Board Staff Interrogatories

2011 IRM3 Electricity Distribution Rates Veridian Connections Inc. ("Veridian") EB-2010-0117

Veridian – Main Specific Questions

Disposition of Group 1 Deferral / Variance Account Balances

Board Staff Interrogatory No. 1

Ref: 2011 IRM3 Rate Generator – Global Adjustment Sub-Account - Sheet J3.21

Ref: 2011 IRM3 Deferral and Variance Account Workform

Questions / Requests:

- a) Please explain how losses are treated when the Global Adjustment rate rider is included in the electricity component of the bill.
- b) Confirm that Veridian Main has non-RPP customers in the USL, Sentinel Lighting and Street Lighting rate classes. If not, does Veridian agree that the Global Adjustment Sub-Account Disposition rate rider need not be applied to the cited rate classes?

Specific Service Charges

Board Staff Interrogatory No. 2

Ref: 2011 IRM3 Rate Generator - Sheet P2.1

<u>Preamble:</u> Board Staff note that Veridian – Main's current Tariff Sheet includes specific service charges for:

- 1) Install / Remove Load Control Device During Regular Hours \$65
- 2) Install / Remove Load Control Device After Regular Hours \$185
- 3) Customer Substation Isolation \$905

These charges have not been included on Sheet P2.1 of the 2011 IRM3 Rate Generator.

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Questions / Requests:

a) Is Veridian proposing the discontinuance of the cited service charges or were these charges omitted by error? Please confirm and Board staff will make the relevant corrections to Sheet P2.1 of the 2011 IRM3 Rate Generator.

Shared Tax Savings

Board Staff Interrogatory No. 3

Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

	Last COS Re-based Year		2010						
	Last COS OEB Application Number			EB-2009-0140					
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B		Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential	Customer	kWh	96,168	895,633,594		11.06	0.0156	
GSLT50	General Service Less Than 50 kW	Customer	kWh	7,781	287,089,314		13.69	0.1690	
GSGT50	General Service 50 to 2,999 kW	Customer	kW	993	926,658,737	2,294,788	134.72		3.0172
GSGT50	General Service 3,000 to 4,999 kW	Customer	kW	2	30,205,301	91,017	5,333.07		1.4111
LU	Large Use	Customer	kW	5	195,617,726	358,799	8,011.37		1.6807
USL	Unmetered Scattered Load	Connection	kWh	893	5,832,532		7.47	0.0185	
Sen	Sentinel Lighting	Connection	kW	651	812,525	2,257	2.84		10.9531
SL	Street Lighting	Connection	kW	26,672	19,168,966	53,375	0.65		3.6272
NA	Rate Class 9	NA	NA						

Questions / Requests:

a) Board staff has been unable to verify that rebased Billing Determinants have been entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform. Please provide evidence supporting the re-based billing determinants entered on the cited sheet.

Board Staff Interrogatory No. 4

Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "F1.1 – Z-Factor Tax Changes" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

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Summary - Sharing of Tax Change Forecast Amounts			
1. Tax Related Amounts Forecast from Capital Tax Rate Changes	2010	2011	2012
Taxable Capital	\$ 175,473,899	\$ 175,473,899	\$175,473,899
Deduction from taxable capital up to \$15,000,000	5 14,106,000	\$ 14,106,000	\$ 14,106,000
Net Taxable Capital	\$ 161,367,899	\$ 161,367,899	\$ 161,367,899
Rate	0.150%	0.000%	0.000%
Ontario Capital Tax (Deductible, not grossed-up)	\$ 120,031	\$.	\$.
Tax Related Amounts Forecast from Income Tax Rate Changes Regulatory Taxable Income	2010 \$ 6,809,361	2011 \$ 6,809,361	2012 \$ 6,809,361
Corporate Tax Rate	30.99%	28.25%	26.25%
Tax Impact	\$ 2,110,357	\$ 1,923,508	\$ 1,787,389
Grossed-up Tax Amount	\$ 3,058,134	\$ 2,680,773	\$ 2,423,546
Tax Related Amounts Forecast from Capital Tax Rate Changes	\$ 120,031	\$ -	\$.
Tax Related Amounts Forecast from Income Tax Rate Changes	\$ 3,058,134	\$ 2,680,773	\$ 2,423,546
Total Tax Related Amounts	\$ 3,178,165	\$ 2,680,773	5 2,423,546
Incremental Tax Savings		-\$ 497,392	.\$ 754,620
Sharing of Tax Savings (50%)		-\$ 248,696	-\$ 377,310

Questions / Requests:

a) Board staff has been unable to verify that the data entered on this sheet is accurate. Please provide supporting evidence.

RTSR Adjustments

Board Staff Interrogatory No. 5

Ref: 2011 IRM3 RTSR Adjustment Workform Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "B1.2 - 2009 Distributor Billing Determinants" of the 2011 IRM3 RTSR Adjustment Workform is reproduced below.

Loss Adjusted Metered kWh	No				
Loss Adjusted Metered kW	No				
Rate Class	Vol Metric	Metered kWh A	Metered kW B	Applicable Loss Factor C	Load Factor D = A / (B * 730)
Residential General Service Less Than 50 kW General Service 50 to 2,999 kW General Service 3,000 to 4,999 kW - Intermediate U Large Use Unmetered Scattered Load Sentinel Lighting Street Lighting	kWh kWh kW se kW kW kWh kW	895,633,594 287,089,314 926,658,737 30,205,301 195,617,726 5,832,532 812,525 19,168,966	358,799 0 2,257	1.0549 1.0549 1.0549 1.0549 1.0145 1.0549 1.0549 1.0549	55.35% 45.49% 74.73% 49.34% 49.22%
Total		2,361,018,695	2,800,236		

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Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

	Last COS Re-based Year		2010						
	Last COS OEB Application Number	EB-2009-0140							
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections	Re-based Billed kWh B		Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential	Customer	kWh	96,168	895,633,594		11.06	0.0156	
GSLT50	General Service Less Than 50 kW	Customer	kWh	7,781	287,089,314		13.69	0.1690	
GSGT50	General Service 50 to 2,999 kW	Customer	kW	993	926,658,737	2,294,788	134.72		3.0172
GSGT50	General Service 3,000 to 4,999 kW	Customer	kW	2	30,205,301	91,017	5,333.07		1.4111
LU	Large Use	Customer	kW	5	195,617,726	358,799	8,011.37		1.6807
USL	Unmetered Scattered Load	Connection	kWh	893	5,832,532		7.47	0.0185	
Sen	Sentinel Lighting	Connection	kW	651	812,525	2,257	2.84		10.9531
SL	Street Lighting	Connection	kW	26,672	19,168,966	53,375	0.65		3.6272
NA	Rate Class 9	NA	NA						

<u>Preamble:</u> Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform requires the distributor to enter 2009 RRR Billing Determinants.

Questions / Requests:

- a) Please explain why the data entered on Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform is the same as the data entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform (where re-based billing determinants are to be entered).
- b) Please confirm that 2009 RRR Billing Determinants have been entered on Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform. If not, please provide the relevant data and Board staff will make the corrections to the Workform.
- c) Please explain why no loss factor has been applied to the data entered in Column A of Sheet B1.2 of the 2011 IRM3 RTSR Workform.

Revenue / Cost Ratio Adjustments

Board Staff Interrogatory No. 6

Ref: 2011 IRM3 Revenue Cost Adjustment Workform

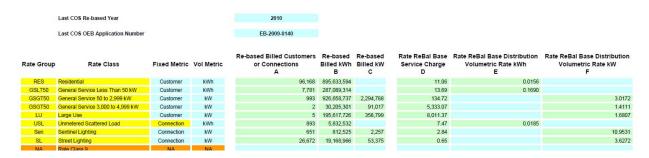
Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "B1.1 - Rate Class Selection, Re-Based Billing Determinants & Current Tariff Rates" of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform is reproduced below.

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	Last COS Re-based Year			2010					
	Last COS OEB Application Number	EB-2009-0140							
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B		Current Tariff Service Charge D		Current Tariff Distribution Volumetric Rate kW F
RES	Residential	Customer	kWh	96,370	927,385,803		11.06	0.0156	
GSLT50	General Service Less Than 50 kW	Customer	kWh	7,758	294,966,007		13.69	0.0169	
GSGT50	General Service 50 to 2,999 kW	Customer	kW	1,038	928,060,437	2,408,247	134.72		3.0172
GSGT50	General Service 3,000 to 4,999 kW - Intermediate Use	Customer	kW	2	32,196,539	86,111	5,333.07		1.4111
LU	Large Use > 5000 kW	Customer	kW	5	166,636,438	311,685	8,011.37		1.6807
USL	Unmetered Scattered Load	Connection	kWh	875	5,413,534		7.47	0.0185	
Sen	Sentinel Lighting	Connection	kW	730	846,470	2,353	2.84		8.8454
SL	Street Lighting	Connection	kW	27,045	19,533,195	54,601	0.65		3.6272

Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.



Questions / Requests:

a) Please explain the discrepancy between the data entered on Sheet B1.1 of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform and the data entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform. If there are errors, please advise and Board staff will make the relevant corrections.

Board Staff Interrogatory No. 7

Ref: 2011 IRM3 Revenue Cost Ratio Adjustment Workform

Ref: 2010 COS RRWF

<u>Preamble:</u> Veridian's 2010 COS RRWF includes \$4,463,100 of Revenue Offsets.

Questions / Requests:

a) Please explain why no revenue offsets have been entered on Sheet C1.2 of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform. If there are errors, please re-file Sheet C1.2 as a stand-alone document and Board staff will make the relevant corrections to the Workform.

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Veridian – Gravenhurst Specific Questions

Disposition of Group 1 Deferral / Variance Account Balances

Board Staff Interrogatory No. 8

Ref: 2011 IRM3 Rate Generator – Global Adjustment Sub-Account - Sheet J3.21

Ref: 2011 IRM3 Deferral and Variance Account Workform

Questions / Requests:

a) Confirm that Veridian – Gravenhurst has non-RPP customers in the USL, Sentinel Lighting and Street Lighting rate classes. If not, does Veridian agree that the Global Adjustment Sub-Account Disposition rate rider need not be applied to the cited rate classes?

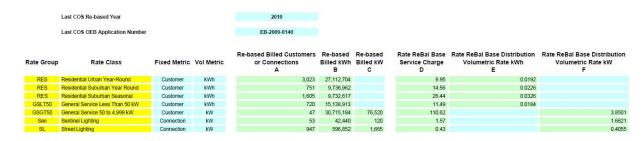
Shared Tax Savings

Board Staff Interrogatory No. 9

Ref: 2011 IRM3 Shared Tax Savings Workform

Ref: 2011 IRM3 Rate Generator

Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.



Sheet "E1.1 – Rate Rebalanced Base Distribution Rates" of the 2011 IRM3 Rate Generator is reproduced below.

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Monthly Service Charge				
Class	Metric	Base Rate	Revenue Cost Ratio	Rate ReBal Bas
Residential Urban Year-Round	Customer per 30 days	9.950000	0.000000	9.950000
Residential Suburban Year Round	Customer per 30 days	14.560000	1.830000	16.39000
Residential Suburban Seasonal	Customer per 30 days	26.440000	0.000000	26.44000
General Service Less Than 50 kW	Customer per 30 days	11.490000	-0.650000	10.84000
General Service 50 to 4,999 kW	Customer -12 per year	110.620000	-6.180000	104.44000
Sentinel Lighting	Connection -12 per year	1.570000	0.700000	2.27000
Street Lighting	Connection -12 per year	0.430000	0.00000	0.430000
Volumetric Distribution Charge			Revenue Cost Ratio	Rate ReBal Bas
Volumetric Distribution Charge	Metric	Base Rate	Revenue Cost Ratio	
Volumetric Distribution Charge			Revenue Cost Ratio 0.000000 0.002500	0.019200
Volumetric Distribution Charge Class Residential Urban Year-Round	Metric kWh	Base Rate 0.019200	0.000000	0.01920 0.02260
Volumetric Distribution Charge Class Residential Urban Year-Round Residential Suburban Year Round	Metric kWh kWh	Base Rate 0.019200 0.020100	0.000000 0.002500	0.01920 0.02260 0.03260
Volumetric Distribution Charge Class Residential Urban Year-Round Residential Suburban Year Round Residential Suburban Seasonal	Metric kWh kWh kWh	Base Rate 0.019200 0.020100 0.032600	0.000000 0.002500 0.000000	0.019200 0.022600 0.032600 0.018400
Volumetric Distribution Charge Class Residential Urban Year-Round Residential Suburban Year Round Residential Suburban Seasonal General Service Less Than 50 kW	Metric kWh kWh kWh kWh	Base Rate 0.019200 0.020100 0.032600 0.019500	0.000000 0.002500 0.000000 -0.001100	Rate ReBal Bass 0.019200 0.022600 0.032600 0.018400 3.850100 4.306500

<u>Preamble:</u> Board staff notes that "Rate ReBal Base Rates" from Sheet E1.1 of the 2011 IRM3 Rate Generator are supposed to be entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform.

Questions / Requests:

- a) Board staff has been unable to verify that rebased Billing Determinants have been entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform. Please provide evidence supporting the re-based billing determinants entered on the cited sheet.
- b) Please explain the discrepancies between the two sheets cited above. If there are errors, please advise and Board staff will make the relevant corrections.

Board Staff Interrogatory No. 10

Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "F1.1 – Z-Factor Tax Changes" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

.R-

Summary - Sharing of Tax Change Forecast Amounts			
1. Tax Related Amounts Forecast from Capital Tax Rate Changes	2010	2011	2012
Taxable Capital	\$11,121,060	\$11,121,060	\$11,121,060
Deduction from taxable capital up to \$15,000,000	\$ 894,000	\$ 894,000	\$ 894,000
Net Taxable Capital	\$10,227,060	\$10,227,060	\$10,227,060
Rate	0.150%	0.000%	0.000%
Ontario Capital Tax (Deductible, not grossed-up)	5 7,607	5 .	5 .
Tax Related Amounts Forecast from Income Tax Rate Changes Regulatory Taxable Income	2010 \$ 431,559	2011 \$ 431,559	2012 \$ 431,559
Corporate Tax Rate	16.00%	15.50%	15.50%
Tax Impact	\$ 69,049	\$ 66,892	\$ 66,892
Grossed-up Tax Amount	\$ 82,202	\$ 79,162	\$ 79,162
Tax Related Amounts Forecast from Capital Tax Rate Changes	\$ 7,607	\$ -	s -
Tax Related Amounts Forecast from Income Tax Rate Changes	\$ 82,202	\$ 79,162	\$ 79,162
Total Tax Related Amounts	\$ 89,809	\$ 79,162	\$ 79,162
Incremental Tax Savings		-\$ 10,647	-5 10,647
Sharing of Tax Savings (50%)		-5 5,324	-5 5,324

Questions / Requests:

a) Board staff has been unable to verify that the data entered on this sheet is accurate. Please provide supporting evidence.

RTSR Adjustments

Board Staff Interrogatory No. 11

Ref: 2011 IRM3 RTSR Adjustment Workform Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "B1.2 - 2009 Distributor Billing Determinants" of the 2011 IRM3 RTSR Adjustment Workform is reproduced below.

Loss Adjusted Metered kWh	No				
Loss Adjusted Metered kW	No				
Rate Class	Vol Metric	Metered kWh I	Metered kW B	Applicable Loss Factor C	Load Factor D = A / (B * 730)
Residential Urban Year-Round Residential Suburban Year Round	kWh kWh	27,112,704 9,736,962	0	1.0884 1.0884	
Residential Suburban Seasonal	kWh	9,732,617	0	1.0884	
General Service Less Than 50 kW	kWh	15,138,913	0	1.0884	
General Service 50 to 4,999 kW	kW	30,715,184	76,520	1.0884	55.02%
Sentinel Lighting	kW	42,440	120	1.0884	48.47%
Street Lighting	kW	596,852	1,665	1.0884	49.13%
Total		93,075,672	78,305		

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Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

	Last COS Re-based Year			2010					
	Last COS OEB Application Number			EB-2009-0140					
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B		Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential Urban Year-Round	Customer	kWh	3,023	27,112,704		9.95	0.0192	
RES	Residential Suburban Year Round	Customer	kWh	751	9,736,962		14.56	0.0226	
RES	Residential Suburban Seasonal	Customer	kWh	1,605	9,732,617		26.44	0.0326	
GSLT50	General Service Less Than 50 kW	Customer	kWh	720	15,138,913		11.49	0.0184	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	47	30,715,184	76,520	110.62		3.8501
Sen	Sentinel Lighting	Connection	kW	53	42,440	120	1.57		1.6621
SL	Street Lighting	Connection	kW	947	596,852	1,665	0.43		0.4055

<u>Preamble:</u> Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform requires the distributor to enter 2009 RRR Billing Determinants.

Questions / Requests:

- a) Please explain why the data entered on Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform is the same as the data entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform (where re-based billing determinants are to be entered).
- b) Please confirm that 2009 RRR Billing Determinants have been entered on Sheet B1.2 of the 2011 IRM3 RTSR Adjustment Workform. If not, please provide the relevant data and Board staff will make the corrections to the Workform.
- c) Please explain why no loss factor has been applied to the data entered in Column A of Sheet B1.2 of the 2011 IRM3 RTSR Workform.

Board Staff Interrogatory No. 12

Ref: 2011 IRM3 Revenue Cost Adjustment Workform

Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet "B1.1 - Rate Class Selection, Re-Based Billing Determinants & Current Tariff Rates" of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform is reproduced below.

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	Last COS Re-based Year			2010					
	Last COS OEB Application Number	EB-2009-0140					Current Tariff Distribution Nolumetric Rate kW F		
Rate Group	Rate Class Fixed Metric Vol Metr			Re-based Billed Customers or Connections A	Re-based Billed kWh B			Current Tariff Service Charge D	Current Tariff Distribution Volumetric Rate kWh E
RES	Residential Urban Year-Round	Customer	kWh	2,985	27,397,075		9.95	0.0192	
RES	Residential Suburban Year Round	Customer	kWh	757	9,458,013		14.56	0.0201	
RES	Residential Suburban Seasonal	Customer	kWh	1,592	9,730,721		26.44	0.0326	
GSLT50	General Service Less Than 50 kW	Customer	kWh	727	14,769,007		11.49	0.0195	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	50	28,668,436	68,687	110.62		4.0779
Sen	Sentinel Lighting	Connection	kW	53	43,727	127	1.57		2.9843
SL	Street Lighting	Connection	kW	947	598,709	1,664	0.43		0.4055
The state of the s	DW C. VO	100	277						

Sheet "B1.1 – Rate Class and Re-Based Billing Determinants & Rates" of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

	Last COS Re-based Year			2010					
	Last COS OEB Application Number			EB-2009-0140					
Rate Group	Rate Class	Fixed Metric	Vol Metric	Re-based Billed Customers or Connections A	Re-based Billed kWh B		Rate ReBal Base Service Charge D	Rate ReBal Base Distribution Volumetric Rate kWh E	Rate ReBal Base Distribution Volumetric Rate kW F
RES	Residential Urban Year-Round	Customer	kWh	3,023	27,112,704		9.95	0.0192	
RES	Residential Suburban Year Round	Customer	kWh	751	9,736,962		14.56	0.0226	
RES	Residential Suburban Seasonal	Customer	kWh	1,605	9,732,617		26.44	0.0326	
GSLT50	General Service Less Than 50 kW	Customer	kWh	720	15,138,913		11.49	0.0184	
GSGT50	General Service 50 to 4,999 kW	Customer	kW	47	30,715,184	76,520	110.62		3.8501
Sen	Sentinel Lighting	Connection	kW	53	42,440	120	1.57		1.6621
SL	Street Lighting	Connection	kW	947	596,852	1,665	0.43		0.4055

Questions / Requests:

a) Please explain the discrepancy between the data entered on Sheet B1.1 of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform and the data entered on Sheet B1.1 of the 2011 IRM3 Shared Tax Savings Workform. If there are errors, please advise and Board staff will make the relevant corrections.

Board Staff Interrogatory No. 13

Ref: 2011 IRM3 Revenue Cost Ratio Adjustment Workform

Ref: 2010 COS RRWF

<u>Preamble:</u> Veridian's 2010 COS RRWF includes \$4,463,100 of Revenue Offsets.

Questions / Requests:

a) Please explain why no revenue offsets have been entered on Sheet C1.2 of the 2011 IRM3 Revenue Cost Ratio Adjustment Workform. If there are errors, please re-file Sheet C1.2 as a stand-alone document and Board staff will make the relevant corrections to the Workform.

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Z-Factor Cost Recovery – PCB Testing Costs

Board Staff Interrogatory No. 14

Ref: Ex. 2 / Tab 1 / Schedule 2

<u>Preamble:</u> On page 2 of the above referenced exhibit, Veridian noted that it identified 2,385 transformers that required testing and estimated that 1% of those tested would be identified to be replaced.

Questions / Requests:

- a) Following the testing, how many transformers were identified to be replaced?
- b) If applicable, please explain Veridian's regulatory treatment of the removal and replacement costs associated with faulty transformers.

Board Staff Interrogatory No. 15

Ref: Ex. 2 / Tab 1 / Schedule 2

<u>Preamble:</u> On page 6 of the above referenced exhibit, Veridian proposes to allocate the costs within each tariff zone on the basis of the 2009 PBR reported metered kWh.

Questions / Requests:

- a) Please provide the rationale from a cost causality standpoint of proposing to use metered kWh to allocate the costs to Veridian's customer rate classes.
- b) Did Veridian consider allocating this amount on the same basis as transformer costs? If so, please explain the rationale for rejecting this approach. If not, please comment on Veridan's view on whether this approach should be considered.
- c) Please provide a table that compares the costs allocated to each rate classes for each tariff zone when using: (a) kWh as the allocator; and (b) using the allocation factor for transformer costs underpinning Veridian's 2010 cost of service application.
- d) Please confirm that the "2009 PBR reported metered kWh" has the same meaning as 2009 metered kWh information reported in the RRR as of April 30, 2010.

Board Staff Interrogatories Veridian Connections Inc. 2011 IRM3 EB-2010-0117

Dated: November 26, 2010

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Board Staff Interrogatory No. 16

Ref: Ex. 2 / Tab 1 / Schedule 2

<u>Preamble:</u> Veridian noted that the Metered kWh data entered for Tables 3 and 4 on Page 9 of Ex. 2 / Tab 1 / Schedule 2 was based on corrected data filed with the Board on October 4, 2010.

Questions / Requests:

a) Please provide the cited October 4, 2010 filing.