



**Lakefront
Utilities
Inc.**

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Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

November 27 2013

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC) Submission of VECC Interrogatories EB-2013-0148 Lakefront Utilities Inc

Lakefront Utilities Inc. (LUI) hereby submits its responses to VECC Interrogatories to the Ontario Energy Board ("the Board").

Please find attached to this cover letter:

2 paper copies of the Interrogatory Responses to OEB in proceeding EB-2013-0148

A copy of the Interrogatory Responses to OEB has also been filed through the Web Portal electronic copies were forwarded to all intervenors in EB-2012-0144.

In the event of any additional information, questions or concerns, please contact Brittany Ashby, Financial and Regulatory Analyst, at bashby@lusi.on.ca or (905) 372-2193.

Sincerely,
{Original Signed}

Brittany J. Ashby, BMGMT
Financial & Regulatory Analyst
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.

**Lakefront Utilities Reply Submission to the Informational 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.”

- a) Please confirm net class specific savings awarded by the OPA were used in the LRAMVA calculation, not gross class specific savings.

Lakefront Utilities Inc Submission

Lakefront has used the net class specific savings awarded by the OPA in the Final Verified 2012 Report.

b) If not, please explain why gross class specific savings were used.

Lakefront Utilities Inc Submission

Lakefront has not used the gross class specific savings.

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:

- a) 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.

Lakefront Utilities Inc Submission

Lakefront has used the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013 for the calculation of 2012 LRAM to apply to the 2014 rates. These are the most recent available input assumptions.

VECC Question # 3

Reference 1: Application, Pages 10-11

- a) 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.

Lakefront Utilities Inc Submission

Lakefront has adjusted its LRAMVA claim to include 2011 persistence as per the Board staff interrogatory question #14. Summary of this report can be seen in the attached tables below.

Below is a table dividing the programs into their rate class and the awarded kWh from the 'Final Verified Annual 2012 CDM Report_ Lakefront Utilities Inc'.

Total kWh				1,378,235.86	2,052,336.34
2011 Savings and Persistence				1,378,235.86	1,378,235.86
2012 Savings and Persistence					674,100.47

Rate Class Allocation				2011	2012
Residential (Market - Consumer) (kWh)				255,337.04	410,543.15
General Service Less Than 50 kW (Market - Business) (kWh)				308,216.97	868,993.01
General Service 50 to 4,999 kW (Market - Business, Industrial) (kWh)				814,681.85	772,800.18
Total kWh				1,378,235.86	2,052,336.34

LRAM Rate Rider	LRAM	Interest	Total LRAM Claim
Residential	-\$8,939	-\$131	-\$9,071
General Service Less Than 50 kW	\$2,977	\$44	\$3,021
General Service 50 to 4,999 kW	-\$2,116	-\$31	-\$2,147
Total	-\$8,077	-\$119	-\$8,196

- b) Please provide a copy of the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013.

Lakefront Utilities Inc Submission

Lakefront has uploaded to the board site the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013 for Lakefront Utilities Inc.

- c) Please advise if Lakefront Utilities LRAMVA includes Demand Response 3 Programs.

Lakefront Utilities Inc Submission

Lakefront confirms that the demand response 3 program has been included in the LRAMVA.

- d) 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.

Lakefront Utilities Inc Submission

As can be found in the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013 on page 13 below the equations table these are the calculations and assumptions which are used to support the Demand Response 3 Program net kW.

Peak Demand: Gross Savings = Net Savings = contracted MW at contributor level * Provincial contracted to ex ante ratio
Energy: Gross Savings = Net Savings = provincial ex post energy savings * LDC proportion of total provincial contracted MW All savings are annualized (i.e. the savings are the same regardless of the time of year a participant began offering DR)

Lakefront has applied an annualized amount by using a factor of the LDC CDM target and applying it to the OPA granted kWh for the Demand Response 3 program in the industrial class.

- e) 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.

Lakefront Utilities Inc Submission

Lakefront has one Demand Response 3 program in terms of activations in 2012 in the Industrial Class which can be seen in table 1 page 5 of the Final Verified Annual 2012 CDM Report for Lakefront Utilities. The Net Incremental Peak Demand Savings are 98 kW.

- f) 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.

Lakefront Utilities Inc Submission

As can be seen in Lakefronts uploaded LRAM model and the OPA Annual CDM Report - 2012 Final Verified Results Report dated September 3rd 2013 on page 9 Lakefront Utilities has one activated Demand Response Program 3 for the industrial class. Lakefront is not privy to the information and cannot provide the activation month occurrence. Only the results to the OPA Report.

- g) 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.

Lakefront Utilities Inc Submission

Lakefront has updated and submitted the tables to include the 2011 persistence of 2011 OPA results. Please refer to Lakefront Utilites submission reply to the board staff in EB-2013-0148 Question #14.

- h) Please provide separately the calculation for LRAMVA rate riders due to updates in the calculations performed in response to interrogatories.

Lakefront Utilities Inc Submission

Lakefront has provided the updates to the calculations performed in response to question #14 in the board staff EB 2013-0148 interrogatories. Please refer to the LRAM Model and updated rate generator model which were uploaded to the board website.