

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

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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-2011-0172

Horizon Utilities 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: Horizon Utilities Corporation

Ms. Indy Butany-DeSouza

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 Horizon Utilities 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)

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question #1

Reference: Tab 7, Page 4

<u>Preamble:</u> Horizon indicates that it did not include the impact of CDM in its approved 2008 load forecast.

- a) Has Horizon included the impact of its CDM programs in any subsequent Board approved load forecasts?
 - i) If yes, please discuss how this impacts the current LRAM claim?

VECC Question #2

Reference: Tab 7, Page 6

<u>Preamble</u>: Horizon applied for the recovery of LRAM for the rate years 2005 to 2007 for 3rd Tranche CDM programs for 2005 – 2007 & OPA programs implemented in 2007.

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

VECC Question #3

Reference: Tab 7, Page 11

<u>Preamble:</u> Horizon proposes that the recovery of the approved LRAM amount be tracked in a variance account for the disposition at a date to be determined.

a) Please provide the Board directive and rationale to track the LRAM in a variance account.

VECC Question #3

Reference: Tab 7, Appendix A and B

- a) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2005 and 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 EKC 2005 and 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2009 and 2010.
- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2009 and 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.