please discuss the rationale for seeking a claim for savings beyond April 30, 2010 when the Board's Guideline (EB-2008-0037) indicates "Lost revenues are only accruable until new rates (based on a new revenue requirement and load forecast) are set by the Board, as the savings would be assumed to be incorporated in the load forecast at that time."
- b) Please provide an updated LRAM exclusive of estimated lost revenues past April 30, 2010.

VECC Question # 3

Reference: Appendix J, IndEco Report, LRAM Claim

- a) 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.
- b) Demonstrate that savings for 2005 Mass Market Measures and EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2010.
- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.
- d) 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.
- e) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired.

VECC Question # 4

Reference: Appendix J, IndEco Report, LRAM Claim, Appendix A, Page 28

Preamble: For the 2009 Every Kilowatt Counts Power Savings Event, under the Installed CFLs – Spring Campaign – Participant Spillover measure, the input assumptions are a measure life of 8 years, energy savings of 101 kWh/yr and a free ridership of 87%.

Please explain these input assumptions in the context of Halimand's response to VECC #3a.