



***PUBLIC INTEREST ADVOCACY CENTRE
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December 05, 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-2011-0189
Oakville Hydro Electricity Distribution 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: Oakville Hydro Electricity Distribution Inc.
Ms. Lucy Ricci

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
Oakville Hydro Electricity Distribution 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)

Revenue to Cost Ratios

VECC Question # 1

Reference: 2012 IRM Revenue to Cost Ratio Adjustment Workform

- a) Sheet 3 - VECC is able to track the re-based billed customers or connections from the 2011 IRM Revenue to Cost Ratio Adjustment Workform (EB-2010-0104). Please provide the reference to these figures in Oakville's 2010 COS application EB-2009-0271.
- b) Sheet 6 – Oakville proposes that the Sentinel Lighting and Street Lighting rate classes be moved to the target level of 70% in 2012 and the adjustment be distributed proportionately between the Residential, GS>50 kW and GS>1000 kW rate classes. Sheet 6 shows a rebalance of the GS 50 to 999 kW rate class instead of the GS< 50 kW. Please discuss.

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 2

Reference: Proposed Revenue and Shared Savings Mechanism Rate Riders, Page 5

Preamble: The evidence indicates that in Oakville Hydro's 2010 Cost of Service Application, Oakville Hydro sought an approval to LRAM from CDM activities that took place in years 2006, 2007 and 2008.

- a) Please confirm that the LRAM amounts Oakville Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.

- b) Please confirm the load forecast underpinning Oakville Hydro's current rates does not include any load reductions due to CDM programs or provide details of CDM impacts.

VECC Question # 3

Reference: Proposed Revenue and Shared Savings Mechanism Rate Riders, Page 8 to 12, Table 2 and Table 4.

- a) Please tabulate by year for each program, at the measure level, the # of units, measure life, unit energy savings, free-ridership rate, annual energy savings and contribution to LRAM. Reconcile to the values in Table 2 and Table 4.
- 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.