



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

ONE Nicholas Street
Tel: (613) 562-4002 ext. 26

Suite 1204
Fax: (613) 562-0007

Ottawa, ON Canada
e-mail: mjanigan@piac.ca

K1N 7B7
www.piac.ca

January 14, 2014

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700
2300 Yonge Street
27th floor
Toronto, ON
M4P 1E4

VIA E-Mail

Dear Ms. Walli:

**Re: EB-2013-0122 - Cooperative Hydro Embrun Inc.
Submissions of Vulnerable Energy Consumers Coalition (VECC)**

In accordance with the Board's Decision issued on December 23, 2013 in the above noted proceedings these are VECC's submissions with respect to the Draft Rate Order (DRO) filed by Cooperative Hydro Embrun Inc. (Embrun) on January 9, 2014.

Contrary to Embrun's statement (DRO, page 8), the Board did not accept its proposed load forecast of 31,609,564 kWh. Rather the Board accepted "*CHEI's regression model and load forecast methodology*" and directed CHEI to "*update its load forecast based on year-end customer forecast of 2,248 and adjusted by 58,322 kWh for CDM activities*" (Board Decision, page 7).

As outlined in Embrun's original Application (Exhibit 3, Tab 1, page 22) an integral part of Embrun's load forecast methodology (now accepted by the Board) is adjusting the initial forecast developed using the regression model by the product of the number of new customers and the average use per customer. In the Application this adjustment was 200 residential customers times 10,959 kWh / customer – 2,191,747 kWh. In its DRO (Load Forecast Excel Model, Worksheet-Class Analysis, Cell C31) Embrun has not updated this part of its load forecast methodology to reflect the revised 250 residential customer additions (Board Decision, page 6).

VECC submits that the 2014 load forecast to be used by Embrun in its Rate Order should be revised to reflect the approved residential customer count and increased by 547,950 kWh (i.e. 50x10,959).

All of which is respectfully submitted,

Michael Janigan
Counsel for VECC

cc: Embrun - Benoit Lamarche - embrunhydro@magma.ca
Embrun - Manuela Ris-Schofield - manuela@tandemenergyservices.ca