



***PUBLIC INTEREST ADVOCACY CENTRE
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December 14, 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-2011-0201
Waterloo North Hydro 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: Waterloo North Hydro Inc.
Mr. Albert Singh

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
Waterloo North Hydro 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: Summary of Application, 2.11 Lost Revenue Adjustment Mechanism (LRAM)

Preamble: Waterloo North seeks an LRAM claim of \$161,037 including carrying charges for energy savings in 2010 from 2006 to 2010 OPA CDM activities.

- a) Please confirm that the LRAM amounts Waterloo North Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) When was Waterloo North Hydro's load forecast last approved by the Board?
Please discuss how any CDM savings have been accounted for in Waterloo North Hydro's approved load forecast.
- c) Please provide the calculation of the carrying charges.

VECC Question # 2

Reference: Summary of Application, 2.11 Lost Revenue Adjustment Mechanism (LRAM), Page 35

Preamble: Waterloo North Hydro is proposing a four year recovery period in order to mitigate customer rate impacts.

- a) Please provide the rate riders using a one year recovery period, and resulting rate impacts by customer class.

VECC Question # 3

Reference: Attachment Z, LRAM Report, Page 3

Preamble: The Burman Energy Report indicates that input assumptions will be updated once the 2010 Final CDM Results Detailed Report is released.

- a) When does Waterloo North Hydro expect to receive these results and update the LRAM?

VECC Question # 4

Reference: Attachment Z, LRAM Report

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data shown in Attachment A: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues shown in Attachments A and B.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 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 in 2010.
- d) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.