

OPERATING REVENUE

3-Staff-21

Ref: Exh 2, Appendix 2-A – Distribution System Plan, page 101

Ref: Appendix 2-IA Summary of Actual and Forecast Data

The application states that, “Halton Hills Hydro has seen significant growth over the past number of years. This growth comes in the form of new development in vacant lands (farm fields) as well as in-fill development in established urban neighbourhoods.”

OEB staff prepared the following table based on Appendix 2-IA.

	OEB Approved 2012	Actual 2012	Actual 2013	Actual 2014	Bridge 2015	Test 2016
kWh	494,026,422	493,078,700	500,125,974	506,282,929	507,057,514	509,865,892
Customers	21,413	21,116	21,441	21,535	21,715	21,897

- Please confirm that the data in the table are correct.
- Please provide 2015 actual kWh and customers.
- Please confirm that the 2016 proposed load is 3.2% higher than 2012 OEB approved, and that a significant portion of the load increase is related to the Toronto Premium Outlet Mall.
- Please confirm that the 2016 proposed customer count is 2.3% higher than 2012 OEB approved.
- Subject to the above, please explain the statement in the application regarding significant growth over the past number of years.

Response:

- As discussed in response to 3-Staff-22, HHHI updated the loss factor used to adjust the impact of CDM activities on power purchases from its 2012 OEB approved rate of 6.02% to its forecasted loss factor of 5.60% for the 2016 test year. HHHI has updated the table prepared by OEB staff below.

Table IRR - 25 : Load Forecast Summary (revised)

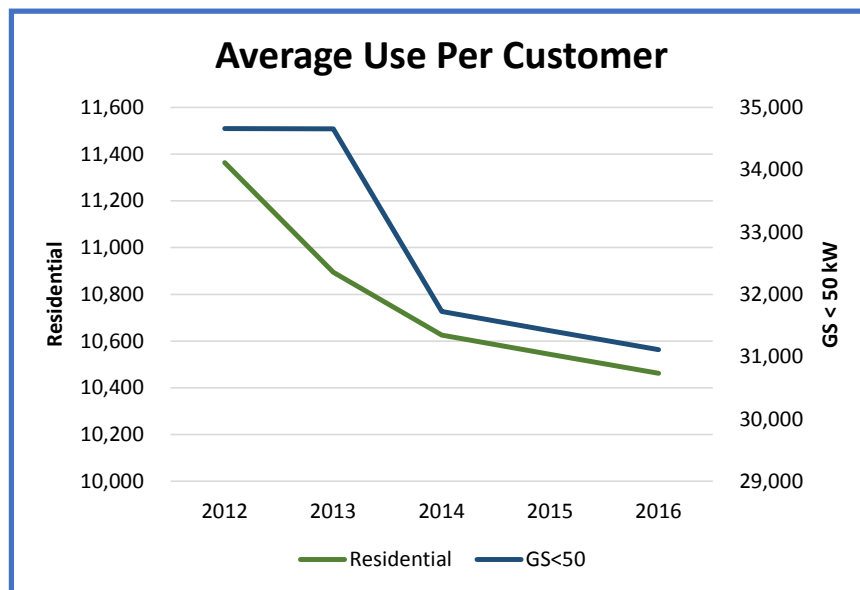
	2012 OEB Approved	2012 Actual	2013 Actual	2014 Actual	2015 Weather Normal	2016 Weather Normal
Total kWh	494,026,422	493,078,700	500,125,974	506,282,929	507,058,035	509,866,419
Metered Customers	21,413	21,116	21,441	21,535	21,715	21,897

- Actual kWh for January 1, 2015 to November 30, 2015 is 458,835,286 kWhs. Total customer numbers as at November 30, 2015 is 21,998.
- HHHI confirms that the 2016 proposed load is 3.2% higher than the 2012 OEB approved or 3.4% higher than 2013 actual load. As shown in the following Table IRR - 26, growth in kWh consumption is primarily in the General Service 50 to 999 kW and General Service 1,000 to 4,999 kW rate classes, a significant portion of that growth is associated with the Toronto Premium Outlet Mall.

Table IRR - 26 : Consumption Growth by Class

Customers	2012 OEB Approved	2012 Actual	2013 Actual	2014 Actual	2015 Weather Normal	2016 Weather Normal	% Growth 2016 vs 2012 OEB Approved	% Growth 2016 vs 2012 Actual
Residential	210,212,474	213,770,412	207,797,230	203,392,794	199,037,136	195,182,110	-7.2%	-8.7%
General Service less than 50 kW	54,285,767	56,941,928	56,899,095	51,541,092	49,623,939	48,031,437	-11.5%	-15.6%
General Service 50 to 999 kW	117,338,024	112,013,765	115,098,501	126,051,551	133,477,926	141,978,525	21.0%	26.8%
General Service 1,000 to 4,999 kW	108,192,394	106,258,036	116,217,792	121,143,600	121,407,020	121,810,401	12.6%	14.6%
Sentinel Lighting	380,342	439,446	443,840	448,279	456,481	464,833	22.2%	5.8%
Street Lighting	2,778,881	2,762,363	2,769,251	2,782,603	2,127,971	1,466,975	-47.2%	-46.9%
Un-Metered Scattered Load	838,540	892,750	900,265	923,011	927,563	932,138	11.2%	4.4%
Total	494,026,422	493,078,700	500,125,974	506,282,929	507,058,035	509,866,419	3.2%	3.4%

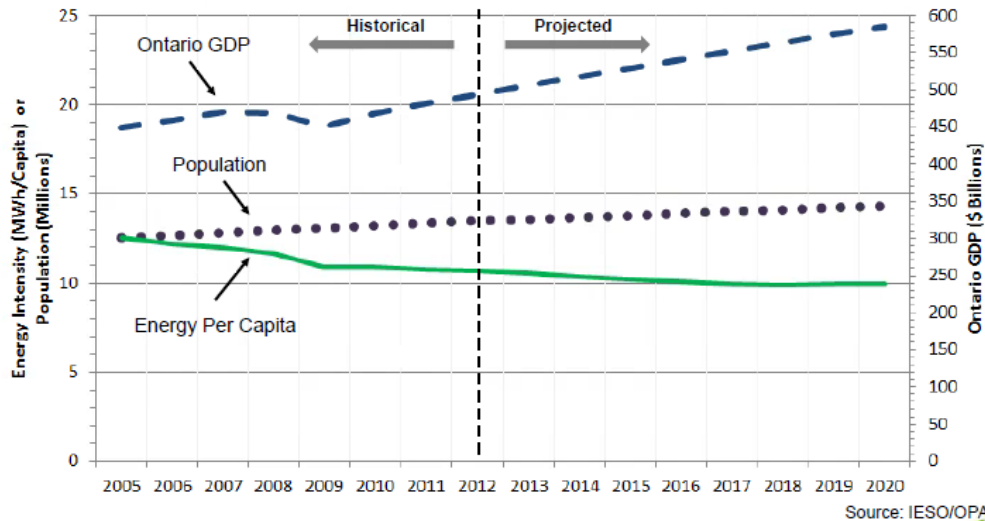
HHHI also notes that although it is experiencing growth in the number of customers in its Residential and General Service less than 50 kW rate classes, the decline in the average use per customer has resulted in a decline in total consumption (excluding the impact of CDM) for these rate classes from 2012 through 2014. In addition, HHHI has forecasted a decline in consumption in the Street Lighting rate class as the Town of Halton Hill transitions to LED street lighting.



This trend is consistent with both the U.S. and Canadian markets and is expected to continue. In its presentation on the future of demand growth on January 8, 2013, the Brattle Group examined the causes of the decrease in demand in the U.S. and concluded that, “The drop in demand seems to be permanent, not transitory...”¹ The following table illustrates the projected decline in consumption per capita in Ontario.

¹ Webinar presented by Dr. Ahmad Faruque, principal with The Brattle Group, and Chuck Farmer, Director, Planning Policy and Approvals, OPA. <http://www.powerauthority.on.ca/sites/default/files/news/Future-of-Demand-Growth-A-Faruqui-C-Farmer.pdf>

The economy and population continue to grow, consumption per capita is declining



Source: IESO/OPA

47



- d) HHHI confirms that the 2016 proposed customer count for metered customers is 2.3% higher than the 2012 OEB approved. HHHI also notes that the 2016 proposed customer count is 3.7% higher than the 2012 actual customer count.

Table IRR - 27 : Customer Count Growth by Class

Metered Customers	2012 OEB Approved	2012 Actual	2013 Actual	2014 Actual	2015 Weather Normal	2016 Weather Normal	% Growth 2016 vs 2012 OEB Approved	% Growth 2016 vs 2012 Actual
Residential	19,530	19,194	19,511	19,623	19,788	19,955	2.2%	4.0%
General Service less than 50 kW	1,694	1,710	1,710	1,701	1,699	1,696	0.1%	-0.8%
General Service 50 to 999 kW	176	200	207	198	214	232	31.9%	16.1%
General Service 1,000 to 4,999 kW	13	12	13	13	14	14	7.2%	16.2%
Total	21,413	21,116	21,441	21,535	21,715	21,897	2.3%	3.7%

- e) As shown in Table IRR - 27 above, HHHI has seen considerable growth in its commercial and industrial sectors with growth of 16% in both the General Service 50 to 999 kW and General Service 1,000 to 4,999 kW rate classes as compared to 2012 actuals. While growth in the residential sector is more modest, with a 4% growth rate, HHHI considers its overall growth to be significant, particularly when compared with more developed service areas.

3-Staff-22

Ref: Exh 3 page 15 – CDM Impacts on the 2016 Load Forecast

Ref: Appendix 3-A

Ref: Appendix 2-IA Actual and Forecast Data

- a) Table 3-14 on page 15 lists a 2016 purchased load forecast of 540,994 MWh including the impact of CDM, but not the impact of LED streetlights. Please explain why this forecast differs from the forecast of 541,102 MWh noted in Appendix 3-A.
- b) Table 3-14 on page 15 lists a 2016 billed load forecast of 511,221 MWh. Please explain why this forecast differs from the forecast of 509,866,419 kWh noted in Appendix 3-A and the 509,865,892 kWh forecast noted in Appendix 2-IA.

Response:

- a) HHHI prepared the load forecast before finalizing the proposed loss factor for the 2016 Test Year. Once calculated, the proposed loss factor was 5.6%. HHHI updated the impact of CDM on the load forecast using a loss factor of 5.6% rather than the loss factor of 6.3%. The results are shown in Table IRR - 28 below.

Table IRR - 28 : Updated Forecast of Purchases

Updated Forecast of Purchases		
Forecasted Purchases (Excluding CDM)	557,440	557,440
Adjustment for CDM (Non Loss Adjusted)	15,472	15,472
Loss Factor	6.3%	5.6%
Loss Adjustment	975	866
Forecasted Purchases (Excluding CDM)	540,993	541,102

- b) As discussed in 3-Staff-22 (a), HHHI updated the load forecast to reflect the proposed loss factor of 5.6% for the 2016 Test Year. This update resulted in a change to both the purchased and billed forecast. HHHI updated Appendix 3-A, but did not update Appendix 2-IA. An updated Appendix 2-IA reflecting the revised forecast of 509,867 MWh is shown as Table IRR - 30.

Table IRR - 29 : Revised CDM Impacts on the 2016 Load Forecast

CDM Impacts on the 2016 Load Forecast (MWh)	Application	Interrogatories
Load Forecast Excluding CDM	526,693	527,012
Deduct persistent CDM Savings		
Pre 2011 CDM Programs	5,181	5,181
2011 to 2014 CDM Programs	7,343	9,883
Sub Total	12,524	15,064
Manual CDM Adjustment for 2015 and 2016 CDM Programs	2,947	2,947
Total	15,471	18,011
Load Forecast Including Impact of CDM	511,222	509,001
Adjustment to Billed kWh - Conversion to LED streetlighting	1,355	-
Load Forecast Including Impact of CDM and LED streetlighting	509,867	509,001

Table IRR – 30 : Revised Board Appendix 2-IA

	2012 Board Approved	2012	2013	2014	2015 Bridge	2016 Test
Residential - Time of Use						
# of Customers	19,530	19,194	19,511	19,623	19,788	19,955
kWh	210,212,474	213,770,412	207,797,230	203,392,794	197,672,942	193,851,901
kW						
Variance Analysis						
# of Customers		-1.72%	-0.10%	0.48%	1.32%	2.18%
kWh		1.69%	-1.15%	-3.24%	-5.97%	-7.78%
kW		0.00%	0.00%	0.00%	0.00%	0.00%
General Service less than 50 kW						
# of Customers	1,694	1,710	1,710	1,701	1,699	1,696
kWh	54,285,767	56,941,928	56,899,095	51,541,092	49,237,943	47,621,962
kW						
Variance Analysis						
# of Customers		0.94%	0.94%	0.41%	0.30%	0.12%
kWh		4.89%	4.81%	-5.06%	-9.30%	-12.28%
kW		0.00%	0.00%	0.00%	0.00%	0.00%
General Service 50 to 999 kW						
# of Customers	176	200	207	198	214	232
kWh	117,338,024	116,558,152	119,703,999	130,517,151	138,229,341	147,798,837
kW	328,299	313,360	321,135	362,946	366,438	391,807
Variance Analysis						
# of Customers		13.64%	17.61%	12.50%	21.59%	31.82%
kWh		-0.66%	2.02%	11.23%	17.80%	25.96%
kW		-4.55%	-2.18%	10.55%	11.62%	19.34%
General Service 1,000 to 4,999 kW						
# of Customers	13	12	13	13	14	14
kWh	108,192,394	101,713,650	111,612,294	116,678,000	116,626,356	116,864,174
kW	293,909	289,209	296,492	307,815	314,658	315,299
Variance Analysis						
# of Customers		-7.69%	0.00%	0.00%	7.69%	7.69%
kWh		-5.99%	3.16%	7.84%	7.80%	8.02%
kW		-1.60%	0.88%	4.73%	7.06%	7.28%
Sentinel Lighting						
# of Connections	175	153	177	170	173	176
kWh	380,342	439,446	443,840	448,279	456,481	464,833
kW	810	650	676	703	622	633
Variance Analysis						
# of Connections		-12.57%	1.14%	-2.86%	-1.14%	0.57%
kWh		15.54%	16.69%	17.86%	20.02%	22.21%
kW		-19.75%	-16.54%	-13.21%	-23.21%	-21.85%

Table IRR - 30 : Revised Board Appendix 2-IA (cont'd)

	2012 Board Approved	2012	2013	2014	2015 Bridge	2016 Test
Street Lighting						
# of Connections	4,474	4,417	4,477	4,477	4,507	4,538
kWh	2,778,881	2,762,363	2,769,251	2,782,603	2,127,971	1,466,975
kW	7,820	7,681	7,731	7,764	5,933	4,090
Variance Analysis						
# of Connections		-1.27%	0.07%	0.07%	0.74%	1.43%
kWh		-0.59%	-0.35%	0.13%	-23.42%	-47.21%
kW		-1.78%	-1.14%	-0.72%	-24.13%	-47.70%
Unmetered Scattered Load						
# of Connections	175	151	146	147	149	150
kWh	838,540	892,750	900,265	923,011	927,563	932,138
kW						
Variance Analysis						
# of Connections		-13.71%	-16.57%	-16.00%	-14.86%	-14.29%
kWh		6.46%	7.36%	10.07%	10.62%	11.16%
kW		0.00%	0.00%	0.00%	0.00%	0.00%
Totals						
Customers / Connections	26,237	25,837	26,241	26,329	26,544	26,761
kWh	494,026,422	493,078,701	500,125,974	506,282,930	505,278,597	509,000,820
kW from applicable classes	630,838	610,900	626,034	679,228	687,651	711,829
Totals - Variance						
Customers / Connections		-1.52%	0.02%	0.35%	1.17%	2.00%
kWh		-0.19%	1.23%	2.48%	2.28%	3.03%
kW from applicable classes		-3.16%	-0.76%	7.67%	9.01%	12.84%

3-Staff-23

Ref: Exh 3 page 18, CDM Impacts for LRAMVA

Please provide a table that lists all the appropriate OPA CDM Initiatives that produced net CDM savings which were used in the LRAMVA calculations. For each rate class, please list all relevant CDM initiatives in the applicable year and provide the subsequent net CDM savings for each. An example is provided below:

Residential	Net kWh	Net kW
Initiative 1		
Initiative 2		
Initiative 3		
Total		
Volumetric Rate Used		
Lost Revenues		
GS < 50 kW	Net kWh	Net kW
Initiative 1		
Initiative 2		
Initiative 3		
Total		
Volumetric Rate Used		
Lost Revenues		
GS > 50 kW	Net kWh	Net kW
Initiative 1		
Initiative 2		
Initiative 3		
Total		
Volumetric Rate Used		
Lost Revenues		
Other classes (e.g., Streetlighting, Large Use, etc.), as needed	Net kWh	Net kW
Initiative 1		
Initiative 2		
Initiative 3		
Total		
Volumetric Rate Used		
Lost Revenues		

A separate table should be provided for each year.

Response:

The CDM initiatives that produced the net CDM savings which were used in the revised LRAMVA calculations for each year are shown in Tables IRR - 31 to IRR - 34.

Table IRR - 31 : 2011 CDM Savings by Program - IESO Final Report

Residential CDM Savings		
Program	kWh	kW
Appliance Retirement	94,294	
Appliance Exchange	1,192	
HVAC Incentives	319,154	
Conservation Instant Coupon Booklet	104,256	
Bi-Annual Retailer Event	160,889	
Residential Demand Response	257	
Residential New Construction	-	
Home Assistance Program	-	
Time-of-Use CDM Savings	-	
Total Residential Savings	680,042	
Volumetric Rate Uses	\$ 0.0119	
Lost Revenues	\$ 9,759.40	
GS < 50 kW CDM Savings		
Program	kWh	kW
Direct Install Lighting	97,298	
Total GS < 50 kW CDM Savings	97,298	
Volumetric Rate Uses	\$ 0.0088	
Lost Revenues	\$ 1,028.68	
GS > 50 kW CDM Savings		
Program	kWh	kW
Retrofit	377,208	48
New Construction	-	-
Energy Audit	-	-
Demand Response 3	3,050	78
Electricity Retrofit Incentive Program	214,036	40
High Performance New Construction	417	-
Adjustments to 2011 Verified Results	-	-
Adjustments to 2012 Verified Results	-	-
Adjustments to 2013 Verified Results	-	-
Total GS > 50 kW CDM Savings	594,711	166
Volumetric Rate Uses		\$ 3.3885
Lost Revenues	\$ 617.18	
GS > 1,000 kW CDM Savings		
Program	kWh	kW
Energy Audit	-	-
Demand Response 3	-	-
Retrofit	103,574	16
Demand Response 3	24,735	421
Electricity Retrofit Incentive Program	392,250	73
High Performance New Construction	765	-
Adjustments to 2011 Verified Results	-	-
Adjustments to 2012 Verified Results	-	-
Adjustments to 2013 Verified Results	-	-
Total GS > 1,000 kW CDM Savings	521,324	510
Volumetric Rate Uses		\$ 3.6066
Lost Revenues	\$ 2,019.95	
Total (kWh / kW)	1,893,375	676
Total Lost Revenues	\$	13,425.20

Table IRR - 32 : 2012 CDM Savings by Program - IESO Final Report

Residential CDM Savings		
Program	kWh	kW
Appliance Retirement	44,553	
Appliance Exchange	4,504	
HVAC Incentives	152,190	
Conservation Instant Coupon Booklet	7,655	
Bi-Annual Retailer Event	146,623	
Residential Demand Response	2,046	
Residential New Construction	-	
Home Assistance Program	-	
Time-of-Use Savings	-	
Total Residential CDM Savings	357,571	
Volumetric Rate Uses	\$ 0.0116	
Lost Revenues	\$ (14,937.99)	
GS < 50 kW CDM Savings		
Program	kWh	kW
Direct Install Lighting	35,757	
Total GS < 50 kW CDM Savings	35,757	
Volumetric Rate Uses	\$ 0.0084	
Lost Revenues	\$ (3,445.54)	
GS > 50 kW CDM Savings		
Program	kWh	kW
Retrofit	1,766,601	264
New Construction	-	-
Energy Audit	-	-
Demand Response 3	1,139	78
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	330	1
Adjustments to 2011 Verified Results	(31,613)	(21)
Adjustments to 2012 Verified Results	-	-
Adjustments to 2013 Verified Results	-	-
Total GS > 50 kW CDM Savings	1,736,457	322
Volumetric Rate Uses		\$ 3.3298
Lost Revenues		\$ (372.73)
GS > 1,000 kW CDM Savings		
Program	kWh	kW
Energy Audit	-	-
Demand Response 3	-	-
Retrofit	-	-
Demand Response 3	6,964	289
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	269	0
Adjustments to 2011 Verified Results	(25,736)	(17)
Adjustments to 2012 Verified Results	-	-
Adjustments to 2013 Verified Results	-	-
Total GS > 1,000 kW CDM Savings	(18,503)	272
Volumetric Rate Uses		\$ 3.1671
Lost Revenues		\$ 3,203.24
Total (kWh / kW)	2,111,282	594
Total Lost Revenues	\$	(16,126.00)

Table IRR - 33 : 2013 CDM Savings by Program - IESO Final Report

Residential CDM Savings		
Program	kWh	kW
Appliance Retirement	25,479	
Appliance Exchange	7,758	
HVAC Incentives	164,883	
Conservation Instant Coupon Booklet	42,197	
Bi-Annual Retailer Event	94,055	
Residential Demand Response	962	
Residential New Construction	-	
Home Assistance Program	127,118	
Time-of-Use Savings	-	
Total Residential CDM Savings	462,452	
Volumetric Rate Uses	\$ 0.0115	
Lost Revenues	\$ (3,915.20)	
GS < 50 kW CDM Savings		
Program	kWh	kW
Direct Install Lighting	31,355	
Total GS < 50 kW CDM Savings	31,355	
Volumetric Rate Uses	\$ 0.0083	
Lost Revenues	\$ (3,445.54)	
GS > 50 kW CDM Savings		
Program	kWh	kW
Retrofit	647,285	131
New Construction	-	-
Energy Audit	-	-
Demand Response 3	1,061	79
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	-	-
Adjustments to 2011 Verified Results	-	-
Adjustments to 2012 Verified Results	40,076	8
Adjustments to 2013 Verified Results	-	-
Total GS > 50 kW CDM Savings	688,422	218
Volumetric Rate Uses		\$ 3.3350
Lost Revenues		\$ 521.36
GS > 1,000 kW CDM Savings		
Program	kWh	kW
Energy Audit	-	-
Demand Response 3	-	-
Retrofit	-	-
Demand Response 3	18,771	824
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	-	-
Adjustments to 2011 Verified Results	-	-
Adjustments to 2012 Verified Results	34,579	7
Adjustments to 2013 Verified Results	-	-
Total GS > 1,000 kW CDM Savings	53,350	831
Volumetric Rate Uses		\$ 3.0245
Lost Revenues		\$ (2,797.51)
Total (kWh / kW)	1,235,579	1,049
Total Lost Revenues	\$	(9,636.88)

Table IRR - 34 : 2014 CDM Savings by Program - IESO Final Report

Residential CDM Savings		
Program	kWh	kW
Appliance Retirement	34,352	
Appliance Exchange	13,300	
HVAC Incentives	186,909	
Conservation Instant Coupon Booklet	154,153	
Bi-Annual Retailer Event	672,862	
Residential Demand Response	-	
Residential New Construction	149,950	
Home Assistance Program	26,376	
Time-of-Use Savings	-	
Total Residential CDM Savings	1,237,902	
Volumetric Rate Uses	\$ 0.0117	
Lost Revenues	\$ 3,881.64	
GS < 50 kW CDM Savings		
Program	kWh	kW
Direct Install Lighting	76,510	
Total GS < 50 kW CDM Savings	76,510	
Volumetric Rate Uses	\$ 0.0084	
Lost Revenues	\$ (3,163.32)	
GS > 50 kW CDM Savings		
Program	kWh	kW
Retrofit	1,553,508	274
New Construction	126,132	24
Energy Audit	70,080	16
Demand Response 3	-	54
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	-	-
Adjustments to 2011 Verified Results	234,778	51
Adjustments to 2012 Verified Results	361	-
Adjustments to 2013 Verified Results	585,130	111
Total GS > 50 kW CDM Savings	2,569,989	530
Volumetric Rate Uses		\$ 3.3826
Lost Revenues		\$ (7,578.52)
GS > 1,000 kW CDM Savings		
Program	kWh	kW
Energy Audit	60,467	11
Demand Response 3	-	-
Retrofit	-	-
Demand Response 3		370
Electricity Retrofit Incentive Program	-	-
High Performance New Construction	-	-
Adjustments to 2011 Verified Results	202,573	37
Adjustments to 2012 Verified Results	311	-
Adjustments to 2013 Verified Results	504,867	79
Total GS > 1,000 kW CDM Savings	768,218	497
Volumetric Rate Uses		\$ 3.1010
Lost Revenues		\$ (339.81)
Total (kWh / kW)	4,652,619	1,027
Total Lost Revenues	\$	(7,200.01)

3-Energy Probe-15

Ref: Exhibit 3, Tab 1, Schedule 1, page 12

- a) Please explain why HHHI used a 3 year average to calculate growth in the number of customers rather than a 5 year average, similar to what was used to calculate the kW forecast.
- b) Please provide the actual number of customers for each rate class by month for 2015 for which data is available.

Response:

- a) Please refer to 3.0-VECC-14 part (a).
- b) The 2015 customer numbers by month are shown in Table IRR - 35 below:

Table IRR - 35 : 2015 Customer Numbers by Class and Month

Class	2015											
	Customers / Connections											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Residential	19,627	19,628	19,619	19,623	19,628	19,645	19,662	19,644	19,647	19,678	19,752	
General Service less than 50 kW	1,687	1,690	1,707	1,695	1,708	1,724	1,768	1,824	1,870	1,935	1,914	
General Service 50 to 999 kW	198	197	195	198	198	200	199	198	198	197	193	
General Service 1,000 to 4,999 kW	13	13	13	13	13	13	13	13	13	13	13	
Un-metered Scattered Load	147	147	147	147	145	145	146	146	144	144	144	
Sentinel Lighting	169	169	168	170	177	175	173	173	172	172	172	
Street Lighting	4,478	4,481	4,481	4,481	4,481	4,481	4,481	4,481	4,481	4,595	4,595	
microFIT	107	108	103	106	110	110	111	112	114	117	118	
FIT	6	6	6	6	6	8	8	8	8	8	8	
Total Customers / Connections	26,432	26,439	26,439	26,439	26,466	26,501	26,561	26,599	26,647	26,859	26,909	-

3-Energy Probe-16

Ref: Exhibit 3, Load Forecast Excel Model

- a) Please explain why the number of peak hours in 2016 of 4,016 is the same as in 2014 and 2015 despite 2016 being a leap year.
- b) Please provide the actual kWh's for the Outlet Mall by month from August 2013 through to the most recent month available in 2015.

Response:

- a) HHHI has corrected the number of peak hours in February 2016 and revised the load forecast model to reflect this change along with the changes discussed in response to VECC interrogatory 3.0-VECC-9.
- b) The actual kWhs for the Outlet Mall, by month, are shown in Table IRR - 36 below.

Table IRR - 36 : Outlet Mall Consumption by Month

Year	Month	kWhs
13	3	-
13	4	33,360
13	5	71,880
13	6	123,960
13	7	312,480
13	8	683,040
13	9	667,800
13	10	675,120
13	11	782,168
13	12	680,713
14	1	624,811
14	2	568,170
14	3	625,449
14	4	575,576
14	5	625,166
14	6	683,319
14	7	704,216
14	8	739,120
14	9	669,757
14	10	629,375
14	11	672,851
14	12	730,843
15	1	691,184
15	2	605,755
15	3	633,502
15	4	598,503
15	5	654,221
15	6	662,625
15	7	757,475
15	8	751,852
15	9	703,570
15	10	611,489
Total		18,549,349

3-Energy Probe-17

Ref: Exhibit 3, page 11

Are the figures in Table 3-5, and by extension those in Table 3-7 supposed to be year end figures or June figures for each month, or some other calculation such as the average for the year?

Response:

The number of customers and connections in Table 3-5 and Table 3-7 are year-end figures.

3-Energy Probe-18

Ref: Exhibit 3, Tab 3, Schedule 1

- a) Please confirm that the figures in Table 3-21C do not include any revenues or expenses associated with CDM programs or deferral and variance account interest. If this cannot be confirmed, please update Tables 3-21C through 3-21F to reflect removal of these amounts.
- b) Please provide a table that shows the most recent available year-to-date actuals for 2015 in the same level of detail as shown in bottom part of Table 3-21C (specific service charges, late payment charges, other operating revenue and other income and deductions), along with figures for the corresponding period in 2014.

Response:

- a) HHHI confirms figures in Table 3-21C do not include any revenues or expenses associated with CDM programs. Included in table 3-21C is interest income associated with deferral and variance account interest – 2015 Bridge \$100,000 and 2016 Test \$100,000
- b) Table IRR - 37 shows the most recent available year-to-date actuals for 2015.

Table IRR - 37 : Revised Board Appendix 2-H: Other Operating Revenue – Including 2015 Year-to-Date Actuals (as available)

USoA #	USoA Description	Actual Year	FORECAST	Test Year
		2014	2015	2016
<i>Reporting Basis</i>		CGAAP	MIFRS	MIFRS
4235	Specific Service Charges	\$ 336,651	\$ 369,500	\$ 375,470
4225	Late Payment Charges	\$ 107,919	\$ 120,000	\$ 120,000
4080	Distribution Services Revenue (4080)	\$ 25,764	\$ 71,160	\$ 72,160
4210	Rent from Electric Property (4210)	\$ 166,859	\$ 175,000	\$ 171,914
	MicroFit Revenue	\$ -	\$ -	\$ -
4325	Revenues from Merchandising Jobbing, etc. (4325)	\$ 30,329	\$ 50,000	\$ 50,000
4355	Gain on Disposition og Utility Property (4355)	\$ -	\$ 40,823	\$ 40,000
4375	Revenues from Non-Utility Operations (4375)	\$ 323,026	\$ 331,697	\$ 331,697
4375	Revenues from Non-Utility Operations (4375)	\$ 125,431	\$ -	\$ -
4385	Non-Utility Rental Income (4385)	\$ 28,931	\$ 25,700	\$ 21,600
	Sale of Vehicle	\$ -	\$ -	\$ -
4405	Interest and dividend income (4405)	\$ 87,678	\$ 75,300	\$ 100,000
Specific Service Charges		\$ 336,651	\$ 369,500	\$ 375,470
Late Payment Charges		\$ 107,919	\$ 120,000	\$ 120,000
Other Operating Revenues		\$ 192,623	\$ 246,160	\$ 244,074
Other Income or Deductions		\$ 595,395	\$ 523,520	\$ 543,297
Total		\$ 1,232,588	\$ 1,259,180	\$ 1,282,841

3-Energy Probe-19

Ref: Exhibit 3, Tab 3, Schedule 1

- a) Where in Table 3-21D or Table 3-21F are the net proceeds from the sale of vehicles shown and are what are these net proceeds in each of 2015 and 2016? If there are such proceeds, please explain why there are not disposals shown in 2015 or 2016 for vehicles in the asset continuity schedules in Exhibit 2.
- b) Please explain the lower level of miscellaneous income forecast for 2015 and 2016 as compared to the four previous years as shown in Table 3-21D.
- c) Where has HHHI recorded revenues from microfit customers in Table 3-21E?
- d) What is the forecast of microfit revenue in 2016?
- e) Why is there no forecast associated with accounts 4082, 4084 and 4086 shown in Table 3-21E in any year other than 2014? Where are these revenues recorded in 2015 and 2016?

Response:

- a) Proceeds from vehicle sales are shown in Table 3-21F – Gain on Disposition of Utility Property (4355). The Net Book Value is zero for the vehicles to be disposed of in 2015 and 2016; hence the dispositions are not reflected in the asset continuity schedules in Exhibit 2.
- b) Miscellaneous revenue as shown in Table 3-21D reflects recoverable costs for technical service layouts, isolation of Customer owned transformer, locates. Service requests year-over-year will vary. Example - 2014 a one-time customer request for technical services layout resulted in additional revenue of \$14,553. The forecast for 2015 and 2016 does not take into consideration “lumpy” one-time request.
- c) Microfit revenue is recorded as Operating Revenue – Table 3-21A Summary of Operating Revenue
- d) The 2016 microfit forecast revenue is \$8,003.
- e) The forecast associated with accounts 4082, 4084 and 4086 are shown in Table IRR - 38 below.

Table IRR - 38 : Forecasted Revenue – USofA 4082, 4084 and 4086

USofA	2015	2016
Retail Service Revenue (4082)	\$ 11,000	\$ 11,000
Service Transaction Requests - STR (4084)	\$ 160	\$ 160
SSS Admin Revenue (4086)	\$ 60,000	\$ 61,000
Total	\$ 71,160	\$ 72,160

3-Energy Probe-20

Ref: Exhibit 3, Tab 3, Schedule 1, page 34

The evidence indicates that the \$125,431 shown in Table 3-21F in 2014 for revenues from non-utility operations was related to HHHI assisting the Town of Halton Hills in the ice storm clean up.

- a) Is the \$125,431 the gross revenue received by HHHI, or the net revenue, net of costs incurred to assist the town?
- b) What were the costs incurred to assist the town and where were these costs included?

Response:

- a) The \$125,431 is gross revenue received by HHH to assist the Town of Halton Hills in the ice storm clean-up.
- b) The OM&A costs incurred to assist the Town of Halton Hills include:
 - Labour
 - Vehicles
 - Burdens

3-SEC-25

Ref: [3/1/1, p. 11]

Please explain the large increase in GS>50 customers in 2012.

Response:

HHHI revises processes and procedures with the intent of ensuring the most accurate data is produced and analyzed at any given time. In 2012, HHHI determined that a number of General Service 50-999 customers were billed at the General Service less than 50 kW classification. HHHI re-classified these customers to the correct General Service 50 to 999 kW class.

3-SEC-26

Ref: [3/1/2, p. 22]

Please confirm that the 11 year average for GS>50 is 0.3037 and that using the 11 year average rather than the 5 year average would result in forecast kW approximately 10% higher for that class. Please provide all studies, reports and other evidence available to the Applicant showing that the 5 year average is a better predictor of the Test Year relationship between kW and kWh than the 11 year average.

Response:

HHHI has calculated the 11-year average as 0.2758%. Using the 11-year average results in a forecast kW that is only 0.1% lower than that calculated with the 5-year average. HHHI submits that the difference in the forecast of kW using the 11-year average instead of the 5-year average is not material. Please see Table IRR - 39 for details.

Table IRR – 39 : Impact of 11 Year Average to 5 Year Average

Impact of Using 11-year Relationship of kW to kWh for the GS > 50 kW Rate Class	
Forecasted kWh	141,978,525
Relationship between kWh and kW:	
5-year average	0.2760%
Forecasted kW	391,918
11-year average	0.2758%
Forecasted kW	391,579
Difference in kW load forecast	-0.1%

3-VECC-9

**Reference: E3/T1/S1, pages 3-5
Load Forecast Excel Model, Power Purchases Tab**

- a) Why for the CDM variable used in the Load Forecast Model (Power Purchases Tab, Column C) is there no mark-up for losses applied to the 2008 values?
- b) Why, for December 2009, is the mark-up for losses use for the WMP different from that used for CDM (Power Purchases Tab, Column C)?

Response:

- a) HHHI inadvertently omitted the mark-up for losses applied to the 2008 values. HHHI is filing a revised load forecast which takes into account the adjustments resulting from interrogatories:
 - 3-Energy Probe-16
Update the number of peak hours in February 2016 to reflect that 2016 is a leap year.
 - 3.0-VECC-9
Update loss factors used in the Purchased Power tab of the load forecast.
 - 3.0 –VECC -12
Add the billed kWh for the Wholesale Market Participant to the GS > 50 kW rate class
 - 3.0-VECC-15
Allocate CDM savings attributed to the conversion to LED street lights to the street lighting rate class.
 - 4.0-VECC-27
Update CDM impact on the load forecast based on the IESO's final 2011-2014 Final Results Report.

The regression statistics are provided below in Table IRR - 40.

Table IRR – 40 : Revised Load Forecast Regression Statistics

SUMMARY OUTPUT					
<i>Regression Statistics</i>					
Multiple R	97.15%				
R Square	94.39%				
Adjusted R Square	94.06%				
Standard Error	889,017				
Observations	144				
ANOVA					
	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>	<i>Significance F</i>
Regression	8	1,794,940,939,566,550	224,367,617,445,818	284	0
Residual	135	106,697,462,248,520	790,351,572,211		
Total	143	1,901,638,401,815,070			
	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>	<i>Lower 95%</i>
Intercept	(34,752,074.25)	3,309,038.26	(10.50)	0.00	(41,296,333.66)
Heating Degree Days	9,993.76	491.49	20.33	0.00	9,021.74
Cooling Degree Days	61,355.59	2,959.89	20.73	0.00	55,501.83
Number of Days in Month	958,001.33	106,888.10	8.96	0.00	746,609.56
Spring Flag	(1,756,816.54)	231,609.24	(7.59)	0.00	(2,214,868.34)
Number of Customers	1,515.90	63.34	23.93	0.00	1,390.64
Number of Peak Hours	18,667.93	4,892.98	3.82	0.00	8,991.12
Fall Flag	(733,720.76)	239,960.38	(3.06)	0.00	(1,208,288.55)
Outlet Mall	935,177.93	256,290.32	3.65	0.00	428,314.54

The revised forecast of 509,000,819 kWhs is detailed in Table IRR - 41 below.

Table IRR - 41 : Revised HHHI Weather Normalized Load Forecast – Including Impact of CDM

	2012 Actual	2013 Actual	2014 Actual	2015 Weather Normal	2016 Weather Normal
Actual kWh Purchases	516,827,036	523,333,728	534,204,473		
Predicted kWh Purchases	521,850,747	524,091,202	533,291,671	534,551,738	538,491,578
% Difference	1.0%	0.1%	-0.2%		
Billed kWh	493,078,700	500,125,975	506,282,929	505,278,597	509,000,819
By Class					
Residential					
Customers	19,194	19,511	19,623	19,788	19,955
kWh	213,770,412	207,797,230	203,392,794	197,672,942	193,851,901
GS<50					
Customers	1,710	1,710	1,701	1,699	1,696
kWh	56,941,928	56,899,095	51,541,092	49,237,943	47,621,962
GS>50 to 999					
Customers	200	207	198	214	232
kWh	116,558,152	119,703,999	130,517,151	138,229,341	147,798,837
kW	313,360	321,135	362,946	366,438	391,807
GS> 1000 to 4999					
Customers	12	13	13	14	14
kWh	101,713,650	111,612,294	116,678,000	116,626,356	116,864,174
kW	289,209	296,492	307,815	314,658	315,299
Sentinels					
Connections	153	177	170	173	176
kWh	439,446	443,840	448,279	456,481	464,833
kW	650	676	703	622	633
Streetlights					
Connections	4,417	4,477	4,477	4,507	4,538
kWh	2,762,363	2,769,251	2,782,603	2,127,971	1,466,975
kW	7,681	7,731	7,764	5,933	4,090
USL					
Connections	151	146	147	149	150
kWh	892,750	900,265	923,011	927,563	932,138
Total of Above					
Customer/Connections	25,837	26,241	26,330	26,544	26,761
kWh	493,078,700	500,125,974	506,282,929	505,278,597	509,000,819
kW from applicable classes	610,899	626,034	679,228	687,651	711,829

- b) In preparing the load forecast, HHHI used the loss factor value calculated in the Rate Class Energy Model tab of the load forecast model. As the inputs to the model were fine-tuned, the loss factors were not updated (as this is a circular calculation). HHHI has updated the Power

Purchases Tab with the recalculated loss factors.

3-VECC-10

**Reference: E3/T1/S1, pages 3-5
Load Forecast Excel Model, CDM Tab**

- a) Please provide the source for the pre-2011 CDM results presented in the CDM Tab, Column B (Rows 3-11) and confirm that the values have been adjusted to account for any loss in the persistence of previous years' program impacts.
- b) Please provide the source for the 2011-2015 CDM results presented in Column C (Rows 8-11) and confirm that the values have been adjusted to account for any loss in the persistence of previous years' program' impacts.
- c) Please reconcile the 2011-2014 CDM results shown in the CDM Tab with those reported by the IESO in Exhibit 4, Appendix 4H, Table 5.

Response:

- a) The pre-2011 CDM results are from the 2006 to 2010 Final CDM results issued by the Ontario Power Authority (now the Independent Electricity Systems Operator). The values are adjusted in each year to account for any loss in the persistence of previous years' program impacts. An electronic copy of the 2006 to 2010 Final CDM results will be filed separately through RESS.
- b) The 2011 to 2015 CDM results presented in Column C (Rows 8-11) are from the 2014 Q4 Preliminary CDM results provided by the IESO on April 8, 2015.

HHHI confirms that the values have been adjusted to account for any loss in the persistence of previous years' program impacts.

- c) The 2011 to 2014 CDM results provided in Exhibit 4, Appendix 4H, Table 5 are from the IESO's Draft 2011-2014 Final Results Report provided by the IESO on July 31, 2015. This report contains more up to date information than the Q4 Preliminary CDM Results Report used in the load forecast.

HHHI is proposing that it is appropriate to update its load forecast and LRAM calculations based on the 2011-2014 Final Results Report issued by the IESO on September 3, 2015.

3-VECC-11

Reference: E3/T1/S1, page 6

a) Is the Outlet Mall one customer or 85 separate customers?

Response:

a) The Outlet Mall consists of 8 meters, all currently in the General Service 50 to 999 kW class.

3-VECC-12

Reference: E3/T1/S1, page 10 (lines 12-15)

- a) Please explain how the historical loss factor for each year (2003-2014) was determined and, in particular, how the load for the customer that was a Wholesale Market Participant for part of the period was treated in the derivation.

Response:

- a) As discussed in response 3.0-VECC-9, HHHI used the historical loss factor value calculated in the Rate Class Energy Model tab of the load forecast model.

In its Application, the billed load for the period that the customer was a Wholesale Market Participant was added to the billed kWh for the General Service 1,000 to 4,999 kW rate class and the billed kWh were adjusted by the loss factor and added to the purchased kWh.

HHHI notes that that the Wholesale Market Participant is in the General Service 50 to 999 kW rate class rather than the General Service 1,000 to 4,999 kW rate class. HHHI has added the billed load to the billed kWh for the General Service 50 to 999 kW rate class in the revised forecast provided in response to 3.0-VECC-9.

3-VECC-13

Reference: E3/T1/S1, page 11
Cost Allocation Excel Model, Customer Data Tab

- a) It is noted that, in the Cost Allocation Model, the number of Street Lighting devices and connections are the same. Please confirm that all of HHHI's Street Lighting devices are each served by its distribution system via a separate connection (i.e., no daisy-chaining).

Response:

- a) Each streetlight has its own photovoltaic eye and is treated separately in cost allocation.

3-VECC-14

Reference: E3/T1/S1, pages 12-13

- a) Please explain why the three-year growth rate was selected as the basis for forecasting customer/connection count.
- b) Please confirm that, for purposes of Table 3-8, the CDM savings achieved by customer class over the 2006-2014 period, were added back into each class' billed energy.

Response:

- a) HHHI selected the three-year growth rate to forecast the number of customers/connection as there were a number of anomalies in the data prior to 2012. HHHI also notes that the growth rates in the previous three years are more reflective of current growth rates.
- b) HHHI confirms that, for the purposes of Table 3-8, the CDM savings achieved by customer class over the 2006-2014 periods were added back into the billed energy for each rate class.

3-VECC-15

Reference: E3/T1/S1, pages 17-21

- a) Please provide the sources for the 2016 persistent CDM savings from: i) Pre 2011 CDM Programs (5,181) and ii) 2011-2014 CDM programs (7,343) used in Table 3-14.
- b) How was the 2016 impact of the Pre 2011 CDM Programs allocated to customer classes?
- c) How was the 2016 impact of the 2011-2014 CDM Programs allocated to customer classes?
- d) Please provide a copy HHHI's 2015-2020 CDM Plan as submitted to the IESO earlier this year.
- e) How was the 2,946,667 kWh of CDM savings from 2015 and 216 programs allocated to customer classes for purposes of Table 3-15D.
- f) How was the 4,420,000 kWh of CDM savings for the 2016 LRAMVA allocated to customer classes for purposes of Table 3-16.
- g) Will the Town of Halton Hills' street light conversion be done under the auspices of an IESO CDM program? If yes, why is it not included the LRAMVA volumes?

Response:

- a)
 - i. The source for the 2016 persistent CDM savings from Pre-2011 Programs of 5,181 is the 2006 to 2010 Final CDM Results issued by the Ontario Power Authority (now the Independent Electricity Systems Operator). The applicable section of the report is provided in Table IRR - 42.

Table IRR - 42 : Net Energy Savings (MWh) for HHHI – 2016 Persistence

#	Initiative Name	Program Name	Program Year	Results Status	2016
2	Cool & Hot Savings Rebate	Consumer	2006	Final	# 51
3	Every Kilowatt Counts	Consumer	2006	Final	# 215
7	Cool & Hot Savings Rebate	Consumer	2007	Final	# 105
8	Every Kilowatt Counts	Consumer	2007	Final	# 51
10	Summer Savings	Consumer	2007	Final	# 29
13	Social Housing Pilot	Consumer LowIncome	2007	Final	# 60
19	Renewable Energy Standard Offer	Consumer, Business, Industrial	2007	Final	# 4
20	Great Refrigerator Roundup	Consumer	2008	Final	# 86
21	Cool Savings Rebate	Consumer	2008	Final	# 127
22	Every Kilowatt Counts Power Savings Event	Consumer	2008	Final	# 232
23	peaksaver®	Consumer, Business	2008	Final	# 4
24	Summer Sweepstakes	Consumer	2008	Final	# 43
25	Electricity Retrofit Incentive	Consumer, Business	2008	Final	# 233
27	High Performance New Construction	Business	2008	Final	# 1
36	Cool Savings Rebate	Consumer	2009	Final	# 156
37	Every Kilowatt Counts Power Savings Event	Consumer	2009	Final	# 200
39	Electricity Retrofit Incentive	Consumer, Business	2009	Final	# 678
41	High Performance New Construction	Business	2009	Final	# 31
42	Power Savings Blitz	Business	2009	Final	# 1,446
54	Cool Savings Rebate	Consumer	2010	Final	# 152
55	Every Kilowatt Counts Power Savings Event	Consumer	2010	Final	# 35
57	Electricity Retrofit Incentive	Consumer, Business	2010	Final	# 285
59	High Performance New Construction	Business	2010	Final	# 109
60	Power Savings Blitz	Business	2010	Final	# 603
61	Multi-Family Energy Efficiency Rebates	Consumer, Consumer LowIncome	2010	Final	# 244
2006 Subtotal					266
2007 Subtotal					251
2008 Subtotal					726
2009 Subtotal					2,512
2010 Subtotal					1,428
Overall Total					5,181

- ii. The source for the 2016 persistent savings for 2011 to 2014 CDM programs is the Final Verified 2013 CDM Report and the 2014 Q4 Preliminary CDM Results as shown in Table IRR - 43 below.

For the purpose of the load forecast, HHHI has assumed that 2014 CDM savings will persist into 2016.

On page 7 of the 2011 – 2014 Final Results Report, the IESO states that “Energy efficiency resources persist for the duration of the effective useful life. Demand response resources persist for 1 year.” Since HHHI did not achieve any savings from demand response activities in 2014, HHHI submits that it is reasonable to expect that 2014 savings will persist into 2016 for the purposes of forecasting load.

Table IRR - 43 : HHHI Net Energy Savings at the End User Level (GWh)

Implementation Period	2011	2012	2013	2014	2011-2014
2011 - Verified	1.893	1.893	1.893	1.800	7.480
2012 - Verified		2.111	2.111	2.111	6.334
2013 - Verified			1.236	1.185	2.420
2014				2.248	2.248
Total	1.893	4.005	5.240	7.343	18.482

- b) The 2006 to 2010 Final CDM Results provides the 2016 CDM impacts by program. The 2016 impact of the pre-2011 CDM programs were allocated to customer classes by program, in the same manner as in Exhibit 10, Tab 1, Schedule 3, Page 2 of HHHI's 2012 cost of service application (EB-2011-0271).
- Consumer programs are allocated to the residential rate class; and
 - The High Performance New Construction program, Power Savings Blitz and Renewable Energy Standard Offer Program (RESOP) are allocated to the General Service less than 50 kW rate class; and
 - The Electricity Retrofit Incentive Program is allocated between the General Service less than 50 kW, General Service 50 to 99 kW and General Service 1,000 to 4,999 kW in the same proportion as in HHHI's LRAM claim in its 2012 Cost of Service application.

- c) The 2016 impact of the 2011 to 2014 CDM Programs was allocated to customer classes based on the 2014 CDM results by Program provided in the IESO's 2014 Q4 Preliminary CDM Results.
- Consumer programs and the Home Assistance Program were allocated to the Residential rate class; and
 - Direct Install Lighting was allocated to the General Service less than 50 kW rate class; and
 - Business Retrofits and New Construction was allocated to the General Service 50 to 999 kW rate class; and
 - Industrial Retrofits and Demand Response was allocated to the General Service 1,000 to 4,999 rate class; and
 - The remaining programs are allocated between the General Service 50 to 999 kW and General Service 1,000 to 4,999 kW rate classes.

HHHI has updated the allocation of the 2016 impact of the 2011-2014 CDM Programs to each customer class in response to 3.0-VECC-9.

- d) A copy of HHHI's 2015-2020 CDM Plan is shown in Appendix IRR - D.
- e) The 2,946,667 kWh of persistent CDM savings was allocated to customer classes based on the 2014 CDM results by Program provided in the IESO's 2014 Q4 Preliminary CDM Results as discussed in response to part (c).

HHHI has updated the allocation of the 2016 impact of the 2011-2014 CDM Programs to each customer class in response to 3.0-VECC-9.

Table IRR - 44 : Revised 2016 CDM Savings by Rate Class for Load Forecast

Rate Class	kWh	kW
Residential	512,413	
General Service less than 50 kW	55,521	
General Service 50 to 999 kW	915,094	2,426
General Service 1,000 to 4,999 kW	789,568	2,130
Street Lighting	674,071	1,879
Total	2,946,667	6,435

- f) The 4,420,000 kWh of persistent CDM savings was allocated to customer classes based on the 2014 CDM results by Program provided in the IESO's 2014 Q4 Preliminary CDM Results as discussed in response to part (c).

HHHI has updated the allocation of the 2016 impact of the 2011-2014 CDM Programs to each customer class in response to 3.0-VECC-9.

Table IRR - 45 : Revised 2016 CDM Savings by Rate Class for the LRAMVA

Rate Class	kWh	kW
Residential	691,161	
General Service less than 50 kW	74,889	
General Service 50 to 999 kW	1,234,311	3,272
General Service 1,000 to 4,999 kW	1,064,997	2,873
Street Lighting	1,354,642	3,777
Total	4,420,000	9,922

- g) At the time that HHHI filed its application, there were questions whether the 2015-2020 CDM Program would continue to include incentives for the conversion to LED street lighting. Since then, it has been confirmed that the conversion to LED street lighting will be done under an IESO CDM program. HHHI has adjusted its forecast to allocate the 2016 CDM savings attributed to the street light conversion to its LRAM volumes and reflect the 2011-2014 Final CDM Report provided by the IESO.

Table IRR - 46 : CDM Impacts on the 2016 Load Forecast

CDM Impacts on the 2016 Load Forecast (MWh)	Application	Interrogatories
Load Forecast Excluding CDM	526,693	527,012
Deduct persistent CDM Savings		
Pre 2011 CDM Programs	5,181	5,181
2011 to 2014 CDM Programs	7,343	9,883
Sub Total	12,524	15,064
Manual CDM Adjustment for 2015 and 2016 CDM Programs	2,947	2,947
Total	15,471	18,011
Load Forecast Including Impact of CDM	511,222	509,001
Adjustment to Billed kWh - Conversion to LED streetlighting	1,355	-
Load Forecast Including Impact of CDM and LED streetlighting	509,867	509,001

3-VECC-16

Reference: E3/T3/S1, page 26

a) Where are the 2016 MicroFIT revenues accounted for?

Response:

a) Please refer to 3-Energy Probe-19 part (d).

3-VECC-17

Reference: E3/T3/S1, page 31

- a) Why, in Table 3-21C, are there two rows for Account 4375 and two separate entries for 2014?
- b) Where are the expenses associated with Non-Utility Operations (normally Account #4380) reported?

Response:

- a) This was an intentional presentation for 2014 to reflect the fact that the recovery of \$125,431 was a one-time event.
- b) Expenses are part of OM&A.