



CANADIAN NIAGARA POWER INC.

A **FORTIS** ONTARIO
Company

BY COURIER

August 2, 2007

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
P.O. Box 2319
Toronto, ON M4P 1E4

Dear Ms. Walli:

**RE: CANADIAN NIAGARA POWER INC. ("CNPI") – FORT ERIE 2007 EDR Z-FACTOR
EB-2007-0514**

I am attaching three (3) copies of the Re-filing Submission pursuant to the Board's Decision with Reasons, For The Combined Proceeding On Storm Cost Claims. This submission is for Canadian Niagara Power Inc. – Fort Erie.

Electronic copies are being sent to your office via Email. Electronic copies are also being transmitted to Intervenors of record.

Yours truly,

Douglas R. Bradbury
Director, Regulatory Affairs

1 Using the Board's prescribed interest rate² of 4.59%, CNPI – Fort Erie has
2 calculated the projected interest at \$126,327 based on a two year recovery period.
3 Interest has been calculated from December 2006 through to August 2009. The
4 detailed calculation is included with this submission.

5
6 CNPI – Fort Erie has allocated the approved recovery together with interest to the
7 customer classes based on the 2004 distribution revenue as stated in the Board
8 approved 2006 EDR model for CNPI – Fort Erie. The total amount allocated per
9 class has been allocated into fixed and variable charges based on the specific
10 percentage splits as per the Board approved 2006 EDR model for CNPI – Fort Erie.
11 The detailed calculation is included with this submission.

12
13 Amounts allocated to each class-specific fixed charge have been divided by the
14 number of customers (connections) and divided by 24 to determine the monthly
15 service charge rate rider for each class. The detailed calculation is included with this
16 submission.

17
18 Amounts allocated to each class-specific volumetric charge have been divided by
19 the volumes in each rate class and divided by 2 to determine the volumetric rate
20 rider for each class. The detailed calculation is included with this submission.

21
22 **MITIGATION**

23
24 CNPI – Fort Erie has elected to maintain the two year recovery period in order to
25 mitigate the overall rate increase to all customer classes.

² Prescribed Interest Rates for Approved Accounts of Gas Utilities and Electricity LDCs and Other Regulated Entities Approved by the Board; Q3, 2007

1 **RATE RIDERS**

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3 CNPI – Fort Erie is seeking the Board’s approval for the electricity distribution Rate
 4 Riders to recover the storm costs as shown below:

5

Residential		
Rate Rider - Fixed	\$/Month	2.11
Rate Rider - Volumetric	\$/kWh	0.0008
General Service Less Than 50 kW		
Rate Rider - Fixed	\$/Month	1.85
Rate Rider - Volumetric	\$/kWh	0.0024
General 50 to 4,999 kW		
Rate Rider - Fixed	\$/Month	12.42
Rate Rider - Volumetric	\$/kW	0.7737
Unmetered Scattered Load		
Rate Rider - Fixed	\$/Month	0.91
Rate Rider - Volumetric	\$/kWh	0.0024
Sentinel Lighting		
Rate Rider - Fixed	\$/Month	0.21
Rate Rider - Volumetric	\$/kW	0.2105
Street Lighting		
Rate Rider 1 - Fixed	\$/Month	0.14
Rate Rider 1 - Volumetric	\$/kW	0.1691

1 **RATE IMPACTS**

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3 Customer impacts for total bill and electricity distribution charges are summarized in
4 detailed calculations that are included with this submission. Customer impacts for
5 total bill for common customer profiles including the Z-factor Rate Riders are
6 summarized below:

Customer Class	Typical Customer	Impact on Total Bill	
		%	\$
Residential	1,000 kWh	2.61%	\$3.08
General Less Than 50 kW	2,000 kWh	2.96%	\$7.05
General Service 50 to 4,999 kW	100,000 kWh / 500 kW	3.20%	\$423.23
Unmetered Scattered Load	500 kWh	3.36%	\$2.24

7

8 These impacts are calculated relative to the current 2007 Incentive Regulation
9 Electricity Distribution Rates effective May 1, 2007.

1 **2007 ELECTRICITY DISTRIBUTION RATES REQUESTED**

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3 Specifically, CNPI – Fort Erie is seeking the Board’s approval for the electricity
 4 distribution rates as shown below:

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Residential		
Service Charge	\$	19.94
Service Charge – Rate Rider (Z-Factor)	\$	2.11
Distribution Volumetric Rate	\$/kWh	0.0072
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kWh	0.0008
Regulatory Asset Recovery	\$/kWh	0.0043
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0054
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0047
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25
General Service Less Than 50 kW		
Service Charge	\$	17.46
Service Charge – Rate Rider (Z-Factor)	\$	1.85
Distribution Volumetric Rate	\$/kWh	0.0221
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kWh	0.0024
Regulatory Asset Recovery	\$/kWh	(0.0012)
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0049
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0042
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25
General 50 to 4,999 kW		
Service Charge	\$	115.83
Service Charge – Rate Rider (Z-Factor)	\$	12.42
Distribution Volumetric Rate	\$/kW	7.1966
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kW	0.7737
Regulatory Asset Recovery	\$/kW	(1.5227)
Retail Transmission Rate – Network Service Rate	\$/kW	2.0150
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	1.6849
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25

Unmetered Scattered Load		
Service Charge	\$	8.51
Service Charge – Rate Rider (Z-Factor)	\$	0.91
Distribution Volumetric Rate	\$/kWh	0.0219
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kWh	0.0024
Regulatory Asset Recovery	\$/kWh	0.0097
Retail Transmission Rate – Network Service Rate	\$/kWh	0.0049
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kWh	0.0042
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25
Sentinel Lighting		
Service Charge	\$	1.96
Service Charge – Rate Rider (Z-Factor)	\$	0.21
Distribution Volumetric Rate	\$/kW	1.9583
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kW	0.2105
Regulatory Asset Recovery	\$/kW	(2.6600)
Retail Transmission Rate – Network Service Rate	\$/kW	1.6083
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	1.3298
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25
Street Lighting		
Service Charge	\$	1.30
Service Charge – Rate Rider (Z-Factor)	\$	0.14
Distribution Volumetric Rate	\$/kW	1.5729
Distribution Volumetric Rate – Rate Rider (Z-Factor)	\$/kW	0.1691
Regulatory Asset Recovery	\$/kW	(2.0954)
Retail Transmission Rate – Network Service Rate	\$/kW	1.5196
Retail Transmission Rate – Line and Transformation Connection Service Rate	\$/kW	1.3025
Wholesale Market Service Rate	\$/kWh	0.0052
Rural Rate Protection Charge	\$/kWh	0.0010
Regulated Price Plan – Administration Charge	\$	0.25

1 **DETAILED CALCULATIONS**

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3 Attached hereto are the following detailed calculations:

- 4 1. Projected Interest to the End of the Recovery Period
- 5 2. Allocation of Recovery to the Customer Classes
- 6 3. Calculation of the Rate Riders
- 7 4. Rate Impacts for Fort Erie Customers Based on a Two Year Recovery Period

8

9 Note that where percentages available in the 2006 EDR, such as fixed and variable
10 splits, have been copied for use in the detailed calculations the resultant of certain
11 mathematical calculations may differ due to rounding. CNPI – Fort Erie submits that
12 any differences yielded by rounding are not impactful on the calculation of rate
13 riders.

14

15

ALL OF WHICH IS RESPECTFULLY SUBMITTED

**Projected Interest to the End of the Recovery Period
CNPI - Fort Erie, 2 Year Recovery Period**

Board Approved Interest Rate 4.59%

	Balance	Recovery	Interest
December-06	1,611,053	-	6,162.28
January-07	1,611,053	-	6,162.28
February-07	1,611,053	-	6,162.28
March-07	1,611,053	-	6,162.28
April-07	1,611,053	-	6,162.28
May-07	1,611,053	-	6,162.28
June-07	1,611,053	-	6,162.28
July-07	1,611,053	-	6,162.28
August-07	1,611,053	-	6,162.28
September-07	1,543,925	67,127	5,905.51
October-07	1,476,798	67,127	5,648.75
November-07	1,409,671	67,127	5,391.99
December-07	1,342,544	67,127	5,135.23
January-08	1,275,417	67,127	4,878.47
February-08	1,208,289	67,127	4,621.71
March-08	1,141,162	67,127	4,364.95
April-08	1,074,035	67,127	4,108.18
May-08	1,006,908	67,127	3,851.42
June-08	939,781	67,127	3,594.66
July-08	872,653	67,127	3,337.90
August-08	805,526	67,127	3,081.14
September-08	738,399	67,127	2,824.38
October-08	671,272	67,127	2,567.62
November-08	604,145	67,127	2,310.85
December-08	537,018	67,127	2,054.09
January-09	469,890	67,127	1,797.33
February-09	402,763	67,127	1,540.57
March-09	335,636	67,127	1,283.81
April-09	268,509	67,127	1,027.05
May-09	201,382	67,127	770.28
June-09	134,254	67,127	513.52
July-09	67,127	67,127	256.76
August-09	-	67,127	-
Total Interest			\$ 126,327

CNPI - Fort Erie - Allocation of Recovery to Customer Classes

Board Approved Recovery	\$ 1,611,053
Project Interest	\$ 126,327
Total Recovery	\$ 1,737,380

Customer Class	Allocation to Customer Class	Volumetric as percent of Total for Customer Class	Fixed Charges as percent of Total for Customer Class	Overall Allocation to Class	Variable Component	Fixed Component
Residential	50.13%	20.09%	79.91%	870,984	174,981	696,004
General Service < 50 kW	14.62%	79.92%	20.08%	254,078	203,059	51,019
General Service > 50 kW	34.00%	93.29%	6.71%	590,682	551,047	39,635
Unmetered Scattered Load	0.22%	38.94%	61.06%	3,847	1,498	2,349
Sentinel Lights	0.31%	18.86%	81.14%	5,396	1,018	4,378
Street Lights	0.71%	17.88%	82.12%	12,392	2,216	10,176
	100.00%	53.73%	46.27%	1,737,380	933,819	803,561

CNPI - Fort Erie - Calculation of Rate Riders
Rate Riders Are Calculated Based on a Two Year Recovery Period

Customer Class	Number of Customers (Connections)	Calculated kWh	Calculated kW	Overall Allocation to Class	Variable Component	Fixed Component	Fixed Charge Rate Rider	Distribution Charge Rate Rider
Residential	13,717	112,747,739		870,984	174,981	696,004	2.11 per month	0.0008 per kWh
General Service < 50 kW	1,150	42,674,415		254,078	203,059	51,019	1.85 per month	0.0024 per kWh
General Service > 50 kW	133	145,569,210	356,123	590,682	551,047	39,635	12.42 per month	0.7737 per kW
Unmetered Scattered Load	107	318,026		3,847	1,498	2,349	0.91 per month	0.0024 per kWh
Sentinel Lights	862	863,072	2,417	5,396	1,018	4,378	0.21 per month	0.2105 per kW
Street Lights	3,020	2,339,029	6,552	12,392	2,216	10,176	0.14 per month	0.1691 per kW
	18,989	304,511,491	365,092	1,737,380	933,819	803,561		

Rate Impacts for Fort Erie Customers Based on a Two Year Recovery Period

Residential

Consumption 1,000 kWh 0 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 19.94			\$ 22.05	\$ 2.11	10.58%	19.27%
Distribution (kWh)	1,000	\$ 0.0072	\$ 7.20	1,000	\$ 0.0080	\$ 8.00	\$ 0.80	11.11%	6.99%
Distribution (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kWh)	1,000	\$ 0.0043	\$ 4.30	1,000	\$ 0.0043	\$ 4.30	\$ -	0.00%	3.76%
Regulatory Assets (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Sub-Total			\$ 31.44			\$ 34.35	\$ 2.91	9.26%	30.02%
Other Charges (kWh)	1048	\$ 0.0163	\$ 17.08	1048	\$ 0.0163	\$ 17.08	\$ -	0.00%	14.93%
Other Charges (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Cost of Power Commodity (kWh)	800	\$ 0.0580	\$ 46.40	800	\$ 0.0580	\$ 46.40	\$ -	0.00%	40.55%
Cost of Power Commodity (kW)	248	\$ 0.0670	\$ 16.61	248	\$ 0.0670	\$ 16.61	\$ -	0.00%	14.51%
Total Bill before Taxes			\$ 111.53			\$ 114.44	\$ 2.91	2.61%	100%
GST 2007 - 6%			\$ 6.69			\$ 6.87	\$ 0.17	2.61%	
Total Bill after Taxes			\$ 118.22			\$ 121.31	\$ 3.08	2.61%	

General Service Less Than 50 kW

Consumption 2,000 kWh 0 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 17.46			\$ 19.31	\$ 1.85	10.60%	8.34%
Distribution (kWh)	2,000	\$ 0.0221	\$ 44.20	2,000	\$ 0.0245	\$ 49.00	\$ 4.80	10.86%	21.15%
Distribution (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kWh)	2,000	-\$ 0.0012	-\$ 2.40	2,000	-\$ 0.0012	-\$ 2.40	\$ -	0.00%	-1.04%
Regulatory Assets (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Sub-Total			\$ 59.26			\$ 65.91	\$ 6.65	11.22%	28.45%
Other Charges (kWh)	2096	\$ 0.0153	\$ 32.07	2096	\$ 0.0153	\$ 32.07	\$ -	0.00%	13.84%
Other Charges (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Cost of Power Commodity (kWh)	750	\$ 0.0580	\$ 43.50	750	\$ 0.0580	\$ 43.50	\$ -	0.00%	18.78%
Cost of Power Commodity (kW)	1,346	\$ 0.0670	\$ 90.17	1,346	\$ 0.0670	\$ 90.17	\$ -	0.00%	38.93%
Total Bill before Taxes			\$ 224.99			\$ 231.64	\$ 6.65	2.96%	100%
GST 2007 - 6%			\$ 13.50			\$ 13.90	\$ 0.40	2.96%	
Total Bill after Taxes			\$ 238.49			\$ 245.54	\$ 7.05	2.96%	

Rate Impacts for Fort Erie Customers Based on a Two Year Recovery Period

General Service 50 to 4,999 kW

Consumption	100,000 kWh 500 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 115.83			\$ 128.25	\$ 12.42	10.72%	1.00%
Distribution (kWh)	100,000	\$ -	\$ -	100,000	\$ -	\$ -	\$ -		0.00%
Distribution (kW)	500	\$ 7.1966	\$ 3,598.30	500	\$ 7.9703	\$ 3,985.15	\$ 386.85	10.75%	30.97%
Regulatory Assets (kWh)	100,000	\$ -	\$ -	100,000	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kW)	500	-\$ 1.5227	-\$ 761.35	500	-\$ 1.5227	-\$ 761.35	\$ -		-5.92%
Sub-Total			\$ 2,952.78			\$ 3,352.05	\$ 399.27	13.52%	26.05%
Other Charges (kWh)	104790	\$ 0.0062	\$ 649.70	104790	\$ 0.0062	\$ 649.70	\$ -	0.00%	5.05%
Other Charges (kW)	500	\$ 3.6999	\$ 1,849.95	500	\$ 3.6999	\$ 1,849.95	\$ -	0.00%	14.38%
Cost of Power Commodity (kWh)	750	\$ 0.0580	\$ 43.50	750	\$ 0.0580	\$ 43.50	\$ -	0.00%	0.34%
Cost of Power Commodity (kW)	104,040	\$ 0.0670	\$ 6,970.68	104,040	\$ 0.0670	\$ 6,970.68	\$ -	0.00%	54.18%
Total Bill before Taxes			\$ 12,466.61			\$ 12,865.88	\$ 399.27	3.20%	100%
GST 2007 - 6%			\$ 748.00			\$ 771.95	\$ 23.96	3.20%	
Total Bill after Taxes			\$ 13,214.60			\$ 13,637.83	\$ 423.23	3.20%	

Unmetered Scattered Load

Consumption	500 kWh 0 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 8.51			\$ 9.42	\$ 0.91	10.69%	14.53%
Distribution (kWh)	500	\$ 0.0219	\$ 10.95	500	\$ 0.0243	\$ 12.15	\$ 1.20	10.96%	18.74%
Distribution (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kWh)	500	\$ 0.0097	\$ 4.85	500	\$ 0.0097	\$ 4.85	\$ -	0.00%	7.48%
Regulatory Assets (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Sub-Total			\$ 24.31			\$ 26.42	\$ 2.11	8.68%	40.75%
Other Charges (kWh)	524	\$ 0.0153	\$ 8.02	524	\$ 0.0153	\$ 8.02	\$ -	0.00%	12.37%
Other Charges (kW)	0	\$ -	\$ -	0	\$ -	\$ -	\$ -		0.00%
Cost of Power Commodity (kWh)	524	\$ 0.0580	\$ 30.39	524	\$ 0.0580	\$ 30.39	\$ -	0.00%	46.88%
Cost of Power Commodity (kW)	0	\$ 0.0670	\$ -	0	\$ 0.0670	\$ -	\$ -		0.00%
Total Bill before Taxes			\$ 62.72			\$ 64.83	\$ 2.11	3.36%	100%
GST (2006 - 7%, 2007 - 6%)			\$ 3.76			\$ 3.89	\$ 0.13	3.36%	
Total Bill after Taxes			\$ 66.48			\$ 68.72	\$ 2.24	3.36%	

Rate Impacts for Fort Erie Customers Based on a Two Year Recovery Period

Sentinel Lighting

Consumption	150 kWh 1 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 1.96			\$ 2.17	\$ 0.21	10.71%	14.62%
Distribution (kWh)	150	\$ -	\$ -	150	\$ -	\$ -	\$ -		0.00%
Distribution (kW)	1	\$ 1.9583	\$ 1.96	1	\$ 2.1688	\$ 2.17	\$ 0.21	10.75%	14.62%
Regulatory Assets (kWh)	150	\$ -	\$ -	150	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kW)	1	-\$ 2.6600	-\$ 2.66	1	-\$ 2.6600	-\$ 2.66	\$ -		-17.93%
Sub-Total			\$ 1.26			\$ 1.68	\$ 0.42	33.42%	11.31%
Other Charges (kWh)	157	\$ 0.0062	\$ 0.97	157	\$ 0.0062	\$ 0.97	\$ -	0.00%	6.57%
Other Charges (kW)	1	\$ 2.9381	\$ 3.08	1	\$ 2.9381	\$ 3.08	\$ -	0.00%	20.75%
Cost of Power Commodity (kWh)	157	\$ 0.0580	\$ 9.11	157	\$ 0.0580	\$ 9.11	\$ -	0.00%	61.37%
Cost of Power Commodity (kW)	0	\$ 0.0670	\$ -	0	\$ 0.0670	\$ -	\$ -		0.00%
Total Bill before Taxes			\$ 14.42			\$ 14.84	\$ 0.42	2.92%	100%
GST 2007 - 6%			\$ 0.87			\$ 0.89	\$ 0.03	2.92%	
Total Bill after Taxes			\$ 15.28			\$ 15.73	\$ 0.45	2.92%	

Street Lighting

Consumption	150 kWh 1 kW	Loss Factor 1.0479
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	2007 BILL			2007 BILL + Recovery			IMPACT		
	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Monthly Service Charge			\$ 1.30			\$ 1.44	\$ 0.14	10.77%	10.20%
Distribution (kWh)	150	\$ -	\$ -	150	\$ -	\$ -	\$ -		0.00%
Distribution (kW)	1	\$ 1.5729	\$ 1.57	1	\$ 1.7420	\$ 1.74	\$ 0.17	10.75%	12.33%
Regulatory Assets (kWh)	150	\$ -	\$ -	150	\$ -	\$ -	\$ -		0.00%
Regulatory Assets (kW)	1	-\$ 2.0954	-\$ 2.10	1	-\$ 2.0954	-\$ 2.10	\$ -		-14.84%
Sub-Total			\$ 0.78			\$ 1.09	\$ 0.31	39.76%	7.69%
Other Charges (kWh)	157	\$ 0.0062	\$ 0.97	157	\$ 0.0062	\$ 0.97	\$ -	0.00%	6.90%
Other Charges (kW)	1	\$ 2.8221	\$ 2.96	1	\$ 2.8221	\$ 2.96	\$ -	0.00%	20.94%
Cost of Power Commodity (kWh)	157	\$ 0.0580	\$ 9.11	157	\$ 0.0580	\$ 9.11	\$ -	0.00%	64.47%
Cost of Power Commodity (kW)	0	\$ 0.0670	\$ -	0	\$ 0.0670	\$ -	\$ -		0.00%
Total Bill before Taxes			\$ 13.82			\$ 14.12	\$ 0.31	2.24%	100%
GST 2007 - 6%			\$ 0.83			\$ 0.85	\$ 0.02	2.24%	
Total Bill after Taxes			\$ 14.64			\$ 14.97	\$ 0.33	2.24%	