Cochrane Office: (70) 272-6669
Iroquois Falls Office: (800) 619-6722
Kapuskasing Office: (800) 619-6722
customercare@puc.net

153 Sixth Avenue – 153 Sixième avenue
P.O. Box 640 – C.P. 640
Cochrane, Ontario P0L 1C0

February 9, 2012

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

RE: Northern Ontario Wires Inc.
2012 IRM3 Distribution Rate Application
Board File: EB-2011-0188
Reply Submission to Board Staff and VECC Interrogatories

Please find attached our reply submission to the Board Staff and VECC submissions dated January 30, 2012. This reply submission includes the following:

- NOW's responses to OEB Submission
- NOW's responses to VECC Submission
- Attachment 1 – Revised LRAM

We have submitted an electronic copy of these documents in PDF format as well as the models in excel format via e-mail to the Board Secretary and web-portal submission.

If you have any questions or concerns regarding this Application, please do not hesitate to contact the undersigned by telephone at 705-272-6669 or via e-mail at monikam@nowinc.ca .

Yours truly,

Monika Malherbe, CA
Chief Financial Officer
Northern Ontario Wires Inc.

NOW response to OEB Submission dated January 30, 2012

DISPOSITION OF ACCOUNT 1590

NOW Inc. provides the following additional information in response to the clarification and supporting calculations requested by the Board.

NOW stated that it had not implemented the approved Regulatory Recovery Rate Adder effective July 14, 2006 in the billing system until October 2007, shortly after the error was discovered. To clarify, the rate rider implemented was the same as what was approved by the Board. It was entered in the billing system in October 2007 and applied to current monthly billings from October 2007 (for consumption starting in early Sept 2007) until May 1, 2008. (May 2008 billing represents consumption up to early May 2008).

Retroactive billing adjustment for period July 14, 2006 to Sept 2007

As a result NOW had under billed customers for the period July 14, 2006 until early Sept 2007. NOW determined the amount that should have been billed to customers for the "omitted" regulatory rate rider charge for the 14/15 month period. It was calculated by determining the total KWH or KW consumption for each customer for the period July 14, 2006 to the most recent read, that being an early Sept 2007 read and applying the approved rate rider accordingly. For residential, GS<50 customers, and most GS>50 customers the total amount owing was applied to their accounts over a four month period, that being November 2007 to February 2008. For street lighting accounts the total retroactive adjustment was applied in November 2007. Two large GS>50 accounts made alternative arrangements to have their retroactive billing adjustment applied over 10 and 12 months. The details of the monthly recoveries for the period Oct 2007 to Nov 2008 are provided below, showing breakdown for each month as to what represents "retroactive billing adjustment" versus "current monthly billing" recoveries. The retroactive adjustment by customer class is as follows:

						TIMING OF APPLICATION TO ACCOUNTS			
July 14, 2006 to Sept 7, 2007		**STATS**	**$ Recoveries**			remove 2 GS>accounts being applied over 10 and 12 months	Balance over 4 months	1/4	
Residential	KWH	46,796,082	$ 219,941.58				$ 219,941.58	$ 54,985.40	
GS<50	KWH	23,254,356	$ 72,088.50	$ 292,030.08			$ 72,088.50	$ 18,022.13	$ 73,007.52
GS>50	kW	161,413	$ 183,316.74			-$ 73,270.83	$ 110,045.91	$ 27,511.48	
Streetlights	kW	4,873	$ 4,090.40	applied 100% in Nov 2007 B#31541					
Total Retroactive Billing Adjustment for Regulatory Asset Recovery			$ 479,437.22			$ 39,320.21	#1 - over 10 months	$ 3,932.02	
						$ 33,950.62	#2 - over 12 months	$ 2,829.22	
						$ 73,270.83		$ 6,761.24	monthly
Application of Retroactive Adjs to accounts									
In 2007			$ 210,128.65						
In 2008			$ 271,003.41						
			$ 481,132.06						
see monthly summary									
Difference to above lists			-$ 1,694.84						
Small Differences related to other Adjs - possible current bill related or retroactive calculation									

Please note that recoveries are shown beyond the regulatory asset rate rider expiry date of April 30, 2008 (from June 2008 until November 2008) approximately $6,700/month . This represents the final month's recovery of the "retroactive billing adjustment" for the two large GS>50 account mentioned above. The regulatory rate adder ceased being billed effective May 1, 2008. The following schedules include the following:

- Account 1590 Variance Continuity Schedule for 2006/2007/2008 – showing principle balance. Monthly recoveries and monthly carrying charges

- Breakdown of Monthly recoveries between current month billing and the application of the retroactive billing adjustment, as well as billing statistics related to current monthly billing recoveries

- Breakdown of monthly retroactive billing adjustment by Class which ties in with the table above

- Monthly billing statistics for the period covered by the Retroactive Billing Adjustment (July 2006 to Sept 2007) and comparison to billing determinants used for calculating the retroactive adjustment.

Regulatory Asset (Account 1590) with Interest Improvement

Regulatory Assets Account		May'06-Aug'06	Sept'06 -Sep'07	Oct'07-Mar'08	Apr'08	July'08
		4.15%	4.59%	5.14%	4.08%	3.35%
Interest Rate - Monthly		0.35%	0.38%	0.43%	0.34%	0.28%

2007 - Regulatory Asset

Changed from 2006 Spreadsheets showed balance as a credit here
Balance is actually a DR - changed to be consistent with other spreadsheets

	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.43%	0.43%	0.43%	
	January	**February**	**March**	**April**	**May**	**June**	**July**	**August**	**September**	**October**	**November**	**December**	**TOTAL**
Interest Bearing Principle (represents approved recoveries for principle balances													
Starting Balance	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	668,834.91	527,227.17	
Recovery 2007	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	114,999.59	141,607.74	66,302.94	322,910.27
Ending Balance	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	783,834.50	668,834.91	527,227.17	460,924.23	
Interest Improvement	2,998.17	2,998.17	2,998.17	2,998.17	2,998.17	2,998.17	2,998.17	2,998.17	2,998.17	3,357.42	2,864.84	2,258.29	
Quarterly Variance			0.00			0.00			0.00			322,910.27	322,910.27
Quarterly Interest			8,994.50			8,994.50			8,994.50			8,480.56	35,464.06

NOT BILLING CORRECT RATES - ie excludes Reg Asset Component
Reg Asset Recovery only starts Oct 2007

Non Interest Bearing Principle (represents approved recoveries for interest) - will apply recoveries here once "interest bearing balance" is 0													
Starting Balance	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	
Recovery 2008													0.00
Ending Balance	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	
Balance 1590 Recoveries -	928,546.50	928,546.50	928,546.50	928,546.50	928,546.50	928,546.50	928,546.50	928,546.50	928,546.50	813,546.91	671,939.17	605,636.23	
(Interest Bearing and Non Interest Bearing)													

2008 - Regulatory Asset

	0.43%	0.43%	0.43%	0.34%	0.34%	0.34%	0.28%	0.28%	0.28%	0.28%	0.28%	0.28%		
	January	**February**	**March**	**April**	**May**	**June**	**July**	**August**	**September**	**October**	**November**	**December**	**TOTAL**	
Interest Bearing Principle (represents approved recoveries for principle balances														
Starting Balance	460,924.23	299,039.83	136,904.45	111,069.40	59,517.49	23,260.69	16,649.66	9,871.53	3,136.51	0.00	0.00	0.00		
Recovery 2008	161,884.40	162,135.38	25,835.05	51,551.91	36,256.80	6,611.03	6,778.13	6,735.02	6,645.65				464,433.37	
Ending Balance	299,039.83	136,904.45	111,069.40	59,517.49	23,260.69	16,649.66	9,871.53	3,136.51	-3,509.14	0.00	0.00	0.00		
									balance moved to non Interest bearing					
Interest Improvement	1,974.29	1,280.89	586.41	377.64	202.36	79.09	46.48	27.56	8.76	0.00	0.00	0.00		
Monthly Variance	-161,884.40	-162,135.38	-25,835.05	-51,551.91	-36,256.80	-6,611.03	-6,778.13	-6,735.02	-6,645.65	0.00	0.00	0.00		
Cumulative Monthly Variance	-161,884.40	-324,019.78	-349,854.83	-401,406.74	-437,663.54	-444,274.57	-451,052.70	-457,787.72	-464,433.37	-464,433.37	-464,433.37	-464,433.37		
Quarterly Variance			349,854.83			94,419.74			20,158.80			0.00	464,433.37	
Quarterly Interest			3,841.59			659.08			82.79			0.00	4,583.46	
Non Interest Bearing Principle (represents approved recoveries for interest) - will apply recoveries here once "interest bearing balance" is 0														
Starting Balance	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	141,202.86	134,454.83	139,508.50		
Recovery 2008				0.00	0.00	0.00	0.00	0.00	3,509.14	6,748.03	-5,053.67	0.48	1,694.84	466,128.21
Ending Balance	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	144,712.00	141,202.86	134,454.83	139,508.50	139,508.02		
Balance 1590 Recoveries -	443,751.83	281,616.45	255,781.40	204,229.49	167,972.69	161,361.66	154,583.53	147,848.51	137,693.72	134,454.83	139,508.50	139,508.02		
(Interest Bearing and Non Interest Bearing)														

DETAILS OF 1590 REGULATORY ASSET RECOVERIES - CURRENT MONTH BILLING STATS and breakdown between current $ and Retroactive $ by month

2007		January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
Billing STAT														
Residential											2,595,124	2,953,199	4,026,763	
GS<50											1,529,537	1,403,350	1,864,299	
GS>50											14,908	14,300	14,570	
Streetlights											418	418	418	
RECOVERIES BREAKDOWN														
Current Month Recoveries											$ 36,115	34,984	41,683	**$ 112,781.62**
Retroactive Billing Adj applied to accounts											$ 78,885	$ 106,624	$ 24,620	**$ 210,128.65**
TOTAL RECOVERIES											**$ 114,999.59**	**$ 141,607.74**	**$ 66,302.94**	**$ 322,910.27**

2008		January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
Billing STATS														
Residential	kWh	5,409,393	4,530,119	4,385,479	4,120,513	2,920,103								
GS<50	kWh	2,374,236	2,022,597	2,382,193	1,626,513	1,511,086								
GS>50	kW	8,510	26,431	11,000	11,547	13,836								
Streetlights	kW	418	418	418	418	418								
RECOVERIES BREAKDOWN														
Current Month Recoveries		$ 45,249.28	$ 57,580.24	$ 25,510.65	$ 37,090.02	$ 29,694.61	$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 195,124.80**
Retroactive Billing Adj applied to accounts		$ 116,635.12	$ 104,555.14	$ 324.40	$ 14,461.89	$ 6,562.19	$ 6,611.03	$ 6,778.13	$ 6,735.02	$ 6,645.65	$ 6,748.03	$ (5,053.67)	$ 0.48	**$ 271,003.41**
						2 GS>50 A/C's	2 GS>50 A/C's	2 GS>50 A/C's	2 GS>50 A/C's	2 GS>50 A/C's	2 GS>50 A/C's	2 GS>50 A/C's		
TOTAL RECOVERIES		**$ 161,884.40**	**$ 162,135.38**	**$ 25,835.05**	**$ 51,551.91**	**$ 36,256.80**	**$ 6,611.03**	**$ 6,778.13**	**$ 6,735.02**	**$ 6,645.65**	**$ 6,748.03**	**$ (5,053.67)**	**$ 0.48**	**$ 466,128.21**

DETAILS OF 1590 REGULATORY ASSET RECOVERIES - RETROACTIVE BILLING ADJUSTMENT - when applied to accounts

2007	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL 2007			
Residential and GS<50 Accounts										$ 72,762.43 Oct 24/07B#31236 - #1/ 4		$ 71,869.68 Dec 17/07 B#31250 #2/4	**$ 144,632.11**			
GS>50 Accounts											$ 27,511.49	$ 18,046.16 Dec 20/07 B#31817	**$ 45,557.65**		$ 9,465.33	Dec diff billed in Jan
2 large GS>50 - Tembec and Norbord											$ 73,270.83	-$ 73,270.83 B#31616 & 31677 removing	**$ -**			
												$ 6,761.24	**$ 6,761.24**			
Streetlighting											$ 4,090.40 B#31541- 100% of adj		**$ 4,090.40**			
TOTAL DETAIL ABOVE										**$ 72,762.43**	**$ 104,872.72**	**$ 23,406.25**	**$ 201,041.40**			
Retroactive Billing Adj applied to accounts										$ 78,884.97	$ 106,623.74	$ 24,619.94	**$ 210,128.65**			
Difference to total Billing Adjs = other smaller adjs										$ 6,122.54 adjs on finalled accounts, etc	$ 1,751.02	$ 1,213.69	$ 9,087.25			

2008	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL 2008	Add 2007 above	2007 and 2008
Residential and GS<50 Accounts	$ 71,466.86 Jan 16 B#32038 #3/4	$ 70,305.26 Feb 15 B#31252 #4/4											**$ 141,772.12**	$ 144,632.11	$ 286,404.23
GS>50 Accounts	$ 27,511.40 **B#32038 #3/4**	$ 27,511.40											**$ 64,489.14**	$ 45,557.65	$ 110,046.79
	$ 9,466.34 B#32035 - missed Dec														
2 large GS>50 - Tembec and Norbord	$ 10,693.26	$ 6,761.24		$ 13,522.48	$ 6,761.24	$ 6,761.24	$ 6,761.24	$ 6,761.24	$ 6,761.24	$ 6,761.24	-$ 5,034.82		**$ 66,509.60**	$ 6,761.24	$ 73,270.84
Streetlighting														$ 4,090.40	$ 4,090.40
TOTAL DETAIL ABOVE	**$ 119,137.86**	**$ 104,577.90**	**$ -**	**$ 13,522.48**	**$ 6,761.24**	**$ 6,761.24**	**$ 6,761.24**	**$ 6,761.24**	**$ 6,761.24**	**$ 6,761.24**	**-$ 5,034.82**	**$ -**	**$ 272,770.86**	**$ 201,041.40**	**$ 473,812.26**
Retroactive Billing Adj applied to accounts	$ 116,635.12	$ 104,555.14	$ 324.40	$ 14,461.89	$ 6,562.19	$ 6,611.03	$ 6,778.13	$ 6,735.02	$ 6,645.65	$ 6,748.03	$ (5,053.67)	$ 0.48	**$ 271,003.41**		
Difference = other small adjs	*$ (2,502.74)*	*$ (22.76)*	*$ 324.40*	*$ 939.41*	*$ (199.05)*	*$ (150.21)*	*$ 16.89*	*$ (26.22)*	*$ (115.59)*	*$ (13.21)*	*$ (18.85)*	*$ 0.48*	***$ (1,767.45)***	*$ 9,087.25*	$ 7,319.80
															$ 481,132.06

Billing Stats during Retroative Billing Adjustement Period (July 12, 2006 to Set 7, 2007)

2006		January	February	March	April	May	June	July	August	September	October	November	December	TOTAL 2006
Residential	**kWh**	4,885,699	4,769,550	4,045,588	4,025,612	2,884,335	3,073,862	2,826,982	3,308,388	2,901,026	3,444,982	2,766,228	3,721,496	
GS<50	**kWh**	2,765,919	2,650,359	1,926,236	2,239,911	1,388,900	1,704,548	1,677,931	2,204,205	1,576,165	1,623,660	1,543,194	1,789,701	
GS>50	**kW**	13,935	14,818	15,691	15,118	15,158	14,807	13,696	13,655	13,291	14,601	14,298	14,714	
Streetlights	**kW**	418	418	418	418	418	418	418	418	418	418	418	418	

With July 2006 Consumption (= August 2006 STATS) prorated for 1/2 month

		January	February	March	April	May	June	July	August	September	October	November	December	TOTAL 2006
Residential	**kWh**								1,654,194	2,901,026	3,444,982	2,766,228	3,721,496	**14,487,925**
GS<50	**kWh**								1,102,102	1,576,165	1,623,660	1,543,194	1,789,701	**7,634,822**
GS>50	**kW**									13,291	14,601	14,298	14,714	**56,904**
Streetlights	**kW**									418	418	418	418	**1,671**

COMPARE STATS TO BILLING DETERMINANTS USED FOR RETROACTIVE ADJ CALCULATION

2007		January	February	March	April	May	June	July	August	September	October	November	December	TOTAL 2007	Add 2006	Total July 14, 2006/ Sept 7,2007		Stats per Retro Billing Adj	Difference	% diff	Notes	$ Diff
Residential	**kWh**	4,717,218	4,624,604	4,205,685	4,318,224	3,004,746	2,931,916	3,054,719	3,293,903	2,798,700				**32,949,715**	14,487,925	47,437,640		46,796,082	- 641,557.8	-1.35%	OK - not siginificant	
GS<50	**kWh**	2,003,011	2,183,790	2,077,268	1,972,197	1,597,023	1,629,269	1,664,310	1,639,439	1,294,385				**16,060,691**	7,634,822	23,695,513		23,254,356	- 441,156.7	-1.86%	OK - not siginificant	
GS>50	**kW**	15,409	16,663	15,821	15,745	15,017	14,229	14,278	13,612	13,355				**134,129**	56,904	191,033		161,413	- 29,620.0	-15.51%	Error - used KWA for adj instead of greater of KW or KVA	-$ 33,639.47
Streetlights	**kW**	418	418	418	418	418	418	418	418	418				**3,760**	1,671	5,432		4,873	- 558.5	-10.28%		-$ 468.83

FACTORS CONTRIBUTING TO THE RESIDUAL BALANCE

The first and most significant contributing factor is the result of a shorter recovery period than expected. NOW would like to point out that the period to which actual recoveries were calculated was from July 14, 2006 to May 1, 2008. The 2006 rate approval was delayed resulting in an effective date of July 14, 2006 instead of May 1, 2006. The regulatory asset rate rider was calculated in the 2006 EDR based on a 24 month recovery however actual recoveries were limited to 21.5 months. This accounts for 2.5 months in under recoveries and contributes significantly to the residual balance being higher than expected. The impact of the missed recoveries during this 2.5 month period is quantified below, amounting to approximately $90,000 in missed recoveries.

CALCULATION OF MISSED RECOVERIES for period May 2006 to July 14, 2006

		May-06	Jun-06	July 1-14/06	TOTAL	Rate	$ missed recoveries due to delay in rate approval
Residential	KWH	3,073,861	2,826,982	1,654,194	7,555,037	$ 0.0047	$ 35,508.67
GS<50	KWH	1,704,548	1,677,931	1,102,103	4,484,582	$ 0.0031	$ 13,902.20
GS>50	kW	14,807	13,696	6,828	35,331	$ 1.1357	$ 40,124.85
Streetlights	kW	418	418	209	1,045	$ 0.8394	$ 877.17
							$ 90,412.90

The second most significant contributing factor is the carrying charges on 1590 from 2006 to 2008. Carrying charges past April 30, 2006 do not appear to have been considered in the determination of the balance to be recovered and the resulting regulatory asset rate rider in the 2006 rates.

The third contributing factor to the remaining residual balance is the result of an error in calculating the regulatory asset recovery retroactive billing adjustment to the GS >50 class. This was recently discovered while investigating the reasons for the remaining residual balance in Account 1590. In order to verify the accuracy of the regulatory asset recovery retroactive billing adjustment, we prepared a table showing the monthly billing statistics for the period in question as per above schedules. The results indicate that the total kWh used for the retroactive billing adjustment for Residential and GS<50 accounts are in line with the billing statistics for this period. However this exercise did highlight that the GS>50 KW used to determine the retroactive billing adjustment was significantly lower than the billing statistics for this July 2006 to Sept 2007 period. Upon further investigation we have discovered that there was an error in calculating the billing determinants for Interval GS>50 accounts. These accounts are billed the greater of the kW demand read or the kVa demand read. The retroactive billing adjustment was based solely on kW read statistics regardless of whether the kVa read was higher and should have been the billing determinant for the retroactive billing adjustment. The comparison in Attachment 2 suggests the retroactive billing adjustment for GS>50 class was approximately $30,000 (29,620 kW x 1.1357) lower than it should have been.

The residual balance in Account 1590 is summarized as follows:

Residual Balance in 1590		**$166,637**
Consists of:		
Under recoveries related to Delay in 2006 Rate Implementation Date from May 1, 2006 to July 14, 2006 = 2.5 months less recoveries		$ 90,412
Carrying Charges for May 2006 to 2008 – Are in excess of balance used to calculate regulatory asset rate rider July 2006 to Dec 2006 Jan 2007 to Dec 2007 Jan 2008 to Sept 2008 (Recovery of principle portion completed in Sept 2008 – therefore no carrying charges thereafter since residual balance remaining is all interest) TOTAL	 $13,411 35,464 4,583 $53,458	 $53,458
Error resulting in under recoveries. Regulatory Asset Recovery retroactive billing adjustment error on GS>50 class as described above for the period July 2006 to Sept 2007.		$30,000
Total Identified Components of Residual Balance		**$173,870**

NOW has also provided the continuity schedule for Account 1590 for the years 2006, 2007 and 2008 which also includes the calculation of the monthly carrying charges and applicable interest rates. OEB Board staff indicated concern with the calculation of carrying charges, specifically that 2007 carrying charges were unreasonably high in comparison to 2006. 2006 carrying charges are for ½ year, from July 2006 to Dec 2006 while 2007 carrying charges are for the full year. Furthermore the Account 1590 balance did not start decreasing until October 2007 when the billing error was discovered and recoveries commenced.

NOW trusts that it has provided the necessary explanations and supporting documentation and requests that the Account 1590 residual balance be approved for disposition in this rate proceeding.

DISPOSITION OF ACOUNT 1521

NOW Inc. provides the following updated balances as of Feb 9, 2012.

Summary	Principle	Interest	TOTAL
Balance December 31, 2010	48,801.00	218.79	49,019.79
2011 Actuals for Jan 1 to December 31, 2011	-40,404.50	454.47	-39,950.03
Actual Balance December 31, 2011	8,396.50	673.26	9,069.76
Actual Recoveries Jan 2012 & 2012 Interest to April 30, 2012	-4,420.66	24.90	-4,395.76
Forecast Balance Apr 30, 2012	3,975.84	698.15	4,673.99

LRAM

We have reviewed the extent to which CDM activities were considered in deriving the most recent OEB approved load forecast, that being from the 2009 Cost of Service proceeding. NOW notes that this load forecast would have incorporated the impact of pre-2008 programs but did not incorporate the impact of 2008 or 2009 programs. The load forecast was based on average historical consumption profiles from 2002 to 2007 data. Accordingly NOW requests that the Board reconsider its denial of the lost revenues related to programs implemented in 2008 and 2009.

NOW provides the following updated LRAM amount as requested by the Board with the following directions:

"Board staff requests that NOW provide an updated LRAM amount that only includes lost revenues from 2006, 2007, 2008, and 2010 CDM programs in the years 2006, 2007, 2008 and 2010 and the subsequent rate riders. Board staff submits that it is premature to consider any lost revenue from 2010 programs persisting from January 1, 2011 to April 30, 2012."

Program Year	Years Lost Revenue took place								
	2006	2007	2008	2009	2010	2011	2012		Total
2006	$ 4,885.88	$ 4,342.59	$ 4,356.03						$ 13,584.50
2007		$ 4,851.35	$ 2,282.61						$ 7,133.96
2008			$ 3,072.66						$ 3,072.66
2009									$ -
2010					$ 5,244.13				$ 5,244.13
	$ 4,885.88	$ 9,193.94	$ 9,711.30	$ -	$ 5,244.13	$ -	$ -		$ 29,035.25
Class Breakdown									
Residential	$ 4,224.95	$ 8,445.57	$ 8,597.44		$ 613.62				$ 21,881.58
GS<50	$ -	$ -	$ 2.86		$ 4,350.17				$ 4,353.02
GS>50	$ 660.93	$ 748.37	$ 1,111.00		$ 280.35				$ 2,800.65
TOTAL	$ 4,885.88	$ 9,193.94	$ 9,711.30		$ 5,244.13				**$ 29,035.25**

NOW Inc.
2012 IRM
LRAM - Rate Rider Determination

Rate Class	Lost Revenues	Interest to April 30, 2012	Total $	Metered kWh/kW (2010 RRR 2.1.5 filing stats) = 2010 actual usage	Volume Metric	1 year Rate Rider
RESIDENTIAL	$21,881.58	$ 1,372.20	$ 23,253.78	41,793,455	kWh	$ 0.000556
GENERAL SERVICE <50KW	$4,353.02	$ 272.98	$ 4,626.00	19,817,364	kWh	$ 0.000233
GENERAL SERVICE >50KW	$2,800.65	$ 175.63	$ 2,976.28	182,783	kW	$ 0.016283
TOTAL	**$ 29,035.25**	**$ 1,820.81**	**$ 30,856.06**			

NOW Inc. will provide revised LRAM figures should the OEB reconsider its position with regards to lost revenues from 2008 and 2009 programs.

NOW response to VECC Submission dated January 30, 2012

See LRAM section of NOW response to OEB Submission dated January 30, 2012

ATTACHMENT A

CDM Load Impacts by Class and Program

Class Program	Year Implemented	NET 2006		GROSS 2006		NET 2007		GROSS 2007		NET 2008		GROSS 2008		NET 2009		GROSS 2009		NET 2010		GROSS 2010		NET 2011		GROSS 2011		NET 2012		GROSS 2012		NET		GROSS	
		kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	kWh	kW	Total kWh	Total kW	Total kWh	Total kW
OPA Programs																																	
Residential																																	
Secondary Fridge Retirement Pilot	2006	5,973	1.35	6,637	1.50	5,973	1.35	6,637	1.50	5,973	1.35	6,637	1.50	5,973	1.35	6,637	1.50	5,973	1.35	6,637	1.50	5,973	1.35	6,637	1.50	0	0.00	0	0.00	35,840	8	39,822	9
Cool & Hot Savings Rebate	2006 - 2007	14,746	13.67	18,680	16.62	37,702	28.98	63,768	48.77	37,702	28.98	63,768	48.77	37,702	28.98	63,768	48.77	37,702	28.98	63,768	48.77	37,702	28.98	63,768	48.77	36,613	27.79	56,841	41.19	239,868	186	394,362	302
	2006	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	14,746	13.67	18,680	16.62	103,220	96	130,761	116
	2007					22,956	15.32	45,088	32.15	22,956	15.32	45,088	32.15	22,956	15.32	45,088	32.15	22,956	15.32	45,088	32.15	22,956	15.32	45,088	32.15	21,868	14.13	38,161	24.58	136,648	91	263,600	185
Every Kilowatt Counts	2006-2007	382,617	4.51	425,130	5.01	520,226	9.84	612,865	12.73	518,543	9.34	609,805	11.82	518,543	9.34	609,805	11.82	185,257	9.34	239,487	11.82	185,257	9.34	239,487	11.82	180,615	9.34	228,881	11.82	2,491,057	61	2,965,459	77
	2006	382,617	4.51	425,130	5.01	382,617	4.51	425,130	5.01	382,617	4.51	425,130	5.01	382,617	4.51	425,130	5.01	49,331	4.51	54,813	5.01	49,331	4.51	54,813	5.01	49,331	4.51	54,813	5.01	1,678,464	32	1,864,960	35
	2007					137,608	5.33	187,734	7.72	135,925	4.83	184,674	6.81	135,925	4.83	184,674	6.81	135,925	4.83	184,674	6.81	135,925	4.83	184,674	6.81	131,284	4.83	174,068	6.81	812,594	29	1,100,500	42
Great Refrigerator Roundup	2007-2010					5,897	0.67	14,634	1.65	40,423	4.32	14,696,965	8.42	56,764	6.60	108,439	12.67	81,615	10.39	155,316	20.11	81,615	10.39	155,316	20.11	81,580	10.32	155,218	19.91	347,896	43	15,285,888	83
	2007					5,897	0.67	14,634	1.65	5,897	0.67	14,633,638	1.65	5,897	0.67	14,634	1.65	5,897	0.67	14,634	1.65	5,897	0.67	14,634	1.65	5,897	0.67	14,634	1.65	35,385	4	14,706,807	10
	2008									34,526	3.66	63,327	6.77	34,526	3.66	63,327	6.77	34,526	3.66	63,327	6.77	34,526	3.66	63,327	6.77	34,491	3.58	63,229	6.57	172,595	18	316,537	34
	2009													16,341	2.28	30,478	4.25	16,341	2.28	30,478	4.25	16,341	2.28	30,478	4.25	16,341	2.28	30,478	4.25	65,362	9	121,912	17
	2010													0	0.00	0	0.00	24,851	3.79	46,878	7.44	24,851	3.79	46,878	7.44	24,851	3.79	46,878	7.44	74,554	11	140,633	22
Summer Savings	2007					202,113	113.15	1,684,275	942.92	34,067	33.74	283,889	281.20	12,895	16.25	107,456	135.39	12,895	16.25	107,456	135.39	12,895	16.25	107,456	135.39	12,895	16.25	107,456	135.39	287,759	212	2,397,989	1,766
Social Housing – Pilot	2007					12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	12,507	1.47	75,041	9	75,041	9
Cool Savings Rebate Program	2008-2010									24,167	15.31	42,071	26.58	55,519	35.96	115,450	73.82	55,932	36.22	116,428	74.42	55,932	36.22	116,428	74.42	55,821	36.12	116,316	74.33	247,372	160	506,693	324
	2008									24,167	15.31	42,071	26.58	24,167	15.31	42,071	26.58	24,167	15.31	42,071	26.58	24,167	15.31	42,071	26.58	24,167	15.31	42,071	26.58	120,835	77	210,353	133
	2009													31,352	20.65	73,379	47.24	31,352	20.65	73,379	47.24	31,352	20.65	73,379	47.24	31,241	20.55	73,268	47.14	125,297	82	293,406	189
	2010																	413	0.26	978	0.61	413	0.26	978	0.61	413	0.26	978	0.61	1,240	1	2,934	2
Every Kilowatt Counts Power Savings Event	2008-2010									122,678	6.69	304,260	16.02	176,661	11.92	451,319	30.25	194,033	13.56	479,545	33.72	191,655	13.49	479,431	33.72	172,631	12.86	431,465	32.21	857,658	59	2,146,019	146
	2008									122,678	6.69	304,260	16.02	122,144	6.39	302,739	15.18	122,144	6.39	302,739	15.18	122,144	6.39	302,739	15.18	103,672	5.81	254,843	13.67	592,782	32	1,467,321	75
	2009													54,517	5.52	148,580	15.08	52,254	5.43	134,377	14.46	52,254	5.43	134,377	14.46	52,251	5.43	134,370	14.46	211,277	22	551,705	58
	2010																	19,634	1.74	42,428	4.08	17,257	1.66	42,314	4.08	16,708	1.62	42,251	4.08	53,599	5	126,993	12
																														0	0	0	0
General Service<50kW																														0	0	0	0
High Performance New Construction	2008-2010									280	0.33	400	0.47	9,287	4.28	13,268	6.12	39,721	17.63	56,744	25.19	39,721	17.63	56,744	25.19	39,721	17.63	56,744	38.61	128,730	58	183,900	96
	2008									280	0.33	400	0.47	280	0.33	400	0.47	280	0.33	400	0.47	280	0.33	400	0.47	280	0.33	400	0.47	1,400	2	2,001	2
	2009													9,007	3.95	12,868	5.64	9,007	3.95	12,868	5.64	9,007	3.95	12,868	5.64	9,007	3.95	12,868	19.07	36,029	16	51,471	36
	2010																	30,433	13.35	43,476	19.07	30,433	13.35	43,476	19.07	30,433	13.35	43,476	19.07	91,300	40	130,429	57
Power Savings Blitz	2008-2010																	291,111	94.86	294,052	95.82	291,111	94.86	294,052	95.82	291,111	94.86	294,052	95.82	873,334	285	882,156	287
	2009																													0	0	0	0
	2010																	291,111	94.86	294,052	95.82	291,111	94.86	294,052	95.82	291,111	94.86	294,052	95.82	873,334	285	882,156	287
Multifamily Energy Efficiency Rebates	2010																	3,094	0.26	4,201	0.34	3,094	0.26	4,201	0.34	3,094	0.26	4,201	0.34	9,283	1	12,603	1
																														0	0	0	0
General Service>50kW to 4,999kW																														0	0	0	0
Demand Response 1	2006 -2010	0	310.49	0	310.49	0	337.42	0	337.42	0	428.96	0	428.96	7,837	178.38	7,837	178.38	0	0.00	0	0.00	0	0.00	0	0.00					7,837	1,255	7,837	1,255
	2006	0	310.49	0	310.49																									0	310	0	310
	2007					0	337.42	0	337.42																					0	337	0	337
	2008									0	428.96	0	428.96																	0	429	0	429
	2009													7,837	178.38	7,837	178.38													7,837	178	7,837	178
Demand Response 2	2009-2010													74,608	121.12	74,608	121.12	143,826	123.04	143,826	123.04									218,435	244	218,435	244
	2009													74,608	121.12	74,608	121.12													74,608	121	74,608	121
	2010																	143,826	123.04	143,826	123.04									143,826	123	143,826	123
Demand Response 3	2008-2010									0	82.95	0	82.95	1,425	173.03	1,425	173.03	5,098	260.25	5,098	260.25									6,523	516	6,523	516
	2008									0	82.95	0	82.95																	0	83	0	83
	2009													1,425	173.03	1,425	173.03													1,425	173	1,425	173
	2010																	5,098	260.25	5,098	260.25									5,098	260	5,098	260
Loblaw & York Region Demand Response	2006-2010	0	15.20	0	15.20	0	28.07	0	28.07	0	28.51	0	28.51	0	29.73	0	29.73	0	30.20	0	30.20									0	132	0	132

ATTACHMENT B

Foregone Revenue by Class and Program

Class / Program	Year Implemented	2006 Load Unit	2006 kWh or kW	2006 Rate per Unit	2006 Revenue	2007 Load Unit	2007 kWh or kW	2007 Rate per Unit	2007 Revenue	2008 Load Unit	2008 kWh or kW	2008 Rate per Unit	2008 Revenue
OPA Programs													
Residential													
Secondary Fridge Retirement Pilot	2006	5,973	kWh	0.0107	$62.57	5,973	kWh	0.0108	$64.31	5,973	kWh	0.0108	$64.51
Cool & Hot Savings Rebate	2006 - 2007	14,746	kWh	0.0107	$154.46	37,702	kWh	0.0108	$405.92	37,702	kWh	0.0108	$407.18
	2006	14,746	kWh	0.0107	$154.46	14,746	kWh	0.0108	$158.76	14,746	kWh	0.0108	$159.25
	2007	0	kWh	0.0107	$0.00	22,956	kWh	0.0108	$247.16	22,956	kWh	0.0108	$247.93
Every Kilowatt Counts	2006-2007	382,617	kWh	0.0107	$4,007.92	520,226	kWh	0.0108	$5,601.10	518,543	kWh	0.0108	$5,600.26
	2006	382,617	kWh	0.0107	$4,007.92	382,617	kWh	0.0108	$4,119.51	382,617	kWh	0.0108	$4,132.27
	2007	0	kWh	0.0107	$0.00	137,608	kWh	0.0108	$1,481.58	135,925	kWh	0.0108	$1,467.99
Great Refrigerator Roundup	2007-2010	0	kWh	0.0107	$0.00	5,897	kWh	0.0108	$63.50	40,423	kWh	0.0108	$436.57
	2007	0	kWh	0.0107	$0.00	5,897	kWh	0.0108	$63.50	5,897	kWh	0.0108	$63.69
	2008	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	34,526	kWh	0.0108	$372.88
	2009	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
	2010	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
Summer Savings	2007	0	kWh	0.0107	$0.00	202,113	kWh	0.0108	$2,176.08	34,067	kWh	0.0108	$367.92
Social Housing – Pilot	2007	0	kWh	0.0107	$0.00	12,507	kWh	0.0108	$134.66	12,507	kWh	0.0108	$135.07
Cool Savings Rebate Program	2008-2010	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	24,167	kWh	0.0108	$261.00
	2008	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	24,167	kWh	0.0108	$261.00
	2009	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
	2010	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
Every Kilowatt Counts Power Savings Event	2008-2010	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	122,678	kWh	0.0108	$1,324.92
	2008	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	122,678	kWh	0.0108	$1,324.92
	2009	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
	2010	0	kWh	0.0107	$0.00	0	kWh	0.0108	$0.00	0	kWh	0.0108	$0.00
					$4,224.95				*$8,445.57*				*$8,597.44*
GENERAL SERVICE Less Than 50kW													
High Performance New Construction	2008-2010									280	kWh	0.0102	$2.86
	2008							0.0102		280	kWh	0.0102	$2.86
	2009							0.0102		0	kWh	0.0102	$0.00
	2010							0.0102		0	kWh	0.0102	$0.00
Power Savings Blitz	2009-2010									0	kWh	0.0102	$0.00
	2009									0	kWh	0.0102	$0.00
	2010									0	kWh	0.0102	$0.00
Multifamily Energy Efficiency Rebates	2010									0	kWh	0.0102	$0.00
									$0.00				*$2.86*
General Service>50kW to 4,999kW													
Demand Response 1	2006 -2009	310.49	kW	2.0293	$630.09	337.42	kW	2.0476	$690.90	428.96	kW	2.0558	$881.86
	2006	310.49	kW	2.0293	$630.09	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2007	0.00	kW	2.0293	$0.00	337.42	kW	2.0476	$690.90	0.00	kW	2.0558	$0.00
	2008	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	428.96	kW	2.0558	$881.86
	2009	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
Demand Response 2	2009-2010	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2009	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2010	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
Demand Response 3	2008-2010	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	82.95	kW	2.0558	$170.53
	2008	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	82.95	kW	2.0558	$170.53
	2009	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2010	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
Electricity Resources Demand Response	2006-2010	15.20	kW	2.0293	$30.84	28.07	kW	2.0476	$57.48	28.51	kW	2.0558	$58.60
	2006	15.20	kW	2.0293	$30.84	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2007	0.00	kW	2.0293	$0.00	28.07	kW	2.0476	$57.48	0.00	kW	2.0558	$0.00
	2008	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	28.51	kW	2.0558	$58.60
	2009	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
	2010	0.00	kW	2.0293	$0.00	0.00	kW	2.0476	$0.00	0.00	kW	2.0558	$0.00
					$660.93				*$748.37*				*$1,111.00*
TOTAL					$4,885.88				$9,193.94				$9,711.30

Class / Program	Year Implemented	2009 Load Unit	2009 kWh or kW	2009 Rate per Unit	2009 Revenue	2010 Load Unit	2010 kWh or kW	2010 Rate per Unit	2010 Revenue	2011 Load Unit	2011 kWh or kW	2011 Rate per Unit	2011 Revenue	2012 Load Unit	2012 kWh or kW	2012 Rate per Unit	2012 Revenue	Total Revenue
OPA Programs																		
Residential																		
Secondary Fridge Retirement Pilot	2006	5,973	kWh	0.0144	$78.85	5,973	kWh	0.0133	$81.64	5,973	kWh	0.0134	$79.84	0	kWh	0.0134	$0.00	$431.73
Cool & Hot Savings Rebate	2006 - 2007	37,702	kWh	0.0144	$497.66	37,702	kWh	0.0133	$515.26	37,702	kWh	0.0134	$503.95	36,613	kWh	0.0134	$490.62	$2,975.05
	2006	14,746	kWh	0.0144	$194.64	14,746	kWh	0.0133	$201.53	14,746	kWh	0.0134	$197.10	14,746	kWh	0.0134	$197.59	$1,263.34
	2007	22,956	kWh	0.0144	$303.02	22,956	kWh	0.0133	$313.73	22,956	kWh	0.0134	$306.85	21,868	kWh	0.0134	$293.03	$1,711.71
Every Kilowatt Counts	2006-2007	518,543	kWh	0.0144	$6,844.76	185,257	kWh	0.0133	$2,531.84	185,257	kWh	0.0134	$2,476.27	180,615	kWh	0.0134	$2,420.24	$29,482.39
	2006	382,617	kWh	0.0144	$5,050.55	49,331	kWh	0.0133	$674.20	49,331	kWh	0.0134	$659.40	49,331	kWh	0.0134	$661.04	$19,304.88
	2007	135,925	kWh	0.0144	$1,794.22	135,925	kWh	0.0133	$1,857.65	135,925	kWh	0.0134	$1,816.87	131,284	kWh	0.0134	$1,759.20	$10,177.51
Great Refrigerator Roundup	2007-2010	56,764	kWh	0.0144	$749.28	81,615	kWh	0.0133	$1,115.41	81,615	kWh	0.0134	$1,090.93	81,580	kWh	0.0134	$1,093.17	$4,548.86
	2007	5,897	kWh	0.0144	$77.85	5,897	kWh	0.0133	$80.60	5,897	kWh	0.0134	$78.83	5,897	kWh	0.0134	$79.03	$443.49
	2008	34,526	kWh	0.0144	$455.74	34,526	kWh	0.0133	$471.86	34,526	kWh	0.0134	$461.50	34,491	kWh	0.0134	$462.17	$2,224.15
	2009	16,341	kWh	0.0144	$215.69	16,341	kWh	0.0133	$223.32	16,341	kWh	0.0134	$218.42	16,341	kWh	0.0134	$218.96	$876.40
	2010	0	kWh	0.0144	$0.00	24,851	kWh	0.0133	$339.64	24,851	kWh	0.0134	$332.18	24,851	kWh	0.0134	$333.01	$1,004.83
Summer Savings	2007	12,895	kWh	0.0144	$170.21	12,895	kWh	0.0133	$176.23	12,895	kWh	0.0134	$172.36	12,895	kWh	0.0134	$172.79	$3,235.59
Social Housing – Pilot	2007	12,507	kWh	0.0144	$165.09	12,507	kWh	0.0133	$170.93	12,507	kWh	0.0134	$167.17	12,507	kWh	0.0134	$167.59	$940.52
Cool Savings Rebate Program	2008-2010	55,519	kWh	0.0144	$732.85	55,932	kWh	0.0133	$764.41	55,932	kWh	0.0134	$747.63	55,821	kWh	0.0134	$748.00	$3,253.90
	2008	24,167	kWh	0.0144	$319.00	24,167	kWh	0.0133	$330.28	24,167	kWh	0.0134	$323.03	24,167	kWh	0.0134	$323.84	$1,557.16
	2009	31,352	kWh	0.0144	$413.85	31,352	kWh	0.0133	$428.48	31,352	kWh	0.0134	$419.07	31,241	kWh	0.0134	$418.62	$1,680.03
	2010	0	kWh	0.0144	$0.00	413	kWh	0.0133	$5.65	413	kWh	0.0134	$5.52	413	kWh	0.0134	$5.54	$16.71
Every Kilowatt Counts Power Savings Event	2008-2010	176,661	kWh	0.0144	$2,331.92	194,033	kWh	0.0133	$2,651.78	191,655	kWh	0.0134	$2,561.80	172,631	kWh	0.0134	$2,313.25	$11,183.67
	2008	122,144	kWh	0.0144	$1,612.30	122,144	kWh	0.0133	$1,669.30	122,144	kWh	0.0134	$1,632.66	103,672	kWh	0.0134	$1,389.20	$7,628.39
	2009	54,517	kWh	0.0144	$719.62	52,254	kWh	0.0133	$714.14	52,254	kWh	0.0134	$698.47	52,251	kWh	0.0134	$700.17	$2,832.40
	2010	0	kWh	0.0144	$0.00	19,634	kWh	0.0133	$268.33	17,257	kWh	0.0134	$230.67	16,708	kWh	0.0134	$223.88	$722.88
					$11,570.64				*$8,007.49*				*$7,799.95*				*$7,405.67*	*$56,051.71*
GENERAL SERVICE Less Than 50kW																		
High Performance New Construction	2008-2010	9,287	kWh	0.0138	$117.02	39,721	kWh	0.0132	$532.26	39,721	kWh	0.0133	$526.96	39,721	kWh	0.0133	$528.29	$1,707.39
	2008	280	kWh	0.0138	$3.53	280	kWh	0.0132	$3.75	280	kWh	0.0133	$3.72	280	kWh	0.0133	$3.73	$17.58
	2009	9,007	kWh	0.0138	$113.49	9,007	kWh	0.0132	$120.70	9,007	kWh	0.0133	$119.50	9,007	kWh	0.0133	$119.80	$473.49
	2010	0	kWh	0.0138	$0.00	30,433	kWh	0.0132	$407.81	30,433	kWh	0.0133	$403.75	30,433	kWh	0.0133	$404.76	$1,216.32
Power Savings Blitz	2009-2010	0	kWh	0.0138	$0.00	291,111	kWh	0.0132	$3,900.89	291,111	kWh	0.0133	$3,862.08	291,111	kWh	0.0133	$3,871.78	$11,634.75
	2009	0	kWh	0.0138	$0.00	0	kWh	0.0132	$0.00	0	kWh	0.0133	$0.00	0	kWh	0.0133	$0.00	$0.00
	2010	0	kWh	0.0138	$0.00	291,111	kWh	0.0132	$3,900.89	291,111	kWh	0.0133	$3,862.08	291,111	kWh	0.0133	$3,871.78	$11,634.75
Multifamily Energy Efficiency Rebates	2010	0	kWh	0.0138	$0.00	3,094	kWh	0.0132	$41.47	3,094	kWh	0.0133	$41.05	3,094	kWh	0.0133	$41.16	$123.68
					$117.02				*$4,474.62*				*$4,430.09*				*$4,441.22*	*$13,465.82*
General Service>50kW to 4,999kW																		
Demand Response 1	2006 -2009	178.38	kW	1.0111	$180.36	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$2,383.20
	2006	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$630.09
	2007	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$690.90
	2008	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$881.86
	2009	178.38	kW	1.0111	$180.36	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$180.36
Demand Response 2	2009-2010	121.12	kW	1.0111	$122.47	123.04	kW	0.6780	$83.42	0.00	kW	0.6806	$0.00					$205.89
	2009	121.12	kW	1.0111	$122.47	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$122.47
	2010	0.00	kW	1.0111	$0.00	123.04	kW	0.6780	$83.42	0.00	kW	0.6806	$0.00					$83.42
Demand Response 3	2008-2010	173.03	kW	1.0111	$174.96	260.25	kW	0.6780	$176.45	0.00	kW	0.6806	$0.00					$521.94
	2008	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$170.53
	2009	173.03	kW	1.0111	$174.96	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$174.96
	2010	0.00	kW	1.0111	$0.00	260.25	kW	0.6780	$176.45	0.00	kW	0.6806	$0.00					$176.45
Electricity Resources Demand Response	2006-2010	29.73	kW	1.0111	$30.06	30.20	kW	0.6780	$20.48	0.00	kW	0.6806	$0.00					$197.46
	2006	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$30.84
	2007	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$57.48
	2008	0.00	kW	1.0111	$0.00	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$58.60
	2009	29.73	kW	1.0111	$30.06	0.00	kW	0.6780	$0.00	0.00	kW	0.6806	$0.00					$30.06
	2010	0.00	kW	1.0111	$0.00	30.20	kW	0.6780	$20.48	0.00	kW	0.6806	$0.00					$20.48
					$507.84				*$280.35*				*$0.00*				*$0.00*	*$3,308.49*
TOTAL					$12,195.50				$12,762.46				$12,230.04				$11,846.89	$72,826.02

	2006	2007	2008	2009	2010	2011	2012	Total Revenue
BREAKDOWN SUMMARY - ORIGINAL								
Residential	$4,224.95	$8,445.57	$8,597.44	$11,570.64	$8,007.49	$7,799.95	$7,405.67	$56,051.71
GENERAL SERVICE Less Than 50kW	$0.00	$0.00	$2.86	$117.02	$4,474.62	$4,430.09	$4,441.22	$13,465.82
General Service>50kW to 4,999kW	$660.93	$748.37	$1,111.00	$507.84	$280.35	$0.00	$0.00	$3,308.49
TOTAL	$4,885.88	$9,193.94	$9,711.30	$12,195.50	$12,762.46	$12,230.04	$11,846.89	$72,826.02
BREAKDOWN SUMMARY - REVISED FOR DENIED YEARS						TOTAL		
Residential	$4,224.95	$8,445.57	$8,597.44		$613.62	$21,881.58		
GENERAL SERVICE Less Than 50kW	$0.00	$0.00	$2.86		$4,350.17	$4,353.02		
General Service>50kW to 4,999kW	$660.93	$748.37	$1,111.00		$280.35	$2,800.65		
TOTAL	$4,885.88	$9,193.94	$9,711.30		$5,244.13	$29,035.25		

Program Year	Years Lost Revenue took place							Total
	2006	2007	2008	2009	2010	2011	2012	Total
2006	$ 4,885.88	$ 4,342.59	$ 4,356.03					$ 13,584.50
2007		$ 4,851.35	$ 2,282.61					$ 7,133.96
2008			$ 3,072.66					$ 3,072.66
2009								$ -
2010					$ 5,244.13			$ 5,244.13
	$ 4,885.88	$ 9,193.94	$ 9,711.30	$ -	$ 5,244.13	$ -	$ -	$ 29,035.25

Class Breakdown	2006	2007	2008	2009	2010	2011	2012	Total
Residential	$ 4,224.95	$ 8,445.57	$ 8,597.44		$ 613.62			$ 21,881.58
GS<50	$ -	$ -	$ 2.86		$ 4,350.17			$ 4,353.02
GS>50	$ 660.93	$ 748.37	$ 1,111.00		$ 280.35			$ 2,800.65
TOTAL	$ 4,885.88	$ 9,193.94	$ 9,711.30		$ 5,244.13			**$ 29,035.25**

LRAM Carrying Charges

		PRINCIPLE BALANCE			INTEREST			
		Lost Revenues Amount	Balance at Year End		Balance for Quarterly Interest Calculation	Quarterly InterestRate	Quareterly Interest Amount	Interest Balance
2006	YEAR	$ 4,885.88	$ 4,885.88					
2007	Q1				$ 4,885.88	4.59%	$ 56.07	$ 56.07
2007	Q2				$ 4,885.88	4.59%	$ 56.07	$ 112.13
2007	Q3				$ 4,885.88	4.59%	$ 56.07	$ 168.20
2007	Q4				$ 4,885.88	5.14%	$ 62.78	$ 230.98
2007	YEAR	$ 9,193.94	$ 14,079.82				$ 230.98	
2008	Q1				$ 14,079.82	5.14%	$ 180.93	$ 411.91
2008	Q2				$ 14,079.82	4.08%	$ 143.61	$ 555.52
2008	Q3				$ 14,079.82	3.35%	$ 117.92	$ 673.44
2008	Q4				$ 14,079.82	3.35%	$ 117.92	$ 791.36
2008	YEAR	$ 9,711.30	$ 23,791.12				$ 560.38	
2009	Q1				$ 23,791.12	2.45%	$ 145.72	$ 937.08
2009	Q2				$ 23,791.12	1.00%	$ 59.48	$ 996.56
2009	Q3				$ 23,791.12	0.55%	$ 32.71	$ 1,029.27
2009	Q4				$ 23,791.12	0.55%	$ 32.71	$ 1,061.98
2009	YEAR		$ 23,791.12				$ 270.62	
2010	Q1				$ 23,791.12	0.55%	$ 32.71	$ 1,094.69
2010	Q2				$ 23,791.12	0.55%	$ 32.71	$ 1,127.41
2010	Q3				$ 23,791.12	0.89%	$ 52.94	$ 1,180.34
2010	Q4				$ 23,791.12	1.20%	$ 71.37	$ 1,251.71
2010	YEAR	$ 5,244.13	$ 29,035.25				$ 189.73	
2011	Q1				$ 29,035.25	1.47%	$ 106.70	$ 1,358.42
2011	Q2				$ 29,035.25	1.47%	$ 106.70	$ 1,465.12
2011	Q3				$ 29,035.25	1.47%	$ 106.70	$ 1,571.83
2011	Q4				$ 29,035.25	1.47%	$ 106.70	$ 1,678.53
2011	YEAR		$ 29,035.25				$ 426.82	
2012	Q1				$ 29,035.25	1.47%	$ 106.70	$ 1,785.24
2012	Q2 - April 2012 only				$ 29,035.25	1.47%	$ 35.57	$ 1,820.81
2012	Q3				$ 29,035.25			$ 1,820.81
2012	Q4				$ 29,035.25			$ 1,820.81
2012	YEAR		$ 29,035.25				$ 142.27	
TOTAL		$ 29,035.25					$ 1,820.81	

NOW Inc.
2012 IRM
LRAM - Rate Rider Determination

Rate Class	Lost Revenues	Interest to April 30, 2012	Total $	Metered kWh/kW (2010 RRR 2.1.5 filing stats) = 2010 actual usage	Volume Metric	1 year Rate Rider
RESIDENTIAL	$21,881.58	$ 1,372.20	$ 23,253.78	41,793,455	kWh	$ 0.000556
GENERAL SERVICE <50KW	$4,353.02	$ 272.98	$ 4,626.00	19,817,364	kWh	$ 0.000233
GENERAL SERVICE >50KW	$2,800.65	$ 175.63	$ 2,976.28	182,783	kW	$ 0.016283
TOTAL	**$ 29,035.25**	**$ 1,820.81**	**$ 30,856.06**			