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December 23, 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-2011-0166
Essex Powerlines 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: Essex Powerlines Corporation
Mr. Richard Dimmel

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
Essex Powerlines Corporation 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: Elenchus LRAM Report, Exhibit 1, Tab 1, Schedule 5

Preamble: Essex seeks an LRAM claim of \$508,029.80 for energy savings from 2006 to 2010 OPA CDM activities, for the years January 1, 2006 through April 30, 2012.

- a) Please discuss why there is no claim for activity related to 2005 to 2009 Third Tranche programs.
- b) When was Essex's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Essex's approved load forecast.
- c) Does the LRAM claim include carrying charges?
 - i) If no, please explain.
 - ii) If yes, please provide the calculation.

VECC Question # 2

Reference: Elenchus LRAM Report, Table One, OPA Results Net kWh

- a) Please provide the input assumptions at the program measure level to add to the data shown in Table One: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the lost revenues shown in Table Five.
- 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) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired.
- e) VECC notes that the totals on Table One – OPA Results Net kWh are the same as Table Two – OPA Results Net kWh Adjusted to April 30, 2012. Please explain.

VECC Question # 3

Reference: Elenchus LRAM Report, Exhibit 1, Tab1, Schedule 1, Page 1

Preamble: Elenchus indicates that the OPA Final 2010 CDM Summary Results September 16, 2011 was used to calculate LRAM amounts.

- a) When does Essex expect to receive the OPA 2010 Final CDM Results Detailed that provides the input assumptions at the measure level?
- b) Please discuss how the detailed OPA CDM Results will impact the LRAM claim?

VECC Question # 4

Reference: Elenchus LRAM Report, Exhibit 1, Tab 1, Schedule 5, Page 1

Preamble: Page 1 includes a table of the total LRAM claim by customer class.

- a) Please provide the rationale for requesting lost revenues for 2011 and January 1, 2012 to April 30, 2012 in the absence of OPA verified results for 2011 and 2012.
- b) Please provide the calculation of the LRAM by customer class separately for 2010, 2011 and January 1, 2012 to April 30, 2012.