

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

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Michael Janigan Counsel for VECC (613) 562-4002 ext. 26

September 15, 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-2011-0177

Kenora Hydro Electric Corporation 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 Janigan Counsel for VECC

Encl.

cc: Kenora Hydro Electric Corporation Ltd.

Ms. Janice Roberston, C.A.

#### **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 Kenora Hydro Electric Corporation Ltd. For an order or orders approving or fixing just and reasonable distribution rates to be effective October 1, 2012.

## Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Lost Revenue Adjustment Mechanism (LRAM)

## VECC Question # 1

Reference: Appendix D, Summary of LRAM and Carrying Charges by Class

<u>Preamble</u>: Kenora seeks an LRAM claim of \$80,961.95 including carrying charges from OPA CDM activities.

- a) Please confirm the scope of the LRAM claim in this application.
- b) Please confirm that the LRAM amounts Kenora is seeking to recover in this application are new amounts not included in past LRAM claims.
- Please explain why Kenora did not make a claim for LRAM amounts in the 2011 COS rate application.
- d) When was Kenora's load forecast last approved by the Board prior to 2011?
- e) Please provide the calculation of the carrying charges for this LRAM claim.
- f) Please discuss why Kenora did not use a 3<sup>rd</sup> party to verify the CDM results.
- g) Please provide a copy of the OPA's final 2006-2010 CDM results for Kenora and update the current LRAM claim accordingly.

## **VECC Question #2**

Reference: LRAM Rate Rider By Class

a) Please confirm the recovery period (beginning and ending dates or the proposes rate riders) and the resulting rate impacts by customer class.

## **VECC Question #3**

Reference: Appendix D, Details of OPA Program Results by Year and Class

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data shown in Appendix D: # units, unit and total kWh energy savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues shown in Appendix D.
- 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) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired in 2010.