

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

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> Michael Janigan Counsel for VECC

December 18, 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) VECC Interrogatories EB-2014-0064 Entegrus Powerlines Inc.

Please find enclosed the interrogatories 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

cc: Entegrus Powerlines 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

Entegrus Powerlines Inc. pursuant to Section 78 of the Ontario Energy Board Act for an order approving just and reasonable rates and other charges for electricity distribution to be effective May 1, 2015.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Revenue Impacts of CDM Programs

VECC-1

Reference 1: Attachment H, LRAMVA Third Party Report, CK, Page 3, Adjustments for results that do not affect revenues

Reference 2: Attachment I, LRAMVA Third Party Report, SMP, Page 3, Adjustments for results that do not affect revenues

Preamble: The evidence in Attachments H and I states:

"For customer classes where the LDC charges for distribution based on the customer's peak monthly demand (kW in the month), the system peak reductions are only partially relevant. For initiatives like lighting upgrades in businesses operating during normal business hours, the peak demand reductions are likely to be maintained throughout the year, including during the customer's monthly peaks, and so may be used to estimate lost revenue. For other programs, in particular demand response programs, the customer's monthly peak may not correspond to the system's peak. Further, even if they are coincident, if a demand response event is called, and the customer's monthly peak is shaved, it is likely that the customer's second highest peak in the month is only slightly less than their highest peak. Thus, the impact on distribution revenues of the demand response program is likely to be minimal, and is assumed to have zero impact on lost load. Thus, no distribution revenues are estimated to be lost from large general service customers' participation in demand response programs."

- a) Please confirm lost revenues from CK's and SMP's Demand Response 3 Programs have not been included for recovery.
- b) Please provide the kWs reported in the OPA's Final CDM Report for each Demand Response Program offered in 2011, 2012 2013 separately for the CK and SMP Rate Zones.

c) For CK's and SMP's Demand Response Programs offered in 2011, 2012 and 2013, please discuss what the kW reported in the OPA's Final CDM Report represents.

VECC-2

Reference: Application Page 20

<u>Preamble:</u> SMP distribution rates were last rebased in 2006. As such, no prior CDM activity has been captured in base rates.

- a) Please provide a reference for this statement.
- b) Please discuss the impact of 2006 CDM programs in the load forecast that underpins 2006 base rates.
- c) Please discuss the timing of Entergrus` next rebasing application(s) by rate zone.

VECC-3

Reference: Application Page 21

<u>Preamble</u>: Entegrus indicates that for initiatives that apply to more than one rate class, Entegrus staff estimated the split by rate class, drawing on participant-specific information where available.

- a) Please confirm the initiatives that apply to more than one rate class.
- b) For each initiative, please explain further how Entegrus calculated the split by rate class.

VECC-4

Reference: Application Page 22

Preamble: Entegrus seeks to recover lost revenue related to 2006-2010 CDM

programs with persistence in 2013.

a) Please confirm estimated savings persistent in 2014 for these CDM programs has been excluded from the LRAM claim.