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February 13, 2009

BY EMAIL & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge St, Suite 2701
Toronto ON M4P 1E4

Dear Ms. Walli:

Board File No. EB-2008-0246
Tillsonburg Hydro Inc. – 2009 Rates Rebasing Application
Energy Probe Interrogatories

Pursuant to Procedural Order No. 2, issued by the Board on January 27, 2009, Energy Probe Research Foundation (Energy Probe) encloses two hard copies of its Interrogatories of Tillsonburg Hydro Inc. An electronic version of this communication will be filed in PDF format.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh
Case Manager

cc: Steve Lund, Tillsonburg Hydro Inc. (By email)
Bryan Drinkwater, Tillsonburg Hydro Inc. (By email)
Randy Aiken, Aiken & Associates (By email)
Intervenors of Record (By email)

Energy Probe Research Foundation 225 BRUNSWICK AVE., TORONTO, ONTARIO M5S 2M6

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Ontario Energy Board

IN THE MATTER OF the *Ontario Energy Board Act, 1998*,
S.O. 1998, c.15, (Schedule B);

AND IN THE MATTER OF an Application by Tillsonburg
Hydro Inc. for an order approving just and reasonable rates
and other charges for electricity distribution to be effective
May 1, 2009.

**INTERROGATORIES OF
ENERGY PROBE RESEARCH FOUNDATION
("ENERGY PROBE")**

February 13, 2009

**TILLSONBURG HYDRO INC.
2009 RATES REBASING CASE
EB-2008-0246**

**ENERGY PROBE RESEARCH FOUNDATION
INTERROGATORIES**

Interrogatory # 1

Ref: Exhibit 1, Tab 2, Schedule 6

Please identify whether the Manager, Regulatory Affairs and two Apprentice Linesmen that were to be recruited in 2008 are new positions or replacement positions.

Interrogatory # 2

Ref: Exhibit 1, Tab 2, Schedule 4, Attachment A

- a) Please add a column to the table showing the forecast full time equivalents for the 2009 test year.**
- b) Please indicate the three additional positions to be recruited as identified in Exhibit 1, Tab 2, Schedule 6 in the 2009 column added in response to part (a) above.**

Interrogatory # 3

Ref: Exhibit 1, Tab 2, Schedule 10

The following questions are based on the 2008 Financial Plan list of major assumptions.

- a) Did Ottawa Fibre resume operations in 2008? Will it resume operations in 2009?**
- b) i) Please provide the initial one-time cost to set up the new CIS billing system for billing and collecting.**
 - ii) Was this cost part of the expense paid to the Town of Tillsonburg under the Master Service Agreement?**
 - iii) What is the expected life of the new CIS billing system?**

- iv) **Is there any deferral/variance/regulatory asset account interest included in the 2009 revenue requirement or other revenue forecast? If yes, please quantify and identify where this amount is shown in the evidence.**
- c)
 - i) **Please provide a detailed break down of the costs incurred or to be incurred that are associated with the 2009 rate application.**
 - ii) **Over what period has THI proposed that the costs associated with the 2009 rate application be recovered from ratepayers? Please explain.**
 - iii) **Please provide a breakout of the expenses related to the 2009 rates application for each of a technical conference and an oral hearing.**
- d) **Please provide the 2008 tax rates that will actually apply to THI for each of the following levels of income (if applicable):**
 - i) **first \$500,000,**
 - ii) **next \$1,000,000**
 - iii) **all over \$1,500,000.**
- e)
 - i) **In the calculation of the depreciation expense, please confirm that EEM stands for Economic Evaluation Model. If this is not correct, please explain what EEM is.**
 - ii) **Please explain why the impact of the 2007 and 2008 EEM contributions are not reflected in the calculation of the depreciation expense.**
- f) **What rate of inflation has been forecast for 2008 and 2009?**

Interrogatory # 4

Ref: Exhibit 3, Tab 1, Schedule 3, Attachment B, Updated

- a) **What is included in the Other Income and Deductions of \$92,000 shown in 2008 related to?**
- b) **Why is there no revenue forecast for 2009 for this line item?**

Interrogatory # 5

Ref: Exhibit 1, Tab 3, Schedule 3

Please provide the pro forma 2008 financial statements that are to be provided at a later date.

Interrogatory # 6

Ref: Exhibit 1, Tab 3, Schedule 4, Updated

- a) The cost of power used is 6.03 cents/kWh. Please confirm that this cost is from the October, 2008 Navigant Report and is the average supply cost for RPP customers.**
- b) Based on the October, 2009 Navigant Report, what price applies to non-RPP customers?**
- c) Does Tillsonburg have any customers that are market participants? If yes, how is Tillsonburg charged for the power consumed by these customers and what rate is applied?**
- d) How has the cost of power forecast reflect the RPP and non-RPP customer/volume mix?**

Interrogatory # 7

Ref: Exhibit 2, Tab 1, Schedule 1, page 4

- a) Please explain why the conductors feeding into the Municipal Stations were originally recorded in account 1715.**
- b) Please confirm that the reclassification will not affect the gross asset values, accumulated depreciation or net book value of these assets.**
- c) Will there be any impact on the depreciation expense and/or rate used by THI of this reclassification?**

Interrogatory # 8

Ref: Exhibit 2, Tab 1, Schedule 1, page 6

- a) Please provide THI's actual and hypothetical capital structure that is used for rate making purposes in each of 2006 and 2007 as well as projections for 2008 and 2009.
- b) What is the impact on the CiAC from using the actual capital structure as opposed to the hypothetical capital structure used for rate making purposes? Is the amount of CiAC higher or lower as a result of using the actual capital structure?

Interrogatory # 9

Ref: Exhibit 2, Tab 1, Schedule 1, page 8

- a) Please provide a table that shows the gross cost associated with customer additions, the contributions and grants credited toward this cost and the net cost of customer additions for each of 2006 and 2007 along with the projections for 2008 and 2009. Please also include lines showing the number of customer additions in each year and the resulting average net cost per customer.
- b) Please explain any significant variances in the net cost per customer reported above.

Interrogatory # 10

Ref: Exhibit 2, Tab 1, Schedule 1, page 10 & 12

- a) Other than the impact of reducing distribution losses, will the voltage conversion program result in reducing any operating and/or maintenance costs? Please explain.
- b) How has the expected reduction in costs associated with the vegetation management program been reflected in the cost of service for 2009?

Interrogatory # 11

Ref: Exhibit 2, Tab 1, Schedule 1, page 15, Updated

- a) Please provide the actual cost of the voltage conversion program from the first year that it was implemented through 2007.
- b) Please provide the forecast cost for each of 2008, 2009 and through to the end of the current phase of the project.

Interrogatory # 12

Ref: Exhibit 2, Tab 1, Schedule 2, Attachment A1, Updated

Please explain why there is a negative net book value for account 1815 in both 2006 and 2007.

Interrogatory # 13

Ref: Exhibit 2, Tab 3, Schedule 3

- a) What portion of the existing stock of electro mechanical meters will be retired in 2009?
- b) Please provide a copy of the Board's current accounting direction that the meters that are removed from service should not be removed from rate base.
- c) What is the total gross asset, accumulated depreciation and net book value associated with these meters that will be removed from service but remain in rate base in 2009?
- d) If meters retired in 2009 are removed from rate base in 2009, how would THI calculate the depreciation expense associated with these meters for 2009? Would a full year of depreciation be calculated, or only a half year, similar to the approach for asset additions? Please explain and provide the full year depreciation cost associated with the meters that will be retired in 2009.
- e) Based on the Board's G-2008-0002 Guideline on Smart Meter Funding and Cost Recovery dated October 22, 2008, will THI be making any changes to its proposals related to the retired meters in 2009?

Interrogatory # 14

Ref: Exhibit 2, Tab 3, Schedule 2, Updated

THI has forecast capital expenditures of \$694,169 for the 2008 bridge year. What is the actual level of capital expenditures for 2008?

Interrogatory # 15

Ref: Exhibit 3, Tab 1, Schedule 1, Table 2, Updated

- a) Please provide a breakdown of the Other Operating Revenues for 2006, 2007, 2008 and 2009 into its components of rent, late payment charges, specific service charges and any other items that make up this total.**
- b) Please explain the significant increase in the 2008 forecast to \$94,000 in Other Operating Revenues in the updated forecast as compared to less than \$69,000 in the original filing.**
- c) Please provide the latest year-to-date Other Operating Revenues for 2008 in the same level of detail as provided in (a) above. Please also provide the corresponding year-to-date figures for 2007.**
- d) With respect to the investment income shown and forecast:**
 - i) Please explain what investment this income is related to.**
 - ii) Please provide the assumptions used to forecast the 2008 and 2009 figures.**
 - iii) Please explain the decline in 2007 and the further decline forecast for 2008.**
 - iv) Please provide the latest year-to-date figure for investment income in 2008 and the corresponding figure for the same period in 2007.**
- e) Why is there no Other Income shown in Table 2 for 2008 when there is \$92,000 shown in Attachment B of Exhibit 3, Tab 1, Schedule 3?**
- f) Where is the Other Service Revenue found in Attachment C of Exhibit 3, Tab 2, Schedule 3 shown in Table 2?**

- g) Is there any revenue or costs associated with carrying charges on deferral/variance/regulatory asset accounts included in any of the lines in Table 2? If yes, please provide a breakdown of the associated line to show the costs and/or revenues associated with these accounts on a separate line for each year.**

Interrogatory # 16

Ref: Exhibit 3, Tab 1, Schedule 3, Attachment C, Updated

- a) What proportion of THI's power poles generated rental revenues in 2006, 2007, 2008 and 2009?**
- b) How many additional poles does THI expect to have in 2009 as compared to 2008?**
- c) There was a significant increase in the number of poles rented in 2007 (1,315) as compared to 2006 (1,028). Please explain this increase and why there are no increases forecast for either 2008 or 2009.**
- d) How many poles are currently rented by THI as of the end of 2008?**
- e) How has the volumetric figure for the Standard Supply Service of 86,920 for 2009 been calculated?**

Interrogatory # 17

Ref: Exhibit 3, Tab 2, Schedule 1, Updated

- a) Please provide the distance from Tillsonburg to the Hamilton International Airport and to the London airport.**
- b) What were the concerns about the completeness of the weather data for the London station? Please provide the London weather data that was reviewed and rejected for use in the regression analysis and highlight the months of concern.**

Interrogatory # 18

Ref: Exhibit 3, Tab 2, Schedule 1, Attachment dated November 4, 2008

- a) Please provide a live Excel spreadsheet that contains all the monthly data used to estimate the equations shown in Table 2. Please also include actual monthly data for 2008 as used in the response to (l) below.**
- b) Please include the London weather data for the same period in the spreadsheet.**
- c) Please provide the monthly number of weather sensitive customers in the spreadsheet for the same period.**
- d) Was the number of customers considered as an explanatory variable in the regression equation? If not, why not?**
- e) Was a regression equation based on average use per weather sensitive customer considered? If not, why not?**
- f) Was a trend variable included in any of the regression equation estimations as a proxy for conservation? If not, why not?**
- g) Please explain the figures of 21.8% and 22.2% shown in Table 7 as the forecast shares for 2008 and 2009, respectively, in the GS < 50 kWh category.**
- h) Please explain how the residential volumes shown in Table 7 have been calculated for 2008 and 2009, especially in relation to the 2007 share of 41.7%.**
- i) Please explain how the GS < 50 kW volumes shown in Table 7 have been calculated for 2008 and 2009, especially in relation to the 2007 share of 20.6%.**
- j) Please explain how the GS 50 – 499 kW volumes shown in Table 7 have been calculated for 2008 and 2009, especially in relation to the 2007 share of 30.4%.**
- k) What are the actual WSL kWh volumes for 2008 as compared to the forecast shown in Table 6?**

- l) Please update the equation shown in Table 2 to include actual monthly data for as many months as is currently available for 2008.**
- m) Please update Tables 3 and 6 to reflect the forecast generated by the updated equation in (l) above.**
- n) Does the 2008 forecast shown in Table 6 include 9 months of normalized actual WSL kWh?**
- o) Have the normalized figures shown in Table 6 been normalized to the 10 year normal HDD and CDD figures of 3,779.1 and 300.2, respectively, shown in Table 4? If not, please provide the figures used to calculate the normalized figures.**
- p) What is the impact on the 2009 forecast of using the 30 year normals found in Table 4 in place of the 10 year normals on:**
 - i) the equation estimated in the report; and**
 - ii) the equation estimated in response to (l) above?**
- q) For each of the rate classes shown in Table 7, please add a column showing the normalized average use per customer for each year, including the forecast years. If available, please add 2008 actual, normalized actual and normalized average use per customer in place of the 2008 forecast.**
- r) Please update the figures in Table 9 to reflect actual data for 2008, or if actual data for 2008 is not available, data that reflects the most recent year-to-date information available and the remainder of the forecast for the year.**
- s) Please provide the actual average annual customers for 2008 as shown in Table 11.**
- t) Please reconcile the total retail kWh of 229,166,628 for 2007 shown in Table 10 with the total retail figure of 228,907,165 shown in Exhibit 4, Tab 2, Schedule 9, Attachment A.**
- u) Please explain why Tillsonburg did not forecast each of the three weather sensitive classes separately using different equations.**
- v) Please provide the monthly retail kWh figures for each of the three weather sensitive rate classes for period beginning January, 2003 to the most recent month available in the spreadsheet requested in part (a) above.**

- w) Please provide the distribution losses for each year that are reflected in the Table 7 shares adding up to less than 100%. Please reconcile these losses with the loss factors shown in Attachment A to Exhibit 4, Tab 2, Schedule 9.
- x) Does the approach taken in forecasting the aggregate weather sensitive load imply that each of the three weather sensitive rate classes is equally impacted by changes in degree days (heating and cooling) and economic variables?

Interrogatory # 19

Ref: Exhibit 3, Tab 2, Schedule 2, Updated

- a) Please confirm that the 1.2 GWh savings attributable to the residential customer class are reflected in the historical data used by Elenchus to estimate the regression equation. If this cannot be confirmed, please explain how these reductions are not reflected in the historical data.
- b) What is the impact on the revenue deficiency if:
 - i) ERA's econometric forecast for residential throughput for the 2009 test year is not reduced by 1.25%;
 - ii) ERA's econometric forecast for GS<50 throughput for the 2009 test year is not reduced by 1.25%;
 - iii) ERA's econometric forecast for GS 50-499 throughput for the 2009 test year is not reduced by 1.25% and no reduction is applied to the forecast of demand for this rate class.
- c) Please provide all the data, information and analysis used to support each of the following statements:
 - i) residential customers have achieved energy reductions of 2.5% in past years;
 - ii) GS < 50 kW customer class has achieved a 1% reduction in energy consumed per customer in 2006 and 2007.
- d) Please indicate what customer classes have had a reduction of 2.6% applied to ERA's econometric forecast (line 27) as opposed to the 1.25% reduction referenced at line 11. Please also provide the justification for the 2.6% reduction.

Interrogatory # 20

Ref: Exhibit 3, Tab 2, Schedule 5, Attachment A

- a) Please confirm that the 2003 through 2006 average use figures are based on normalized volumes.
- b) Please confirm that the average annual change in the average normalized residential use per customer between 2003 (9,083 kWh) and 2007 (8,775 kWh) is (0.86%).
- c) Please confirm that the average change in the average normalized GS < 50 use per customer between 2003 (38,874 kWh) and 2007 (38,930 kWh) is 0.00%.
- d) Please confirm that the average change in the average normalized GS 50-499 use per customer between 2003 (470,498 kWh) and 2007 (513,802 kWh) is a 2.23% increase per year.

Interrogatory # 21

Ref: Exhibit 5, Tab 1, Schedule 4

Given that THI will be under incentive regulation for 2010, 2011 and 2012, why is THI not proposing to recover the balances recorded in the variance and deferral accounts through rate riders that would be charged over the four year period 2009 through 2012?

Interrogatory # 22

Ref: Exhibit 6, Tab 1, Schedule 1, page 2, Updated

Is the \$10,000 in fees included in the total debt figure of \$303,455 shown in Table 1 or is this an additional expense that has been included in the revenue requirement? If so, please explain where this cost has been included.

Interrogatory # 23

Ref: Exhibit 8, Tab 1, Schedule 2, Updated

- a) Please explain why THI has not moved the rate classes to within the OEB approved range for a number of rate classes in 2009?**
- b) Assume that the revenue to cost ratios are set as follows: GS>50-499 increased to 80%, GS>500-1499 increased to 80%, GS>1500 increased to 80%, street lighting reduced to 120%. What would be the resulting revenue to cost ratio for the residential class (assuming no change to the GS<50 ratio).**
- c) Has the allocation of costs to the street lighting class been based on the number of customers or on the number of connections?**
- d) What is the rate impact on customers of moving to the ratios noted above (b), combined with a four year rate rider (IR #21 above)?**

Interrogatory # 24

Ref: Exhibit 4, Tab 1, Schedule 2, Updated

- a) Please provide the federal and provincial tax rates used to derive the combined tax rate of 17.00% shown in Attachment D.**
- c) Please confirm that THI is not claiming any provincial or federal capital taxes as part of its revenue requirement. If this cannot be confirmed, please show the calculations used to arrive at the capital taxes claimed.**
- d) Please confirm that with a taxable income of less than \$500,000, the appropriate federal tax rate is 11.00%. If not, please explain the rationale for a different tax rate.**
- e) Please confirm that with a taxable income of less than \$500,000, the appropriate provincial tax rate is 5.50%. If not, please explain the rationale for a different tax rate.**
- f) Please confirm that all distribution system additions post February 22, 2005 have been posted to CCA class 47 in 2005, 2006 and 2007.**

- g) Please reconcile the income before PILS/taxes of (\$90,932) shown for 2009 at existing rates on page 2 of Attachment C with the figure of (\$84,463) shown on page 1 of Exhibit 7, Tab 1, Schedule 2, Updated.

Interrogatory # 25

Ref: Exhibit 7, Tab 1, Schedule 2, Updated

Please add a column to Table 1 that reflects an increase in total net revenues to reflect the recovery of the \$794,490 deficiency. If the resulting indicated rate of return is different than the requested rate of return of 7.11%, please reconcile this difference.

Interrogatory # 26

Ref: Exhibit 4, Tab 1, Schedule 2, page 8, Updated

- a) The evidence states that there is an increase of \$290,000 in 2009 as compared to 2008 because of staffing changes related to two apprentice linemen and a manager of regulatory affairs. The evidence further indicates that the linemen are at a cost of \$60,000 per year and the positions were budgeted to be filled by mid 2008. This would imply an increase in 2009 of approximately \$60,000 related to these two positions in aggregate. The annual cost associated with the manager position is \$102,000. In total this implies an increase in 2009 due to these three positions of approximately \$162,000. Please reconcile this figure with the \$290,000 variance stated.
- b) Are any of the linemen that are likely to retire expected to retire before the end of 2009? If yes, has this reduction in wages and benefits been taken into account in the 2009 forecast?
- c) Will the addition of the Operations Regulatory Affairs Manager reduce the amount of time allocated to THI of the Finance Regulatory Affairs Manager currently shown as 0.73 FTE for 2008 on Exhibit 1, Tab 2, Schedule 4, Attachment A? If not, please explain why not. If yes, please indicate the reduction in costs associated with this reduction in staffing requirement for this position and indicate whether it has been reflected as a reduction in the OM&A forecast for 2009.
- d) Please provide the forecasted cost of living adjustments for the existing staff complement (page 4 of 16) in both percentage and dollar terms. What is the percentage increase been based on?

Interrogatory # 27

Ref: Exhibit 4, Tab 1, Schedule 2, page 9, Updated

- a) Please explain why capital costs are being recovered over a three year period and not over a longer period? What is the basis for the three year period?**
- b) What is the total cost of the customer information system and how has the THI portion of this cost (\$315,000) been estimated given that the CIS supports both water and sewers in addition to electricity?**
- c) Please provide a breakdown of the cost into hardware and software related costs.**
- d) Is the 5% management fee applied on top of the capital related cost of \$315,000 that is to be recovered over three years?**

Interrogatory # 28

Ref: Exhibit 4, Tab 1, Schedule 2, page 10, Updated

- a) Please provide a breakdown of the \$244,000 in costs associated with the filing and defending of the rates application into each of its components (consulting, legal, etc.). Please confirm that this cost does not include any internal resource costs.**
- b) Please provide the estimated cost associated with each of a technical conference and an oral hearing that has been included in the forecast cost.**
- c) Has better information been provided by or requested from the OEB in relation to the OEB's costs to process this application? If so, please provide the details.**

Interrogatory # 29

Ref: Exhibit 4, Tab 1, Schedule 2, pages 13 & 14, Updated

- a) The evidence seems to suggest that \$30,000 of the increase in costs is due to THI assuming cost responsibility for paper and postage.**
 - i) Is the \$30,000 the total cost for paper and postage? If not, what is the total projected cost?**
 - ii) Did the Town previously pay this expense without recovering these costs from THI?**
 - iii) Does the Town bill for water and sewer services in conjunction with the electricity services, or is the electricity bill mailed to customers separately from the water and sewer bills?**
 - iv) If the bills are not mailed separately, how has the cost of postage and envelopes been allocated between THI and the Town?**
- b) The explanation provided for the \$497,000 increase only appears to account for \$406,000 of the increase ($102 + 60 + 117 + 62 + 30 + 35 = 406$). Please provide an explanation for the remaining \$91,000.**
- c) Please provide the total compensation to the Board of Directors for each of 2006, 2007, 2008 and 2009, along with the total number of Directors in each year.**
- d) OM&A costs increased by \$7,000 between 2007 and 2008. The variance explanations total an increase of \$78,000, including \$60,000 for the apprentice linemen. Please provide a variance explanation for the net reduction of \$71,000 in other costs and whether and why these cost reductions are forecast to increase in 2009.**

Interrogatory # 30

Ref: Exhibit 5, Tab 1, Schedule 3, page 2, Updated

Please provide any evidence required in response to the Board's G-2008-0002 Guide for Smart Meter Funding and Cost Recovery dated October 22, 2008 related to the THI proposal to increase the smart meter rate adder to \$1.00.

Interrogatory # 31

Ref: Exhibit 5, Tab 1, Schedule 2, Attachment A, Updated

- a) Please update the account balances to reflect the following prescribed interest rates if different rates have been used in the evidence:

Q1 2008	5.14%
Q2 2008	4.08%
Q3 2008	3.35%
Q4 2008	3.35%
Q1 2009	2.45%.

- b) If the account balances are different as a result of the response to (a) above, please update the calculation of the rate riders in Exhibit 5, Tab 2, Schedule 2, Attachment H.

Interrogatory #32

Ref: Exhibit 9, Tab 1, Schedule 7, Updated

- a) How do the Tillsonburg proposals related to the division of the General Service 500 – 5,000 kW customer class into a General Service 500 – 1,500 class and a General Service > 1,500 Class reconcile with the Staff Discussion Paper on Rate Classification for Electricity Distribution Customers (EB-2007-0031) dated January, 29, 2008?
- b) Does Tillsonburg still believe it should proceed with its proposal, despite the uncertainty as to how customer classes may be determined in the future? Please explain fully.
- c) The Staff Discussion Paper proposes combining the street lighting and sentinel lights into a single class. What impact would this have on the Tillsonburg proposal to combine sentinel lights with USL?
- d) Please provide the cost allocation results, revenue to cost ratios and proposed rates if there were no changes to the existing rate classes.

Interrogatory #33

Ref: Exhibit 3, Tab 2, Schedule 1, Attachment dated November 4, 2008

The footnote on page 5 indicates that the calculated weather sensitive load (WSL) is calculated by subtracting the kWh for GS 500-4999 kW class, lighting and USL from the monthly kWh purchases.

- a) Are the losses associated with the GS 500-4999 kW class, lighting and USL also subtracted from the monthly kWh purchases? If not, why not?**
- b) If the response to part (a) is no, does this mean that the historical data being used to forecast weather sensitive load includes losses from rate classes that are not weather sensitive?**

Interrogatory #34

Ref: Exhibit 4, Tab 2, Schedule 2, Attachment F, page 2, Updated

Please provide the actual 2008 expenses in the same level of detail as shown in this attachment.

Interrogatory #35

Ref: Exhibit 3, Tab 2, Schedule 1, Attachment dated November 4, 2008

For each of the large customers that is forecast to close, has closed or has forecast a significant reduction (Synrecon, DDM Plastics, Tillsonburg LP), please provide the estimated lost revenue in 2009 based on the proposed rates and a use profile that would reflect recent consumption levels when the plants were operating.