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toronto hydro electric system

May 14, 2010

via RESS e-filing – signed original to follow by courier

Ms. Kirsten Walli, Board Secretary
Ontario Energy Board
PO Box 2319, 2300 Yonge St, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Application for Recovery of Contact Voltage Remediation Costs
EB-2009-0243

Pursuant to the Board's Decision, issued on December 11, 2009, Toronto Hydro-Electric System Limited ("THESL") hereby submits an application for recovery of approved costs incurred by THESL for the emergency correction of contact voltage conditions on its system.

Yours truly,

Colin J. McLorg,
Manager, Regulatory Policy and Relations

cc: J. Mark Rodger, Counsel for THESL, by electronic mail only
Intervenors of Record for EB-2009-0243, by electronic mail only

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

AND IN THE MATTER OF an application for recovery of amounts related to contact voltage emergency remediation costs in 2011 rates.

TORONTO HYDRO-ELECTRIC SYSTEM LIMITED

APPLICATION FOR RECOVERY OF AMOUNTS RELATED TO CONTACT VOLTAGE EMERGENY REMEDIATION COSTS IN 2011 RATES

OEB File No. EB-2009-0243
Filed: May 14, 2010

Overview

On June 30, 2009, Toronto Hydro-Electric System Limited ("THESL") filed an application with the Ontario Energy Board ("Board") seeking approval for recovery of costs incurred by THESL for the emergency correction of contact voltage conditions on its system. In its December 11, 2009 Decision, the Board authorized THESL to record in a sub account of USoA 1572 up to $9.44 million of these costs, with the amount ultimately eligible for recovery conditional on THESL's actual controllable OM&A expenditures for the 2009 year. Any shortfall in actual spending relative to the amount approved in the 2009 revenue requirement was to be deducted from the conditionally approved amount. The actual balance eligible for recovery was to be submitted by THESL for approval and clearance once the 2009 audited financial results were known. THESL is now applying for approval and clearance of this eligible amount.

Determination of Approved 2009 Controllable OM&A

On December 17, 2009, THESL filed with the Board a letter concerning the presentation of the Board's Decision. In that letter, THESL observed that the evidence relied on by the Board to arrive at the numerical value of $195.6 million for the approved 2009 controllable OM&A expenditures was supporting evidence filed by THESL in its 2010 rate application. The value of $195.6 million, intended to represent THESL's 2009 Board-approved controllable OM&A, appears to be derived from Table 1 of Exhibit D1, Tab 3, Schedule 1 of THESL's EB-2009-0139 pre-filed evidence, by deducting an amortization expense of $154.4 million from total 2009 Board-approved distribution expenses of $350 million. That evidence was historical information in support of THESL's 2010 rates application, and did not directly represent the approved 2009 revenue requirement.

In addition, that evidence was not intended to demonstrate the derivation of the value for controllable OM&A, and in fact contained a figure of $0.4 million representing the amounts spent on donations and special events. That amount was not included as part of 2009 rates. As a result, if that evidence were to be used, the correct value for controllable OM&A should be reduced by $0.4 million, resulting in an approved value of $195.2 million.

THESL submits that in any case, the authoritative reference for the 2009 approved controllable OM&A amount set by the Board is found in the EB-2009-0069 proceeding, which approved the 2009 rates. There, the figure of $195.2 million is confirmed as the correct value for controllable OM&A in THESL's Draft Rate Order for 2009 rates, and is produced by adding OM&A of $182.4 million, Municipal Property Taxes of $7.8 million, and the Ontario Capital Tax embedded in the PILs

amount of $5.0 million[1], which together total $195.2 million. These costs agree categorically (i.e., follow the same definition as) the costs defined by the Board as "controllable OM&A" in the Decision.

Audited 2009 OM&A

THESL's audited financial statements were publicly filed in March 2010. The Operating Expenses for THESL, including contact voltage costs, are $204.55 million. After subtracting actual 2009 amounts for donations and special events of $0.3 million, THESL's total actual controllable expenses are $204.25 million.

Amount for Recovery

In accordance with the Board's decision, THESL seeks to recover the difference between the approved total controllable expenses of $195.2 million, and the audited actual controllable expenses of $204.25 million (up to a maximum of $9.44 million), which results in a net total recovery of $9.05 million dollars, plus applicable carrying charges.

Stated differently, actual 2009 controllable OM&A exclusive of Contact Voltage expenditures was $194.81 million, as compared to the allowed amount of $195.20 million. The shortfall in spending, equal to $195.20 - $194.81, is $0.39 million (the 'Spending Shortfall'), which when deducted from the conditional amount of $9.44 million gives a figure of $9.05 million eligible for recovery.

Table 1 – Recovery Amount ($M)

	Col. 1	Col. 2	Col. 3
1		**2009 Board Approved**	**2009 Actual**
2	OPEX	195.60	204.55
3	- Donations	-0.20	-0.10
4	- Special Events	-0.20	-0.20
5	- Contact Voltage Costs		-9.44
6	**Controllable OM&A**	**195.20**	**194.81**
7	Spending Shortfall		-0.39
8	Allowed Maximum Recovery		9.44
9	**Net Eligible Recovery**		**9.05**

[1] The PILs amount of $30.7M is composed of income tax of $25.7M and Ontario Capital Tax of $5.0M.

Allocation of Spending Shortfall

The Decision was silent on the matter of allocating any spending shortfall between different cost categories. Given that the recovery of scanning and remediation costs is allocated to different classes of customers over different periods of time, THESL proposes to allocate the spending shortfall proportionally between the scanning costs and remediation costs, as shown in Table 2 below.

Table 2 – Allocation per Cost Category ($M)

	Col. 1	Col. 2	Col. 3
1		**Allocation of $9.44M**	**Allocation of Net Eligible Cost of $9.05M**
2	Scanning	4.15	3.98
3	Remediation	5.29	5.07
4	**Total**	**9.44**	**9.05**

Rate Implementation and Rate Impacts

In its December 11, 2009 decision, the Board approved THESL's proposed method of recovery to allocate the scanning costs across all rate groups, while allocating remediation costs directly to the Street lighting and USL classes. THESL has applied this methodology to the revised amount of $9.05 million. As originally outlined in its application of June 30, 2009 THESL requests recovery through fixed-term monthly rate riders, with costs allocated to Streetlighting and USL classes recovered over a period of 3 years and costs for all other classes recovered over a single rate year. As it is no longer possible for rate implementation to coincide with 2010 distribution rates, THESL requests recovery commencing May 1, 2011. The proposed rate riders based on the recovery of $9.05 million, by class and year, are shown below in Table 3.

Table 3 – Rate Riders (customer/connection per 30 days)

Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8
2011 - Rate Riders	**Residential**	**GS < 50 kW**	**GS - 50 to 999 kW**	**GS - 1000 to 4999 kW**	**Large Use**	**Unmetered Scattered Load**	**Streetlighting**
Scanning	$0.41	$0.42	$0.09	$0.01	$0.00	$0.13	$0.08
Remediation	$0.00	$0.00	$0.00	$0.00	$0.00	$1.16	$0.70
Total Contact Voltage Rate Rider	$0.41	$0.42	$0.09	$0.01	$0.00	$1.29	$0.78

2012 - Rate Riders	**Residential**	**GS < 50 kW**	**GS - 50 to 999 kW**	**GS - 1000 to 4999 kW**	**Large Use**	**Unmetered Scattered Load**	**Streetlighting**
Scanning	$0.00	$0.00	$0.00	$0.00	$0.00	$0.13	$0.08
Remediation	$0.00	$0.00	$0.00	$0.00	$0.00	$1.16	$0.70
Total Contact Voltage Rate Rider	$0.00	$0.00	$0.00	$0.00	$0.00	$1.29	$0.78

2013 - Rate Riders	**Residential**	**GS < 50 kW**	**GS - 50 to 999 kW**	**GS - 1000 to 4999 kW**	**Large Use**	**Unmetered Scattered Load**	**Streetlighting**
Scanning	$0.00	$0.00	$0.00	$0.00	$0.00	$0.13	$0.08
Remediation	$0.00	$0.00	$0.00	$0.00	$0.00	$1.16	$0.70
Total Contact Voltage Rate Rider	$0.00	$0.00	$0.00	$0.00	$0.00	$1.29	$0.78

Complete Bill Impact Tables are included as Appendix A.

Application of Carrying Charges

In its Decision, the Board stated with respect to carrying charges that:

> "In its application to recover the requested relief through rate riders, THESL had not incorporated interest. In any event, until the disposition matter is brought forward by THESL there will be no interest on the $9.44 million amount."

THESL interprets the Decision to indicate that the Board will determine at the time of final disposition the carrying charges that will apply to the approved principal amount. On this basis, THESL requests carrying charges to be calculated, using the Board's prescribed interest rates and methodology, from a date to be determined by the Board until the date of requested rate implementation on May 1, 2011.

2010 Distribution and Rate Rider Bill Impact - RPP

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
				2010 without Contact Voltage Rate Riders			2010 with Contact Voltage Rate Riders			Rate Impact	
1	kWh	kW	kVA	Distribution ($)	Rate Rider ($)	Total ($)	Distribution ($)	Rate Rider ($)	Total ($)	$	%
2	**Residential**										
3	100			19.82	0.54	20.36	19.82	0.95	20.77	**0.41**	**2.0%**
4	250			22.18	0.33	22.51	22.18	0.74	22.92	**0.41**	**1.8%**
5	500			26.11	-0.01	26.09	26.11	0.40	26.50	**0.41**	**1.6%**
6	800			30.82	-0.43	30.39	30.82	-0.02	30.80	**0.41**	**1.3%**
7	1,000			33.97	-0.71	33.26	33.97	-0.30	33.67	**0.41**	**1.2%**
8	1,500			41.83	-1.41	40.42	41.83	-1.00	40.83	**0.41**	**1.0%**
9	2,000			49.69	-2.10	47.59	49.69	-1.69	48.00	**0.41**	**0.9%**
10	**GS<50 kW**										
11	2,000			69.70	-2.66	67.04	69.70	-2.24	67.46	**0.42**	**0.6%**
12	5,000			137.80	-7.67	130.13	137.80	-7.25	130.55	**0.42**	**0.3%**
13	10,000			251.30	-16.02	235.28	251.30	-15.60	235.70	**0.42**	**0.2%**
14	20,000			478.30	-32.72	445.58	478.30	-32.30	446.00	**0.42**	**0.1%**
15	**GS 50-999 kW**										
16	30,000	100	100	593.89	-58.64	535.25	593.89	-58.55	535.34	**0.09**	**0.0%**
17	40,000	100	100	593.89	-58.64	535.25	593.89	-58.55	535.34	**0.09**	**0.0%**
18	150,000	500	556	3,137.71	-328.88	2,808.84	3,137.71	-328.79	2,808.93	**0.09**	**0.0%**
19	200,000	500	556	3,137.71	-328.88	2,808.84	3,137.71	-328.79	2,808.93	**0.09**	**0.0%**
20	270,000	900	1,000	5,619.49	-592.52	5,026.97	5,619.49	-592.43	5,027.06	**0.09**	**0.0%**
21	360,000	900	1,000	5,619.49	-592.52	5,026.97	5,619.49	-592.43	5,027.06	**0.09**	**0.0%**
22	450,000	900	1,000	5,619.49	-592.52	5,026.97	5,619.49	-592.43	5,027.06	**0.09**	**0.0%**
23	**GS 1000-4999 kW**										
24	300,000	1,000	1,111	5,152.91	-745.65	4,407.26	5,152.91	-745.64	4,407.27	**0.01**	**0.0%**
25	400,000	1,000	1,111	5,152.91	-745.65	4,407.26	5,152.91	-745.64	4,407.27	**0.01**	**0.0%**
26	500,000	1,000	1,111	5,152.91	-745.65	4,407.26	5,152.91	-745.64	4,407.27	**0.01**	**0.0%**
27	600,000	2,000	2,222	9,646.02	-1,491.99	8,154.04	9,646.02	-1,491.98	8,154.05	**0.01**	**0.0%**
28	800,000	2,000	2,222	9,646.02	-1,491.99	8,154.04	9,646.02	-1,491.98	8,154.05	**0.01**	**0.0%**
29	1,000,000	2,000	2,222	9,646.02	-1,491.99	8,154.04	9,646.02	-1,491.98	8,154.05	**0.01**	**0.0%**
30	**Large Use**										
31	1,500,000	5,000	5,556	26,680.69	-4,012.10	22,668.59	26,680.69	-4,012.10	22,668.59	**0.00**	**0.0%**
32	2,000,000	5,000	5,556	26,680.69	-4,012.10	22,668.59	26,680.69	-4,012.10	22,668.59	**0.00**	**0.0%**
33	2,500,000	5,000	5,556	26,680.69	-4,012.10	22,668.59	26,680.69	-4,012.10	22,668.59	**0.00**	**0.0%**
34	3,000,000	10,000	11,111	50,487.36	-8,024.88	42,462.48	50,487.36	-8,024.88	42,462.48	**0.00**	**0.0%**
35	4,000,000	10,000	11,111	50,487.36	-8,024.88	42,462.48	50,487.36	-8,024.88	42,462.48	**0.00**	**0.0%**
36	5,000,000	10,000	11,111	50,487.36	-8,024.88	42,462.48	50,487.36	-8,024.88	42,462.48	**0.00**	**0.0%**
37	**Street Lighting**	Connections	Mthly kVA								
38	9,182,014	162,353	26,765	995,665.51	-20,071.25	975,594.27	995,665.51	106,564.41	1,102,229.93	**126,635.66**	**13.0%**
39	365	1	1	30.53	-0.75	29.78	30.53	0.03	30.56	**0.78**	**2.6%**
	Unmetered										
40	**Scattered Loads**	Customers	Connections								
41	4,829,242	1,124	21,782	310,349.24	-4,780.95	305,568.29	310,349.24	23,317.95	333,667.19	**28,098.90**	**9.2%**
42	365	1	1	27.63	-0.36	27.27	27.63	0.93	28.56	**1.29**	**4.7%**

2010 Total Bill Impact - RPP

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14
					2010 without Contact Voltage Rate Riders				2010 with Contact Voltage Rate Riders				Rate Impact	
1		kWh	kW	kVA	Distribution ($)	Rate Rider ($)	Non-Distribution ($)	Total ($)	Distribution ($)	Rate Rider ($)	Non-Distribution ($)	Total ($)	$	%
2	**Residential**													
3		100			19.82	0.54	9.65	30.01	19.82	0.95	9.65	30.42	**0.41**	**1.4%**
4		250			22.18	0.33	23.75	46.26	22.18	0.74	23.75	46.67	**0.41**	**0.9%**
5		500			26.11	-0.01	47.25	73.35	26.11	0.40	47.25	73.76	**0.41**	**0.6%**
6		800			30.82	-0.43	75.76	106.15	30.82	-0.02	75.76	106.56	**0.41**	**0.4%**
7		1,000			33.97	-0.71	96.63	129.89	33.97	-0.30	96.63	130.30	**0.41**	**0.3%**
8		1,500			41.83	-1.41	148.82	189.24	41.83	-1.00	148.82	189.65	**0.41**	**0.2%**
9		2,000			49.69	-2.10	201.01	248.60	49.69	-1.69	201.01	249.01	**0.41**	**0.2%**
10	**GS<50 kW**													
11		2,000			69.70	-2.66	201.76	268.80	69.70	-2.24	201.76	269.22	**0.42**	**0.2%**
12		5,000			137.80	-7.67	515.28	645.41	137.80	-7.25	515.28	645.83	**0.42**	**0.1%**
13		10,000			251.30	-16.02	1,037.81	1,273.09	251.30	-15.60	1,037.81	1,273.51	**0.42**	**0.0%**
14		20,000			478.30	-32.72	2,082.87	2,528.45	478.30	-32.30	2,082.87	2,528.87	**0.42**	**0.0%**
23	**GS 50-999 kW**													
24		30,000	100	100	593.89	-58.64	3,113.08	3,648.33	593.89	-58.55	3,113.08	3,648.42	**0.09**	**0.0%**
25		40,000	100	100	593.89	-58.64	4,032.59	4,567.84	593.89	-58.55	4,032.59	4,567.93	**0.09**	**0.0%**
26		150,000	500	556	3,137.71	-328.88	15,594.39	18,403.22	3,137.71	-328.79	15,594.39	18,403.31	**0.09**	**0.0%**
27		200,000	500	556	3,137.71	-328.88	20,191.93	23,000.77	3,137.71	-328.79	20,191.93	23,000.86	**0.09**	**0.0%**
28		270,000	900	1,000	5,619.49	-592.52	28,075.69	33,102.67	5,619.49	-592.43	28,075.69	33,102.76	**0.09**	**0.0%**
29		360,000	900	1,000	5,619.49	-592.52	36,351.28	41,378.25	5,619.49	-592.43	36,351.28	41,378.34	**0.09**	**0.0%**
30		450,000	900	1,000	5,619.49	-592.52	44,626.86	49,653.83	5,619.49	-592.43	44,626.86	49,653.92	**0.09**	**0.0%**
31	**GS 1000-4999 kW**													
32		300,000	1,000	1,111	5,152.91	-745.65	31,884.32	36,291.58	5,152.91	-745.64	31,884.32	36,291.59	**0.01**	**0.0%**
33		400,000	1,000	1,111	5,152.91	-745.65	41,079.41	45,486.67	5,152.91	-745.64	41,079.41	45,486.68	**0.01**	**0.0%**
34		500,000	1,000	1,111	5,152.91	-745.65	50,274.50	54,681.76	5,152.91	-745.64	50,274.50	54,681.77	**0.01**	**0.0%**
35		600,000	2,000	2,222	9,646.02	-1,491.99	63,775.89	71,929.93	9,646.02	-1,491.98	63,775.89	71,929.94	**0.01**	**0.0%**
36		800,000	2,000	2,222	9,646.02	-1,491.99	82,166.07	90,320.11	9,646.02	-1,491.98	82,166.07	90,320.12	**0.01**	**0.0%**
37		1,000,000	2,000	2,222	9,646.02	-1,491.99	100,556.26	108,710.29	9,646.02	-1,491.98	100,556.26	108,710.30	**0.01**	**0.0%**
38	**Large Use**													
39		1,500,000	5,000	5,556	26,680.69	-4,012.10	158,495.52	181,164.12	26,680.69	-4,012.10	158,495.52	181,164.12	**0.00**	**0.0%**
40		2,000,000	5,000	5,556	26,680.69	-4,012.10	203,697.28	226,365.87	26,680.69	-4,012.10	203,697.28	226,365.87	**0.00**	**0.0%**
41		2,500,000	5,000	5,556	26,680.69	-4,012.10	248,899.04	271,567.63	26,680.69	-4,012.10	248,899.04	271,567.63	**0.00**	**0.0%**
42		3,000,000	10,000	11,111	50,487.36	-8,024.88	316,998.30	359,460.78	50,487.36	-8,024.88	316,998.30	359,460.78	**0.00**	**0.0%**
43		4,000,000	10,000	11,111	50,487.36	-8,024.88	407,401.81	449,864.29	50,487.36	-8,024.88	407,401.81	449,864.29	**0.00**	**0.0%**
44		5,000,000	10,000	11,111	50,487.36	-8,024.88	497,805.33	540,267.81	50,487.36	-8,024.88	497,805.33	540,267.81	**0.00**	**0.0%**
45	**Street Lighting**		Connections	Mthly kVA										
46		9,182,014	162,353	26,765	995,665.51	-20,071.25	965,429.36	1,941,023.63	995,665.51	106,564.41	965,429.36	2,067,659.29	**126,635.66**	**6.5%**
47		365	1	1	30.53	-0.75	34.55	64.33	30.53	0.03	34.55	65.11	**0.78**	**1.2%**
48	**Unmetered Scattered Loads**		Customers	Connections										
49		4,829,242	1,124	21,782	310,349.24	-4,780.95	484,884.15	790,452.44	310,349.24	23,317.95	484,884.15	818,551.34	**28,098.90**	**3.6%**
50		365	1	1	27.63	-0.36	33.11	60.38	27.63	0.93	33.11	61.67	**1.29**	**2.1%**

2010 Distribution and Rate Rider Bill Impact - Non RPP

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11
				2010 without Contact Voltage Rate Riders			2010 with Contact Voltage Rate Riders			Rate Impact	
1	kWh	kW	kVA	Distribution ($)	Rate Rider ($)	Total ($)	Distribution ($)	Rate Rider ($)	Total ($)	$	%
2	**Residential**										
3	100			19.82	0.60	20.42	19.82	1.01	20.83	**0.41**	**2.0%**
4	250			22.18	0.47	22.65	22.18	0.88	23.06	**0.41**	**1.8%**
5	500			26.11	0.26	26.37	26.11	0.67	26.78	**0.41**	**1.6%**
6	800			30.82	0.01	30.83	30.82	0.42	31.24	**0.41**	**1.3%**
7	1,000			33.97	-0.16	33.81	33.97	0.25	34.22	**0.41**	**1.2%**
8	1,500			41.83	-0.58	41.25	41.83	-0.17	41.66	**0.41**	**1.0%**
9	2,000			49.69	-1.00	48.69	49.69	-0.59	49.10	**0.41**	**0.8%**
10	**GS<50 kW**										
11	2,000			69.70	-1.56	68.14	69.70	-1.14	68.56	**0.42**	**0.6%**
12	5,000			137.80	-4.92	132.88	137.80	-4.50	133.30	**0.42**	**0.3%**
13	10,000			251.30	-10.52	240.78	251.30	-10.10	241.20	**0.42**	**0.2%**
14	20,000			478.30	-21.72	456.58	478.30	-21.30	457.00	**0.42**	**0.1%**
15	**GS 50-999 kW**										
16	30,000	100	100	593.89	-42.74	551.15	593.89	-42.65	551.24	**0.09**	**0.0%**
17	40,000	100	100	593.89	-37.44	556.45	593.89	-37.35	556.54	**0.09**	**0.0%**
18	150,000	500	556	3,137.71	-249.38	2,888.34	3,137.71	-249.29	2,888.43	**0.09**	**0.0%**
19	200,000	500	556	3,137.71	-222.88	2,914.84	3,137.71	-222.79	2,914.93	**0.09**	**0.0%**
20	270,000	900	1,000	5,619.49	-449.42	5,170.07	5,619.49	-449.33	5,170.16	**0.09**	**0.0%**
21	360,000	900	1,000	5,619.49	-401.72	5,217.77	5,619.49	-401.63	5,217.86	**0.09**	**0.0%**
22	450,000	900	1,000	5,619.49	-354.02	5,265.47	5,619.49	-353.93	5,265.56	**0.09**	**0.0%**
23	**GS 1000-4999 kW**										
24	300,000	1,000	1,111	5,152.91	-580.65	4,572.26	5,152.91	-580.64	4,572.27	**0.01**	**0.0%**
25	400,000	1,000	1,111	5,152.91	-525.65	4,627.26	5,152.91	-525.64	4,627.27	**0.01**	**0.0%**
26	500,000	1,000	1,111	5,152.91	-470.65	4,682.26	5,152.91	-470.64	4,682.27	**0.01**	**0.0%**
27	600,000	2,000	2,222	9,646.02	-1,161.99	8,484.04	9,646.02	-1,161.98	8,484.05	**0.01**	**0.0%**
28	800,000	2,000	2,222	9,646.02	-1,051.99	8,594.04	9,646.02	-1,051.98	8,594.05	**0.01**	**0.0%**
29	1,000,000	2,000	2,222	9,646.02	-941.99	8,704.04	9,646.02	-941.98	8,704.05	**0.01**	**0.0%**
30	**Large Use**										
31	1,500,000	5,000	5,556	26,680.69	-3,217.10	23,463.59	26,680.69	-3,217.10	23,463.59	**0.00**	**0.0%**
32	2,000,000	5,000	5,556	26,680.69	-2,952.10	23,728.59	26,680.69	-2,952.10	23,728.59	**0.00**	**0.0%**
33	2,500,000	5,000	5,556	26,680.69	-2,687.10	23,993.59	26,680.69	-2,687.10	23,993.59	**0.00**	**0.0%**
34	3,000,000	10,000	11,111	50,487.36	-6,434.88	44,052.48	50,487.36	-6,434.88	44,052.48	**0.00**	**0.0%**
35	4,000,000	10,000	11,111	50,487.36	-5,904.88	44,582.48	50,487.36	-5,904.88	44,582.48	**0.00**	**0.0%**
36	5,000,000	10,000	11,111	50,487.36	-5,374.88	45,112.48	50,487.36	-5,374.88	45,112.48	**0.00**	**0.0%**
37	**Street Lighting**	Connections	Mthly kVA								
38	9,182,014	162,353	26,765	995,665.51	-15,112.96	980,552.55	995,665.51	111,522.70	1,107,188.22	**126,635.66**	**12.9%**
39	365	1	1	30.53	-0.55	29.98	30.53	0.23	30.76	**0.78**	**2.6%**
40	**Unmetered Scattered Loads**	Customers	Connections								
41	4,829,242	1,124	21,782	310,349.24	-4,780.95	305,568.29	310,349.24	23,317.95	333,667.19	**28,098.90**	**9.2%**
42	365	1	1	27.63	-0.36	27.27	27.63	0.93	28.56	**1.29**	**4.7%**

2010 Total Bill Impact - Non RPP

	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13	Col. 14
					2010 without Contact Voltage Rate Riders				2010 with Contact Voltage Rate Riders				Rate Impact	
1		kWh	kW	kVA	Distribution ($)	Rate Rider ($)	Non-Distribution ($)	Total ($)	Distribution ($)	Rate Rider ($)	Non-Distribution ($)	Total ($)	$	%
2	**Residential**													
3		100			19.82	0.60	9.65	30.07	19.82	1.01	9.65	30.48	**0.41**	**1.4%**
4		250			22.18	0.47	23.75	46.40	22.18	0.88	23.75	46.81	**0.41**	**0.9%**
5		500			26.11	0.26	47.25	73.62	26.11	0.67	47.25	74.03	**0.41**	**0.6%**
6		800			30.82	0.01	75.76	106.59	30.82	0.42	75.76	107.00	**0.41**	**0.4%**
7		1,000			33.97	-0.16	96.63	130.44	33.97	0.25	96.63	130.85	**0.41**	**0.3%**
8		1,500			41.83	-0.58	148.82	190.07	41.83	-0.17	148.82	190.48	**0.41**	**0.2%**
9		2,000			49.69	-1.00	201.01	249.70	49.69	-0.59	201.01	250.11	**0.41**	**0.2%**
10	**GS<50 kW**													
11		2,000			69.70	-1.56	201.76	269.90	69.70	-1.14	201.76	270.32	**0.42**	**0.2%**
12		5,000			137.80	-4.92	515.28	648.16	137.80	-4.50	515.28	648.58	**0.42**	**0.1%**
13		10,000			251.30	-10.52	1,037.81	1,278.59	251.30	-10.10	1,037.81	1,279.01	**0.42**	**0.0%**
14		20,000			478.30	-21.72	2,082.87	2,539.45	478.30	-21.30	2,082.87	2,539.87	**0.42**	**0.0%**
23	**GS 50-999 kW**													
24		30,000	100	100	593.89	-42.74	3,113.08	3,664.23	593.89	-42.65	3,113.08	3,664.32	**0.09**	**0.0%**
25		40,000	100	100	593.89	-37.44	4,032.59	4,589.04	593.89	-37.35	4,032.59	4,589.13	**0.09**	**0.0%**
26		150,000	500	556	3,137.71	-249.38	15,594.39	18,482.72	3,137.71	-249.29	15,594.39	18,482.81	**0.09**	**0.0%**
27		200,000	500	556	3,137.71	-222.88	20,191.93	23,106.77	3,137.71	-222.79	20,191.93	23,106.86	**0.09**	**0.0%**
28		270,000	900	1,000	5,619.49	-449.42	28,075.69	33,245.77	5,619.49	-449.33	28,075.69	33,245.86	**0.09**	**0.0%**
29		360,000	900	1,000	5,619.49	-401.72	36,351.28	41,569.05	5,619.49	-401.63	36,351.28	41,569.14	**0.09**	**0.0%**
30		450,000	900	1,000	5,619.49	-354.02	44,626.86	49,892.33	5,619.49	-353.93	44,626.86	49,892.42	**0.09**	**0.0%**
31	**GS 1000-4999 kW**													
32		300,000	1,000	1,111	5,152.91	-580.65	31,884.32	36,456.58	5,152.91	-580.64	31,884.32	36,456.59	**0.01**	**0.0%**
33		400,000	1,000	1,111	5,152.91	-525.65	41,079.41	45,706.67	5,152.91	-525.64	41,079.41	45,706.68	**0.01**	**0.0%**
34		500,000	1,000	1,111	5,152.91	-470.65	50,274.50	54,956.76	5,152.91	-470.64	50,274.50	54,956.77	**0.01**	**0.0%**
35		600,000	2,000	2,222	9,646.02	-1,161.99	63,775.89	72,259.93	9,646.02	-1,161.98	63,775.89	72,259.94	**0.01**	**0.0%**
36		800,000	2,000	2,222	9,646.02	-1,051.99	82,166.07	90,760.11	9,646.02	-1,051.98	82,166.07	90,760.12	**0.01**	**0.0%**
37		1,000,000	2,000	2,222	9,646.02	-941.99	100,556.26	109,260.29	9,646.02	-941.98	100,556.26	109,260.30	**0.01**	**0.0%**
38	**Large Use**													
39		1,500,000	5,000	5,556	26,680.69	-3,217.10	158,495.52	181,959.12	26,680.69	-3,217.10	158,495.52	181,959.12	**0.00**	**0.0%**
40		2,000,000	5,000	5,556	26,680.69	-2,952.10	203,697.28	227,425.87	26,680.69	-2,952.10	203,697.28	227,425.87	**0.00**	**0.0%**
41		2,500,000	5,000	5,556	26,680.69	-2,687.10	248,899.04	272,892.63	26,680.69	-2,687.10	248,899.04	272,892.63	**0.00**	**0.0%**
42		3,000,000	10,000	11,111	50,487.36	-6,434.88	316,998.30	361,050.78	50,487.36	-6,434.88	316,998.30	361,050.78	**0.00**	**0.0%**
43		4,000,000	10,000	11,111	50,487.36	-5,904.88	407,401.81	451,984.29	50,487.36	-5,904.88	407,401.81	451,984.29	**0.00**	**0.0%**
44		5,000,000	10,000	11,111	50,487.36	-5,374.88	497,805.33	542,917.81	50,487.36	-5,374.88	497,805.33	542,917.81	**0.00**	**0.0%**
45	**Street Lighting**		Connections	Mthly kVA										
46		9,182,014	162,353	26,765	995,665.51	-15,112.96	965,429.36	1,945,981.92	995,665.51	111,522.70	965,429.36	2,072,617.58	**126,635.66**	**6.5%**
47		365	1	1	30.53	-0.55	34.55	64.53	30.53	0.23	34.55	65.31	**0.78**	**1.2%**
48	**Unmetered Scattered Loads**		Customers	Connections										
49		4,829,242	1,124	21,782	310,349.24	-4,780.95	484,884.15	790,452.44	310,349.24	23,317.95	484,884.15	818,551.34	**28,098.90**	**3.6%**
50		365	1	1	27.63	-0.36	33.11	60.38	27.63	0.93	33.11	61.67	**1.29**	**2.1%**