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September 12, 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-2012-0157
Oshawa OUC Networks Inc.

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 Janigan
Counsel for VECC
Encl.

cc: Oshawa PUC Networks Inc.
Philip Martin

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
Oshawa PUC Networks Inc. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective January 1, 2013.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 1

Reference: Manager's Summary, Page 7 LRAM/SSM Recovery Rate Adder

Preamble: Oshawa indicates that for the reasons presented in its 2012 rate application it has included its request to recover LRAM and SSM amounts, as applicable, in this application.

- a) Please include specific reference(s) to the evidence or an agreement/decision in EB-2011-0073 to support the above statement.
- b) Please summarize the reasons presented in Oshawa's 2012 COS rate application for Oshawa to include its LRAM request in this application.
- c) Please confirm the scope of the LRAM recovery approved in Oshawa's 2012 COS rate application.

VECC Question # 2

Reference: Manager's Summary, Page 7 LRAM/SSM Recovery Rate Adder

Preamble: Oshawa indicates that this application includes an application for LRAM Recovery Rate Riders to be effective from January 1, 2013 through December 31, 2013 to recover revenue lost in 2010 from programs implemented in 2010 and revenue lost in 2011 from programs implemented up to the end of 2010. VECC notes that the LRAM Calculation Worksheet includes revenue lost in 2010 from programs implemented between 2006 and 2010.

- a) VECC is unclear of the scope of the LRAM claim in this application. Please confirm.
- b) Please provide the program results and evaluation reports that Oshawa has received from the OPA that supports this LRAM request.
- c) Please confirm that the LRAM amounts Oshawa is seeking to recover in this application are new amounts not included in past LRAM claims.
- d) Please summarize all prior LRAM claims.
- e) Please discuss why Oshawa did not retain a 3rd party to verify its CDM results.

VECC Question # 3

Reference: Application, Page 8

Preamble: The Table on Page 8 includes 2010 program amounts pertaining to 2010 (not previously claimed) and 2011.

- a) Please reproduce the Table to show 2011 separately.

VECC Question # 4

Reference: LRAM Calculation Worksheet

- a) Please provide a summary explanation of the Sheets provided in the LRAM excel worksheet filed on July 27, 2012.
- b) Please provide the LRAM amounts for 2011 separately.
- c) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 to 2010 including the measure life, unit kWh savings and free ridership 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) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2010.
- e) 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.
- f) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.

VECC Question # 5

Reference: LRAM Calculation Worksheet

- a) Identify all Mass Market measures (CFLs etc) installed in 2006 with measure lives of 4 years or less for which savings have been claimed in a prior LRAM claim.
- b) Please provide the input assumptions for the Third Tranche CDM Programs included in prior LRAM claims.
- c) Adjust the current Third Tranche LRAM claim as necessary to reflect the measure lives (and unit savings) for any/all measures that have expired in 2010.