



***PUBLIC INTEREST ADVOCACY CENTRE
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March 3, 2009

VIA MAIL and E-MAIL

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge St.
Toronto, ON
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)
EB-2008-0230
Greater Sudbury Hydro Inc. – 2009 Electricity Distribution Rate Application**

Please find enclosed the submissions of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

**EB-2008-0230 Greater Sudbury Hydro
2009 Rate Application
Interrogatories of the Vulnerable Energy Consumers Coalition (VECC)**

Question # 1

**References: Exhibit 1 Tab 2 Schedule 1 Appendix A; Exhibit 2 Tab 1
Schedule 1 ` Appendix A Pgs 25/26**

- a) Provide a summary tabulation of annual average Service Quality Indicators 2005-2008 and 2009 forecast/targets.
- b) Provide a summary tabulation of Reliability Indices for each of GSHi and West Nipissing 2005-2008 and 2009 forecast/target.
- c) Discuss Reliability Indices trends and compare GSHI to other utilities in its Cohort. Delineate the impact of Capital programs.
- d) What is being done to reduce SAIDI due to Scheduled Outages and what are the forward improvement targets?
- e) Comment on trends in Reliability Indices, including impacts of capital programs.

Question # 2

Reference: Exhibit 1 Tab 1 Schedule 12 and Schedule 13

- a) Provide the following actual 2007 and projected 2009 metrics for all business units of GSUI, including Corporate, 1627596 Ontario and 700211 Ontario:
 - i. Capital Deployed \$million
 - ii. Employees (FTEs) at Dec 31 2008-include separately # of contract employees
 - iii. 2007 actual, 2008 estimated and 2009 projected operating revenue
 - iv. 2007 actual, 2008 estimated and 2009 projected operating costs.
- b) Explain in which Business unit(s) Water Services are located and provide the following metrics for this activity.
 - i. Capital Deployed \$million

- ii. Employees (FTEs) at Dec 31 2008-include separately # of contract employees
 - iii. 2007 actual,2008 estimated and 2009 projected operating revenue
 - iv. 2007 actual, 2008 estimated and 2009 projected operating costs.
- c) Provide a list of all *outbound* services provided by GSHPI together with the operating and capital costs for 2007 actual, 2008 estimated and 2009 projected
- d) Does GSHI (Wireco) provide any outbound services to any affiliates? If so provide the costs (2007 actual, 2008 estimated and 2009 projected) amounts for each service recipient.

Question # 3

Reference: Exhibit 1 Tab1 Schedule 15 App A CDM Program

Preamble: OPA has a number of "Standard Programs " available to EDs. OPA is also open to consider proposals for other programs.

- a) Which OPA CDM programs will GSHI implement in 2009 and what is the funding/cost, (show utility resources separately)? Provide details
- b) Has GSHI approached OPA for funding of proposed ratepayer-funded programs listed in the Exhibit? Provide copies of communications.
- c) Explain why GSHI cannot give priority to delivery OPA standard programs in 2009 and seek OPA support for other programs.
- d) Why are the programs proposed for ratepayer funding better in terms of TRC than OPA programs? Please provide details.
- e) Two of the proposed programs-Electric Thermal storage and West Nipissing Traffic Light Conversion have net TRC s of <1.0. Why should these be pursued at ratepayer expense? Please justify.

Question # 4

Reference: Exhibit 2 Tab3Schedule 1 p 17

- a) Provide the budgeted number and cost of standard residential meters to be installed in 2009.

- b) Has GSHI requested and/ or received dispensation from Measurement Canada to either defer replacement or allow resealing of expired residential meters, pending installation of Smart Meters?
- c) What is difference in # units and cost of replacement vs resealing expired meters in 2009.
- d) What is the average scrap value for standard meters and the number taken out of service in 2009? Where is this revenue forecast recorded?

Question # 5

Reference: Exhibit 2/Tab3/Sch1/p 36

Preamble: The 2009 budget provides for the acquisition of eight new vehicles. The vehicles are replacing one large and six smaller units ranging in age from 5 to 20 years.

- a) Provide a summary of the total fleet by vehicle type/duty category and age
- b) Provide GSHI's assessment of which of the proposed 2009 vehicle replacements are "Mission Critical". Indicate the aggregate capital cost
- c) Has GSHI examined leasing/lease-to-own for standard duty vehicles? If so provide a copy of the assessment.

Question # 6

Reference: Exhibit 2 Tab 1 Schedule 1 Appendix A

Preamble: "GSHI would like to increase pole replacement from existing levels to replacement levels in the 400 to 450 poles per year range. We would sustain this level until the percentage of pole population older than 40 years is in the 25 to 28 % range, putting GSHI in line with the reported pole population statistic of the provinces largest utility, Hydro One."

- a) Provide the history of wood pole *failure rates* for both GSHI and WNH up to and including 2008
- b) Provide the history of Pole replacement # poles per year for each service area
 - i. Existing Feeders
 - ii. Upgrade of 4kv feeders

iii. Other

- c) Provide the unit pole replacement costs for 2007, 2008 and projected 2009 for wood poles and other types of pole, together with the expected life of each.
- d) Reconcile the proposed accomplishment of 247, 276 and 442 poles per year in each of 2009-2011 and the unit costs, with the data in Figure 7 line 12.
- e) Compare GSHI unit pole replacement costs with those filed by Hydro One Distribution in its 2009 Rates case.

Question # 7

Reference: Exhibit 2 Tab3 Schedule1 p 38 and 43

Preamble:

It is the intention of Greater Sudbury Hydro Inc. and the CODAC group 1 members to explore the possibility of using SAP to replace their existing obsolete ERP functionality on the basis of the existing governance model utilized for the CIS solution. GSHI is confident that the CODAC evaluation will prove that SAP meets our collective needs and we intend to proceed with implementation in 2009.

- a.) Provide the implementation milestones and % completion for each of the Enterprise Resource Planning (ERP) and the Customer Information Systems (CIS).
- b.) Please clarify the total and year by year costs, including capital and operating, of the Enterprise Resource Planning (ERP) and the Customer Information Systems (CIS) and the specific amount(s) that GSHI is seeking for the 2009 Test Year with respect to the two IT Projects.
- c.) Provide a 2009 revenue requirement calculation related to each of the two Projects, including the effect of CCA and other applicable taxes.
- d.) Please provide a copy of the Benefits Realization plan/assessment for the ERP and CIS respectively, (including multiyear OM&A savings) and (for CIS) the impacts on GSHI's Customer Care costs per customer.
- e.) Provide the go live dates/schedule for CIS and explain the 2009 Rate Base addition of \$2.1 million.
- f.) Provide more support for the chosen methodology for allocating CIS costs among CODAC members (Section 10 page 15).

Question # 8**Reference: Exhibit 3 Tab 1 Schedule 2, page 1**

- a) Please Confirm that the loads and customer/connections set out in this Section of the evidence are for both the GSHI and West Nipissing Service areas. If not indicate in detail how West Nipissing is addressed.
- b) Please provide a schedule setting out the rates and volumes by customer class supporting the 2009 test year revenues reported in the Summary Table.
- c) Please clarify whether the rates used in part (a) included:
 - Charges for LV recovery
 - Smart Meter charges
 - Discounts for transformer ownership where applicable.
- d) If necessary, please re-do the 2009 values using rates that:
 - Exclude the LV adder
 - Exclude the Smart Meter Rate adder
 - Account for the lower revenue due to the transformer ownership allowance discount where applicable.

Question # 9**Reference: Exhibit 3/Tab 2/Schedule 1, page 6**

- a) Did GSHI test a model specification that included customer count as opposed to population? If yes please provide the results.
- b) Please provide a regression model (along with the statistical measures) that includes the number of residential, GS<50 and GS>50 customers as separate explanatory variables. Using this model please provide a projection of system purchases for 2008 and 2009.

Question # 10**Reference: Exhibit 3/Tab 2/Schedule 1, pages 8-9**

- a) Since the model estimated by GSHI is based on data up to July 2008, please explain why GSHI believes it does not capture CDM impacts and trends that occurred in the years 2006 and 2007.
- b) What is the basis for the CDM adjustments included for 2006 – 2009 inclusive.

Question # 11**Reference: Exhibit 3/Tab 2/Schedule 1, page 8**

- a) Please provide a schedule that sets out the weather normalized system purchases for the years 2002 to 2007 inclusive (i.e., use the definition of “weather normal” to predict values).

Question # 12

Reference: Exhibit 3/Tab 2/Schedule 1, pages 11-12

- a) Please explain how the “geometric mean” is calculated. Is it simply the compound growth rate required to escalate the 2002 customer count up to the 2007 customer count?
- b) Given that the growth in Residential customer count has been fairly constant since 2004 why is it reasonable to include the negative values for 2003 and 2004 in the determination of the average growth rate for this class?

Question # 13

Reference: Exhibit 3/Tab 2/Schedule 1, pages 12-15

- a) Please explain what initial usage per customer value the historical geometric mean growth rate in usage per customer was applied to in order to project usage per customer in 2008 and 2009 (per page 13, lines 10-11).
- b) The Residential; GS<50 and GS>50 classes annual usage per customer values set out in Table 10 will be influenced weather in the year concerned.
- Given this fact, please confirm that the calculated growth rates for these two classes will be affected by historical variations in weather.
 - Why is it appropriate to use the growth rate in usage per customer/connection (non weather-normalized) to forecast usage for 2008 and 2009?
- c) GSHI’s load forecast methodology assumes there is some consistency between:
- It’s forecast of overall system purchases based on econometric analysis, and
 - It’s forecast of # of customers and average customer used based on simple growth trends.
- Please explain why this is reasonable to assume when these two approaches are conceptually different and there is no linkage between them.
- d) Why is all of the CDM associated with the Residential class? Please provide a schedule setting out the derivation of the 9786 kWh average use for Residential in 2009.

- e) If the projected average use is based on trends in average use up to (and including 2007) why is it necessary to adjust 2008 and 2009 for CDM savings in 2006 and 2007?
- f) Also, if the average use forecast is based on trends, why can one not assume that the 2008 and 2009 values will reflect a continuing trend in CDM?
- g) How did GSHI determine the weather sensitivity of each class – as set out in Table 14?
- h) When residential use includes non-weather sensitive loads (such as lighting, cooking, etc.) why is it reasonable to assume that it is 100% weather sensitive?
- i) Please provide the weather normalized average use per customer values as determined by Hydro One Networks in support of GSHI's March 2007 Cost Allocation Informational filing and, in the same schedule, set out GSHI's forecast average use per customer values for 2009 for each class.

Question # 14

Reference: Exhibit 3 Tab 3 Schedule 1 pages 1-3

- a) Account 4225 Late Payment Charges shows a reduction from \$130,205 in 2008 to \$112,728 in 2009 (\$17,477) Explain this reduction given the economic outlook and the harmonization of rates.
- b) 4390 Miscellaneous Non-Operating Income, shows \$0 in 2008 and \$187,236 2009. Provide details of the year over year change and explain "This account reflects potential CDM funding available to the organization in 2009"
- c) Reconcile the answer to part b) with the response to VECC questions about 2009 CDM funding (VECC IR#3).
- d) 4405 Interest and Dividend Income- Indicate how much of the year end balances 2006-2008 and forecast 2009 amounts are carrying charges on regulatory balances.

Question # 15

References: Exhibit 4Tab 2Schedule 4 Pages 2 -6; Exhibit 4Tab 2 Schedule 4 Appendix A

Preamble: GSHi further notes that it is undertaking a review of transfer pricing methodologies and intra- company cost allocations once additional requested information and interpretations from the regulator are received.

- a) Has GSUI had an independent study performed of its shared services/corporate cost allocation method/model? If so please provide a copy.
- b) If the study was done for prior years other than 2009, please provide a copy of the spreadsheet(s) showing the calculation of Shared Service costs and allocation to Business units populated with forecast 2009 data. Provide explanatory notes.

The following questions may be omitted if a complete response has been provided to parts a) and b) above:

- a) For **each** of the 32 services listed in Exhibit 4Tab 2Schedule 4 Appendix A Schedule B, provide the following for 2009 in table/spreadsheet format:
 - Total Cost to Service
 - Cost drivers/Allocator(s) used to allocate the costs to service
 - Physical Quantity of each cost driver for each Business unit (FTEs, Assets etc.)
 - \$Allocation to each business unit (GSHI ,GSHP,GSTI,1627596 Ontario and 1700211 Ontario)
- b) Reconcile the results to the costs shown in Tables 4.2.2-1 and 4.2.2-2.
- c) Why is there no 2009 shared services cost allocation shown for 1700211 Ontario (Genco)?
- d) For time-based allocators indicate when the last time studies were done.
- e) Of the total 2009 costs allocated to GSHI indicate how much is allocated directly and how much by indirect cost driver allocators.
- f) Provide full details of the 2009 calculations of the cost to service and the allocation of costs to each business unit for the 3 largest (based on cost) services provided to GSHI.
- g) Show the 2009 \$ amounts and how common costs are allocated to water and electricity distribution respectively.
- h) Does GSTI (Telecom) provide services directly to Holdco, the City of Greater Sudbury and other Business units? If so, indicate how in the context of the ARC, the services are costed and the amount charged to each Business unit and the total for 2009. If GSHPI provides the services, provide the same information.

Question # 16

References: Exhibit 1/Tab2/Sch1, Appendix B & Exhibit 3/Tab2/Schedule 1, Table 2

- a) With regard to benchmarking GSHIs historic OM&A costs, please confirm/correct the data for 2005 and 2007 shown in the file “Comparison of Distributors (EB-2006-0268)” found on the OEB web site:
http://www.oeb.gov.on.ca/OEB/Documents/EB-2006-0268/Comparison_of_Distributors_with_2007_data.xls

2007	2006	2005
\$15,772,040	\$9,147,515	\$8,989,486

Please indicate the correct data for 2005-2007 and reconcile with Exhibit 1/Tab2/Sch1, Appendix B & Exhibit 3/Tab2/Schedule 1, Table 2

For the historic years 2005-2007 compute the average EWU OM&A cost per customer and compare the EWU average to that of the peer group shown on the OEB website.

- b) Compute the distribution OM&A cost per customer for the years 2007-2009.
- c) Compute the OM&A per kilowatt hour of energy distributed for the years 2005-2009.
- d) Discuss trends in OM&A per customer and per Kilowatt hr of energy distributed 2005-2009.
- e) Provide the 2008 and 2009 OM&A/Customer and per Kwh distributed following the amalgamation with West Nipissing.

Question # 17

Reference: Exhibit 4Tab2 Schedule 6 p 2

- a) Reconcile the Total Compensation for Executive and Management shown in Table 3 with the corresponding shared services costs in Table 4.2.2-2. Indicate which costs in Table 3 are included in the totals shown in 4.2.2-2 and what other costs are included.

Question # 18

References: Exhibit 4 Tab2 Schedule 3 & Exhibit 4 Tab2 Schedule 6 Table 3

Preamble: The Evidence indicates that two new Apprentice Powerline Technicians, one System Operator, and one Substation Electrician are planned to be hired.

- a) Table 3 of Schedule 6, shows an addition of three FTE's (rather than 4). Please explain which positions will be added in 2009 and the incremental Total Compensation for each.
- b) Provide the hiring schedule for new 2009 positions and the incremental total compensation by month of 2009 for new hires.
- c) If the new positions are delayed by an average of three months, provide the impact on total compensation and 2009 OM&A. State your assumptions.

Question # 19

Reference: Exhibit 4/Tab2/Schedule 6/p1

Preamble: In this Exhibit, Greater Sudbury states:

"A third party consultant works with the HR/Governance Sub Committee of the Board of Directors to review the market analysis and consider salary recommendations."

- a) Please provide the latest Compensation Market Comparison Study (e.g. Hay/Mercer)

Question # 20

Reference: Exhibit 6Tab 1Schedule 3 and Schedule 4

Preamble: On February 24, 2009 the Board issued a letter to all licensed electricity distributors informing them of Cost of Capital Parameter Updates for 2009 Cost of Service Applications.

- a) Provide updates to Schedules 3 and 4 incorporating the Board's new Cost of capital parameters.
- b) Provide an estimate of impact on the 2009 Revenue Requirement and Revenue Deficiency resulting from the Cost of Capital Parameter Updates, for example update Exhibit 7 Tab1 Schedule 2 page 2.

Question # 21

Reference: Exhibit 6 Tab1 Schedule 2 p. 1

- a) Please reconcile the 2006 and 2007 Actual Capital Structure and in particular the Equity Component, with the Financial Statements filed at Exhibit 1 Tab 3 Schedule 1 Appendix A including the Balance Sheets and Notes 10-13 to the Statements.
- b) Provide the 2008 Actual Capital Structure based on either Audited or Unaudited Financial Statements.

- c) Explain why GSHI does not bring its Actual Capital Structure closer to the Deemed Capital Structure and discuss actual financial ratios (Interest coverage etc.) in this context.

Question # 22

Reference: Exhibit 6/Tab1/Sch3

- a) Provide a copy the Original Promissory Note with the City.
- b) Provide copies of the term sheet(s) for any renewals/extension.
- c) Provide a discussion regarding whether the Note is callable and/or repayable and whether the rate is fixed or may be varied (and under what conditions).

Question # 23

Reference: Exhibit 8/Tab 1/Schedule 2, page 1-2 and Appendix A

- a) Please confirm that for purposes of the Cost Allocation Informational Filing:
- The Revenues are based on distribution rates (excluding the discounts for transformer ownership allowance).
 - The Costs include the cost of the Transformer Ownership Allowance.
 - The cost of the Transformer Ownership Allowance is allocated to all customer classes.
- b) Please confirm that (per Exhibit 9, Tab 1, Schedule 1, page 11), GSHI is proposing to allocate the cost of the Transformer Ownership Allowance to just the GS>50 class.
- c) Please provide the results of an alternative cost allocation run which is consistent with GSHI's current proposed treatment of the Transformer Ownership Allowance where:
- The Revenues by class are based the rates reduced by the transformer ownership allowance where applicable.
 - The Costs allocated exclude the "cost" of the Transformer Ownership Allowance. (i.e. Appendix A, Sheet I3).
- (Note: For purposes of the response please just file the revise Output Sheet O1).

Question # 24

Reference: Exhibit 8/Tab 1/Schedule 2, pages 2-4

- a) Please explain why the revenue to cost ratios shown in Table 2 are not the same as those shown in Table 3 under the column “Greater Sudbury Hydro Updated Cost Allocation Filing Results”.
- b) With respect to Table 4, please provide a schedule that sets out how the percentages in the column “100% Cost Allocation” were determined.
- c) With respect to Table 4, please provide schedule that sets out (for each customer class) the 2009 billing parameters and 2008 rates used to derive the percentages in the column “Allocation at Existing Rates”. For each customer class, please separate the revenues from Greater Sudbury Area customers versus West Nipissing Area customers.
- d) If response to part (c) is different, please provide a schedule that sets out each customer class’ 2009 revenues at 2008 rates using rates that:
- Exclude the LV adder
 - Exclude the Smart Meter Rate adder
 - Account for the lower revenue due to the transformer ownership allowance discount where applicable.
- Please show the derivation of the fixed and variable revenues and total revenues for each class. Again, please separate out Greater Sudbury and West Nipissing area customers by customer class.

Question # 25

Reference: Exhibit 8/Tab 1/Schedule 2

- a) Please complete the following schedules:

- kWh by Customer Class (delivered)

Customer Class (all)	Cost Allocation Filing		2009 Application	
	kWh	% of Total	kWh	% of Total

- Customer/Connection Count

Customer Class (all)	Cost Allocation Filing		2009 Application	
	#	% of Total	#	% of Total

Question # 26**Reference:** Exhibit 9/Tab 1/Schedule 1, pages 3-5

- a) Please explain how the total revenue requirement was split between the Greater Sudbury and West Nipissing area customers – per Tables 2 d) and 2 f).
- b) What is the basis for the “Proposed Portion of Revenue” values shown in Table 2 e)?
- c) If not already provided, please provide the Proportion of Revenue by class based on existing rates separately for the Greater Sudbury area and the West Nipissing area customers.
- d) If a Cost Allocation Informational filing was prepared for the West Nipissing area, please provide an electronic copy of the full filing and hard copies of output sheets – O1 and O2.

Question # 27**Reference:** Exhibit 9/Tab 1/Schedule 1, pages 6-10

- a) Please confirm that the rates set out in Table 3 exclude any smart meter rate adder.
- b) Please provide a schedule that sets out the derivation of the fixed-variable splits by customer class and area as reported in Table 4.
- c) Please confirm if the Fixed Revenue Proportion values reported in Table 5 a) are correct.
- d) Please confirm whether the volumetric rates shown in Tables 6 a) – 6 c) for the GS>50 class are before or after the adjustment for the transformer ownership allowance.

Question # 28**Reference:** Exhibit 9/Tab 1/Schedule 1, page 11

- a) Please provide a schedule that sets out the 2009 kW eligible for the transformer ownership discount broken down between the Greater Sudbury and West Nipissing areas.
- b) Is the \$0.1368/kW adjustment associated with the harmonization or non-harmonization case? How was it determined?
- c) In the non-harmonization case, how is the transformer ownership allowance payable to each “area’s” customers recovered?

Question # 29

Reference: Exhibit 9/Tab 1/Schedule 1, page 12

- a) Please provide a schedule that sets out the derivation of the Retail Transmission Revenue by customer class.
- b) Please provide the basis (i.e., volumes and assumed rates) supporting the \$224,166 in LV costs for 2009.

Question # 30

Reference: Exhibit 9/Tab 1/Schedule 1, page 15

- a) If the phase-in is moving the rates West Nipissing area rates half way to the consolidated rates then why doesn't the shortfall (\$309,630) equal the difference between the year 2 (\$1,569,221) and the year 1 (\$1,261,210) revenues?
- b) Please provide a schedule indicating how the "shortfall" was factored into the rates proposed for the Greater Sudbury area customers.

Question # 31

Reference: Exhibit 9/Tab 1/Schedule 9, Appendix A

- a) What is the most recent actual customer count for each class – broken down between the Greater Sudbury and West Nipissing areas? Please indicate the date associated with the customer count reported.
- b) Based on a recent 12 consecutive months of actual billing data, please indicate the percentage of total residential customers that:
 - Consume less than 250 kWh per month
 - Consume 250 -> 500 kWh per month
 - Consume 500 -> 750 kWh per month
 - Consume 750 -> 1000 kWh per month
 - Consume 1000 -> 1500 kWh per month
 - Consume 1500 -> 2000 kWh per month
 - Consume more than 2000 kWh per month

Please provide data for both the West Nipissing area and the Greater Sudbury area.

- c) Appendix A indicates significant bill impacts for low volume residential customers, while high volume customers are seeing total bill impacts well below 10%. Did GSHI give any consideration to adjusting the fixed/variable split for the Great Sudbury area or West Nipissing area residential customers in order to mitigate total bill impacts for low use customers? If not, why not? If yes, why was this approach rejected?

- d) Based on GSHI's proposed 2009 revenue requirement what residential fixed-variable split is required to reduce the total bill impact for a 250 kWh residential customer in the Greater Sudbury area to 10%? Please provide the resulting rates and the bill impact calculation similar to those in Appendix A, pages 1-2
- e) Based on GSHI's proposed 2009 revenue requirement what residential fixed-variable split is required to reduce the total bill impact for a 250 kWh residential customer in the West Nipissing area to 10%? Please provide the resulting rates and the bill impact calculation similar to those in Appendix A, pages 7-8.

Question # 32

Reference: Exhibit 9 Tab1 Schedule 10

Preamble: The Guidelines for Electricity Distributor Conservation and Demand Management EB-2008-0037, Section 7.5 require an independent audit/review of the results.

- a) Has GSHI undertaken such an independent review? If so provide a Copy.

Question # 33

Reference: Exhibit 9 Tab1 Schedule 10

Preamble: The "Guidelines for Electricity Distributor Conservation and Demand Management" -EB-2008-0037, Section 7.3 require for LRAM/SSM calculations the Input assumptions should be the best available at the time of the independent review and/or the preparation of the LRAM/SSM claim.

- a) Provide copies of the OPA Every Kilowatt Counts (EKC) Program Calculators (2) for the 2006 and 2007 EKC Campaigns
- b) Provide a Table that shows and compares the OPA 2006 and 2007 input assumptions for CFLs (11w and 15w screw-in) with the similar assumptions used by GSHI in its LRAM/SSM claim:
 - i. Lifetime
 - ii. Free-ridership
 - iii. Unit Cost
 - iv. Unit savings- kwh and kw
- c) Compare the kwh savings for CFLs estimated by using the OPA EKC input assumptions with those calculated by GSHI. in its schedules
- d) Recalculate the LRAM/SSM claims using the OPA EKC 2007 input assumptions for CFLs and provide revised versions of Tables 2 and 3

- e) Provide the revised rate rider for the Residential class in the format of Table 1