



**PUBLIC INTEREST ADVOCACY CENTRE**  
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November 01, 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-2012-0144**  
**Lakefront Utilities 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: Lakefront Utilities Inc.  
Jennifer Theoret

**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  
Lakefront Utilities Inc. (LUI) for an order or orders  
approving or fixing just and reasonable  
distribution rates to be effective May 1, 2013.

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

LRAMVA

**VECC Question # 1**

**Reference:** Manager's Summary, Page 8

Preamble: LUI proposes to clear the account balances of 1521 with a credit balance of \$(61,133) and 1568 as a debit balance of \$9,786 by means of a one year deferral and variance rate rider excluding the remainder of the Group 1 account balances. The net of this amount is \$(51,347).

- a) Please explain the rationale for combining the account balances of 1521 and 1568 for clearance.
- b) Please confirm the scope of the LRAM claim in this application.
- c) Please confirm that the LRAM amounts LUI is seeking to recover in this application are new amounts not included in past LRAM claims.
- d) Please provide the Board approved forecasted CDM related load forecast reduction compared to the actual CDM results.
- e) Please explain why LUI deems the balance in the LRAMVA as significant for disposition.

**VECC Question # 2**

**Reference:** Manager's Summary, Page 8

Preamble: LUI indicates it received the actual LRAM data from the OPA on August 31, 2012 and therefore the LRAM figures in 2.1.7 for the year ended 2011 do not reflect the 2011 LRAM amounts as they were not yet provided.

- a) Please explain why the 2011 LRAM amounts were not provided.
- b) Please explain the rationale for disposition of 1568 if the 2011 LRAM amounts were not provided.
- c) Please provide the LRAM data received from the OPA.
- d) Please confirm the input assumptions used in the LRAM calculation.
- e) Please provide a list of all CDM programs at the measure level by year and customer class and include: # units, unit and total kWh energy savings, lifetime, and free ridership rate.
- f) Please provide the LRAM calculations (lost revenue) for each CDM program.
- g) Please provide the calculation of carry charges if applicable.
- h) Please discuss why LUI did not have a 3<sup>rd</sup> party verify its CDM results.
- i) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired.

### **VECC Question # 3**

**Reference:** Manager's Summary, Page 14

Preamble: LUI states it did not require a true-up to forecast as in the Cost of Service LUI did not forecast a CDM savings, and only forecasted from the year 2012 forward.

- a) Please explain this statement more fully.
- b) Please explain how CDM is factored into the last Board-approved load forecast.

## Revenue to Cost Ratio Adjustments

### **VECC Question # 4**

**Reference:** Revenue to Cost Ratio Adjustment Workform, Sheet 3 Re-Based Bill Det & Rates

Preamble: VECC has reviewed the current tariff service charges and distribution volumetric rates and notes the following:

- a) The service charge for the GS 3,000 to 4,999 kW is shown as \$4,059.59 in the model compared to \$4,069.60 in the final rate order. Please explain.
- b) The distribution volumetric rate for street lighting is shown as \$24.4722 in the model compared to \$24.4721 in the final rate order. Please explain.

### **VECC Question # 5**

**Reference:** Revenue to Cost Ratio Adjustment Workform, Sheet 6, Decision Cost Revenue Adjustment

Preamble: As part of LUI's Settlement Agreement approved by the Board, LUI is to adjust the revenue to cost ratio for the GS 3,000 – 4,999 kW customer class to the lower boundary of the range in equal increments over a 4 year period. The range for this customer class is 80-120%. A revenue to cost ratio of 57.5% was approved for this customer class in 2012.

- a) Please explain why LUI shows no change in the revenue to cost ratio for the GS 3,000 – 4,999 kW customer class in 2013.
- b) Please confirm LUI should adjust the revenue to cost ratio for the GS 3,000 – 4,999 kW customer class by increments of 5.625% over a 4 year period beginning in 2013 and ending in 2016 to arrive at the lower boundary of the range at the end of 4 years i.e. 80%.