



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

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October 23, 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 Additional VECC Interrogatories EB-2013-0112**  
**Bluewater Power Distribution Corporation**

Please find enclosed additional interrogatories from VECC in the above-noted proceeding. We filed interrogatories on October 21, 2013 but through additional discussions determined that answers to the attached questions would also be of value. Accordingly, we ask that the Board and the Applicant please accept VECC's additional questions for response by Bluewater by November 4, 2013 (as per Procedural Order No.1).

We have also directed a copy of the same to the Applicant.

Thank you for your consideration.

Yours truly,

Michael Janigan  
Counsel for VECC  
Encl.

Cc: Leslie Dugas, Bluewater Power Distribution Corporation

**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  
Bluewater Power Distribution Corporation for an order or orders  
approving or fixing just and reasonable  
distribution rates to be effective May 1, 2014.

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

**VECC Question # 2**

**Reference:** Appendix 3, Elenchus Report

- a) At Tab 1, Schedule 4, Page 1, the Report states :This report for Bluewater was created with the following assumptions that are often peculiar to the 2011 - 2012 periods :
- “Industrial” and “Pre-2011 Programs” kWh savings were omitted because they are not assignable as a volumetric charge
  - “Consumer” “Business” and “Home Assistance Program” kW savings were omitted because they are not assignable as a volumetric charge.

Please explain this statement more fully to explain why the savings were omitted.

- b) At Tab 1, Schedule 4, Page 1, the Report states Energy (kWh) savings are assumed to be annual values. Peak Demand (kW) savings have been extended by the number of months (either 5 months for Demand Response programs or 12 months for all other programs).

Please confirm that, for kW billing customers, the LRAM should be calculated based on the CDM program impacts on billing demand .

Please confirm that Report has calculated billing demand reductions based on the reported (annual) Peak Demand savings and explain why this is appropriate.

Please confirm that the timing of the customer’s monthly billing demand may not be coincident with the Utility’s or the System’s peak demand.

Please explain the rationale for the 5 months for Demand Response.

- c) At Tab 1, Schedule 5, Page 1 the Report shows the adjustments to previous years verified results from the OPA Report. Please explain the basis for the errors and omissions regarding the specific adjustments by customer class (i.e. explain how the specific adjustments were determined).
- d) At Tab 1, Schedule 5, Page 1 the Report states Billing determinants have been applied based on Bluewater's 2013 Cost of Service CDM adjusted load forecast.

Please provide the rationale for using 2013 billing determinants.

- e) At Input Table Two (2011 Persistence in 2012 and 2012 Programs (Net kW)), please provide details on how the value shown for Demand Response 3 in 2012 of 1,798 net kW was determined and if it reflects the contracted amount. Please provide any calculations and assumptions.
- f) Please provide details of Bluewater's Demand Response 3 program in terms of the activations in 2012 compared to what was contracted and the savings that actually occurred in 2012.
- g) If there were Demand Response Program 3 activations in 2012, for each customer impacted, please indicate whether they occurred at the same time of as the customer's billing demand (kW) for the month was established.