



***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-2011-0100  
Enersource Hydro Mississauga Inc.**

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: Enersource Hydro Mississauga Inc.  
Ms. Gia DeJulio

**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  
Enersource Hydro Mississauga Inc. 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 3

Preamble: Enersource seeks approval to recover \$856,957 in lost revenue including \$16,660 in carrying charges pertaining to 2010 CDM programs in 2010 and prior years' lost volumes carried over to 2010.

- a) Please provide a summary of all past LRAM claims.
- b) Please confirm that the LRAM amounts Enersource is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) When was Enersource's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Enersource's approved load forecast.

**VECC Question # 2**

**Reference:** Appendix E

- a) Please provide the following details by year for each OPA CDM Program at the measure level to add to the data shown in Appendix E: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues in Appendix E.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2005 and 2006 including the measure life, unit kWh savings and free ridership 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.

- a) Demonstrate that savings for EKC 2005 and 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2010.
- b) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.
- c) For Custom Projects, please provide the input assumptions used in this application compared to the input assumptions used in prior LRAM claims.

### **VECC Question # 3**

**Reference:** Attachment H, Report on Independent Review of Enersource's LRAM Claim

- a) For the Third Tranche CDM projects, please list the input assumptions used in prior LRAM claims compared to this claim for 13-15 W CFLs and LEDs.
- b) Identify all Mass Market Measures (CFLS etc) installed in 2005 and 2006 with measure lives of 4 years or less for which savings have been claimed in any prior claim.
- c) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired.