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January 7, 2010

BY RESS & COURIER

Ms. Kirsten Walli, Board Secretary Ontario Energy Board 2300 Yonge Street, 26th Floor, P.O. Box 2319 TORONTO. ON M4P 1E4

Re:

ED Number EB-2009-0263

Festival Hydro Inc. Response to Board Staff Second Round Interrogatories 2010 Electricity Distribution Rates, Licence No. ED-2002-0513

Dear Ms. Walli:

On August 28, 2009, Festival Hydro Inc., referred to herein as the Applicant, filed its application for 2010 electricity distribution rates and, subsequently, on December 18, 2009, Board staff submitted its interrogatories to the Applicant as per the Board's Procedural Order #2 dated December 7, 2009. The Applicant now submits its responses to those interrogatories.

A copy of this package has been electronically filed through the Ontario Energy Board's RESS system and emailed to the Board Secretary. The original has been couriered to the Board's offices.

Should you require any further information or clarification of any of the above, kindly contact the writer.

Respectfully submitted, Originally Signed by

W.G. Zehr, President

Cc All Intervenors

Board Staff Interrogatories 2010 Electricity Distribution Rates Festival Hydro Inc. ("Festival Hydro") EB-2009-0263

Load Forecasting

39. Ref: Board Staff IR#6, VECC IR#10, Energy Probe IR#10

Ref: Exhibit 3/ Tab 2/ Sch. 1/ Page 7

The coefficient for "Population" in the multifactor regression model is negative 5,558.23. In response to interrogatories, Festival Hydro states that, "The load increase from the modest customer growth is less than the reduction in load resulting from reduced average consumption across the entire customer population. This reduction across the entire consumer population is primarily the result of two factors: conservation and reduced manufacturing demand related to plant closures."

a) The interrogatory queried the negative population coefficient; however the response was stated in terms of customers. Does Festival Hydro have an alternative model using customers as a variable?

RESPONSE:

Festival Hydro does not have an alternate model which makes use of customer numbers as a variable.

b) Please explain the relationship between population and manufacturing demand.

RESPONSE:

Festival Hydro has no empirical evidence as to whether there is a direct relationship between an increase or decrease in the amount of manufacturing activity and the population within our service area. One would expect there would be a correlation between the two i.e. increased manufacturing capacities needing more employees would translate into greater population. The same effect would be expected with manufacturing losses as residents move to find employment elsewhere. This being the case, there are many other factors that would need to be considered such as shifts in manufacturing, labour being replaced by robots, availability of resources such as highways, rail, gas, electricity, land, labour and tax that influence manufacturing. Taking into account all of such variables, it would be difficult to prove a correlation between population and manufacturing demand.

c) Please develop a load forecast using the retail normalized average use per customer ("retail NAC") method. Please base the forecast on 2008 actual data.

RESPONSE:

Festival Hydro has developed a load forecast using the retail NAC method applied to the 2008 actual data. Please refer to the table below.

d) Please develop a load forecast using the IESO 18-Month Outlook. Please base the forecast on 2008 actual data.

RESPONSE:

Festival Hydro has developed a load forecast using the electricity growth (decline) for Ontario of -4.0% for 2009 and -0.3% for 2010 as reported in the May 25, 2009 IESO 18 month Report for the period June 2009 to November 2010. Please refer to the table below.

e) Provide a summary chart comparing the load forecast as filed on August 28, 2009 with the forecasts developed from (c) and (d) above.

RESPONSE:

The table below summarizes for 2009 and 2010 the original submitted forecast, the NAC forecast and the IESO forecast.

OEB Interrogatory # 30 c Load forecast using NAC based on 2008 Actual Data

2008 Average Energy Usage per Customer by Rate Class

Year	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL
Energy Usa	ge by Customer	/Connection						
2008	8,198	9,761	34,120	1,435,542	33,712,174	656	2,687	4,356

Forecasted Customers by Rate Class for 2009 & 2010

Year	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
2009	16,910	412	1,970	219	2	5,886	82	156	25,638
2010	17,115	413	1,968	221	2	5,916	83	156	25,874

Forecasted Load using the NAC method based on 2008 actual data

Year	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
2009	138,632,059	4,025,843	67,224,396	314,753,718	67,424,347	3,861,818	221,042	680,046	596,823,268
2010	140,313,581	4,035,190	67,164,064	316,569,689	67,424,347	3,881,508	223,093	678,377	600,289,849

OEB Interrogatory # 30 d Load forecast using IESO forecast based on 2008 Actual Data

2008 Energy Usage by Rate Class

Year	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
Energy Usa	ge by Class								
2008	136,970,688	4,016,517	67,284,782	312,948,164	67,424,347	3,842,227	219,010	681,719	593,389,462

2009 and 2010 Expected Ontario Growth (Decline) from the IESO May 25, 2009 18 Month Outlook Report

2009 -4.00% 2010 -0.30%

Forecasted Load applying the IESO growth rates to 2008 Actual Data

Year	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
2009	131,491,860	3,855,856	64,593,391	300,430,237	64,727,373	3,688,538	210,250	654,450	569,651,956
2010	131,097,385	3,844,289	64,399,611	299,528,947	64,533,191	3,677,472	209,619	652,487	567,943,000

OEB Interrogatory # 30 e Summary table

2009 Load Forecast under three scenarios

	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
Aug 2009									
filed *	136,117,457	3,993,693	65,962,671	312,529,632	66,477,958	3,873,055	226,715	655,210	589,836,391
39c NAC									
based	138,632,059	4,025,843	67,224,396	314,753,718	67,424,347	3,861,818	221,042	680,046	596,823,268
39d IESO									
based	131,491,860	3,855,856	64,593,391	300,430,237	64,727,373	3,688,538	210,250	654,450	569,651,956

 $^{^{\}star}\,$ Per Table 15 under Exhibit 3, Tab 2, Schedule 1, page 20 using 11 years of HDD and CDD

OEB Interrogatory # 30 e

2010 Load Forecast under three scenarios

	Residential	Residential Hensall	General Service < 50 kW	General Service > 50 kW	Large Use	Street Lighting	Sentinel Lights	USL	Total
Aug 2009									
filed *	129,737,473	3,808,598	62,021,896	310,990,652	65,544,852	3,904,130	234,690	629,732	576,872,024
39c NAC									
based	140,313,581	4,035,190	67,164,064	316,569,689	67,424,347	3,881,508	223,093	678,377	600,289,849
39d IESO									
based	131,097,385	3,844,289	64,399,611	299,528,947	64,533,191	3,677,472	209,619	652,487	567,943,000

^{*} Per Table 15 under Exhibit 3, Tab 2, Schedule 1, page 20 using 11 years of HDD and CDD

OM&A

40. Ref: Board Staff IR#12

Ref: Exhibit 4/ Tab 2/ Sch. 3/ Page 17

As noted in the response to the IR, Festival Hydro anticipates using a deferral account mechanism to record one-time conversion costs to IFRS. Festival Hydro feels that there will be significant on-going compliance costs related to IFRS reporting that should be considered. The response to the IR states that these on-going compliance costs total \$14,000 each year for four years. Please provide specific examples of the activities related to on-going IFRS compliance.

RESPONSE:

Once IFRS is fully implemented we anticipate ongoing compliance costs to be higher than in the past for the following specific items:

- The annual audit of our IFRS statements will cost more than our current audit under Canadian GAAP as IFRS reporting requirements are more extensive. The additional disclosure requirements, for example, would cause the expected professional fee to increase. We anticipate that our annual audit costs for this item will increase \$4,000.
- The OEB has indicated in their document EB-2008-0408, Transition to IFRS, that the RRR will include a requirement for supplementary audit assurance regarding regulatory accounting values reported on an annual basis where they differ from IFRS reported values in audited financial statements and that are not otherwise audited. This supplementary audit assurance will involve a full audit of regulatory accounting values by a third party auditor in accordance with attest audit requirements. FHI anticipates that this additional audit assurance required will cost approximately \$5,000 per year.
- In addition to the specific issues being faced by the Rate Regulated Industry in the conversion to IFRS, we are aware of significant changes to many of the IFRS standards to be implemented in the upcoming years as noted in the table below (the information is per IASB plans at October 30, 2009). In the year that a new standard is implemented, we anticipate our external audit costs will increase by approximately \$4,000. As the table notes below there are several scheduled IFRS changes for 2011, 2012, and 2013, in addition to some standard changes where the revision date is still unknown at this point.

2011	2012	2013	Unknown
			Implementation
			Date
Consolidation	Derecognition	Financial	Earnings per
(include more entities on B/S – when to	(significant changes to standard are likely)	statement	share
consolidate not how)	Standard are likely)	presentation	
Discontinued	Financial	Financial	Extractive
operations	Instruments	instruments with	activities
	(revisions to first time adoption provisions and	characteristics of	
	disclosure requirements)	equity	
Joint Ventures	Fair value	Insurance	Common control
	measurement	contracts	transactions
Non-financial	Income taxes	Leases	Government
liabilities	(would eliminate some differences between		grants
(liability definition, liability recognition	CDN GAAP and IFRS,		
criteria, liability	however will create some new differences)		
measurement, reimbursement rights,	,		
disclosure)			
Related Party	Rate Regulated	Post-	Intangible assets
Disclosures	Activities (new standard for	employment	
	industry)	benefits (recognition of	
	• •	gains/losses from	
		defined benefit plans,	
		presentation of defined benefit liabilities,	
		accounting for benefits	
		that are based on contributions and a	
		promised return)	
		Revenue	
		recognition	
		Emissions	
		trading schemes	

41. Ref: Board Staff IR#13 Ref: Exhibit 4/ Tab 2/ Sch. 6

In response to the IR, Festival Hydro states that, "In 2007 and 2008 executive wage increases were greater than 3% to reflect pay amounts that are competitive with other LDC's in the Southwestern Region." Please provide the number of LDC's used for comparison and the rank of Festival Hydro among these LDC's before and after the executive wage increases for each of 2007 and 2008.

RESPONSE

Festival Hydro participates in the annual MEARIE salary survey for LDC's in the 10,000 – 20,000 customer range. In 2007 the survey data encompassed groupings that included nine President positions, five VP of Engineering and Operations, and eight Secretary Treasurers. In 2008 the survey categories included data for seven Presidents, three VP of Engineering and Operations, and five Secretary Treasurers. The tables below compare the results of the survey to the actual FHI data.

The tables below include columns that for the following defined items:

Average minimum – The average minimum rate of the salary range for all respondents.

Average maximum – The average maximum rate of the salary range for all respondents.

Mean – The sum of the actual average salary reported divided by the number of respondents.

P25 – 25th percentile (1st quartile) – the rate within the sample which is higher than 25% of all rates reported.

P75 – 75th percentile (3rd quartile) – the rate within the sample which is higher than 75% of all rates reported.

Median – the middle rate when data are arranged in order and there is an odd number of observations (i.e. 3, 5, 7 etc.). It is the mean of the two middle observations when the data is arranged in order for even number observations (2, 10 etc.).

Note that the 2008 MEARIE data could not provide the P25, P75 or Median data for the position of VP Engineering & Operations as there were less than 3 LDC's that reported data for this position. Also note that in 2008 FHI is still below the mean even after the change in compensation amounts.

Average Range Minimum Mean P25 P75 MEARIE Survey Total for 3 Executive positions (president, VP engineering &	
2007 MEARIE Survey Total for 3 Executive positions (president, VP engineering &	
MEARIE Survey Total for 3 Executive positions (president, VP engineering &	Median
operations, secretary treasurer) \$ 277,363 \$ 337,875 \$ 326,053 \$ 306,650 \$ 337,673 \$	217 005
operations, secretary treasurer) \$\frac{3}{277,503} \frac{3}{357,673} \frac{3}{3520,033} \frac{3}{3500,030} \frac{3}{3537,073} \frac{3}{357,073} \frac{3}{35	317,363
FHI Actual for President, VP Engineering & Operations, & Secretary Treasurer \$ 313,236 \$ 313,236 \$ 313,236 \$ 313,236 \$ 313,236 \$	313,236
Over/(Under) \$ 35,873 \$ (24,639) \$ (12,817) \$ 6,586 \$ (24,437) \$	(4,749)
After	
Average Average	
Range Range	Madian
2007 Minimum Maximum Mean P25 P75 MEARIE Survey Total for 3 Executive	Median
positions (president, VP engineering &	
operations, secretary treasurer) \$ 277,363 \$ 337,875 \$ 326,053 \$ 306,650 \$ 337,673 \$	317,985
FHI Actual for President, VP Engineering &	
Operations, & Secretary Treasurer \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$	332,107
Over/(() oder)	3 14,122
Over/(Under) \$ 54,744 \$ (5,768) \$ 6,054 \$ 25,457 \$ (5,566) \$	
Before	
Average Range Range	
Average Range Minimum Range Maximum Mean P25 P75	Median
Average Range Range	Median
2008 MEARIE Survey Total for 3 Executive	Median
2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering &	Median
2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering & operations, secretary treasurer) Secretary treasurer Before Average Range Range Maximum Mean P25 P75 P75 P75 Secretary treasurer \$ 294,866 \$ 374,053 \$ 350,051	
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2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering & operations, secretary treasurer) FHI Actual for President, VP Engineering & Operations, & Secretary Treasurer Over/(Under) Secretary Treasurer Secretary Tr	332,107
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2008 MEARIE Survey Total for 3 Executive positions (president, VP Engineering & Operations, & Secretary Treasurer) 2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering & Operations, & Secretary Treasurer) 2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering & Operations, & Secretary Treasurer) 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ 332,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,107 \$ \$ 32,	332,107 Median
2008 MEARIE Survey Total for 3 Executive positions (president, VP engineering & operations, secretary treasurer) Standard Stand	332,107 Median

Cost Allocation

42. Ref: Board Staff IR#21, IR#22 and VECC IR#19

Ref: Exhibit 7/ Tab 1/ Sch. 2

Ref: Exhibit 8/ Tab 1/ Sch. 8/ Appendix A

The interrogatories queried Festival Hydro's plans to bring the revenue to cost ratios for sentinel lights, street lights and Residential Hensall class within the Board's target range. Festival Hydro replied that,

The Board's Filing Instructions for the 2010 3rd Generation Incentive Regulation Mechanism (IRM3) dated August 24, 2009 under Section SD1.2 allows for the adjustment if so ordered by the Board. If not ordered by the Board, Festival Hydro will consider requesting the Board to allow Festival Hydro, as part of the 2011, 2012 and 2013 3rd generation IRM filings, to adjust each of the three classes to bring the revenue to cost ratios within the target range by the 2013 rate year. The revenue offsets will be to the classes which are on the higher side of their ranges.

a) Please provide a table which shows Festival Hydro's proposed revenue to cost ratios for these customer classes for each year from 2010 to 2013.

RESPONSE:

Table 1 below provides the proposed revenue to cost ratio for each customer class from 2010 to 2013. In order to increase rates for sentinel lights, streetlighting and Hensall residential, the offset has been applied to reduce the rates associated with unmetered scattered load, regular residential and general service less than 50 kW. By the end of 2013, the revenue to cost ratios for sentinel lights and streetlighting will be at the minimum 70.0%; Hensall residential will be at a 100% revenue to cost ratio and all other classes will fall in a range of 81.85% to 109.30%.

OEB Interrogatory 42 a Table of Proposed Revenue Cost Ratios for 2010 to 2013

Customer Class	2010 Proposed Rev Cost Ratio	2011 Proposed Rev Cost Ratio	2012 Proposed Rev Cost Ratio	_
Residential	107.70%	107.37%	107.34%	107.28%
Residential - Hensall	91.21%	94.10%	97.10%	100.00%
GS < 50 kW	112.28%	111.00%	110.10%	109.30%
GS >50	81.85%	81.85%	81.85%	81.85%
Large Use	108.13%	108.13%	108.13%	108.13%
Sentinel Lights	50.70%	57.20%	63.80%	70.00%
Street Lighting	51.52%	58.00%	64.00%	70.00%
USL	120.30%	116.00%	110.00%	105.00%
TOTAL	•		·	

Cost allocation by class resulting from ratio changes

Customer Class	2010 Rate Application inc Misc Rev	2011 Rate Class Allocation	2012 Rate Class Allocation	2013 Rate Class Allocation
Residential	5,830,422	5,825,957	5,824,448	5,821,294
Residential - Hensall	127,203	131,603	135,798	139,854
GS < 50 kW	1,739,985	1,727,716	1,713,707	1,701,255
GS >50	2,344,011	2,344,011	2,344,011	2,344,011
Large Use	324,011	324,011	324,011	324,011
Sentinel Lights	7,120	8,009	8,933	9,801
Street Lighting	104,318	117,099	129,212	141,326
USL	34,511	33,176	31,460	30,030
TOTAL	10,511,581	10,511,581	10,511,581	10,511,581

b) Festival Hydro's proposed revenue to cost ratio of 91.21% for the residential Hensall class exceeds the 50% difference between the existing ratio and the Board's minimum target. Based on VECC IR#19 and the bill impact summaries, approximately 10% of the residential Hensall customers will experience a greater than 10% total bill impact from the proposed changes. Please confirm this approximation. What is the revenue to cost ratio at which all residential Hensall customers experience a less than 10% total bill impact?

RESPONSE:

As noted in the response to VECC IR # 19, a total 42 of the 413 customers (approximately 10%) use 250 kWh per month or less. Below is a table which shows the resulting revenue to cost ratio for three scenarios: 1. total bill impact to a 250 kWh customer as proposed in the original application; 2. 250 kWh customer at 10% increase total bill impact; and 3. 100 kWh customer at a 10% total bill impact.

Monthly	Total	Total Bill			Revenue	OEB
kWh	Bill -	Original	Increase	Increase	to Cost	Target
Usage	Current	Proposal	\$	%	Ratio	
250	\$34.77	\$39.65	\$4.88	14.02%	90.95%	85.00%
kWh						
250	\$34.77	\$38.25	\$3.48	10.00%	86.08%	85.00%
kWh						
100	\$20.23	\$22.26	\$2.03	10.00%	82.65%	85.00%
kWh						

The objective of rate harmonization is to increase the rates charged to Hensall residential customers so that eventually they pay the same rates as the remaining residential customers. This is based on the premise that all Festival Hydro customers receive equivalent service, regardless of their physical location.

For the 42 customers with monthly usage of 250 kWh and less, Festival Hydro's cost of service application proposed increase is greater than 10% (14.02%), but the absolute amount translates to only \$4.88 per month.

To keep virtually all customers within an increase of 10% would mean reducing the increase to \$2.03 per month. This is not desirable from Festival perspective for two reasons: 1. the revenue to cost ratio would continue to fall short of the OEB target of 85.0% and 2. it will hamper the ability to arrive at harmonization in a reasonable period of time. Festival Hydro recommends adopting the proposed rates as provided in the original COS rate application as an increase in excess of 10% impacts only 42 of our total 19,500 customer base.

Rate Design

43. Ref: Board Staff IR#23

Ref: Exhibit 8/ Tab 1/ Sch. 1/ Page 10

In response to IR#23(e) relating to ST rates and Hydro One rate riders, Festival Hydro stated that it applied the Hydro One rates effective May 1, 2009.

a) The Hydro One ST rate effective May 1, 2009 (EB-2008-0187) for connection to common ST lines (44 kV to 13.8 kV) is \$0.55/kW. Rider #4 is \$(0.20)/kW. In the table on page 10 of the second reference, Festival Hydro has used an ST charge of \$0.35/kW. Rider #4 is in effect until April 30, 2011. (i) Please calculate the ST cost assuming no rider #4. (ii) Please calculate a weighted average forecast of ST charges for the test year with weights of ½ with rate rider #4 and ¾ without rate rider #4. The

weighting assumes that Festival Hydro's next cost of service will be 2014. If other weights would be more reasonable, please provide that calculation instead, including an explanation.

RESPONSE:

Table 1 below provides the recalculated low voltage (subtransmission) charges using the two approaches outlined by the OEB (1) assuming no riders and (ii) assuming ¼ with rate riders and 3/4 without rate riders. Included in the table below are the Common ST Line charges calculated under the two assumptions.

In a letter received from Hydro One on June 8, 2009, it states these rate riders are in effective over an 11 month period starting June 2009. As such, Festival Hydro believes the weightings as used are reasonable.

Table 9 Calculation of Low Voltage Charges fro	om Hydro One for Te	est Year 2010		Answers to Inte	rrogatories
LV charges for 2010 Test Year based on r	new LV rates June 1,	2009:	Original COS	OEB Q# 43	OEB Q# 43
	KW subject to LV	Charges	With May 1 2009 rate	•	With 1/4 rate riders and 3/4 no rate riders
Total kW of embedded distribution	233,782.00				
Seaforth (1)	97,565.00				
Brussels (2)	16,191.00				
Grand Bend supplying Dashwood (3)	19,101.00		2010 Original COS		
Remaining locations (4)	100,925.00	June 1, 2009	LV charges		
Total kW for embedded locations	233,782.00	L.V. Rates	for the year		
kW with Common ST Lines Charge (1,2,3)	116,666.00	0.35	40,833.10	64,166.30	58,333.00
kW with Inc Capital (1,2,3)	116,666.00	0.021	2,449.99	-	612.50
kW with LVDS (2)	16,191.00	0.78	12,628.98	19,591.11	17,850.58
kW with HVDS High (3)	19,101.00	0.89	16,999.89	26,550.39	24,162.77
Monthly Service charge (1,2,3,4)	6.00	118.4	8,524.80	1,103.52	2,958.84
Test Year 2010 LV charges, with new rate	s effective June 1, 2	009	81,436.76	111,411.32	103,917.68

Sub transmission rates effective May 2009					
	With rate riders	Rate Rider	No rate riders		
	May 1, 2009	Period	May 1, 2010 forward	Account charged	to
Common ST Line Charge	0.35	11 months	0.55	4750	_V Charges
Rider # 5A Incremental Capital	0.021	11 months	0	1508	Other Reg. assets
LVDS	0.78	11 months	1.21	4750	_V Charges
HVDS High	0.89	11 months	1.39	4750	_V Charges
Service Charge	118.27	11 months	183.92	4750	_V Charges

b) As above for connection to high voltage (≥ 13.8 kV secondary).

RESPONSE:

Included in the above table are the HVDS High charges calculated under the two assumptions.

c) As above for connection to low voltage (< 13.8 kV secondary).

RESPONSE:

Included in the above table are the LVDS charges calculated under the two assumptions.

d) As above for monthly service charge.

RESPONSE:

Included in the above table are the monthly service charges calculated under the two assumptions.

e) Please confirm the source of the ST charge related to "Inc Capital".

RESPONSE:

The charge for Incremental capital of \$0.021 per kW is being taken directly from our Hydro One bills for the TS Seaforth location and the Grand Bend East DS, being charged since June 1, 2009. These are the only two bills with Common ST Lines.

44. Ref: VECC IR#17

Ref: Exhibit 8/ Tab 1/ Sch. 1/ Page 5
Ref: Exhibit 8/ Tab 1/ Sch. 8/ Appendix A

Festival Hydro proposes that it is appropriate for 2010 to maintain the same fixed/variable proportions assumed in the current rates for all customer classifications. The references provide the proposed fixed and variable distribution charges. Please explain the large differences noted in Appendix A in %impact between fixed and variable charges for the GS>50 and Large User customer classes.

RESPONSE:

• The impact of the transformer allowance was not properly reflected in the original calculations. This caused the fixed ratio to be understated and the variable overstated which in turn, created a large difference on Appendix A for the G.S. > 50 kW and Large User classes. In order to maintain the same fixed/variable ratios as previous, Festival Hydro has recalculated the fixed/variable ratios and the impact on rates which properly reflects transformer allowances. Festival Hydro requests that the OEB accept these revised rates in place of the original COS filed rates for G.S. > 50 kW and Large User rate classes.

Noted below are the following tables:

- a table which contains our 2009 current rates, the original COS application rates and the revised COS application rates for GS > 50 kW and Large User.
- a reconciliation of the revenue requirement comparing the fixed/variable splits used in the original calculations to the revised ratios.
- revised bill impacts based on the revised COS application rates.

Correction of Fixed/Variable s	plit for G.S. > 50 K	W and Large use		
Table of Rates	Monthly Service Charge <u>G.S. > 50 kW</u>	kW Variable Rate <u>G.S. > 50 kW</u>	Monthly Service Charge <u>Large User</u>	kW Variable Rate <u>Large User</u>
2009 Current Rates	209.76	2.2603	10,447.04	1.0931
2010 Original COS apllication	206.40	2.5255	8,730.51	1.4217
2010 Revised COS apllication	238.49	2.4135	10,977.20	1.0026

			Large			C	Seneral Service	
Forecasted Data from Exhibit 3, Tab2, Schedul	a 1 Dago 22		User				<u>> 50 kW</u>	
Totecasted Data Horri Exhibit 3, Tab2, Schedul	Number of cu	ctomore	2.00				221.00	
	kW sales	Storriers	128,687.00				782.812.00	
	kW subject to	TA	128,687.00				505,368.00	
			,				,	
Revenue Requirement			392,480.00				2,523,182.00	
Less transformer allowance			- 77,212.00	-		-	- 305,922.00	
Net Revenue Requirement			315,268.00	ı		:	2,217,260.00	
Fixed/Variable Split calculated in original mo	odel based on e	xisting rates						
From Exhibit 8, Schedule 1, Page 5, Table 5								
	2009 rate	2010 Quantity		Ratio	2009 rate	2010 Quantity		
Fixed Portion based on existing rates	10,447.04		250,728.96	66.46%	209.76	x 220.5 x 12	555,082.00	24.639
Variable Portion based on existing rates	0.9832	128,687		33.54%	2.1694	782,812	1,698,232.35	75.379
Gross revenue			377,254.02	100.00%			2,253,314.35	100.00%
Transformer allowance	- 0.60	128,687	- 77,212.20	<u>.</u>	- 0.60	509,870	- 305,922.00	
Net revenue requirement			300,041.82	Ī		=	1,947,392.35	
Corrected calculation of fixed/variable ratio		2010 0 11				2010 0 11		
Fixed Portion based on existing rates	2009 rate 10,447.04	2010 Quantity	250,728.96	83.56%	2009 rate 209.76	2010 Quantity x 220.5 x 12	555,082.00	28.50%
Tived Tottloff based off existing fales	10,447.04	X Z X 1Z	230,720.30	05.50 /0	203.70	X 220.5 X 12	333,002.00	20.50 /
Variable Portion based on existing rates	0.9832	128,687	126,525.06		2.1694	782,812	1,698,232.35	
Transformer allowance	- 0.60	128,687	- 77,212.20		- 0.60	509,870	- 305,922.00	
Net variable			49,312.86	16.44%			1,392,310.35	71.50%
	Tatal		200 044 02	400.000/			4.047.000.05	400.000
	Total		300,041.82	100.00%		:	1,947,392.35	100.00%
Original Generated Revenue Requirement	2010 COS				2010 COS			
Original Ocherated Nevenue Negaliement	Original rate	Quantity			Original rate	2010 Quantity		
Fixed portion	8730.51		209,532.24	66.46%	206.40	x 220.5 x 12	546,190.29	24.63%
Variable portion	1.4217		182,947.76	00.4070	2.5255		1,976,991.71	24.007
Transformer allowance	- 0.60	•	- 77,212.20		- 0.60		- 305,922.00	
	0.00	120,001	315,267.80	•	0.00	200,000	2,217,260.00	
Revised Generated Revenue Requirement	2010 COS				2010 COS			
	Revised rate	Quantity			Revised rate	Quantity		
Fixed portion	10977.19		263,452.56	83.56%	238.49	x 220.5 x 12	631,164.24	28.47%
Variable portion	1.0026	128,687	129,027.44		2.4135	782,812	1,889,316.76	
Transformer allowance	- 0.60	128,687	- 77,212.20		- 0.60	505,368	- 303,221.00	
			315,267.80				2,217,260.00	

	GENERAL SERVICE > 50 kW												
			2009 BI	LL		2010 BII	LL						
		Volume	Volume RATE CHARGE			RATE \$	CHARGE \$	Change \$	Change %	% of Total Bill			
Consumption	Monthly Service Charge			209.76			238.49	28.73	13.70%	7.44%			
30,000 kWh	Distribution (kWh)	30,000	0.0000	0.00	30,000	0.0000	0.00	0.00	0.00%	0.00%			
100 kW	Distribution (kW)	100	2.2603	226.03	100	2.4135	241.35	15.32	6.78%	7.52%			
	Low Voltage Cost Recovery Adder				100	0.0591	5.91	5.91	0.00%	0.18%			
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.03%			
	Regulatory Assets (kW)	100	0.0000	0.00	100	(0.3573)	(35.73)	(35.73)	100.00%	(1.11%)			
	Sub-Total			436.79			451.02	14.23	3.26%	14.06%			
	Other Charges (kWh)	30,843	0.0135	416.38	30,921	0.0135	417.43	1.05	0.25%	13.01%			
	Other Charges (kW)	103	3.5180	361.69	103	3.0479	313.36	(48.33)	(13.36%)	9.77%			
	Cost of Power Commodity (kWh)	30,843	0.0607	1,872.80	30,843	0.0607	1,872.80	0.00	0.00%	58.39%			
	Total Bill Before Taxes			3,087.66			3,054.61	(33.05)	(1.07%)	95.24%			
	GST		5.00%	154.38		5.00%	152.73	(1.65)	(1.07%)	4.76%			
	Total Bill			3,242.04			3,207.34	(34.70)	(1.07%)	100.00%			

	GENERAL SERVICE > 50 kW												
			2009 BILL				LL						
		Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill			
Consumption	Monthly Service Charge			209.76			238.49	28.73	13.70%	3.12%			
75,000 kWh	Distribution (kWh)	75,000	0.0000	0.00	75,000	0.0000	0.00	0.00	0.00%	0.00%			
250 kW	Distribution (kW)	250	2.2603	565.08	250	2.4135	603.38	38.30	6.78%	7.88%			
	Low Voltage Cost Recovery Adder				250	0.0591	14.78	14.78	0.00%	0.19%			
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.01%			
	Regulatory Assets (kW)	250	0.0000	0.00	250	(0.3573)	(89.33)	(89.33)	100.00%	(1.16686%)			
	Sub-Total			775.84			768.31	(7.53)	(0.97%)	10.04%			
	Other Charges (kWh)	77,108	0.0135	1,040.96	77,303	0.0135	1,043.59	2.63	0.25%	13.63%			
	Other Charges (kW)	257	3.5180	904.22	258	3.0479	785.37	(118.85)	(13.14%)	10.26%			
	Cost of Power Commodity (kWh)	77,108	0.0607	4,681.99	77,303	0.0607	4,693.82	11.83	0.25%	61.31%			
	Total Bill Before Taxes			7,403.00			7,291.09	(111.92)	(1.51%)	95.24%			
	GST		5.00%	370.15		5.00%	364.55	(5.60)	(1.51%)	4.76%			
	Total Bill			7,773.15			7,655.64	(117.51)	(1.51%)	100.00%			

		GENER	AL SEF	RVICE > 5	50 kW					
		2009 BILL				2010 BI	LL	IMPACT		
		Volume RATE CHARGE			Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Consumption	Monthly Service Charge			209.76			238.49	28.73	13.70%	1.25%
200,000 kWh	Distribution (kWh)	200,000	0.0000	0.00	200,000	0.0000	0.00	0.00	0.00%	0.00%
500 kW	Distribution (kW)	500	2.2603	1,130.15	500	2.4135	1,206.75	76.60	6.78%	6.33%
	Low Voltage Cost Recovery Adder				500	0.0591	29.55	29.55	0.00%	0.15%
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.01%
	Regulatory Assets (kW)	500	0.0000	0.00	500	(0.3573)	(178.66)	(178.66)	100.00%	(0.94%)
	Sub-Total			1,340.91			1,297.13	(43.78)	(3.27%)	6.80%
	Other Charges (kWh)	205,621	0.0135	2,775.89	206,141	0.0135	2,782.90	7.01	0.25%	14.59%
	Other Charges (kW)	514	3.5180	1,808.44	515	3.0479	1,570.74	(237.70)	(13.14%)	8.23%
	Cost of Power Commodity (kWh)	205,621	0.0607	12,485.32	206,141	0.0607	12,516.86	31.54	0.25%	65.62%
	Total Bill Before Taxes			18,410.55			18,167.62	(242.93)	(1.32%)	95.24%
	GST		5.00%	920.53		5.00%	908.38	(12.15)	(1.32%)	4.76%
	Total Bill			19,331.08			19,076.00	(255.07)	(1.32%)	100.00%

	GENERA	L SERVI	CE > 5	0 kW (Int	erval m	etered)				
			2009 BI	LL		2010 BI	LL	IMPACT		
		Volume	Volume RATE CHARGE \$			RATE \$	CHARGE \$	\$	%	% of Total Bill
Consumption	Monthly Service Charge			209.76			238.49	28.73	13.70%	0.31%
800,000 kWh	Distribution (kWh)	800,000	0.0000	0.00	800,000	0.0000	0.00	0.00	0.00%	0.00%
2,000 kW	Distribution (kW)	2,000	2.2603	4,520.60	2,000	2.4135	4,827.00	306.40	6.78%	6.29%
	Low Voltage Cost Recovery Adder				2,000	0.0591	118.20	118.20	0.00%	0.15%
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%
	Regulatory Assets (kW)	2,000	0.0000	0.00	2,000	(0.3573)	(714.64)	(714.64)	100.00%	(0.93152%)
	Sub-Total			4,731.36			4,470.05	(261.31)	(5.52%)	5.83%
	Other Charges (kWh)	822,485	0.0135	11,103.54	824,563	0.0135	11,131.59	28.05	0.25%	14.51%
	Other Charges (kW)	2,056	3.7877	7,788.31	2,061	3.5879	7,396.07	(392.24)	(5.04%)	9.64%
	Cost of Power Commodity (kWh)	822,485	0.0607	49,941.26	824,563	0.0607	50,067.44	126.17	0.25%	65.26%
	Total Bill Before Taxes			73,564.48			73,065.15	(499.33)	(0.68%)	95.24%
	GST		5.00%	3,678.22		5.00%	3,653.26	(24.97)	(0.68%)	4.76%
	Total Bill		•	77,242.70			76,718.40	(524.30)	(0.68%)	100.00%

	GENERAL SERVIC	E > 50 k	w (int	erval me	tered w	ith tran	sformer)			
		2	2009 BI	LL		2010 BI	LL	IMPACT		
		Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Consumption	Monthly Service Charge			209.76			238.49	28.73	13.70%	0.16%
1,600,000 kWh	Distribution (kWh)	1,600,000	0.0000	0.00	1,600,000	0.0000	0.00	0.00	0.00%	0.00%
4,000 kW	Distribution (kW)	4,000	2.2603	9,041.20	4,000	2.4135	9,654.00	612.80	6.78%	6.41%
	Low Voltage Cost Recovery Adder				4,000	0.0591	236.40	236.40	0.00%	3.29%
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%
	Transformer Credit	4,000	(0.6000)	(2,400.00)	4,000	(0.6000)	(2,400.00)	0.00	0.00%	(1.59%)
	Regulatory Assets (kW)	4,000	0.0000	0.00	4,000	(0.3573)	(1,429.29)	(1,429.29)	100.00%	(0.95%)
	Sub-Total			6,851.96			6,300.60	(551.36)	(8.05%)	7.32%
	Other Charges (kWh)	1,644,969	0.0135	22,207.08	1,649,125	0.0135	22,263.19	56.10	0.25%	14.78%
	Other Charges (kW)	4,112	3.7877	15,576.62	4,123	3.5879	14,792.14	(784.49)	(5.04%)	9.82%
	Cost of Power Commodity (kWh)	1,644,969	0.0607	99,882.53	1,649,125	0.0607	100,134.87	252.34	0.25%	66.46%
	Total Bill Before Taxes			144,518.20			143,490.80	(1,027.40)	(0.71%)	98.38%
	GST		5.00%	7,225.91		5.00%	7,174.54	(51.37)	(0.71%)	4.76%
	Total Bill			151,744.11			150,665.34	(1,078.77)	(0.71%)	103.14%

	LARGE USER (> 5000 kW)												
			2009 BI	LL	2010 BILL			IMPACT					
		Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	Change \$	Change %	% of Total Bill			
Consumption	Monthly Service Charge			10,447.04			10,977.20	530.16	5.07%	4.96%			
2,400,000 kWh	Distribution (kWh)	2,400,000	0.0000	0.00	2,400,000	0.0000	0.00	0.00	0.00%	0.00%			
5,400 kW	Distribution (kW)	5,400	1.0931	5,902.74	5,400	1.0026	5,414.04	(488.70)	(8.28%)	2.45%			
	Low Voltage Cost Recovery Adder				5,400	0.0718	387.72	387.72	0.00%	3.68%			
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%			
	Transformer Credit	5,400	(0.6000)	(3,240.00)	5,400	(0.6000)	(3,240.00)	0.00	0.00%	(1.46%)			
	Regulatory Assets (kW)	5,400	0.0000	0.00	5,400	(0.5613)	(3,030.75)	(3,030.75)	100.00%	(1.37%)			
	Sub-Total			13,110.78			10,509.21	(2,601.57)	(19.84%)	8.25%			
	Other Charges (kWh)	2,410,800	0.0135	32,545.80	2,418,000	0.0135	32,643.00	97.20	0.30%	14.74%			
	Other Charges (kW)	5,424	4.2538	23,073.89	5,441	3.8375	20,877.89	(2,196.00)	(9.52%)	9.43%			
	Cost of Power Commodity (kWh)	2,410,800	0.0607	146,383.78	2,418,000	0.0607	146,820.96	437.18	0.30%	66.32%			
	Total Bill Before Taxes			215,114.24			210,851.06	(4,263.19)	(1.98%)	98.74%			
	GST		5.00%	10,755.71		5.00%	10,542.55	(213.16)	(1.98%)	4.76%			
	Total Bill			225,869.96			221,393.61	(4,476.35)	(1.98%)	103.50%			

	LARGE USER (> 5000 kW)											
			2009 BILL			2010 BI	LL		IMPAC1			
		Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill		
Consumption	Monthly Service Charge			10,447.04			10,977.20	530.16	5.07%	3.86%		
3,100,000 kWh	Distribution (kWh)	3,100,000	0.0000	0.00	3,100,000	0.0000	0.00	0.00	0.00%	0.00%		
7,500 kW	Distribution (kW)	7,500	1.0931	8,198.25	7,500	1.0026	7,519.50	(678.75)	(8.28%)	2.64%		
	Low Voltage Cost Recovery Adder				7,500	0.0718	538.50	538.50	0.00%	3.97%		
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%		
	Transformer Credit	7,500	(0.6000)	(4,500.00)	7,500	(0.6000)	(4,500.00)	0.00	0.00%	(1.58%)		
	Regulatory Assets (kW)	7,500	0.0000	0.00	7,500	(0.5613)	(4,209.38)	(4,209.38)	100.00%	(1.48%)		
	Sub-Total			14,146.29			10,326.82	(3,819.47)	(27.00%)	7.41%		
	Other Charges (kWh)	3,113,950	0.0135	42,038.33	3,123,250	0.0135	42,163.88	125.55	0.30%	14.81%		
	Other Charges (kW)	7,534	4.2538	32,047.07	7,556	3.8375	28,997.06	(3,050.00)	(9.52%)	10.19%		
	Cost of Power Commodity (kWh)	3,113,950	0.0607	189,079.04	3,123,250	0.0607	189,643.74	564.70	0.30%	66.61%		
	Total Bill Before Taxes			277,310.72			271,131.50	(6,179.22)	(2.23%)	99.02%		
	GST		5.00%	13,865.54		5.00%	13,556.58	(308.96)	(2.23%)	4.76%		
	Total Bill			291,176.26			284,688.08	(6,488.18)	(2.23%)	103.78%		

	LARGE USER (> 5000 kW)												
			2009 BI	LL	2010 BILL			IMPACT					
		Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill			
Consumption	Monthly Service Charge			10,447.04			10,977.20	530.16	5.07%	2.88%			
4,200,000 kWh	Distribution (kWh)	4,200,000	0.0000	0.00	4,200,000	0.0000	0.00	0.00	0.00%	0.00%			
10,000 kW	Distribution (kW)	10,000	1.0931	10,931.00	10,000	1.0026	10,026.00	(905.00)	(8.28%)	2.63%			
	Low Voltage Cost Recovery Adder				10,000	0.0718	718.00	718.00	0.00%	3.96%			
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%			
	Transformer Credit	10,000	(0.6000)	(6,000.00)	10,000	(0.6000)	(6,000.00)	0.00	0.00%	(1.57%)			
	Regulatory Assets (kW)	10,000	0.0000	0.00	10,000	(0.5613)	(5,612.50)	(5,612.50)	100.00%	(1.47%)			
	Sub-Total			15,379.04			10,109.70	(5,269.34)	(34.26%)	6.42%			
	Other Charges (kWh)	4,218,900	0.0135	56,955.15	4,231,500	0.0135	57,125.25	170.10	0.30%	14.99%			
	Other Charges (kW)	10,045	4.2538	42,729.42	10,075	3.8375	38,662.75	(4,066.67)	(9.52%)	10.15%			
	Cost of Power Commodity (kWh)	4,218,900	0.0607	256,171.61	4,231,500	0.0607	256,936.68	765.07	0.30%	67.44%			
	Total Bill Before Taxes			371,235.22			362,834.38	(8,400.84)	(2.26%)	99.01%			
	GST		5.00%	18,561.76		5.00%	18,141.72	(420.04)	(2.26%)	4.76%			
	Total Bill			389,796.98			380,976.10	(8,820.88)	(2.26%)	103.77%			

LARGE USER (> 5000 kW)										
2009 BILL 2010 BILL IMPACT								Γ		
	<u> </u>	Volume	RATE \$	CHARGE \$	Volume	RATE \$	CHARGE \$	\$	%	% of Total Bill
Consumption	Monthly Service Charge			10,447.04			10,977.20	530.16	5.07%	2.52%
4,700,000 kWh	Distribution (kWh)	4,700,000	0.0000	0.00	4,700,000	0.0000	0.00	0.00	0.00%	0.00%
13,900 kW	Distribution (kW)	13,900	1.0931	15,194.09	13,900	1.0026	13,936.14	(1,257.95)	(8.28%)	3.20%
	Low Voltage Cost Recovery Adder				13,900	0.0718	998.02	998.02	0.00%	4.81%
	Smart Meter Rider (per month)			1.00			1.00	0.00	0.00%	0.00%
	Transformer Credit	13,900	(0.6000)	(8,340.00)	13,900	(0.6000)	(8,340.00)	0.00	0.00%	(1.91%)
	Regulatory Assets (kW)	13,900	0.0000	0.00	13,900	(0.5613)	(7,801.38)	(7,801.38)	100.00%	(1.79%)
	Sub-Total			17,302.13			9,770.98	(7,531.15)	(43.53%)	6.82%
	Other Charges (kWh)	4,721,150	0.0135	63,735.53	4,735,250	0.0135	63,925.88	190.35	0.30%	14.67%
	Other Charges (kW)	13,963	4.2538	59,393.90	14,004	3.8375	53,741.23	(5,652.67)	(9.52%)	12.33%
	Cost of Power Commodity (kWh)	4,721,150	0.0607	286,668.23	4,735,250	0.0607	287,524.38	856.15	0.30%	65.99%
	Total Bill Before Taxes			427,099.78			414,962.47	(12,137.31)	(2.84%)	99.82%
	GST		5.00%	21,354.99		5.00%	20,748.12	(606.87)	(2.84%)	4.76%
	Total Bill			448,454.77			435,710.59	(12,744.18)	(2.84%)	104.58%

Deferral and Variance Accounts

45. Ref: Exhibit 9/ Tab 1/ Sch. 2/ Page 4 Ref: RP-2004-0203/EB-2004-0520

Ref: Accounting Procedures Handbook, FAQ December 2005

The application states that accounts 1565 and 1566 "are equal and offsetting at an amount of \$670,623, which represents the full amount of Festival Hydro's third tranche funding. Festival Hydro request[s] that these balances be removed from the accounts. There is no disposition required." Staff notes that the balances are not zero. Staff also notes that the 2008 Annual Report CDM Third Tranche MARR Funding for Festival Hydro Inc., dated December 31, 2008 states that the total budget and actual spending is \$661,623.

a) The Final Board Order for file RP-2004-0203/EB-2004-0520 approved a total budget of \$660,343, the exact amount of Festival Hydro's incremental MARR. Please explain the difference between this amount and (i) the current amount in 1565 and 1566 and (ii) the amount in the 2008 Annual Report.

RESPONSE:

There are two amounts which make up the balance of \$670,623:

- 1. \$661,623 related to 3rd MARR installment, which was part of the approved 2005 RAM model and
- 2. \$9,000 approved as part of the 2006 Cost of service rate application for distribution of LED lights to residential customer. This \$9,000 was not included in the 2008 Annual report of Funding via 3rd MARR. It was reported in a separate report to the Board called 2008 Annual Report CDM funded via distribution rates.

Regarding the final Board order RP-2004-0203/EB-2004-0520, Festival Hydro is not aware of how the \$660,343 was derived and why there was a difference of \$1,280 from the OEB approved 2005 RAM models. In 2005, Festival Hydro received from the OEB final copies of the 2005 RAM models in excel format. The following amounts are reported on Sheet # 2 Adding Final 3rd MARR, entered on the line called "Enter the final MARR installments":

2005 Approved RAM Model	3 rd MARR Amount for CDM
Festival Hydro Co-Application	\$645,334
Festival Hydro Seaforth	12,969
Residential Rates	
Festival Hydro Hensall Residential	3,320
Rates	
Total per excel RAM models	\$661,623

In addition, the approved 1st and 2nd tranche approved MARR amounts were \$661,623 as well.

To reduce the balance to agree to the Final Board order RP-2004-0203/EB-2004-0520 of \$660,343, Festival Hydro will charge the \$1,820 against its 2009 operations.

b) Please explain why the balance in account 1565 (and the corresponding offsetting balance in 1566) is not zero.

RESPONSE:

In account # 1565, we recorded all the recoveries of the approved 3rd tranche MARR funding of \$661,623 as well recorded the \$9,000 recovery arising from the approved 2006 CDM distribution rate rider. Account #1566 was the account used to keep track of our spending so that on an ongoing basis Festival Hydro could easily determine how much was collected versus spent. This is why account # 1565 on our records has a balance which is equal to the amount spent in #1566. All CDM funding received was spent in its entirety.

c) Please provide the justification for the Board to approve the 1565 account balance since it represents an amount that is above the total spending limit approved in the applicant's CDM Plan.

RESPONSE:

There is a balance in # 1565 as a result of our accounting treatment as opposed to our spending practices. Our accounting practices did not directly follow Article 220. In order that proper accounting treatment is in place, we request the Board allow Festival Hydro to retroactively adjust its accounting for the expenditures so we may move the spending portion from #1566 to USOA # 1565. The balance in 1565 will then be zero.

d) Please confirm that all entries made in accounts 1565 and 1566 are consistent with the accounting procedures in Article 220 of the Accounting Procedures Handbook and the Board's FAQs dated December 2005.

RESPONSE:

As described in c). above, accounting procedures were not consistent with Article 220 of the Accounting Procedures Handbook and the Board's FAQs dated December 2005. Festival Hydro request retroactive treatment so we may charge the expenditures to Acct # 1565 and clear both Account # 1565 and account # 1566 to zero.

46. Ref: Board Staff IR#33 Ref: Exhibit 9/ Tab 1/ Sch. 1

a) Please identify separately, the balance associated with the Global Adjustment sub-account in Account 1588 Power, as of December 31, 2008 for the principal balance and April 30, 2010 for carrying charges.

RESPONSE:

The breakdown of Account # 1588 RSVA Power is provided in Exhibit 9, Tab 1, Schedule 2 Page 3 of 5. Festival Hydro separated the G.A. sub account from the remaining RSVA power variance on this schedule. (G.A. Sub account (non-RPP global adjustment)— Dec 31, 2008 principal of \$553,697 and interest to April 23, 2010 of \$21,773; Remaining balance Dec 31, 2008 principal of \$179,553 and interest to April 30, 2010 of 131,591; Total account # 1588 principal at Dec 31, 2008 of \$733,250 and interest to April 30, 2010 of \$153,364).

 Please confirm that the Global Adjustment principal balance proposed for disposition is based on the procedures identified by the Accounting Procedures Handbook.

RESPONSE:

The global adjustment principal balance is based on the procedures as described on page 36 of the Accounting Procedures Handbook. It contains the net of the global adjustment billed to non-RPP customers and the global adjustment charged by the IESO related to non-RPP customers.

c) Please provide an allocation of the December 31, 2008 balance of the Global Adjustment sub-account (plus interest to April 30, 2010) based on the 2008 kWhs for non-RPP customers.

RESPONSE:

Exhibit 9, Tab 1, Schedule 2 Appendix A provides the Method of Disposition of Accounts. On this original schedule, the Global Adjustment sub account has been separated from the remaining RSVA Power variance amount. In order to dispose of the global

adjustment, we have used the 2008 non-RPP kWh sales by class to arrive at the applicable allocator for each rate class.

d) Please calculate a separate rate rider for the recovery of the proposed Global Adjustment balance using the allocated amounts in (c) and the 2010 non-RPP consumption data (kWh or kW as applicable) as the billing determinant.

RESPONSE:

The separate rate rider has been determined based on 2008 non-RPP kWh sold allocated amounts applied to the 2010 non-RPP consumption data, and is illustrated in the table below.

Rate Classes	2010 forecasted kWh	Allocator based on 2010 kWhs	2008 Non RPP kWh	Allocator for 2010 based on 2008 non-RPP kWhs	Allocation of the \$575,470 sub G.A.	Reg asset Rate rider as originally reported	Rate rider for G.A. sub account only	Rate rider excluding G.A. sub	Allocator
RESIDENTIAL CLASS	131,547,184	22.4%	27,584,013	6.7%	38,481	- 0.0009	0.0001	- 0.0010	kWh
GENERAL SERVICE <50 KW CLASS	62,887,041	10.7%	14,512,693	3.5%	20,246	- 0.0010	0.0001	- 0.0011	kWh
GENERAL SERVICE >50 KW	308,262,669	52.6%	301,254,388	73.0%	420,267	- 0.3573	0.1354	- 0.4927	kW
RESIDENTIAL HENSALL	3,861,724	0.7%	808,731	0.2%	1,128	- 0.0010	0.0001	- 0.0011	kWh
LARGE USER CLASS	74,918,429	12.8%	65,544,852	15.9%	91,439	- 0.5613	0.1776	- 0.7389	kW
UNMETERED SCATTERED LOADS	629,732	0.1%	0	0.0%	0	- 0.0008	-	- 0.0008	kWh
SENTINEL LIGHTS	234,690	0.0%	0	0.0%	0	- 0.3976	-	- 0.3976	kW
STREET LIGHTING	3,904,130	0.7%	2,801,582	0.7%	3,908	- 0.2846	0.0868	- 0.3714	kW
Totals	586,245,601	100%	412,506,260	100%	575,470				

e) If Festival Hydro were to establish a separate rate rider to dispose of the balance of the Power (Global Adjustment) sub-account of account 1588, please provide Festival Hydro's views as to whether this rate rider would be applicable to MUSH ("Municipalities, Universities, Schools and Hospitals") sector customers.

RESPONSE:

Festival Hydro is of the opinion that the sub account rater rider should apply to MUSH accounts. Most of the municipalities, school boards and hospitals in our service territory were with retailers in 2008 and are currently with retailers. With the change in MUSH pricing effective November 1, 2009, all MUSH accounts with > 50 kW demand per month are no longer eligible for RPP pricing. MUSH should be afforded the same treatment as non-MUSH accounts, especially when most have been with retailers and not paying the RPP price.

f) If the answer to e) is in the negative, does Festival Hydro have the capability in its billing system to exclude MUSH sector customers to which the separate rate rider for the disposition of the account 1588 subaccount Power (Global Adjustment) balance would be applied?

RESPONSE:

Festival Hydro does not have the ability to exclude MUSH only accounts from the rate rider. Special system changes would be required to our billing system.

g) Please provide a variation of the rate rider calculations for the remaining accounts, excluding the Power (GA) sub-account.

RESPONSE:

Under part (d) of this question is a table which shows the total 2010 forecasted kWh sales data and that portion of the total which is 2010 forecasted non-RPP sales data. The non-RPP sales kWh has been used as the allocator of the GA sub account to each class. Also show is the original reported rate riders, the separation of the G.A. sub account only rate rider and the net rate rider excluding G.A. sub account.

47. Ref: Exhibit 9

It is likely that the PST and GST will be harmonized effective July 1, 2010.

a) Would the Applicant agree to the establishment of a variance account to capture the reductions in OM&A and capital expenditures?

RESPONSE:

In principle FHI accepts the use of deferral accounts to protect both consumers and utilities in cases of changes to external items such as tax rates. In some cases the effects of such changes are readily determinable. The cost impact to FHI on the transition to HST however, is unknown at this time and may never be accurately determined. The cost impact will consist of the (effective) removal of an 8% tax component on both capital goods and other operating supplies and services, offset by the fact that depending on market conditions for each of those goods and services, prices will increase as suppliers fail to pass through the full tax reduction in prices. Information on the degree to which prices fail to reflect the full tax change will necessarily be speculative and in all probability could not form the basis for accounting entries. Therefore FHI does not accept that accurate entries could be made in such a deferral account if it were established.

b) Are there other alternatives that the Board might consider to reflect the reductions in OM&A and capital expenditures if this bill is enacted?

RESPONSE:

FHI has not considered any other alternatives to address this legislative change at this point as we are uncertain of the total impact on our OM&A costs due to the change.

48. Manager's Summary

 a) Based on the first and second round interrogatories from all parties, please submit an updated Microsoft Excel file containing the revenue requirement workform.

RESPONSE

See revised work form attached in appendix A.

b) Please provide a listing of all changes made to Festival's original application (by exhibit), including an updated derivation of its revenue requirement, PILs calculation, base rates, rate adders/riders, and bill impacts.

RESPONSE:

See the listing attached in appendix B titled "Summary of Changes".

49. Responses to Letters of Comment

a) Following publication of the Notice of Application and Hearing, has Festival Hydro received any letters of comment?

RESPONSE:

No.

- b) If so, please confirm whether a reply was sent from Festival Hydro to the customer.
 - i) If confirmed, please file that reply with the Board.
 - ii) If not confirmed, please explain why a response was not sent and confirm if Festival Hydro intends on responding. If so, please file that response with the Board.

RESPONSE:

Not applicable.



Name of LDC:	Festival Hydro Inc.		(1)
File Number:	2002-0513		
Rate Year	2010	Version:	1.0

Table of Content

<u>Sheet</u>	<u>Name</u>
A	Data Input Sheet
1	Rate Base
2	Utility Income
3	Taxes/PILS
4	Capitalization/Cost of Capital
5	Revenue Sufficiency/Deficiency
6	Revenue Requirement
7	Bill Impacts

Notes:

- (1) Pale green cells represent inputs
- (2) Please note that this model uses MACROS. Before starting, please ensure that macros have been enabled.

Copyright

This Revenue Requirement Work Form Model is protected by copyright and is being made available to you solely for the purpose of preparing or reviewing your draft rate order. You may use and copy this model for that purpose, and provide a copy of this model to any person that is advising or assisting you in that regard. Except as indicated above, any copying, reproduction, publication, sale, adaptation, translation, modification, reverse engineering or other use or dissemination of this model without the express written consent of the Ontario Energy Board is prohibited. If you provide a copy of this model to a person that is advising or assisting you in preparing or reviewing your draft rate order, you must ensure that the person understands and agrees to the restrictions noted above.

Name of LDC: Festival Hydro Inc.

2002-0513 File Number: Rate Year: 2010

		Data Input				
		Application		Adjustments	Per Board Decision	
1	Rate Base					
	Gross Fixed Assets (average) Accumulated Depreciation (average)	\$75,147,744 (\$42,899,817)	(4) (5)		\$75,147,744 (\$42,899,817)	
	Allowance for Working Capital: Controllable Expenses Cost of Power	\$4,007,486 \$44,886,161	(6)		\$4,007,486 \$44,886,161	
	Working Capital Rate (%)	15.00%				
2	Utility Income					
	Operating Revenues:					
	Distribution Revenue at Current Rates	\$8,872,663				
	Distribution Revenue at Proposed Rates Other Revenue:	\$9,697,453				
	Specific Service Charges	\$207,660				
	Late Payment Charges	\$128,414				
	Other Distribution Revenue	\$201,474	(7)			
	Other Income and Deductions	\$136,887				
	Operating Expenses:					
	OM+A Expenses	\$3,957,347	(6)		\$3,957,347	
	Depreciation/Amortization	\$2,655,496	(-)		\$2,655,496	
	Property taxes	\$30,000			\$30,000	
	Capital taxes	\$20,139				
	Other expenses	\$ -		\$ -	\$0	
3	Taxes/PILs					
	Taxable Income:	4				
	Adjustments required to arrive at taxable income	\$526,532	(3)			
	Utility Income Taxes and Rates: Income taxes (not grossed up)	\$543,800				
	Income taxes (not grossed up)	\$780,197				
	Capital Taxes	\$20,139				
	Federal tax (%)	18.00%				
	Provincial tax (%)	12.30%	(8)			
	Income Tax Credits					
4	Capitalization/Cost of Capital					
	Capital Structure:					
	Long-term debt Capitalization Ratio (%)	56.0%				
	Short-term debt Capitalization Ratio (%)	4.0%	(2)			(2)
	Common Equity Capitalization Ratio (%) Prefered Shares Capitalization Ratio (%)	40.0% 0.0%				
	Prefered Shares Capitalization Ratio (%)	0.0%			Capital Structure	
					must total 100%	
	Cost of Capital					
	Long-term debt Cost Rate (%)	7.40%				
	Short-term debt Cost Rate (%)	1.33%				
	Common Equity Cost Rate (%) Prefered Shares Cost Rate (%)	8.01% 0.00%				
	i ieleleu Silales Cust Nate (70)	0.00%				

Notes:

This input sheet provides all inputs needed to complete sheets 1 through 6 (Rate Base through Revenue Requirement), except for Notes that the utility may wish to use to support the components. Notes should be put on the applicable pages to understand the

- All inputs are in dollars (\$) except where inputs are individually identified as percentages (%)
- (1) (2) (3) 4.0% unless an Applicant has proposed or been approved for another amount.
- Net of addbacks and deductions to arrive at taxable income.
- (4) Average of Gross Fixed Assets at beginning and end of the Test Year
- Average of Accumulated Depreciation at the beginning and end of the Test Year. Enter as a negative amount. (5)
- (6) (7) (8) Reduced from original filing as a result of reducing the expected ongoing IFRS compliance costs by \$11k
- Increased from original filing as a result of adding a \$15k margin on streetlighting services
- This rate is the effective tax rate in Ontario taking into account the new corporate rate and changes to the small business rules effective July 1, 2010. The effective rate also includes the apprentice credits expected.



Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

				Rate Base	
• •	Particulars	_	Application	Adjustments	Per Board Decision
l	Gross Fixed Assets (average)	(3)	\$75,147,744	\$ -	\$75,147,744
2	Accumulated Depreciation (average)	(3)	(\$42,899,817)	\$ -	(\$42,899,817)
3	Net Fixed Assets (average)	(3)	\$32,247,927	\$ -	\$32,247,927
ļ	Allowance for Working Capital	(1)	\$7,334,047	\$ -	\$7,334,047
	Total Rate Base	_	\$39,581,974	\$ -	\$39,581,974
	(1) Allowance fo	r Worki	ng Capital - Derivation		
6	Controllable Expenses		\$4,007,486	\$ -	\$4,007,486
7	Cost of Power		\$44,886,161	\$ -	\$44,886,161
	Working Capital Base		\$48,893,647	\$ -	\$48,893,647
	Working Capital Rate %	(2)	15.00%		15.00%
)	Working Capital Allowance		\$7,334,047	<u> </u>	\$7,334,047

Notes (2)

Generally 15%. Some distributors may have a unique rate due as a result of a lead-lag study.

(3) Average of opening and closing balances for the year.



Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

				Utility income	
Line No.	Particulars 	_	Application	Adjustments	Per Board Decision
1 2	Operating Revenues: Distribution Revenue (at Proposed Rates) Other Revenue	(1)	\$9,697,453 \$674,435	\$ - \$ -	\$9,697,453 \$674,435
3	Total Operating Revenues		\$10,371,888	\$ -	\$10,371,888
4 5 6 7 8	Operating Expenses: OM+A Expenses Depreciation/Amortization Property taxes Capital taxes Other expense		\$3,957,347 \$2,655,496 \$30,000 \$20,139 \$-	\$ - \$ - \$ - \$ - \$ -	\$3,957,347 \$2,655,496 \$30,000 \$20,139 \$ -
9	Subtotal	•	\$6,662,982	\$ -	\$6,662,982
10	Deemed Interest Expense	-	\$1,660,502	\$ -	\$1,660,502
11	Total Expenses (lines 4 to 10)		\$8,323,484	\$ -	\$8,323,484
12	Utility income before income taxes	:	\$2,048,404	<u> </u>	\$2,048,404
13	Income taxes (grossed-up)		\$780,197	\$ -	\$780,197
14	Utility net income		\$1,268,207	\$ -	\$1,268,207
<u>Notes</u>					
(1)	Other Revenues / Revenue Offsets Specific Service Charges Late Payment Charges Other Distribution Revenue Other Income and Deductions Total Revenue Offsets		\$207,660 \$128,414 \$201,474 \$136,887		\$207,660 \$128,414 \$201,474 \$136,887



Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

	Taxes/PILs								
Line No.	Particulars	Application	Per Board Decision						
	Determination of Taxable Income								
1	Utility net income	\$1,268,206	\$1,268,206						
2	Adjustments required to arrive at taxable utility income	\$526,532	\$526,532						
3	Taxable income	\$1,794,738	\$1,794,738						
	Calculation of Utility income Taxes								
4 5	Income taxes Capital taxes	\$543,800 \$20,139	\$543,800 \$20,139						
6	Total taxes	\$563,939	\$563,939						
7	Gross-up of Income Taxes	\$236,397	\$236,397						
8	Grossed-up Income Taxes	\$780,197	\$780,197						
9	PILs / tax Allowance (Grossed-up Income taxes + Capital taxes)	\$800,336	\$800,336						
10	Other tax Credits	\$ -	\$ -						
	Tax Rates								
11 12 13	Federal tax (%) Provincial tax (%) Total tax rate (%)	18.00% 12.30% 30.30%	18.00% 12.30% 30.30%						

Notes



Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

Capitalization/Cost of Capital

Particulars	Capitaliz	Capitalization Ratio		Return	
		Application			
	(%)	(\$)	(%)	(\$)	
Debt		,	` ,	` ,	
Long-term Debt	56.00%	\$22,165,905	7.40%	\$1,639,44	
Short-term Debt	4.00%	\$1,583,279	1.33%	\$21,05	
Total Debt	60.00%	\$23,749,184	6.99%	\$1,660,50	
Equity					
Common Equity	40.00%	\$15,832,790	8.01%	\$1,268,20	
Preferred Shares	0.00%	\$ -	0.00%		
Total Equity	40.00%	\$15,832,790	8.01%	\$1,268,20	
Total	100%	\$39,581,974	7.40%	\$2,928,70	
Total			7.40%	\$2,928,70	
Total	Per	Board Decision		\$2,928,70	
	Per		7.40%	\$2,928,70	
Debt	Per (%)	Board Decision	(%)		
Debt Long-term Debt	(%) (56.00%	Board Decision (\$) \$22,165,905	(%) 7.40%	\$1,639,44	
Debt	Per (%)	Board Decision	(%)	\$1,639,44 \$21,05	
Debt Long-term Debt Short-term Debt Total Debt	Per (%) (56.00% 4.00%	Board Decision \$) \$22,165,905 \$1,583,279	(%) 7.40% 1.33%	\$1,639,44 \$21,05	
Debt Long-term Debt Short-term Debt Total Debt Equity	Fer (%) (56.00% 4.00% 60.00%	\$) \$22,165,905 \$1,583,279 \$23,749,184	(%) 7.40% 1.33% 6.99%	\$1,639,44 \$21,05 \$1,660,50	
Debt Long-term Debt Short-term Debt Total Debt Equity Common Equity	Per (%) (56.00% 4.00% 60.00%	\$22,165,905 \$1,583,279 \$23,749,184 \$15,832,790	(%) 7.40% 1.33% 6.99% 8.01%	\$1,639,44 \$21,05 \$1,660,50	
Debt Long-term Debt Short-term Debt Total Debt Equity	Fer (%) (56.00% 4.00% 60.00%	\$) \$22,165,905 \$1,583,279 \$23,749,184	(%) 7.40% 1.33% 6.99%	\$1,639,44 \$21,05 \$1,660,50 \$1,268,20 \$1,268,20	

<u>Notes</u> (1)

4.0% unless an Applicant has proposed or been approved for another amount.

REVENUE REQUIREMENT WORK FORM Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

Ontario

Revenue Sufficiency/Deficiency

Per Application

Per Board Decision

Line	Particulars	At Current	At Proposed	At Current	At Proposed
No.		Approved Rates	Rates	Approved Rates	Rates
1	Revenue Deficiency from Below		\$824,790		\$824,790
2	Distribution Revenue	\$8,872,663	\$8,872,663	\$8,872,663	\$8,872,663
3	Other Operating Revenue Offsets - net	\$674,435	\$674,435	\$674,435	\$674,435
4	Total Revenue	\$9,547,098	\$10,371,888	\$9,547,098	\$10,371,888
5	Operating Expenses	\$6,662,982	\$6,662,982	\$6,662,982	\$6,662,982
6	Deemed Interest Expense	\$1,660,502	\$1,660,502	\$1,660,502	\$1,660,502
	Total Cost and Expenses	\$8,323,484	\$8,323,484	\$8,323,484	\$8,323,484
7	Utility Income Before Income Taxes	\$1,223,614	\$2,048,404	\$1,223,614	\$2,048,404
	Total A. Prostore and to Assessed to a				
8	Tax Adjustments to Accounting Income per 2009 PILs	\$526,532	\$526,532	\$526,532	\$526,532
9	Taxable Income	\$1,750,146	\$2,574,936	\$1,750,146	\$2,574,936
9	Taxable income	\$1,730,140	φ2,374,930	\$1,750,140	φ2,574,930
10	Income Tax Rate	30.30%	30.30%	30.30%	30.30%
11	Income Tax on Taxable Income	\$530,289	\$780,198	\$530,289	\$780,198
12	Income Tax Credits	\$ -	\$ -	\$ -	\$ -
13	Utility Net Income	\$693,325	\$1,268,207	\$693,325	\$1,268,207
	•				
14	Utility Rate Base	\$39,581,974	\$39,581,974	\$39,581,974	\$39,581,974
	Deemed Equity Portion of Rate Base	\$15,832,790	\$15,832,790	\$15,832,790	\$15,832,790
15	Income/Equity Rate Base (%)	4.38%	8.01%	4.38%	8.01%
16	Target Return - Equity on Rate Base	8.01%	8.01%	8.01%	8.01%
	Sufficiency/Deficiency in Return on Equity	-3.63%	0.00%	-3.63%	0.00%
17	Indicated Rate of Return	5.95%	7.40%	5.95%	7.40%
18	Requested Rate of Return on Rate Base	7.40%	7.40%	7.40%	7.40%
19	Sufficiency/Deficiency in Rate of Return	-1.45%	0.00%	-1.45%	0.00%
20	Target Return on Equity	\$1,268,206	\$1,268,206	\$1,268,206	\$1,268,206
21	Revenue Sufficiency/Deficiency	\$574,881	\$0	\$574,881	\$0
22	Gross Revenue Sufficiency/Deficiency	\$824,790 (1)		\$824,790 (1)	

Notes:

(1) Revenue Sufficiency/Deficiency divided by (1 - Tax Rate)



Name of LDC: Festival Hydro Inc.

File Number: 2002-0513

Rate Year: 2010

Revenue Requirement

Line No.	Particulars	Application	Per Board Decision		
1	OM&A Expenses	\$3,957,347	\$3,957,347		
2	Amortization/Depreciation	\$2,655,496	\$2,655,496		
3	Property Taxes	\$30,000	\$30,000		
4	Capital Taxes	\$20,139	\$20,139		
5	Income Taxes (Grossed up)	\$780,197	\$780,197		
6 7	Other Expenses Return	\$ -	\$ -		
	Deemed Interest Expense	\$1,660,502	\$1,660,502		
	Return on Deemed Equity	\$1,268,206	\$1,268,206		
	Distribution Revenue Requirement				
8	before Revenues	\$10,371,888	\$10,371,888		
9	Distribution revenue	\$9,697,453	\$9,697,453		
10	Other revenue	\$674,435	\$674,435		
11	Total revenue	\$10,371,888	\$10,371,888		
	Difference (Total Revenue Less Distribution Revenue Requirement				
12	before Revenues)	<u>\$0</u> (1	\$0_(

Notes

(1) Line 11 - Line 8



REVENUE REQUIREMENT WORK FORMName of LDC: Festival Hydro Inc.

File Number: 2002-0513 Rate Year: 2010

		Selected Delivery Charge and Bill Impacts Per Draft Rate Order										
		Мо	nthly Deli	very Chai	rge		Total Bill					
		Per Draft Change					Per Draft Change					
		Current	Rate Order	\$	%		Current	Rate Order	\$	%		
Residential	800 kWh/month	\$ 35.71	\$ 36.81	\$ 1.10	3.1%		\$ 98.91	\$ 100.21	\$ 1.30	1.3%		
GS < 50kW	2000 kWh/month	\$ 75.40	\$ 78.47	\$ 3.07	4.1%		\$ 243.31	\$ 246.93	\$ 3.62	1.5%		

Notes:

Festival Hydro Inc. Summary of Proposed Changes

	Regulated Return on Capital	Regulated Rate of Return	Rate Base	Working Capital	Working Capital Allowance	Amortization	PILs	OM&A	Service Revenue Requirement	Base Revenue Requirement	Gross Revenue Deficiency
Original Submission August 2009	\$2,928,832	7.40%	\$39,583,651	\$48,904,825	\$7,335,724	\$2,655,496	\$908,589	\$4,018,664	\$10,511,581	\$9,852,131	\$979,468
IFRS reduction in ongoing compliance cost estimate from \$25k/yr to \$14k/yr	\$2,928,710		\$39,582,001					\$4,007,664		\$9,840,984	\$968,331
Change	\$ (122)			\$ (11,000)		. , ,	\$ (25)		. , ,		
Streetlighting margin added of \$15k Change	\$2,928,832 \$ -	7.40%	\$39,583,651 \$ -	\$48,904,825 \$ -	\$7,335,724 \$ -	\$2,655,496 \$ -	\$908,589 \$ -	\$4,018,664 \$ -	\$10,511,581 \$ -	\$9,837,146 \$ (14,985)	\$964,497 \$ (14,971)
PILs Correction for addition reclass on application software, inclusion in UCC of FMV bump, Ontario corporate rate change, application of Ontario small business rate	\$2,928,708	7.40%	\$39,581,974	\$48,893,647	\$7,334,047	\$2,655,496	\$780,198	\$4,007,486	\$10,371,887	\$9,697,453	\$824,790
Change	\$ (124)		\$ (1,677)	\$ (11,178)	\$ (1,677)	\$ -	\$(128,391)	\$ (11,178)	\$ (139,694)	\$ (154,678)	\$ (154,678)
Proposed at January 7, 2009	\$2,928,708	7.40%	\$39,581,974	\$48,893,647	\$7,334,047	\$2,655,496	\$780,198	\$4,007,486	\$10,371,887	\$9,697,453	\$824,790

SUMMARY OF CHANGES 1 of 1