



***PUBLIC INTEREST ADVOCACY CENTRE
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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-2011-0164
Cooperative Hydro Embrun 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: Cooperative Hydro Embrun Inc.
Mr. Benoit Lamarche

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
Cooperative Hydro Embrun 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: Exhibit 1, Tab 2, Schedule 6, Attachment 1, Elenchus Report, Page 1

Preamble: Cooperative Hydro Embrun Inc. (Embrun) seeks an LRAM claim of \$23,748.80 for energy savings from 2006 to 2010 OPA CDM activities, for the years January 1, 2006 through April 30, 2012.

- a) Please confirm that the LRAM amounts Embrun is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Please explain why there is no claim for activity related to 2005 to 2009 Third Tranche programs.
- c) Please discuss how any CDM savings have been accounted for in Embrun's approved load forecast.
- d) Does the LRAM claim include carrying charges? If not, please explain.
- e) Please provide the rationale for requesting lost revenues for 2011 and January 1, 2012 to April 30, 2012.
- f) Please provide the calculation of the LRAM Rate Riders for each applicable rate class to the end of 2010.

VECC Question # 2

Reference: Elenchus Report, Table One, OPA Results Net kWh

- 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 One: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the lost revenues shown in Table Five.
- 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 rate 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.
- e) VECC notes that the totals on Table One – OPA Results Net kWh are the same as Table Two – OPA Results Net kWh Adjusted to April 30, 2012. Please explain.