



***PUBLIC INTEREST ADVOCACY CENTRE  
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(416) 767-1666

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-2011-0176  
Innisfil Hydro Distribution Systems 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: Innisfil Hydro Distribution Systems Limited  
Ms. Brenda L. Pinke

**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  
Innisfil Hydro Distribution Systems 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:** Manager's Summary, Section 5. LRAM Lost Revenue Adjustment Mechanism

Preamble: Innisfil Hydro seeks an LRAM claim of \$180,250.03 for impacted revenues from 2006 to 2010 OPA CDM programs.

- a) Please confirm the applicable years of lost revenue included in the LRAM claim from 2006 to 2010 CDM programs.
- b) Please provide a summary of past LRAM claims.
- c) Please confirm that the LRAM amounts Innisfil Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.
- d) When was Innisfil Hydro's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Innisfil Hydro's approved load forecast.
- e) Does the LRAM claim include carrying charges?
  - i) If no, please explain.
  - ii) If yes, please provide the calculation.
- f) Please provide the rationale for requesting lost revenues in 2011.
- g) Please provide the calculation of the LRAM Rate Riders for each applicable rate class to the end of 2010.

## **VECC Question # 2**

**Reference:** Tab 3, LRAM Supporting Documentation, Burman Energy Consultant Group Inc. LRAM Report

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data referenced in Attachment A: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues in Attachments A and B. (VECC notes that Attachment A is referenced but not included in the filing)
- 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.

## **VECC Question # 3**

**Reference:** Tab 3, LRAM Supporting Documentation, Burman Energy Consultant Group Inc. LRAM Report, Results Page 3

Preamble: Burman's LRAM report indicates that input assumptions and free ridership rates for the 2010 program were not provided in the September 16, 2011 OPA 2010 Final CDM Results Summary. These input assumptions will be updated once the 2010 Final CDM Results Detailed report is released.

- a) When does Innisfil Hydro expect to receive the 2010 Final CDM Results Detailed report?
- b) How will these results impact the LRAM claim?