



PUBLIC INTEREST ADVOCACY CENTRE
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January 19, 2012

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-2011-0181
London Hydro 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,

A handwritten signature in blue ink, appearing to be 'M. Buonaguro', is written over a light blue horizontal line.

Michael Buonaguro
Counsel for VECC
Encl.

cc: London Hydro Inc.
Mr. Mike Chase

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
London Hydro Inc. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective May 1, 2012.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

Lost Revenue Adjustment Mechanism (LRAM)

VECC Question # 1

Reference: Manager's Summary, LRAM Rate Rider, Pages 15 to 18

Preamble: London Hydro seeks an LRAM claim of \$291,445 including carrying charges, associated with 2009 and 2010 CDM programs funded by the OPA.

- a) Please confirm that the LRAM amounts London Hydro is seeking to recover in this application are new amounts not included in past LRAM claims.
- b) Confirm that persisting savings for programs prior to 2009 are not included in the LRAM amount.
- c) Please confirm when London Hydro's load forecast was last approved by the Board? Please discuss how any CDM savings have been accounted for in London Hydro's approved load forecast.

VECC Question # 2

Reference: Manager's Summary, LRAM Rate Rider, Page 16

Preamble: On Page 16, the evidence indicates that the 2010 OPA Program results are estimates and the LRAM will be updated for final OPA 2010 results once the final report has been released.

- a) When does London Hydro expect to receive the 2010 OPA Final Results?
- b) If London Hydro has received the 2010 OPA Final Results, please update the LRAM claim accordingly.

VECC Question # 3

Reference: Appendix E, London Hydro IRM 2012 LRAM Recovery - Letter

Preamble: On Page 1 of the Letter, London Hydro indicates that in this application, London Hydro is applying to the Board to recover an LRAM amount of \$468,172, including carrying costs, which differs from the LRAM amount of \$291,445.

- a) Please explain/confirm the scope and amount of the LRAM recovery London Hydro is applying for in this application.

VECC Question # 4

Reference: Manager's Summary, LRAM Rate Rider, Page 17, Table 5

- a) Please provide the following details by year for each CDM Program at the measure level to add to the data shown in Table 5 & Appendix F: # units, unit and total kWh savings, lifetime, and free ridership rate. Reconcile to the load impacts and lost revenues in Table 5.
- b) List and confirm OPA's latest input assumptions for Every Kilowatt Counts (EKC) programs including the measure life, unit kWh savings and free ridership rate for Compact Fluorescent Lights (CFLs) and Seasonal Light Emitting Diodes (LED).
- c) Confirm these values were used for CFLs and LEDs in the LRAM claim for lost savings in 2010 and 2011.