



***PUBLIC INTEREST ADVOCACY CENTRE
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November 21, 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-2011-0153
Bluewater Power Distribution 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: Bluewater Power Distribution Corporation
Ms. Leslie Dugas

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
Bluewater Power Distribution Corporation 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 Ratios

VECC Question # 1

Reference: 2012 IRM Revenue to Cost Ratio Workform, Sheet 7

Please provide the reference for the values in Column A: Informational Filing Revenue Offsets.

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 2

Reference: Tab 1, Application and Manager's Summary, Page 11

Preamble: Bluewater has had approval for two previous LRAM recoveries; one in the 2009 COS rebasing application, and the second in the 2011 IRM application.

- a) Please confirm the scope of each prior LRAM claim.
- b) Please confirm that the LRAM amounts Bluewater is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) Please discuss if any prior CDM savings have been accounted for in Bluewater's load forecast.

VECC Question # 3

Reference: Tab 6, LRAM Support, Burman Energy Consultants Group Inc. Report, September 29, 2011, Page 3

Preamble: The report indicates "The most recent 2010 published program evaluation results were used to calculate 2010 LRAM amounts."

- a) Please confirm the source of the input assumptions in the LRAM calculations for OPA programs.
- b) If the OPA results used are not the latest 2010 OPA Program results, please indicate when the OPA results for the 2010 Programs will be available and how this may affect the LRAM?
- c) Please make any adjustments to update the LRAM claim as required.

VECC Question # 4

Reference: Tab 6, LRAM Support, Burman Energy Consultants Group Inc. Report, September 29, 2011, Attachments A and B

Preamble: Attachments A and B show the OPA program results for 2010 and 2011 by customer class for the years implemented for each program.

- a) Please provide the net and gross program results and foregone revenue for each residential program separately by year.
- b) Please provide the following details of the OPA EKC campaigns for each year that adds to the data shown in attachment A: # of units, measure life, free ridership, unit and total kWh savings. Reconcile to the net and gross program results and revenue for each year.

VECC Question # 5

Reference: Tab 6, LRAM Support, Burman Energy Consultants Group Inc. Report, September 29, 2011

- a) For each program for each year, at the program/measure level, please confirm the number of units, measure life, LRAM free ridership, annual energy savings (kWh/a), annual peak demand savings (kW/a) and contribution to the LRAM recovery.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 and 2007 separately 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/confirm that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs & Seasonal LEDs have been removed from the LRAM claim beginning 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.

VECC Question # 6

Reference: Tab 1, Application and Manager's Summary, Page 11

Preamble: Bluewater is proposing recovery of lost revenue in the amount of \$303,393.37.

- a) Please provide the LRAM totals for OPA Programs by rate class separately for 2010 and 2011.
- b) Please provide the calculation of the LRAM Rate Riders for each applicable rate class separately for 2010 and 2011.
- c) Does the LRAM claim include carrying charges?
 - i) If yes, please provide the calculation.
 - ii) If no, please explain.