



PUBLIC INTEREST ADVOCACY CENTRE
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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-2011-0165
EnWin Utilities Ltd.

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: EnWin Utilities Ltd.
Mr. Andrew J. Sasso

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
EnWin Utilities Ltd. 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, LRAM & SSM Rate Riders, Page 7

Preamble: EnWin seeks an LRAM claim of \$2,227,586.68 for impacted revenues from 2005 to 2010 inclusive CDM results.

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

VECC Question # 2

Reference: Appendix G, LRAM Support, Burman Energy Consultants 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) 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 in 2010.
- d) Provide the input assumptions for Third Tranche CDM Programs included in prior LRAM claims.
- e) Identify mass market measures (CFLs, LEDs) installed in 2005 and 2006 with measure lives of 4 years or less for which savings have been claimed in a prior claim.
- f) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired beginning in 2009.
- g) Attachment A shows energy saving calculations for Third Tranche programs from 2009 to 2011. Please confirm that the lost revenues for Third Tranche programs in prior years is included in a previous LRAM claim.
- h) Attachment D – OPA assumptions shows a technology life of 5 years for 15 W CFLs under the Energy Conservation Media Campaign and a technology life of 8 years for 15 W CFLs Keep Cool/Torchiere Exchange and Porch Light. Please explain.