



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

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

January 5, 2009

**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: LAKEFRONT UTILITIES INC.  
EB-2008-0193**

Please find enclosed the Interrogatories of the Vulnerable Energy Consumers Coalition (VECC) on the Applicant's evidence in the above-noted proceeding.

We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro  
Counsel for VECC  
Encl.

**LAKEFRONT UTILITIES INC.  
EB-2008-0193**

**VECC Interrogatory Requests**

**Question #1**

**Reference:** Lakefront Utilities Inc., 3GIRM Supplementary Filing Model

- a) With respect to Tabs C3.1 and C4.1, why is all of the revenue re-allocation adjustment due to cost allocation changes applied only to the variable charges? Why aren't the service charges for the customer classes involved also adjusted?
- b) With respect to Tab B3.1, please confirm that the OEB Cost Allocation Model included the cost of the Transformer Ownership Allowance in the Base Revenue Requirement and allocated it to all customer classes.
- c) Please confirm that in its 2008 Rate Order Lakefront excluded the cost of the transformer ownership allowance from the base revenue requirement allocated to all customer classes based on its proposed revenue to cost ratios and assigned the cost of the Transformer Ownership Allowance only to the GS>50 class.
- d) Given the price cap adjustment is applied to the all rates, why shouldn't it also be applied to the transformer ownership allowance for 2009?

**Question #2**

**Reference:** Lakefront Utilities Inc., 3GIRM Rate Generator Model & Manager's Summary

- a) Why wasn't the Z-Factor tax change incorporated in 2009 proposed rates?