

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 2

November 11, 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-2013-0150 London Hydro Inc.

Please find enclosed interrogatories from VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Michael Janigan Counsel for VECC Encl.

Cc: London Hydro Inc.

EB-2013-0150

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

London Hydro Inc. 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 # 1

Reference: Application, Page 13

<u>Preamble:</u> The evidence states that London Hydro is requesting a 2012 LRAM rate rider to recover lost distribution revenue associated with 2012, and pre-2011 completed in 2012, CDM programs that were funded by the OPA.

- a) Please define "pre-2011 completed in 2012" programs and summarize the year each program was implemented.
- b) Please confirm the revenues associated with pre-2011 completed programs completed in 2012 included in the 2012 LRAM rate rider.
- c) Please confirm the revenue associated with 2012 programs completed in 2012 included in the 2012 LRAM rate rider.
- d) Please provide a summary of the contribution of Demand Response 3 programs to lost revenue in 2011.

VECC Question # 2

Reference: Application, Page 17, Table 5

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

- c) Please confirm that London Hydro has calculated billing demand reductions based on the reported (annual) Peak Demand savings and explain why this is appropriate.
- d) 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.
- e) Please provide details on how the value shown for Demand Response 3 in 2012 of 994 net kW was determined and if it reflects the contracted amount. Please provide any calculations and assumptions.
- f) Please provide details of London Hydro's Demand Response 3 program in terms of the activations in 2011 and 2012 compared to what was contracted and the savings that actually occurred in 2011 and 2012.
- g) For the Demand Response Program 3 activations in 2011 and 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.
- Please explain how peak demand (kW) savings have been extended by the number of months (such as either 5 months for Demand Response programs or 12 months for all other programs).