

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

ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. http://www.piac.ca

Michael Buonaguro Counsel for VECC (416) 767-1666

February 08, 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-2011-0146

Fort Frances 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: Fort Frances Power Corporation

Mr. Joerg Ruppenstein

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 Fort Frances 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 Mechanism (LRAM), Page 11

<u>Preamble</u>: Fort Frances Power seeks an LRAM recovery of \$50,043 including carrying charges associated with 2006 to 2010 savings from OPA programs that Fort Frances Power participated in from 2006 to 2010.

- a) Please provide a summary of past LRAM claims.
- b) Please confirm that the LRAM amounts Fort Frances Power is seeking to recover in this application are new amounts not included in past LRAM claims.
- c) When was Fort Frances Power's load forecast last approved by the Board? Please discuss how any CDM savings have been accounted for in Fort Frances Power's approved load forecast.
- d) Did Fort Frances Power retain a third party to verify its LRAM claim? Please discuss.

VECC Question # 2

Reference: Manager's Summary, Lost Revenue Adjustment Mechanism (LRAM), Page 11

<u>Preamble:</u> Fort Frances Power indicates that the detailed calculations supporting the foregone revenue are provided in the completed LRAM model.

- a) Please provide the following input assumption details by year for each CDM program at the measure level: # units, unit and total kWh savings, effective useful life and free ridership rate and resulting energy savings for each program.
- b) Please provide the results of the LRAM model or calculations to show the energy savings and contributions to LRAM to support the LRAM amounts by rate class shown on Page 12 of the Manager's Summary.
- 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.