

# PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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Michael Buonaguro Counsel for VECC (416) 767-1666

December 22, 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-2011-0193** 

**Parry Sound Power Corporation** 

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: Parry Sound Power Corporation

Mr. Miles Thompson

#### **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 Parry Sound Power Corporation for an order or orders approving or fixing just and reasonable distribution rates to be effective January 1, 2012.

## Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Lost Revenue Adjustment Mechanism (LRAM)

#### **VECC Question #1**

**Reference:** Burman Energy Report, LRAM Support (Dec 6, 2011)

<u>Preamble</u>: Parry Sound Power Corporation (Parry Sound Power) seeks an LRAM claim of \$50,034.24. This LRAM Claim includes 2006-2009 persistent results into 2011, 2010 finalized program results, and 2010 program results persistent into 2011.

- a) Please summarize the date and outcome of Parry Sound Power's previous LRAM claim?
- b) Please confirm that the LRAM amounts Parry Sound Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) When was Parry Sound Power's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Parry Sound's load forecast.
- d) Does the LRAM claim include carrying charges?
  - i) If yes, please provide the calculation.
  - ii) If no, please explain.

### **VECC Question #2**

Reference: Burman Energy Report, LRAM Support (Dec 6, 2011), Page 2

<u>Preamble</u>: The Burman Report States "Those measures which would have expired prior to 2010 have not been included in this claim."

- a) Please tabulate the CDM measures that expired prior to 2010 that are not included in this LRAM claim.
- b) Please tabulate the CDM measures that expire in 2010 and 2011 and discuss how they are treated in this LRAM claim.

#### **VECC Question #3**

Reference: Burman Energy Report, LRAM Support (Dec 6, 2011)

- a) For each program for each year, at the program/measure level, please tabulate by customer class the number of units, measure life, LRAM free ridership, annual net energy savings (kWh/a), annual net peak demand savings (kW/a) and contribution to LRAM.
- 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 beginning in 2010.
- d) List the input assumptions including kWh savings, free ridership and measure life for all Third Tranche programs and the sources of those assumptions used in the last LRAM claim.
- e) Identify all Mass Market Measures (CFLS etc) installed in 2006 with measure lives of 4 years or less for which savings have been claimed in the prior claim.
- f) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired beginning in 2010.

## **VECC Question #4**

**Reference:** Burman Energy Report, LRAM Support (Dec 6, 2011)

- a) Please provide the rationale for seeking an LRAM claim for lost revenue in 2011.
- b) Please provide the LRAM totals for Third Tranche and OPA Programs by rate class separately for 2010 and 2011.