



***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

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-2011-0199
Veridian Connections 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,

Michael Buonaguro
Counsel for VECC
Encl.

cc: Veridian Connections Inc.
Ms. George Armstrong

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
Veridian Connections Inc. (Veridian) 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

- a) Sheet 3 - Re-based Bill determinants and Rates: Please provide the reference for the values in Column D (current tariff service charge).
- b) Sheet 6: Please explain why the proposed 2012 revenue to cost ratios for the GS < 50 kW and GS 50 to 4,999 kW rate classes differ from EB-2009-0140.
- c) Sheet 8: Please confirm the rate class that receives the Transformer Allowance.

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 2

Reference: Exhibit 2, Tab 1, schedule 1, Page 22

Preamble: Veridian is seeking to recover \$1,388,731 of lost revenue (including carrying costs) due to energy savings resulting from CDM activity during the years 2007 to 2010.

- a) Please confirm that the LRAM amounts Veridian is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Please confirm the recovery period for the LRAM claim.

VECC Question # 3

Reference: Exhibit 2, Tab 1, schedule 1, Page 24

Preamble: Veridian indicates under the discussion on the methodology for calculating LRAM that it has followed the Board's Decision and Order in the EB-2007-0096 proceeding in which the Board approved Toronto Hydro-Electric System Limited's LRAM/SSM recovery application.

- a) Please explain how the details of this decision and influenced Veridian's approach to calculate LRAM.

VECC Question # 4

Reference: Exhibit 2, Tab 1, schedule 1, Attachments 2C to 2F

- 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 the attachments: # units, unit and total kWh savings, operating hours, lifetime, and free ridership rate. Reconcile to the lost revenues shown in the attachments.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 to 2010 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) 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 # 5

Reference: Attachment 6, Third Party Review, SeeLine Group Ltd.

- a) 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 LRAM claim.
- b) 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 2009.
- c) Page 3 of the SeeLine Report indicates that SeeLine relied on the OPA Measures and Assumptions List – Release 1 January 2010 to form the basis of the recommended savings estimates for Veridian's LRAM claim. Appendices A, B & C of SeeLine's Report indicate that an updated OPA Measures List (as of April 06,

2011) was used as the source of the input assumptions. Please confirm the version used.