



***PUBLIC INTEREST ADVOCACY CENTRE
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January 13, 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-2011-0180
Lakeland Power Distribution Ltd.**

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: Lakeland Power Distribution Ltd.
Ms. Margaret Maw

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
Lakeland Power Distribution Ltd. 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: Manager's Summary, Pages 10-12

Preamble: Lakeland Power seeks an LRAM claim of \$109,850 including carrying charges for impacted revenues in 2006 to 2010, regarding OPA CDM Programs deployed from 2006 to 2010.

- a) Please confirm that the LRAM amounts Lakeland Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Please discuss how CDM savings have been accounted for in Lakeland Power's approved load forecast.

VECC Question # 2

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

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data in Appendix D: # units, unit and total kWh savings, lifetime and free ridership rate. Reconcile to the net savings and lost revenue in Appendix D.
- 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.

VECC Question # 3

Reference: Manager's Summary, Page 11

Preamble: Lakeland Power indicates that the level of achieved savings used in Appendix D was provided by the OPA up to 2009 and an estimate for 2010 based on the number of installs or on methods of estimating program savings, and will be updated once the OPA provides final results.

- a) When does Lakeland Power expect to receive the 2010 Final OPA CDM Results and how will these results impact the LRAM claim?
- b) If the 2010 Final OPA CDM Program Results are available, please provide a copy and update the LRAM claim accordingly.