

February 21, 2012

Ontario Energy Board P.O. Box 2319, 27th Floor 2300 Yonge Street Toronto, ON M4P 1E4 Attn: Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Fort Frances Power Corporation 2012 IRM2 Distribution Rate Application Reply to Board Staff Interrogatories Board File No. EB-2011-0146

This letter acknowledges the receipt of the Vunerable Energy Consumers Coalition (VECC) interrogatories on February 8, 2012. Fort Frances Power Corporation respectfully submits two (2) paper copies of its responses to the VECC Interrogatories for the 2012 IRM Distribution Rate Application by electronic copy through the Ontario Energy Board's RESS on-line filing system and via email, including a copy to all intervenors.

Please contact the undersigned for any additional information.

Regards,

Lori Cain Finance and Regulatory Officer

cc Michael Buonaguro, Counsel for Vunerable Energy Consumers Coalition (VECC)

EB-2011-0146

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.

Response by Fort Frances Power Corporation (FFPC) to Information Requests of the Vulnerable Energy Consumers Coalition (VECC) completed February 17, 2012.

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.

Response: FFPC has no prior 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.

<u>Response</u>: The LRAM amounts that FFPC is seeking to recover in this application are new amounts and are not included in past LRAM claims, as Q1, a).

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.

Response: The last load forecast approved by the Board was completed in 2006 as a requirement of the 2006 EDR Application.

d) Did Fort Frances Power retain a third party to verify its LRAM claim? Please discuss.

Response: FFPC did not retain a third party to verify its LRAM claim. FFPC did acquire working documents and guidance from a consultant to assist with the claim preparation.

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.

<u>Response</u>: Please see the 'Bdstaff_IR_Fort Frances_Response'; Question 13 a).

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.

Response: *Please see the 'Bdstaff_IR_Fort Frances_Response'; Question 13 a).*

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.

Response: As this is the first LRAM application, FFPC does not need to adjust prior claims that may have overstated the useful life measure or savings. FFPC has used the most current OPA Measures and Assumptions available in the completion of the LRAM application.

 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.

Response: Please note the highlighted excerpt from the FFPC LRAM 2006-2010 that demonstrates the removal of the EKC 2006 Mass Market impact of the CFL & Seasonal LED programs.

ults-Fort Franc	es Power C	orporation							
Program	Results	Market	2006 kWh	2007 kWh	2008 kWh	2009 kWh	2010 kWh	Total kWh	
Year	Status		Saved	Saved	Saved	Saved	Saved	Saved	
2006	Final	Consumer	379,310	379,310	379,310	379,310	48,905	1,566,143	
ults-Fort Franc	es Power C	orporation							
Program	Results	Market	2006 kWh	2007 kWh	2008 kWh	2009 kWh	2010 kWh	Total kWh	Free
Year	Status		Saved	Saved	Saved	Saved	Saved	Saved	Ridership
									%
2006	Final	Consumer	341,379	341,379	341,379	341,379	44.015	1,409,529	10%
	Program Year 2006 ults-Fort Franc Program Year	Program Year Results Status 2006 Final ults-Fort Frances Power C Program Program Results Year Status	Year Status 2006 Final Consumer ults-Fort Frances Power Corporation Program Results Market Year Status Market Market	Program Year Results Status Market 2006 kWh Saved 2006 Final Consumer 379.310 ults-Fort Frances Power Corporation Program Year Results Status Market 2006 kWh Saved	Program Year Results Status Market 2006 kWh Saved 2007 kWh Saved 2006 Final Consumer 379.310 379.310 ults-Fort Frances Power Corporation Program Year Results Status Market 2006 kWh Saved 2007 kWh Saved	Program Year Results Status Market 2006 kWh Saved 2007 kWh Saved 2008 kWh Saved 2006 Final Consumer 379.310 379.310 379.310 ults-Fort Frances Power Corporation 2006 kWh 2007 kWh 2008 kWh Program Results Market 2006 kWh 2007 kWh 2008 kWh Saved Saved Saved Saved Saved Saved	Program Year Results Status Market Market 2006 kWh Saved 2007 kWh Saved 2008 kWh Saved 2009 kWh Saved 2008 kWh Saved 2009 kWh 2009 kWh Saved 2009 kWh	Program Year Results Status Market 2006 kWh Saved 2007 kWh Saved 2008 kWh Saved 2009 kWh Saved 2010 kWh Saved	Program Year Results Status Market 2006 kWh Saved 2007 kWh Saved 2008 kWh Saved 2009 kWh Saved 2010 kWh Saved

e) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired.

Response: As this is the first LRAM application, FFPC does not need to adjust prior claims that may have overstated beyond the useful life measure or savings. FFPC has used the most current OPA Measures and Assumptions available in the completion of the LRAM application.