



***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](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

December 16, 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-2011-0169  
Greater Sudbury 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: Greater Sudbury Hydro Inc.  
Ms. Catherine Huneault

**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  
Greater Sudbury 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:** Appendix D, Lost Revenue Adjustment Mechanism (LRAM)

Preamble: GSHI seeks an LRAM claim of \$328,086 including carrying charges for energy savings from third tranche CDM programs implemented in 2005 to 2007 and OPA CDM programs implemented in 2007 to 2010, over the period 2008 to 2010.

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

**VECC Question # 2**

**Reference:** Appendix D, Lost Revenue Adjustment Mechanism (LRAM)

- a) 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.
- b) 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.

- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2009.
- d) Table 4 on page 5 of Appendix D shows Every Kilowatt Counts as a Third Tranche-Funded Program. Please explain. Please provide the input assumptions for this program at the measure level by year.

### **VECC Question # 3**

**Reference:** Appendix D1, Third Party Review, SeeLine Group Ltd.

- a) List the input assumptions including free ridership, kWh savings and measure life for all third tranche programs and sources of those assumptions used in prior LRAM claims.
- b) Identify all Mass Market measures (CFLs etc) installed in 2005 and 2006 with measure lives of 5 years or less for which savings have been claimed in any prior LRAM claim.
- c) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired starting in 2009.

### **VECC Question # 4**

**Reference:** Appendix D3, Lost Revenue Adjustment Mechanism (LRAM)

Preamble: The OPA 2010 Final CDM Results Summary was used to calculate LRAM amounts.

- a) When does GSHI expect to receive the OPA 2010 Final CDM Results Detailed that provides the input assumptions at the measure level?
- b) How will these results impact the LRAM claim?

Smart Grid Rate Adder

### **VECC Question # 5**

**Reference:** Appendix E

- a) Please confirm the objectives of the project.
- b) Please provide the status of the Smart Grid Fund Application.

- c) Please provide an estimated construction timeline and completion date for the project.
- d) On Page 11, GSHI indicates it has reviewed the internet to see if similar projects exist elsewhere and what, if any, publicly reported results exist. Please summarize any other activities undertaken by GSHI to research work being done in Ontario and other jurisdictions (most notably the United States) to ensure efforts are not being unnecessarily duplicated.
- e) Please comment on what has already been learned about the technology and how GSHI has incorporated this information or results from previous projects into the proposed project.
- f) Please describe the new information that GSHI expects from the smart grid project and how that will aid in developing smart grid.
- g) Page 18 of the Board's Filing Requirements (EB-2009-0397) indicates that the Government will be providing further direction regarding smart grid development? Please discuss the timing needs for this project given that further direction in this area is under development.
- h) Page 19 of the Board's Filing Requirements (EB-2009-0397) provides a list of descriptive information that should be provided for smart grid development activities. Please provide:
  - i) A discussion of any joint preparation agreements, information sharing arrangements and other efforts that GSHI has made to avoid undertaking projects that unnecessarily duplicate other ongoing or planned demonstration projects so as to avoid redundant demonstration projects.
  - ii) A description of the formal evaluation that will be performed to assess the value of the project and confirm the evaluation will be suitable for sharing with other distributors.

## **VECC Question # 6**

**Reference:** Appendix E. Page 22

Preamble: Applications to increase base rates between cost of service applications for expenditures proposed in a GEA Plan are not encouraged by the Board.

- a) Please discuss why GSHI believes it is appropriate to seek approval of this project outside of a cost of service application.

## **VECC Question # 7**

**Reference:** Appendix E, Page 17

Preamble: GSHI is applying to the Ontario Energy Board to recover all capital costs over a two year period using a funding adder mechanism and all OM&A costs on an enduring basis using a funding adder mechanism. Page 23 of the Board's Filing Requirements (EB-2009-0397) provides for Smart Grid Development Deferral Accounts: Account 1534 Smart Grid Capital Deferral Account, Account 1535 Smart Grid OM&A Deferral Account and Account 1536: Smart Grid Funding Adder Deferral Account.

- a) Please discuss how GHSI plans to use the deferral accounts to track the differences between the amount funded in rates and actual costs.