



**PUBLIC INTEREST ADVOCACY CENTRE
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December 03, 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-2012-0151
Norfolk Power Distribution 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,

A handwritten signature in blue ink, appearing to be 'M Janigan', is written over a light blue horizontal line.

Michael Janigan
Counsel for VECC
Encl.

cc: Norfolk Power Distribution Inc.
Mr. McEachran

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
Norfolk Power Distribution Inc. 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)

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 1

Reference: Application, Page 6

Preamble: The evidence states “In 2011 there were no CDM program activities included in the load forecast underpinning Norfolk’s rates.”

- a) Please explain this statement more fully.
- b) Please confirm when Norfolk’s load forecast was last approved by the Board - prior to 2012.
- c) Please explain how CDM was reflected in the last approved load forecast prior to 2012.

VECC Question # 2

Reference: Application, Page 9

Preamble: Norfolk seeks recovery of \$95,375 (including \$2,669 in carrying charges) for LRAM amounts related to 2011 lost revenues persisting from CDM activities between January 1 2005 and December 31 2010 and a recovery of \$15,691 (including \$439 in carrying charges) for LRAMVA amounts related to lost revenue from 2011 CDM activities between January 1 2011 and December 31 2011.

- a) Please confirm the date the OPA released Norfolk’s Final OPA CDM Results for 2011.
- b) Please provide a copy of the OPA’s final 2011 CDM results for Norfolk.

- c) Please explain why Norfolk deems the balance in the LRAMVA as significant for disposition.

VECC Question # 3

Reference: Appendix D, LRAM Third Party Review

- a) 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 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.
- b) 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.
- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2010.
- d) Identify mass market measures (CFLs, LEDs) installed in 2005 and 2006 with measure lives of 4 years or less for which savings have been claimed in a prior claim.
- e) Adjust the LRAM claim as necessary to reflect the mass market measure lives and unit savings for any/all measures that have expired beginning in 2009.