



***PUBLIC INTEREST ADVOCACY CENTRE
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December 02, 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-2011-0005
PowerStream 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: PowerStream Inc.
Mr. Tom Barrett

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
PowerStream 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: Manager's Summary, LRAM Application, Page 11

Preamble: The evidence indicates that in PowerStream's 2011 IRM Application, PowerStream - Barrie sought an approval to recover LRAM for OPA 2006-2007 funded programs for the period January 1st, 2007 to December 31, 2008.

- a) Did the 2011 IRM LRAM claim also include CDM savings in 2008 from OPA 2008 funded programs?
- b) Please provide a summary of all other LRAM claims that PowerStream has previously applied for.

VECC Question # 2

Reference: Manager's Summary, LRAM Application

Preamble: PowerStream is seeking to recover \$554,020 of lost revenue (including carrying costs) for the PowerStream – Barrie rate zone only due to energy savings resulting from CDM activities over the period January 1, 2009 to December 31, 2011.

- a) Please confirm that the LRAM amounts PowerStream is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Please discuss PowerStream's plans for an LRAM recovery application for the PowerStream – South rate zone.

- c) Please confirm the load forecast underpinning PowerStream's current rates does not include any load reductions due to CDM programs.
- d) Please confirm this LRAM application does not include the recovery of any CDM activities funded through the 3rd tranche of MARR.
- e) Please provide the rationale for requesting lost revenues for 2011.
- f) Please provide the calculation of the LRAM Rate Riders for each applicable rate class to the end of 2010.
- g) Please provide the rationale for using forecast 2012 billing units.
- h) Please re-calculate the LRAM Rate Riders by customer class based on Board-approved billing determinants.

VECC Question # 3

Reference: Appendix G to Appendix K

- a) Please tabulate by year for each program/measure, the # of units, measure life, unit energy savings, free-ridership rate, annual energy savings and contribution to LRAM. Reconcile to the values in K-3.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 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.
- c) Demonstrate that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim 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 2009.