



***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-2011-0182
Midland Power Utility 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: Midland Power Utility Corporation
Mr. Phil Marley

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
Midland Power Utility 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: Tab 1, Manager's Summary, Page 15

Preamble: Midland Power seeks an LRAM claim of \$76,737.50 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 OPA CDM programs.
- b) Please provide a summary of past LRAM claims.
- c) Please confirm that the LRAM amounts Midland Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- d) When was Midland Power's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Midland Power'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.

VECC Question # 2

Reference: Tab 6, Lost Revenue Adjustment Mechanism Report and Schedules, Burman Energy Consultant Group Inc.

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data shown 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.
- b) Attachment A provides CDM load impacts for 2010 only, yet Attachment B shows foregone revenue in 2010 and 2011. Please explain.
- c) 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.
- d) 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.
- e) 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 Midland Power expect to receive the 2010 Final CDM Results Detailed report?
- b) How will these results impact the LRAM claim?

VECC Question # 4

Reference: Tab 6, Lost Revenue Adjustment Mechanism Report and Schedules, Burman Energy Consultant Group Inc. LRAM Report, Results Page 3

Preamble: Burman indicates Input assumptions and free ridership rates for 2006-2009 programs are identified in Attachment D – OPA Assumptions. VECC was unable to locate Attachment D in the evidence.

a) Please provide Attachment D.