



PUBLIC INTEREST ADVOCACY CENTRE
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December 06, 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)
Westario Power Inc. EB-2013-0180
Final Submissions of VECC

Please find enclosed the submissions 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: Westario Power inc.

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 Westario Power Inc. for an order or orders approving or fixing just and reasonable distribution rates to be effective May 1, 2014.

FINAL SUBMISSIONS

On Behalf of The

Vulnerable Energy Consumers Coalition (VECC)

December 6, 2013

Public Interest Advocacy Centre

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Suite 1204
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Vulnerable Energy Consumers Coalition (VECC)

Final Argument

1 The Application

- 1.1 Westario Power Inc. (“Westario”, “the Applicant”, or “the Utility”) filed an application (“the Application”) with the Ontario Energy Board (“the Board” or “the OEB”), under section 78 of the *Ontario Energy Board Act, 1998*, as amended, for electricity distribution rates effective May 1, 2014. The Application was filed based on a 4th Generation Incentive Rate-setting (“4GIR”) application.
- 1.2 As part of its application, Westario is seeking recovery of lost revenues related to conservation and demand management programs. The following section sets out VECC’s final submissions regarding this aspect of the application.

2 Lost Revenue Adjustment Mechanism (LRAM) Variance Account

- 2.1 Westario calculates the LRAMVA (Account 1568) for 2012 as \$47,280 (\$46,015 plus \$1,265 in interest to April 30, 2014). Westario indicates it utilized the most recent input assumptions and the 2012 final CDM evaluation report from the OPA to calculate the lost revenue. Westario also filed a report by Elenchus dated September 24, 2013 to validate the LRAMVA claim.¹ Westario proposes a disposition period of one year through rate riders.
- 2.2 Westario is claiming 2012 persistence of OPA CDM program activities from 2011, 2012 OPA CDM activities and adjustments for previous years (2011) verified results in 2012.
- 2.3 In response to VECC interrogatory #2, Westario confirms it has not recovered any of the amounts proposed in this application in a previous application.
- 2.4 Westario’s load forecast was updated in 2013 as part of its 2013 Cost of Service application that included adjustments for CDM activities and threshold adjustments to LRAMVA.
- 2.5 VECC submits Westario’s request for the Board to approve 2012 lost revenues is appropriate as these savings occurred prior to the load forecast established in Westario’s 2013 COS application; the revenues have not been claimed in previous applications; and the calculation is appropriately based on Westario’s 2012 OPA final CDM results. On this basis, VECC supports the recovery of Westario’s LRAMVA.

¹ Page 11 LRAM Variance Account

3 Recovery of Reasonably Incurred Costs

- 4.1 VECC submits that its participation in this proceeding has been focused and responsible. Accordingly, VECC requests an order of costs in the amount of 100% of its reasonably-incurred fees and disbursements.

All of which is respectfully submitted this 5th day of December 2013.