



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

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January 9, 2014

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-2013-0128
Essex Powerlines Corporation**

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: Essex Powerlines Corporation

EB-2013-0128

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
Essex Powerlines 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)

Recovery of Revenue Losses due to Conservation Programs

VECC Question # 1

Reference: General

- a) Please discuss how CDM is reflected in Essex's current Board approved load forecast and provide any relevant references.

VECC Question # 2

Reference: Exhibit 2, Elenchus Report, Attachment 1 2011 and 2012 LRAMVA Calculation

- a) Input Tables One to Three - For the Demand Response 3 programs there is an asterisk but no explanation note. Please provide.
- b) Input Table Two 2011 Persistence in 2012 and 2012 Programs, Business Program Demand Response 3: Please explain why 2,742 kWh for 2012 is included in the LRAMVA calculation whereas 7,344 kWh for 2011 is not included in the LRAMVA calculation.

VECC Question # 3

Reference: Exhibit 2, Elenchus Report

Preamble: 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).

- a) Please confirm that, for kW billing customers, the LRAM should be calculated based on the CDM program impacts on billing demand.
- b) Please confirm that the Report has calculated billing demand reductions based on the reported (annual) Peak Demand savings and explain why this is appropriate.
- c) 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.
- d) Attachment 1 - At Input Table Three and Input Table 4, (Net kW), please provide details on how the value shown for Demand Response 3 of 1,749 net kW in 2011 and 1,811 net kW in 2012 was determined and if it reflects the contracted amount. Please provide any calculations and assumptions.
- e) Please provide details of Essex'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.
- f) If there were Demand Response Program 3 activations in 2011 and 2012, for each customer impacted, please indicate whether they occurred at the same time as the customer's billing demand (kW) for the month was established.
- g) 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).