



***PUBLIC INTEREST ADVOCACY CENTRE
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January 09, 2012

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-2011-0171
Hearst Power Distribution Company Limited**

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: Hearst Power Distribution Company Limited
Mr. Steven Blier

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
Hearst Power Distribution Company Limited 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, Elenchus LRAM Report

Preamble: Hearst Power seeks an LRAM claim of \$33,962.36 for energy savings from 2006 to 2010 OPA CDM activities, for the years January 1, 2006 through April 30, 2012.

- a) Please confirm that the LRAM amounts Hearst Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Please explain why there is no claim for activity related to 2005 to 2009 Third Tranche programs.
- c) When was Hearst Power's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Hearst Power's approved load forecast.
- d) Does the LRAM claim include carrying charges?
 - i) If no, please explain.
 - ii) If yes, please provide the calculation.
- e) Please provide the rationale for requesting lost revenues for 2011 and January 1, 2012 to April 30, 2012 in the absence of verified OPA results for 2011 and 2012.
- f) Please provide the calculation of the LRAM Rate Riders for each applicable rate class to the end of 2010.

VECC Question # 2

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

- a) Please provide the following details by year 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: Exhibit 1, Tab 1, Schedule 6, Page 1, Elenchus LRAM Report

Preamble: The report indicates that the most recently published OPA 2010 Final CDM Results Summary released September 16, 2011 were used to calculate LRAM amounts.

- a) When does Hearst Power 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?