

1 Greendale Drive, Caledonia, ON, N3W 2J3 Tel: (905) 765-5344 Fax: (905) 765-5316

February 17, 2012

Delivered By Email Only

Ontario Energy Board P.O. Box 2319 27<sup>th</sup> Floor, 2300 Yonge Street Toronto, ON M4P 1E4

Attention: Kirsten Walli

**Board Secretary** 

Re: Haldimand County Hydro Inc. (EB-2011-0170)

2012 IRM3 Electricity Distribution Rate Application Additional Board Staff Request No. 2 for LRAM Claim

Dear Ms. Walli:

With respect to Haldimand County Hydro Inc.'s 2012 IRM3 Electricity Distribution Rate Application (EB-2011-0170), and in particular the Lost Revenue Adjustment Mechanism ("LRAM") Claim contained therein, a request for additional information, by email dated February 8, 2012, was received from your Christiane Wong, Information Administrator. Haldimand County Hydro provided its response to this request by letter dated February 13, 2012. The following second request for additional information, by email dated today, February 17, 2012, was received from your Christiane Wong:

"Board staff acknowledges the receipt of Haldimand's updated LRAM amount inclusive of the lost revenues associated with 2008 and 2009 CDM programs in 2008 and 2009. Board staff requests that Haldimand provide the subsequent rate riders for the updated LRAM amount. This will allow for the issuance of the final rate order in a timelier basis if the Board is inclined to approve only the lost revenues associated with the 2008 and 2009 programs in 2008 and 2009."

As noted in their Written Submission dated December 15, 2011, for which Haldimand County Hydro responded in their Reply Submission dated January 6, 2012, Board

staff appear to be reiterating their position that LRAM claims pertaining to a test year and beyond would be unnecessary once a distributor rebases and accordingly updates its load forecast. Board staff have further noted that "...in the past LRAM applications may have been approved for persistence of programs after a new load forecast has been approved in a CoS application, and the Board may want to consider the issue of consistency in its decision." Board staff has currently requested detailed information associated with LRAM claims relating only to the 2008 and 2009 periods for which Haldimand County Hydro was under IRM.

Haldimand County Hydro continues to submit that (i) In its Decision in EB-2009-0265, the Board noted that it considered the load forecast as originally submitted by Haldimand County Hydro to have likely overstated the effects of CDM and consequently reduced the impact of CDM at that time, and it would be unfair to have the Board not approve our LRAM claims pertaining to the test year and beyond at this time; and in the event the Board does not approve this, (ii) Haldimand County Hydro was also under IRM for the first four months of 2010 and would request that its LRAM claim including carrying charges during the IRM period of January 1, 2008 to April 30, 2010 inclusive, in the amount of \$183,500, be approved.

Accordingly, the following two tables are being provided in response to this second additional request for information. The first table provides the rate riders, by class, for the 2008 and 2009 IRM periods only. The second table provides the rate riders, by class, for the January 1, 2008 to April 30, 2010 inclusive IRM periods.

Table 1: Rate Riders for LRAM Claim Associated with 2008 and 2009 Programs during the 2008 and 2009 IRM Periods

RATE CLASS			LRAM CLA	IM	BILLING	RATE RIDER (ONE YEAR)			
	Lost Revenue			Carrying Charges		TOTAL			
	2008	2009	Total						
Residential	\$46,643	\$48,966	\$ 95,609	\$	1,626	\$ 97,235	171,936,412	kWh	\$ 0.0006
General Service Less Than 50 kW	\$ 14	\$25,571	\$ 25,585	\$	291	\$ 25,876	61,801,919	kWh	\$ 0.0004
General Service 50 to 4999 kW	\$ 1,928	\$15,455	\$ 17,383	\$	219	\$ 17,602	298,148	kW	\$ 0.0590
	\$48,585	\$89,992	\$138,577	\$	2,136	\$140,713			

Table 2: Rate Riders for LRAM Claim Associated with 2008 and 2009 Programs during the 2008, 2009 and 2010 IRM Periods

		BILLING UNITS		RATE RIDER (ONE YEAR)							
ATE CLASS Lost Revenue					Carrying Charges		TOTAL				
	2008	2009	2010	Total							
Residential	\$46,643	\$48,966	\$25,905	\$121,514	\$	1,760	\$123,274	171,936,412	kWh	\$	0.0007
General Service Less Than 50 kW	\$ 14	\$25,571	\$ 9,392	\$ 34,977	\$	339	\$ 35,316	61,801,919	kWh	\$	0.0006
General Service 50 t0 4999 kW	\$ 1,928	\$15,455	\$ 7,270	\$ 24,653	\$	257	\$ 24,910	298,148	kW	\$	0.0835
	\$48,585	\$89,992	\$42,567	\$181,144	\$	2,356	\$183,500				

Haldimand County Hydro continues to request that the Board approve the applied-for LRAM claim of \$249,145 as developed and fully supported in the evidence. In the meantime, we trust that this information satisfies this additional request of Board staff.

Yours truly, HALDIMAND COUNTY HYDRO INC.

Original signed by

Jacqueline A. Scott Finance Manager