***PUBLIC INTEREST ADVOCACY CENTRE***

***LE CENTRE POUR LA DEFENSE DE L’INTERET PUBLIC***

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Michael Janigan

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Counsel for VECC

(613) 562-4002 ext 2

November 20, 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-2013-0148
 Lakefront Utilities 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: Lakefront Utilities Inc.

**EB-2013-0148**

**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. 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 1:** Application, Page 18

Preamble: The evidence states:

“LRAM 1568 deferral and variance account dollars was allocated using the OPA Annual CDM Report 2012 2012 Final Verified Results dated September 3rd 2013. Specifically the gross class specific savings awarded by the OPA Program for the year 2012 and 2011 adjusted figures and applied against LUI’s distribution rates for the year 2012 with rates from the months January – April in File number EB -2010-0095 and distribution rates for May – Dec year 2012 in File number EB-2012-0144 to determine the value.”

1. Please confirm net class specific savings awarded by the OPA were used in the LRAMVA calculation, not gross class specific savings.
2. If not, please explain why gross class specific savings were used.

**VECC Question # 2**

**Reference 1:** Application, Page 10

**Reference 2:** Filing Requirements For Electricity Distribution Rate Applications, July 17, 2013, Page

Preamble: At reference 1, the evidence indicates Lakefront Utilities has calculated its LRAMVA 1568 deferral and variance account dollars for the year 2012 by using the allocated OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013. At reference 2, the Board’s Guidelines state that in support of an application for the lost revenues, specifically the actual results used in the determination of the LRAMVA balance to be disposed, distributors must file the following:

1. A statement indicating that the distributor has used the most recent input assumptions available at the time of the program evaluation when calculating its lost revenue amount – Please confirm.

**VECC Question # 3**

**Reference 1:** Application, Pages 10-11

1. Please provide separate tables for each rate class showing the lost revenue amounts requested by the year they are associated with and the year the lost revenues took place by CDM program and include the adjustments for any 2011 net incremental adjustments that were stated in the OPA Annual CDM Report.
2. Please provide a copy of the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013.
3. Please advise if Lakefront Utilities LRAMVA includes Demand Response 3 Programs.
4. If confirmed, please provide any calculations and assumptions to support how the Demand Response 3 Program net kW (annual amount) was determined by customer class.
5. Please provide details of Lakefront Utilities Demand Response 3 program in terms of the activations in 2012 compared to what was contracted and the savings that actually occurred in 2012.
6. 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.
7. Please update the LRAMVA amount and carrying charges in Tables 2 and 3 in the evidence on Page 11 of the evidence due to interrogatory responses.
8. Please provide separately the calculation for LRAMVA rate riders due to updates in the calculations performed in response to interrogatories.