



***PUBLIC INTEREST ADVOCACY CENTRE
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December 01, 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-2011-0190
Orangeville Hydro Limited**

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: Orangeville Hydro Limited
Ms. Jan Howard

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
Orangeville Hydro Limited 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 1: 2012 IRM Revenue to Cost Ratio Adjustment Workform, Sheet 6

Reference 2: EB-2010-0105 Decision, Page 6, Table 1 (2011 IRM Application)

Preamble: VECC notes that the Current Year 2011 revenue to cost ratios shown on sheet 6 of the 2012 Revenue to Cost Ratio Adjustment Workform (column 2) differ from the 2011 Board approved revenue to cost ratios (column 1).

Rate Class	Approved 2011 Ratios (EB-2010-0105 Decision) Column 1	2012 Workform (Sheet 6) Current Year Revenue to Cost Ratios Column 2
Residential	108.64	108.64
GS< 50 kW	102.26	102.48
GS 50-4,999 kW	81.14	80.59
Street Lighting	49.62	48.92
Sentinel Lighting	52.22	51.69
USL	101.10	102.65

- a) Please discuss why the ratios in the Workform for the Current Year differ from the 2011 Board Approved ratios.

VECC Question # 2

Reference: Manager's Summary, Revenue-to-Cost Ratio Adjustment, Page 47

Preamble: Orangeville Hydro indicates that there is no transformer allowance included in the volumetric rate for the GS > 50 kW class and this is noted on Sheet 8, Transformer Allowance.

- a) Please confirm that some of the GS > 50 kW rate class customers receive a transformer allowance? If yes, please explain why there is no Transformer Allowance included in the volumetric rate. If no, please reconcile with Orangeville Hydro's response to EB-2010-0105, VECC IR #6.
- b) If the GS > 50 kW rate class has a transformer allowance, please add the appropriate values to Sheet 8 and update the Workform.

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 3

Reference: Manager's Summary, LRAM Rate Rider, Page 50

Preamble: Orangeville Hydro had approval of an LRAM claim incorporated into 2011 rates (EB-2010-0105). Orangeville Hydro notes in this application that there was an error in the class and the formula that collected the recovery, regarding a Third Tranche program, Reduce the Juice Energy Audits.

- a) Please confirm the scope of the prior LRAM claim.
- b) Please confirm that the LRAM amounts Orangeville Hydro is seeking to recover in this application, aside from the correction noted above, are new amounts not included in past LRAM claims.
- c) Please provide the reference for Table 1: 2011 IRM Third Tranche Foregone Revenue Claimed.
- d) Please discuss how any prior CDM savings have been accounted for in Orangeville Hydro's approved load forecast.

VECC Question # 4

Reference: Manager's Summary, LRAM Rate Rider, Page 50

Preamble: Orangeville Hydro retained the services of Burman Energy Consultants Group Inc. (BECGI) to review the foregone revenue related to the third tranche savings to December 31, 2011.

- a) VECC was unable to locate the BECGI LRAM Report. Please provide a copy or a reference in the evidence.

VECC Question # 5

Reference: Manager's Summary, LRAM Rate Rider, Page 51

Preamble: To support an LRAM claim as part of the 2012 3rd Generation IRM, Orangeville included the foregone revenue from OPA programs projected on the 2006-2009 Final OPA CDM Results Report. Orangeville Hydro also included the 2010 Final CDM Results Report to assist in producing calculations however, Orangeville Hydro is aware that there are savings from programs that the OPA did not include on the report and once the correct information is received from the OPA, Orangeville Hydro will make the necessary adjustments.

- a) Please indicate when the correct information from the OPA will be available?
- b) Please indicate the programs where the savings were not included on the OPA's 2010 Final CDM Results.

VECC Question # 6

Reference: Manager's Summary, LRAM Rate Rider, Page 51

- a) Please provide the following details by year for the OPA Every Kilowatt Counts and Every Kilowatt Counts Power Savings Event that adds to the data shown in Table 4: # units, unit and total kWh savings, operating hours, lifetime, and free ridership rate. Reconcile to the lost revenues shown in Table 4 on page 51.
- 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 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 # 7

Reference: Manager's Summary, LRAM Rate Rider, Page 51

- a) Please confirm the input assumptions (# of units, unit kWh savings, lifetime, free ridership rate by year for the following 3rd Tranche CDM Programs: Home Show Light Bulb Giveaway and Reduce the Juice Energy Audits 15 W CFLs. Reconcile to the lost revenues shown in Table 3 on Page 51.
- b) 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.
- c) 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.

VECC Question # 8

Reference: Manager's Summary, Page 52-53

Preamble: Orangeville Hydro is proposing recovery of lost revenue in the amount of \$38,630.13.

- a) Please provide the rationale for requesting lost revenues to the end of 2011.
- b) Please provide the calculation of the LRAM Rate Riders for each applicable rate class separately for 2010 and 2011.