

PUBLIC INTEREST ADVOCACY CENTRE LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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January 20, 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-2011-0161

COLLUS Power 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: COLLUS Power Corporation

Mr. Tim Fryer

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 COLLUS Power 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: Manager's Summary, Lost Revenue Adjustment (LRAM), Page 4

<u>Preamble</u>: COLLUS seeks an LRAM claim of \$66,095 for energy savings in 2010 from 2006 to 2010 OPA CDM programs.

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

VECC Question # 2

Reference: Appendix 1, Attachments A-D

- a) Did COLLUS have a third party verify the energy savings in Appendix 1? If so, please provide the LRAM report.
- b) Attachment C in Appendix 1 shows an LRAM amount of \$126,532.51. Please explain the significance of this value for inclusion in this application.
- 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 starting in 2010.

VECC Question #3

Reference: Appendix 1, Attachment D – OPA Measures

<u>Preamble</u>: Line 613 in Attachment D refers to the 2009 Every Kilowatt Counts Power Savings Event and the Measure – Installed CFLs, Spring Campaign, Participant Spillover.

a) For this measure, the life is shown as 8 years and the annual energy savings is shown as 101.42 kWh/a. Please explain these input assumptions, in the context of the response to 2 (c).