

CENTRE WELLINGTON HYDRO LTD. 730 Gartshore St. P.O. Box 217, Fergus, Ontario, N1M 2W8

Digartshore St. P.O. Box 217, Fergus, Ontario, N1M 2W PHONE: (519) 843-2900 FAX: (519) 843-7601 Keith Roszell, Chair Ron Hallman, Director Audrey McNiven, Director George Pinkney, Director

May 20, 2009

Ontario Energy Board 26th Floor 2300 Yonge Street Toronto, Ontario M4P 1E4

ATT: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli,

EB – 2008 - 0225 2009 Draft Rate Order- Response to VECC Comments Centre Wellington Hydro Ltd.

In accordance with the directions received on April 29, 2009 Centre Wellington Hydro Ltd. is responding to comments made by the Vulnerable Energy Consumers Coalition's (VECC) in their letter dated May 14, 2009 to Centre Wellington Hydro's Draft Rate Order.

Two (2) hard copies of the response to comments by VECC on Centre Wellington Hydro Draft Rate Order are enclosed, together with an electronic copy in searchable / unrestricted PDF format. This submission has also been submitted using the OEB's RESS e-filing format.

Centre Wellington Hydro respectfully submits this letter in response to VECC's comments.

Thank you,

Mr. Doug Sherwood President/Secretary Centre Wellington Hydro Ltd. Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 1 of 13

Centre Wellington Hydro Ltd. Draft Rate Order EB-2008-0225

Response to VECC Comments

Centre Wellington is responding to the Vulnerable Energy Consumers Coalition's (VECC) letter of May 14, 2009.

The response is presented in four parts.

- 1.0 First, is a response to the Working Capital charts referred to in VECC's third paragraph on page 1.
- 2.0 Second, is a response to attempt to bring VECC up-to-date with respect to the Working Capital and Rate Base changes. Tables and explanations have been provided.
- 3.0 Third is a table providing the details of changes that resulted in a change to the taxes payable followed by a brief description of each of the changes
- 4.0 Fourth is a section to deal with VECC's concern that Centre Wellington may not have followed the Board's direction when Centre Wellington has clearly stated in the Draft Rate Order that Centre Wellington did.

The change numbers referred to in this document reference the change number on the Summary of Changes Table included on page 2 of the Draft Rate Order.

1.0 Working Capital Charts

On pages 4 and 5 in the Working Capital section of the Manager's Summary of Centre Wellington Hydro's 2009 Draft Rate Order, Centre Wellington used volumes which included a loss factor which had been updated during the application process and not the loss factor used in the August 18, 2008 cost of Service Rate Application. This has no impact on the Draft Rate Order and Tariff of Rates and Charges.

VECC was correct in their assumption in their May 14, 2009 letter stating the Original Application Commodity costs appear to be calculated using the revised loss factors. Centre Wellington has provided the charts used in the original application for both commodity and Rural Rate Protection (RRP) for clarification purposes.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 2 of 13

Original rate application with original volumes

Electricity (Commodity))	Customer	2009	rate (\$/kWh):	\$0.05450
		Class Name	Volume		Amount
	kWh	Residential	47,172,831		2,570,919
er forecast average	kWh	General Service Less Than 50 kW	22,838,459		1,244,696
t rates on this row.	kWh	General Service 50 to 2,999 kW	67,481,331		3,677,733
er RPP rates on sheet	kWh	General Service 3,000 to 4,999 kW	21,969,645		1,197,346
	kWh	Unmetered Scattered Load	419,344		22,854
	kWh	Sentinel Lighting	45,820		2,497
	kWh	Street Lighting	1,165,253		63,506
		TOTAL			8,779,551
Rural Rate Protection		Customer	2009	rate (\$/kWh):	\$0.00100
		Class Name	Volume		Amount
	kWh	Residential	47,172,831		47,173
	kWh	General Service Less Than 50 kW	22,838,459		22,838
	kWh	General Service 50 to 2,999 kW	67,481,331		67,481
	kWh	General Service 3,000 to 4,999 kW	21,969,645		21,970
	kWh	Unmetered Scattered Load	419,344		419
	kWh	Sentinel Lighting	45,820		46
	kWh	Street Lighting	1,165,253		1,165
		TOTAL			161,093

The totals in the above chart agree with the Original Rate application Exhibit 2, Tab 4, Schedule 2, pages 3 & 4.

2.0 Working Capital and Rate Base

The following table provides additional details to support the Working Capital and Rate Base changes made throughout the Cost of Service Rate Application process. The table is followed by notes providing further details where required.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 3 of 13

Centre Wellington Hydro Changes Affecting Working Capital and Rate Base	TE BASE Andrist	SE Angust 18 2008 Change 5	و بح	S	Change	Change 7	2	ĉ	Change 12	٥	Change 14		Change 15	5	Change 20	
Eligible Distribution Expenses:	n n						- 2	5		•				•	8	
3500-Distribution Expenses - Operation		264,900	26	4,900		264,900		264,900		264,900		264,900		264,900		264,900
3550-Distribution Expenses - Maintenance		292,600	58	2,600		292,600		292,600		292,600		292,600		292,600		292,600
3650-Billing and Collecting		332,200	33	2,200		332,200		332,200		332,200		332,200		332,200		332,200
3700-Community Relations		35,600	ਲ	2,600		35,600		35,600		35,600		35,600		35,600		35,600
3800-Administrative and General Expenses		786,300	8/		6,750	793,050		793,050		793,050		793,050		793,050		793,050
3950-Taxes Other Than Income Taxes		35,000	ਲ	2,000		35,000		35,000		35,000		35,000		35,000		35,000
Total Eligible Distribution Expenses	-	746,600	1,74	1,746,600	6,750 1,	1,753,350]`	1,753,350		1,753,350	l	1,753,350		1,753,350		1,753,350
Commodity	∞	0,		3,889	တ်	713,889	0,	3,713,889		9,713,889		9,692,554	67,510	9,760,064		9,760,064
Network				4,223		804,223		804,223		804,223		803,414		803,414		803,414
connection		680,511 (8,	(8,596) 67	671,915		671,915		671,915		671,915	(989)	671,229		671,229		671,229
WMS		837,682	8	7,682		837,682		837,682		837,682		835,842		835,842		835,842
RRP		161,093	16	1,093		161,093		161,093		161,093		160,739		160,739	48,222	208,961
Γ٨		91,000	6	1,000		91,000		91,000	(1,608)	89,392		89,392		89,392		89,392
3350-Power Supply Expenses	£	11,369,553 910,	910,249 12,279,802	9,802	12,	12,279,802	₩	12,279,802	(1,608)	12,278,194	(25,024) 12,253,170	12,253,170	67,510 12,320,680		48,222 1;	12,368,902
Total Expenses for Working Capital	13	13,116,153	14,02	14,026,402	14,	14,033,152	4	14,033,152	_	14,031,544	•	14,006,520	-	14,074,030	~	14,122,252
Working Capital Allowance	15.00% 1,	1,967,423	2,10	2,103,960	6 1	2,104,973		2,104,973		2,104,732		2,100,978		2,111,105		2,118,338
Net Fixed Assets in Service: Opening Balance	Ó	802.840	.08.9	2.840	Ó			3.849.815		6.849.815		6.849.815		6.849.815		5.849.815
Closing Balance	9	6,898,562	6,89	6,898,562	Ó	6,898,562	93,951 (6,992,513		6,992,513		6,992,513		6,992,513		6,992,513
Average Balance	· ·	6,850,701	6,85	0,701	Ġ.	850,701		3,921,164		6,921,164		6,921,164		6,921,164		6,921,164
TOTAL RATE BASE	80	8,818,124	8,954,661	4,661	ω΄	8,955,674		9,026,137	1 11	9,025,896	1 11	9,022,142	1 11	9,032,269	1-1	9,039,502

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 4 of 13

A description of the changes affecting working capital and rate base is provided below:

Change # 5

Centre Wellington updated both the Commodity and Network and Connection rates during the rate application process.

Rates Prior to Change #5

Electricity (Commodity)		Customer	2009	rate (\$/kWh):	\$0.05450
		Class Name	Volume		Amount
	kWh	Residential	47,172,831		2,570,919
er forecast average	kWh	General Service Less Than 50 kW	22,838,459		1,244,696
t rates on this row.	kWh	General Service 50 to 2,999 kW	67,481,331		3,677,733
er RPP rates on sheet	kWh	General Service 3,000 to 4,999 kW	21,969,645		1,197,346
	kWh	Unmetered Scattered Load	419,344		22,854
	kWh	Sentinel Lighting	45,820		2,497
	kWh	Street Lighting	1,165,253		63,506
		TOTAL			8,779,551
Transmission - Network		Customer		2009	
		Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.005534	261,054
	kWh	General Service Less Than 50 kW	22,838,459	\$0.004966	113,416
	kW	General Service 50 to 2,999 kW	166,526	\$2.032847	338,522
	kW	General Service 3,000 to 4,999 kW	43,874	\$2.273633	99,753
	kWh	Unmetered Scattered Load	419,344	\$0.004966	2,082
	kW	Sentinel Lighting	122	\$1.540917	188
	kW	Street Lighting	3,066	\$1.533113	4,701
		TOTAL			819,716
Transmission - Connect	ion	Customer		2009	
		Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.004649	219,306
		General Service Less Than 50 kW	22,838,459	\$0.004124	94,186
		General Service 50 to 2,999 kW	166,526	\$1.654846	275,575
		General Service 3,000 to 4,999 kW	43,874	\$1.951787	85,633
	kWh	Unmetered Scattered Load	419,344	\$0.004124	1,729
	kW	Sentinel Lighting	122	\$1.306090	159
	kW	Street Lighting	3,066	\$1.279320	3,922
		TOTAL			680,511

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 5 of 13

CHANGE #5 Commodity, Network and Connection rate changes

Electricity (Commodity)		Customer	2009	rate (\$/kWh):	\$0.06030
		Class Name	Volume		Amount
	kWh	Residential	47,172,831		2,844,522
er forecast average	kWh	General Service Less Than 50 kW	22,838,459		1,377,159
t rates on this row.	kWh	General Service 50 to 2,999 kW	67,481,331		4,069,124
er RPP rates on sheet	kWh	General Service 3,000 to 4,999 kW	21,969,645		1,324,770
	kWh	Unmetered Scattered Load	419,344		25,286
	kWh	Sentinel Lighting	45,820		2,763
	kWh	Street Lighting	1,165,253		70,265
		TOTAL			9,713,889
Transmission - Network		Customer		2009	
		Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.005400	254,733
	kWh	General Service Less Than 50 kW	22,838,459	\$0.004900	111,908
	kW	General Service 50 to 2,999 kW	166,526	\$1.997800	332,686
	kW	General Service 3,000 to 4,999 kW	43,874	\$2.234500	98,036
	kWh	Unmetered Scattered Load	419,344	\$0.004900	2,055
	kW	Sentinel Lighting	122	\$1.514400	185
	kW	Street Lighting	3,066	\$1.506700	4,620
		TOTAL			804,223
Transmission - Connection		Customer		2009	
		Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.004600	216,995
	kWh	General Service Less Than 50 kW	22,838,459	\$0.004100	93,638
	kW	General Service 50 to 2,999 kW	166,526	\$1.628900	271,254
	kW	General Service 3,000 to 4,999 kW	43,874	\$1.921200	84,291
	kWh	Unmetered Scattered Load	419,344	\$0.004100	1,719
	kW	Sentinel Lighting	122	\$1.285600	157
	kW	Street Lighting	3,066	\$1.259300	3,861
		TOTAL			671,915

Change # 6

Change # 6 of \$6,750 was required to amortize the cost of preparing the Cost of Service Rate application over 4 years and to reflect the revisions to the budget amount to reflect amounts not originally budgeted for.

Change # 7

A change to the method of amortizing Contributed capital resulted in an increase of \$70,463 to the average balance of the Net Fixed Assets.

Change # 12

Centre Wellington was asked to revise the LV Costs. The result was a reduction in LV costs of \$1,608.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 6 of 13

Change # 14

The Loss Factor was revised from 1.0472 to 1.0449.

Volumes used prior to Change # 14 (Same as Change # 5)

Electricity (Commodity)		Customer	2009	rate (\$/kWh):	\$0.06030
		Class Name	Volume	,	Amount
	kWh	Residential	47.172.831		2,844,522
er forecast average	kWh	General Service Less Than 50 kW	22,838,459		1,377,159
t rates on this row.		General Service 50 to 2,999 kW	67.481.331		4,069,124
er RPP rates on sheet		General Service 3,000 to 4,999 kW	21,969,645		1,324,770
		Unmetered Scattered Load	419,344		25,286
		Sentinel Lighting	45,820		2,763
		Street Lighting	1,165,253		70,265
		TOTAL	1,100,200		9,713,889
Transmission - Network		Customer		2009	0,1 10,000
		Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.005400	254,733
		General Service Less Than 50 kW	22,838,459	\$0.004900	111,908
		General Service 50 to 2,999 kW	166,526	\$1.997800	332,686
		General Service 3,000 to 4,999 kW	43,874	\$2.234500	98,036
		Unmetered Scattered Load	419,344	\$0.004900	2,055
1		Sentinel Lighting	122	\$1.514400	185
		Street Lighting	3,066	\$1.506700	4,620
	1000	TOTAL	0,000	ψ1.000700	804,223
Transmission - Connecti	on	Customer		2009	004,220
Transmission - Connecti	<u> </u>	Class Name	Volume	Rate	Amount
	kWh	Residential	47,172,831	\$0.004600	216,995
	kWh		22,838,459	\$0.004100	93,638
	kW	General Service 50 to 2,999 kW	166,526	\$1.628900	271,254
	kW		43,874	\$1.921200	84,291
		Unmetered Scattered Load	419,344	\$0.004100	1,719
	kW	Sentinel Lighting	122	\$1.285600	157
		Street Lighting	3,066	\$1.259300	3,861
		TOTAL	0,000	ψ.1.200000	671,915
Wholesale Market Service	e	Customer	2009	rate (\$/kWh):	\$0.00520
		Class Name	Volume	,	Amount
	kWh	Residential	47.172.831		245,299
	kWh	General Service Less Than 50 kW	22,838,459		118,760
		General Service 50 to 2,999 kW	67,481,331		350,903
1		General Service 3,000 to 4,999 kW	21,969,645		114,242
1		Unmetered Scattered Load	419,344		2,181
		Sentinel Lighting	45,820		238
		Street Lighting	1,165,253		6,059
		TOTAL	,,		837,682
Rural Rate Protection		Customer	2009	rate (\$/kWh):	\$0.00100
		Class Name	Volume	1	Amount
	kWh	Residential	47,172,831		47,173
	kWh	General Service Less Than 50 kW	22,838,459		22,838
		General Service 50 to 2,999 kW	67,481,331		67,481
1		General Service 3,000 to 4,999 kW	21,969,645		21,970
1	kWh		419,344		419
		Sentinel Lighting	45,820		46
		Street Lighting	1,165,253		1,165
		TOTAL	,,		161,093
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Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 7 of 13

Volumes used in Change #14

Electricity (Commodity)	Customer	2009	rate (\$/kWh):	\$0.06030
	Class Name	Volume		Amount
	Residential	47,069,224		2,838,274
er forecast average kWi	General Service Less Than 50 kW	22,788,298		1,374,134
t rates on this row.	General Service 50 to 2,999 kW	67,333,120		4,060,187
er RPP rates on sheet kWh	General Service 3,000 to 4,999 kW	21,921,393		1,321,860
	Unmetered Scattered Load	418,423		25,231
	Sentinel Lighting	45,720		2,757
kWi	Street Lighting	1,162,694		70,110
	TOTAL			9,692,554
Transmission - Network	Customer		2009	
	Class Name	Volume	Rate	Amount
	Residential	47,069,224	\$0.005400	254,174
	General Service Less Than 50 kW	22,788,298	\$0.004900	111,663
kW		166,526	\$1.997800	332,686
	General Service 3,000 to 4,999 kW	43,874	\$2.234500	98,036
kWh	Unmetered Scattered Load	418,423	\$0.004900	2,050
	Sentinel Lighting	122	\$1.514400	185
kW	Street Lighting	3,066	\$1.506700	4,620
T	TOTAL		2000	803,413
Transmission - Connection	Customer Class Name	Volume	2009 Rate	Amount
F/V/1	Residential	47,069,224	\$0.004600	216,518
kWi		22,788,298	\$0.004000	93,432
l kW		166,526	\$1.628900	271,254
l kW		43,874	\$1.921200	84,291
kWh		418,423	\$0.004100	1,716
kW.		122	\$1.285600	1,710
kW		3,066	\$1.259300	3,861
	TOTAL	0,000	ψ1.200000	671,229
Wholesale Market Service	Customer	2009	rate (\$/kWh):	\$0.00520
	Class Name	Volume	,	Amount
kWl	Residential	47,069,224		244,760
kWl	General Service Less Than 50 kW	22,788,298		118,499
	General Service 50 to 2,999 kW	67,333,120		350,132
kWh	General Service 3,000 to 4,999 kW	21,921,393		113,991
kWl	Unmetered Scattered Load	418,423		2,176
kWh	Sentinel Lighting	45,720		238
kWi	Street Lighting	1,162,694		6,046
	TOTAL			835,842
Rural Rate Protection	Customer	2009	rate (\$/kWh):	\$0.00100
	Class Name	Volume		Amount
	Residential	47,069,224		47,069
	General Service Less Than 50 kW	22,788,298		22,788
kWh	General Service 50 to 2,999 kW	67,333,120		67,333
kWi	General Service 3,000 to 4,999 kW	21,921,393		21,921
	Unmetered Scattered Load	418,423		418
	Sentinel Lighting	45,720		46
kWi	Street Lighting	1,162,694		1,163
	TOTAL			160,739

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 8 of 13

Change # 15

Centre Wellington was directed to update the commodity rate to \$0.06072 / kWh The following chart provides the details for each customer class and can be compared to the commodity in previous charts provided above showing the Application's original volumes and the various cost of power rates used throughout the application.

Electricity (Commodit	<u>y)</u>	Customer	2009	rate (\$/kWh):	\$0.06072
		Class Name	Volume		Amount
	kWh	Residential	47,069,224		2,858,043
er forecast average	kWh	General Service Less Than 50 kW	22,788,298		1,383,705
t rates on this row.	kWh	General Service 50 to 2,999 kW	67,333,120		4,088,467
er RPP rates on sheet	kWh	General Service 3,000 to 4,999 kW	21,921,393		1,331,067
	kWh	Unmetered Scattered Load	418,423		25,407
	kWh	Sentinel Lighting	45,720		2,776
	kWh	Street Lighting	1,162,694		70,599
		TOTAL			9,760,064

Change # 20

Centre Wellington changed the RRP rate from \$0.0010 to \$0.0013 in accordance with direction from the Board in a letter dated December 17, 2008. The following table provides the revised revenues. Revenues for RRP at earlier rates can be seen in the tables above.

Rural Rate Protection	Customer	2009	rate (\$/kWh):	\$0.00130
	Class Name	Volume		Amount
·	Wh Residential	47,069,224		61,190
 	Wh General Service Less Than 50 kW	22,788,298		29,625
 	Wh General Service 50 to 2,999 kW	67,333,120		87,533
	Wh General Service 3,000 to 4,999 kW	21,921,393		28,498
 	Wh Unmetered Scattered Load	418,423		544
 	Wh Sentinel Lighting	45,720		59
 	Wh Street Lighting	1,162,694		1,512
	TOTAL			208,961

3.0 Payment in Lieu of Taxes

Centre Wellington has prepared the following table to provide the details of the changes to Regulatory Taxable Income which ultimately results in a change to the Taxes Payable. A brief explanation of the changes follows the table.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 9 of 13

Centre Wellington Hydro		o de la companya de l	Change	Special Control of the Control of th	S			e de la company	S S S S S S S S S S S S S S S S S S S	Observe	Change		o Page	Chame		
Payment in Lieu of Taxes	Aug 18 2008	- L	es es	5	9		7	86 80	10 10	T dange	dange 12	14	15	oliange 16	20 T	Totals
Income (Loss) before PILs	327,473			5,071		37	2,617				(6)	(139)	376	-21918	34	313,759
Additions Charlable durations Un Deductible Mesis and Expenses Change in Reserves from end of year Amortization Total Additions	10,000 3,570 1,053,328 638,185 1,705,004	(000'01)	65,576			₫ .	(46,976)	(17,427)		(1,101,478)					<i>w</i> w	3,570 3,570 - - - - - - - - - - - - - - - - - - -
Deductions Non Utility Rev Non Utility Per Chartable bonations Charge in Reserves from beginning of year CCA Total Deductions	(251,000) 226,800 (10,000) (1,256,220) (715,097) (2,005,517)	251,000 (226,800) 10,000	8,829					21,752		1,225,639					7)	(715,097)
Regulatory Tarable incomel[Loss] Combined Income Tar Rate Total Income Taxes	27,040 22.0% 5,949	24,200 51,240 22,0% 11,773	74,405	125,645 5,071 1 22.0% 27,642	130,716 22.0% 28,758	37 130,753 (4, 22.0% 28,766	(44,359) 86,394 22.0% 19,007	4,325 90,719 22.0%	- 90,719 16.5% 14,969	124,161 214,880 16.5% 35,455	(9) 214,871 16.5% 35,454	(139) 214,732 16,5% 35,431	376 215,108 16,5% 35,493	(21,918) 193,190 16.5% 31,876	122	1 93,441 16.5% 31,918
Investment & Miscellareous I ax Credis Income Tax Payable	5,949	11,23		7,642	28,758	28,766	19,007	19,958	14,969	35,455	35,454	35,431	35,493	31,876	l	31,918
Cargo Culpulations (av. L.C.) Ontaio Capital Tax (OCT) Grossed-up Income Tax	2,839	2,839		2,839 35,438	2,839	2,839	2,839	25,587	(597) 2,242 17,927	2,242 42,461	2,242 42,460	2,242 42,432	2,242 42,506	2,242 38,175		2,242 38,225
Glosser-up LC I	10,466	17,291		38,277	39,708	39,718	27,207	28,426	20,169	44,703	44,702	44,674	44,748	40,417	1 11	40,467

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 10 of 13

Change #1

The Regulatory Taxable income was adjusted to remove Charitable Donations and Non Utility Revenue and Expenses. Although these amounts are used for tax purposes they are not included in Regulatory Taxable income.

Change # 3

The balances of the DVADs changes as a result of a change to the interest rates. The ending and beginning year balances were used to calculate Regulatory Taxable Income at his point in the rate application and were therefore adjusted to reflect the interest rate change.

Change # 5

A change to the Commodity, Network, and Connection rates increased the Income before PILs. Those changes were reflected on the tables included in the previous Working Capital and Rate Base section of this document.

Change # 6

As a result of changing the period of recovery for the rate application costs, the Income before PILs increased by \$37.

Change #7

A change in the method of amortization of contributed capital had a \$2,617 impact on Income before PILs as well as a change to the Amortization which is added back to income before PILs in arriving at Regulatory Taxable Income.

Change #8

A change to account 1508 for OMERS and the OEB Cost Assessment resulted ina change to the beginning and ending balances of the DVADs resulting in a change to Reserves at this point in the application.

Change # 10

Centre Wellington was directed to change the combined Income tax rate from 22.0% to 16.5%.

Change # 11

Centre Wellington was alerted to the fact the opening and closing balances of the DVAD were not to be included in Regulatory Taxable Income although they are used for tax purposes. Centre Wellington removed the remaining amounts related to these reserves.

Change # 12

Centre Wellington was directed to update the LV costs. A reduction of \$1,608 of LV costs related to a \$9 reduction in Income before PILs.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 11 of 13

Change # 14

Centre Wellington revised it loss factor from 1.0472 to 1.0449 resulting in a decrease to Income befoe PILs of \$139.

Change # 15

Centre Wellington was directed to change the Cost of Power rate to \$0.06072 resulting in a further change to Income before PILs increasing it by \$376.

Change # 16

Centre Wellington was directed to change its Long Term Debt and Equity rates to 7.62 and 8.01 respectively. This had an impact of reducing the Income before PILs by \$21,918.

Change # 20

An increase to the RPP rate to \$0.0013 from \$0.0010 increase Income before PILs by \$251.

In reference to derivation of the revised adjustments of (-\$120,318) required to arrive at taxable utility income Centre Wellington provides the following reconciliation:

Income (Loss) before PILs	\$313,759
Adjustments: Add: Non Deductible Meals & Expenses Add: Amortization Less: CCA	3,570 591,209 (715,097)
Total Adjustments	(\$120,318)
Regulatory Taxable Income (Loss)	\$193,441

4.0 Cost Allocation & Rate Design

Centre Wellington will respond to VECC concerns in the same order as items identified by the BOARD in the Decision and Order.

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 12 of 13

RTSRs

Centre Wellington has provided the rates and volumes used in the calculation of the power supply expenses in their Draft Rate Order. The Network and Connection revenues are provided below.

Transmission - Network	Customer		2009	
	Class Name	Volume	Rate	Amount
kWh	Residential	47,069,224	\$0.005400	254,174
kWh	General Service Less Than 50 kW	22,788,298	\$0.004900	111,663
kW	General Service 50 to 2,999 kW	166,526	\$1.997800	332,686
kW	General Service 3,000 to 4,999 kW	43,874	\$2.234500	98,036
kWh	Unmetered Scattered Load	418,423	\$0.004900	2,050
kW	Sentinel Lighting	122	\$1.514400	185
kW	Street Lighting	3,066	\$1.506700	4,620
	TOTAL			803,413
Transmission - Connection	Customer		2009	
	Class Name	Volume	Rate	Amount
kWh	Residential	47,069,224	\$0.004600	216,518
kWh	General Service Less Than 50 kW	22,788,298	\$0.004100	93,432
kW	General Service 50 to 2,999 kW	166,526	\$1.628900	271,254
kW	General Service 3,000 to 4,999 kW	43,874	\$1.921200	84,291
kWh	Unmetered Scattered Load	418,423	\$0.004100	1,716
kW	Sentinel Lighting	122	\$1.285600	157
kW	Street Lighting	3,066	\$1.259300	3,861
	TOTAL		·	671,229

Line Losses

The total loss factor of 1.0449 was used in Centre Wellington's Draft Rate Order. The normalized load forecast is provided in the top section of the table increased by the TLF to arrive at the values provided in the bottom half of the table.

Customer Class Name	2009□
Customer Class Name	Normalized
Residential	45,046,630
General Service Less Than 50 kW	21,809,071
General Service 50 to 2,999 kW	64,439,774
General Service 3,000 to 4,999 kW	20,979,417
Unmetered Scattered Load	400,443
Sentinel Lighting	43,755
Street Lighting	1,112,732
TOTAL	153,831,822

Customer Class Name	2009 □ Normalized		
Residential	47,069,224		
General Service Less Than 50 kW	22,788,298		
General Service 50 to 2,999 kW	67,333,120		
General Service 3,000 to 4,999 kW	21,921,393		
Unmetered Scattered Load	418,423		
Sentinel Lighting	45,720		
Street Lighting	1,162,694		

Centre Wellington Hydro Ltd. Filed: May 20, 2009 EB-2008-0225 Draft Rate Order-Response to VECC Comments Page 13 of 13

Low Voltage Costs

The update LV charges of \$89,392 were used in the derivation of the final rates. The following table is an excerpt from the final rate model used by Centre Wellington:

Customer Class Name	Total Base Revenue	Transformer Allowance	Low Voltage Revenue	Gross Base Revenue
	Requirement	Recovery 4	Required ⁵	Requirement
Residential	1,539,695		28,835	1,568,530
General Service Less Than 50 kW	478,076		12,443	490,519
General Service 50 to 2,999 kW	529,526	58,940	36,125	624,591
General Service 3,000 to 4,999 kV	88,755	25,908	11,226	125,889
Unmetered Scattered Load	10,924		228	11,152
Sentinel Lighting	2,021		21	2,042
Street Lighting	81,928		514	82,442
TOTAL	2,730,924	84,849	89,392	2,905,164

Revenue to Cost Ratios

The following table provides the Revenue to Cost ratios Centre Wellington Hydro was directed to use in its Draft Rate Order. The second Last column is the Revenue to Cost ration per the Decision and Order and the last column is the results of the transformer allowance methodology recommended by VECC. The table is an excerpt from Centre Wellington's final rate model and used in the Draft Rate Order.

	Rate Application			Cost Allocation
Customer Class Name	Allocated	Allocated	Revenue to	Revenue to
	Revenue 8	Cost ⁸	Cost Ratio	Cost Ratio 9
Residential	1,539,695	1,498,243	1.0277	1.0987
General Service Less Than 50 kW	478,076	443,081	1.0790	1.1468
General Service 50 to 2,999 kW	529,526	468,869	1.1294	1.0504
General Service 3,000 to 4,999 kV	88,755	107,602	0.8248	0.3487
Unmetered Scattered Load	10,924	9,780	1.1169	1.4231
Sentinel Lighting	2,021	4,385	0.4609	0.1688
Street Lighting	81,928	198,964	0.4118	0.0918
TOTAL	2,730,924	2,730,924	1.0000	

This table also provides proof that the Street lighting and Sentinel Lighting Revenue to Cost ratios directed by the Board have been used in the Draft Rate Order.

Rate Design

Centre Wellington was directs by the Board to phase in the fixed charge for the GS>50 kW customer class. It was directed to go to half way between the current and proposed rate which is mathematically proven to be \$71.46. This was calculated before the addition of any smart meter adders. The Tariff of Rates and Charges shows a fixed charge for this class of \$72.46 which includes \$1 for a smart meter funding adder.