



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

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April 12, 2013

**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-2013-0024**  
**Enersource Hydro Mississauga 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: Enersource Hydro Mississauga Inc.  
Ms. Gia M. DeJulio

**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

Enersource Hydro Mississauga Inc. (Enersource) for permission to change its delivery charges beginning May 1, 2013 to reflect the recovery of costs associated with lost revenues in 2011 and 2012 from the persistence of conservation and demand management ("CDM") programs implemented prior to 2011.

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

Lost Revenue Adjustment Mechanism (LRAM)

**VECC Question # 1**

**Reference:** Tab 2, Page 1

Preamble: In this application, Enersource seeks an LRAM claim of \$1,753,174 including \$34,853 in carry charges.

- a) Please provide a table to summarize all past LRAM claims.
- b) Please provide a list of all measures that have expired in 2011 and 2012.
- c) Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired.
- d) Please provide the live excel spreadsheet for the 2006 – 2010 Final OPA Conservation Program Results – Enersource Hydro Mississauga Inc.

**VECC Question # 2**

**Reference 1:** Tab 2, Page 5

**Reference 2:** Tab 3, Schedule 5, Third Party Verification Report

Preamble: At reference 1, the evidence indicates Enersource used the latest OPA Measures and Assumptions list to calculate lost volumes. Enersource provided a link to the OPA's latest Measures and Assumptions list that is dated March 2011. At reference 2, SeeLine indicates it used the OPA 2011 Prescriptive Measures and Assumptions List, Version 1.0 Final (April 6, 2011).

- a) Please discuss if there are two different documents used in calculating lost volumes and if so, explain what the difference is between the two documents.
- b) Please confirm the date of the OPA's latest Measures and Assumptions list to be used and update the lost revenue calculations as required to reflect the latest version.