



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-2011-0101
PUC Distribution 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: PUC Distribution Inc.
Ms. Jennifer Uchmanowicz

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
PUC Distribution 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: Manager's Summary, Page 11

Preamble: PUC seeks an LRAM claim of \$623,790 including carrying charges. The requested LRAM amounts are derived from savings composed of:

- Third Tranche CDM programs implemented in 2005, 2006, 2007 and 2008;
- Ontario Power Authority (OPA) programs implemented in 2006, 2007, 2008, 2009 and 2010. The lost revenues are calculated from the year of introduction through to April 30, 2012.

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

VECC Question # 3

Reference: Exhibit 7, LRAM & SSM 3rd Party Review, IndEco Report

- a) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 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 2006 Mass Market measures 13-15 W Energy Star CFLs & Seasonal LEDs have been removed from the LRAM claim beginning in 2010.
- b) Adjust the LRAM claim for OPA programs as necessary to reflect the measure lives and unit savings for any/all measures that have expired.
- c) 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 and confirm the input assumptions used.
- d) Adjust the Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired.

VECC Question # 3

Reference: Exhibit 7, LRAM & SSM 3rd Party Review, IndEco Report

Preamble: PUC proposes to recover an SSM amount of \$53,663.

- a) Please confirm the scope of the SSM recovery.
- b) Please confirm that the measure life used in the SSM calculation for CFLs was 4 years and unit savings of 104 kWh based on OEB assumptions.
- c) If any SSM claim is to be made in 2010 and beyond under this application, confirm that the 2010 savings for CFLs should be adjusted to recognize the 4 year life for CFLs.
- d) Please adjust the SSM as necessary to account for measures that have expired.
- e) Please provide a copy of IndEco's TRC calculations.