



***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 15, 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-2011-0196
St. Thomas Energy 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: St. Thomas Energy Inc.
Mr. Dana Witt

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
St. Thomas Energy 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

Preamble: St. Thomas Energy Inc. seeks an updated LRAM claim of \$120,419.52 including carrying charges. St. Thomas Energy indicates that calculations in this claim continue to utilize persistent 2009 program evaluation results into 2010.

- a) Please confirm the CDM programs included in this LRAM claim and over what period in time St. Thomas Energy is seeking recovery for energy savings.
- b) Please confirm that the LRAM amounts St. Thomas is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) When was St. Thomas' load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in St. Thomas' approved load forecast.

VECC Question # 2

Reference: Exhibit 1, Tab 2, Schedule 6, Attachment 1

- 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.

VECC Question # 3

Reference: Exhibit 1, Tab 2, Schedule 6, Attachment 1

- a) Please provide the rationale for seeking an LRAM claim for lost revenue in 2011.
- b) Please update the LRAM rate riders for lost revenue to the end of 2010.