

CAMBRIDGE AND NORTH DUMFRIES HYDRO INC. 1500 Bishop Street, P.O. Box 1060, Cambridge, ON N1R 5X6 Phone: 519-621-3530, Fax: 519-621-0383

January 5, 2011

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

Dear Ms. Walli:

#### Re: Cambridge and North Dumfries Hydro Inc. Response to Board Staff Interrogatories 2011 Electricity Distribution Rate Application EB – 2010-0068

Attached please find Cambridge and North Dumfries Hydro Inc. response to Board staff interrogatories regarding the above application.

Two copies of this letter have been forwarded to your attention via courier.

If you require any additional information or clarification, please contact me at (519) 621-8405, ext. 2355.

Yours truly,

#### CAMBRIDGE & NORTH DUMFRIES HYDRO INC.

John W. Grotheer, CMA President & CEO

## Cambridge and North Dumfries Hydro Inc. 2011 Electricity Distribution Rates EB-2010-0068 Board Staff Interrogatories

## 1. Tax Change Rate Rider Sunset Date

Ref: Rate Generator Model Ref: RTSR Model

A portion of Sheet J2.7 from the Rate Generator Model is reproduced below

# Tax Change Rate Rider



Please confirm that the Sunset Date should be 30/04/2012, reflecting a 1-year refund period from May 1, 2011. If this is an error, Board staff will make the relevant correction.

#### <u>Response</u>

CND confirms that the Sunset Date for the Tax Change Rate Rider should be 30/04/2012.

# 2. RTSR Network Adjustment

Ref: Rate Generator Model Ref: RTSR Model

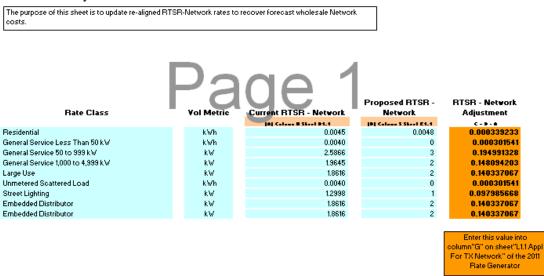
A portion of Sheet L1.1 from the Rate Generator Model is reproduced below.

# Applied For RTSR - Network

| Rate Description<br>Retail Transmission Rate - Network Service Rate | Applied to Class<br>Yes<br>Vol Metric<br>\$/kWh | Current Amount<br>0.004500 | X Adjustment<br>0.000% | \$ Adjustment<br>0.000100 | Final Amount<br>0.004600 |
|---|---|----------------------------|------------------------|---------------------------|--------------------------|
| Rate Class<br>General Service Less Than 50 k¥                       | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/kWh                            | Current Amount<br>0.004000 | X Adjustment<br>0.000X | \$ Adjustment<br>0.000100 | Final Amount<br>0.004100 |
| Rate Class<br>General Service 50 to 999 k¥                          | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/kW                             | Current Amount<br>2.586600 | % Adjustment<br>0.000% | \$ Adjustment<br>0.056900 | Final Amount<br>2.643500 |
| Rate Class<br>General Service 1,000 to 4,999 k¥                     | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/k₩                             | Current Amount<br>1.364500 | % Adjustment<br>0.000% | \$ Adjustment<br>0.044700 | Final Amount<br>2.009200 |
| Rate Class<br>Large Use   | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/k₩                             | Current Amount<br>1.861600 |                        | \$ Adjustment<br>0.045500 | Final Amount<br>1.907100 |
| Rate Class Unmetered Scattered Load                                 | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/kWh                            | Current Amount<br>0.004000 | % Adjustment<br>0.000% | \$ Adjustment<br>0.000100 | Final Amount<br>0.004100 |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Applied to Class<br>Yes<br>Vol Metric<br>\$/kW  | Current Amount<br>1.299800 |                        | \$ Adjustment<br>0.028600 | Final Amount<br>1.328400 |
| Rate Class<br>Embedded Distributor                                  | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/k₩                             | Current Amount<br>1.861600 |                        | \$ Adjustment<br>0.045500 | Final Amount<br>1.907100 |
| Rate Class Embedded Distributor                                     | Applied to Class<br>Yes                         |                            |                        |                           |                          |
| Rate Description<br>Retail Transmission Rate - Network Service Rate | Vol Metric<br>\$/kW                             | Current Amount<br>1.861600 |                        | \$ Adjustment<br>0.045500 | Final Amount<br>1.907100 |

A portion of Sheet F1.1 from the RTSR Model is reproduced below.

#### IRM RTSR Adjustment Calculation - Network



a. Please explain the discrepancies between the values in the "\$ Adjustment" column in the former and values in column C titled "RTSR – Network Adjustment" in the latter. If this is an error, Board staff will make the relevant corrections.

#### **Response**

The values in the "\$ Adjustment" column on Sheet L1.1 from the Rate Generator Model should have been the adjustment values for the RTSR Connection charges and the values in the "\$ Adjustment" column on Sheet L2.1 from the Rate Generator Model should have been the adjustment values for the RTSR Network charges.

CND requests that Board Staff make the corrections.

# 3. **RTSR Connection Adjustment**

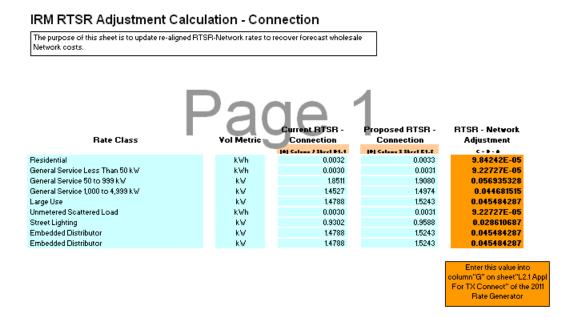
Ref: Rate Generator Model Ref: RTSR Model

A portion of Sheet L2.1 from the Rate Generator Model is reproduced below.

# Applied For RTSR - Connection

| Basi Class<br>Besidential  | Applied to Class<br>Yes |                            |                        |                           |                       |
|--|-------------------------|----------------------------|------------------------|---------------------------|-----------------------|
|  | Vol Metric              | Q                          |                        | • • • •                   | First America         |
| Rate Description<br>Retail Transmission Rate - Line and Transformation Connection Service Rate | \$/kWh                  | Current Amount<br>0.003200 | 4 Adjustment<br>0.000% | \$ Adjustment<br>0.000300 | 0.003500              |
|  |                         |                            |                        |                           |                       |
| Rate Class   | Applied to Class        |                            |                        |                           |                       |
| General Service Less Than 50 kV  | Yes                     |                            |                        |                           |                       |
| Rate Description   | Vol Metric              | Current Amount             |                        |                           |                       |
| Retail Transmission Rate - Line and Transformation Connection Service Rate                     | \$/kWh                  | 0.003000                   | 0.000%                 | 0.000300                  | 0.00330               |
| Rate Class   | Applied to Class        |                            |                        |                           |                       |
| General Service 50 to 999 k¥   | Yes                     |                            |                        |                           |                       |
| Rate Description   | Vol Metric              | Current Amount             | 2 Adjustment           | t Adjustment              | Final Amou            |
| Retail Transmission Rate - Line and Transformation Connection Service Rate                     | \$/kW                   | 1.851100                   | 0.000%                 | 0.195000                  | 2.04610               |
|  |                         |                            |                        |                           |                       |
| Rate Class<br>General Service 1,000 to 4,999 kV  | Applied to Class<br>Yes |                            |                        |                           |                       |
| Clefferal Service 1,000 (0 4,333 k V   | Tes                     |                            |                        |                           |                       |
| Rate Description<br>Retail Transmission Rate - Line and Transformation Connection Service Rate | Vol Metric<br>\$/kW     | Current Amount<br>1452700  | % Adjustment<br>0.000% |                           |                       |
|  |                         | 1422100                    | 0.000                  | 0.140100                  |                       |
| Rate Class Large Use   | Applied to Class<br>Yes |                            |                        |                           |                       |
| -  |                         |                            |                        |                           |                       |
| Rate Description<br>Retail Transmission Rate – Line and Transformation Connection Service Rate | Vol Metric<br>\$/kW     | Current Amount<br>1.478800 | % Adjustment<br>0.000% | \$ Adjustment<br>0.140300 | Final Amou<br>1.61910 |
|  | •                       |                            |                        |                           |                       |
| Rate Class   | Applied to Class        |                            |                        |                           |                       |
| Unmetered Scattered Load   | Yes                     |                            |                        |                           |                       |
| Rate Description   | Vol Metric              | Current Amount             |                        |                           |                       |
| Retail Transmission Rate - Line and Transformation Connection Service Rate                     | \$/k\/h                 | 0.003000                   | 0.000%                 | 0.000300                  | 0.00330               |
|  |                         |                            |                        |                           |                       |
|  | Applied to Class        |                            |                        |                           |                       |
|  | J                       |                            |                        |                           |                       |
| Rate Description<br>Retail Transmission Rate - Line and Transformation Connection Service Rate | Vol Metric<br>\$/kW     | Current Amount<br>0.930200 | % Adjustment<br>0.000% | \$ Adjustment<br>0.098000 | Final Amou<br>1.02820 |
|  |                         |                            |                        |                           |                       |
| Rate Class   | Applied to Class        |                            |                        |                           |                       |
| Embedded Distributor   | Yes                     |                            |                        |                           |                       |
| Rate Description   | Vol Metric              | Current Amount             | % Adjustment           | \$ Adjustment             | Final Amou            |
| Retail Transmission Rate - Line and Transformation Connection Service Rate                     | \$/kW                   | 1.478800                   | 0.000×                 | 0.140300                  | 1.61910               |
|  |                         |                            |                        |                           |                       |
| Rate Class Embedded Distributor  | Applied to Class        |                            |                        |                           |                       |
| Empeaged Distributor   | Yes                     |                            |                        |                           |                       |
| Rate Description<br>Public Transmission Data - Line and Transformation Constanting Social Data | Vol Metric<br>\$/kW     | Current Amount<br>1.478800 | X Adjustment<br>0.000X | \$ Adjustment<br>0.140300 |                       |
| Retail Transmission Rate - Line and Transformation Connection Service Rate                     | <b>X</b> /KW            | 1.410000                   | 0.000%                 | 0.140300                  | 1.61910               |

A portion of Sheet F1.2 from the RTSR Model is reproduced below.



a. Please explain the discrepancies between the values in the "\$ Adjustment" column in the former and values in column C titled "RTSR – Network Adjustment" in the latter. If this is an error, Board staff will make the relevant corrections.

## <u>Response</u>

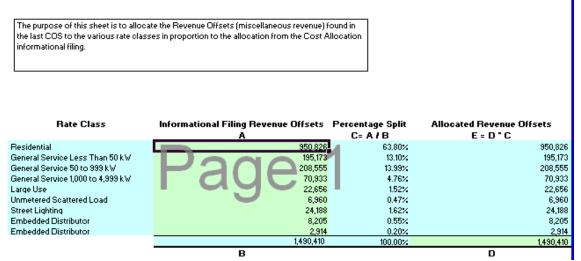
Please refer to the response to question 2 (a

## 4. Revenue Offsets Allocation

Ref: Revenue Cost Ratio Model

A portion of Sheet C1.2 from the Revenue Cost Ratio Model is reproduced below.

#### Revenue Offsets Allocation



 Board Staff has been unable to verify the figures in column A (Informational Filing Revenue Offsets) for the various rate classes. Please provide evidence supporting these amounts.

#### <u>Response</u>

The figures presented in column A are the Revenue Offsets from CND 2010 Cost of Service Rate Application.

Specifically, page 3 of Appendix C of the Updated Draft Rate Order filed on May 05, 2010.

# 5. Transformer Allowance

Ref: Revenue Cost Ratio Model

Ref: Tariff of Rates and Charges, effective May 1, 2010

A portion of Sheet C1.3 from the Revenue Cost Ratio Model is reproduced below.

| Rate Class                        | Transformer Allowance in Rate | Transformer Allowance |   | nce k¥'s Transfo | ormer Allowance Rate |
|-----------------------------------|-------------------------------|-----------------------|---|------------------|----------------------|
|                                   |                               | A                     | C |                  | E                    |
| Residential                       | No                            |                       |   |                  |                      |
| General Service Less Than 50 kW   | No                            |                       |   |                  |                      |
| General Service 50 to 999 kW      | Yes                           | 42,400                |   | 1,312,686        | 0.0323               |
| General Service 1,000 to 4,999 kW | Yes                           | 241,345               |   | 478,860          | 0.5040               |
| Large Use                         | No                            |                       |   |                  |                      |
| Unmetered Scattered Load          | No                            |                       |   |                  |                      |
| Street Lighting                   | No                            |                       |   |                  |                      |
| Embedded Distributor              | No                            |                       |   |                  |                      |
| Embedded Distributor              | No                            |                       |   |                  |                      |
|                                   |                               | 283,745               |   | 1,791,546        |                      |
|                                   |                               | в                     | D |                  |                      |
|                                   |                               | 0                     |   |                  |                      |
|                                   |                               |                       | - |                  |                      |

a. Board Staff notes that the Transformer Allowance Rates shown in column E of the exhibit do not align with the corresponding allowance in the current tariff sheet, i.e. Tariff of Rates and Charges, effective May 1, 2010, where it is shown as \$0.60 per kW. If this is an error, Board staff will make the relevant corrections.

## <u>Response</u>

CND confirms that the transformer allowance shown above is incorrect and request it be updated to the \$0.60 per kW.

# 6. Billing Determinants and Rates

#### Ref: Tax Model

A portion of Sheet B1.1 from the Tax Model is reproduced below.

| Rate Class  | Fixed Metric | Vol Metric | Re-based Billed Customers<br>or Connections<br>A | Re-based Billed<br>kWh<br>B | Re-based Billed<br>kW<br>C | Rate ReBal Base<br>Service Charge<br>D | Rate ReBal Base Distribution<br>Volumetric Rate kWh<br>E | Rate ReBal Base Distribution<br>Volumetric Rate kW<br>F |  |  |
|---|--------------|------------|--|-----------------------------|----------------------------|--|--|---|--|--|
| Residential   | Customer     | kWh        | 45,218   | 389,793,819                 |                            | 9.93                                   | 0.0161   |   |  |  |
| General Service Less Than 50 kW   | Customer     | kWh        | 4,582  | 168,223,630                 |                            | 11.74                                  | 0.0125   |   |  |  |
| General Service 50 to 999 kW  | Customer     | k₩         | 724  | 494,496,789                 | 1,312,686                  | 107.06                                 |  | 3.6062  |  |  |
| General Service 1,000 to 4,999 kW   | Customer     | k₩         | 25   | 215,965,446                 | 478,860                    | 894.91                                 |  | 3.1597  |  |  |
| Large Use   | Customer     | k₩         | 2  | 159,305,102                 | 308,824                    | 7,666.51                               |  | 2.1290  |  |  |
| Unmetered Scattered Load  | Connection   | kWh        | 507  | 1,855,931                   |                            | 6.97                                   | 0.0149   |   |  |  |
| Street Lighting   | Connection   | k₩         | 12,717   | 9,470,257                   | 24,144                     | 2.01                                   |  | 12.8127   |  |  |
| Embedded Distributor  | Connection   | k₩         |  |                             |                            |  |  |   |  |  |
| Embedded Distributor  | Connection   | k₩         |  |                             |                            |  |  |   |  |  |
| Enter "Rate ReBal Base" rates from Sheet "E1.1 Rate Reb Base Dist Rts Gen"<br>of your 2011 IRM3 Rate Generator. |              |            |  |                             |                            |  |  |   |  |  |

a) Board staff notes that data for the two Embedded Distributor rates classes in missing in columns A, C and F. If this is an error, Board staff will make the relevant corrections.

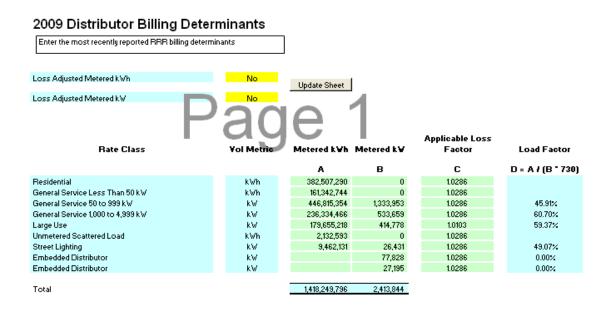
## <u>Response</u>

CND confirms that the values for the Embedded Distributors were omitted in error and requests that Board Staff make the corrections.

# 7. Loss Adjusted Metered kWh

Ref: RTSR Model

A portion of Sheet B1.2 from the RTSR Model is reproduced below.



a. Please confirm that the kWh volumes in column A are not loss adjusted, i.e. losses are not included in these volumes.

## <u>Response</u>

CND confirms that the kWh volumes in column A above are not loss adjusted.

# 8. Recovery of RTSR Connection Charge

Ref: RTSR Model Ref: Deferral/Variance Account Model.

A portion of Sheet D1.2 from the RTSR Model is reproduced below.

|             | Rate Class                | Vol Metric |    | Bi      | lled Amount           | Billed Amount % | Cu | rrent Wholesale Billing |  |
|-------------|---------------------------|------------|----|---------|-----------------------|-----------------|----|-------------------------|--|
|             |                           |            | ÷( | D) = (4 | A) * (B) or (A) * (C) | (F) = (D) / (E) |    | (H) = (G) • (F)         |  |
| Resident    | tial                      | kWh        |    | \$      | 1,224,023             | 21.28%          | \$ | 1,261,671               |  |
| General 3   | Service Less Than 50 KW   | kWh        |    | \$      | 484,028               | 8.41%           | \$ | 498,916                 |  |
| — General : | Service 50 to 999 KW      | KW         |    | \$      | 2,469,280             | 42.93%          | \$ | 2,545,229               |  |
| General :   | Service 1,000 to 4,999 KW | K/V        |    | \$      | 775,246               | 13.48%          | \$ | 799,091                 |  |
| Large Us    | e                         | KW         |    | \$      | 613,374               | 10.66%          | \$ | 632,240                 |  |
| Unmeter     | ed Scattered Load         | kWh        |    | \$      | 6,398                 | 0.11%           | \$ | 6,595                   |  |
| Street Lig  | ghting                    | KW         |    | \$      | 24,586                | 0.43%           | \$ | 25,342                  |  |
| Embedd      | ed Distributor            | KW         |    | \$      | 115.092               | 2.00%           | \$ | 118,632                 |  |
| Embedd      | ed Distributor            | KW/        |    | \$      | 40,216                | 0.70%           | \$ | 41,453                  |  |
|             |                           |            |    |         |                       |                 |    |                         |  |
|             |                           |            |    | \$      | 5,752,244             | 100.00%         | \$ | 5,929,169               |  |
|             |                           |            |    |         | (E)                   |                 |    | (G) Cell Q73 Sheet C1.2 |  |

A portion of Sheet D1.6 from the Deferral/Variance Account Model is reproduced below.

|   | Account<br>Number            | Total Claim  |
|---|------------------------------|--|
| Account Description   |                              | J = C + I  |
| LV Variance Account   | 1550                         | 58,929   |
| RSVA - Wholesale Market Service Charge<br>RSVA - Retail Transmission Network Charge<br>RSVA - Retail Transmission Connection Charge<br>RSVA - Power (Excluding Global Adjustment)<br>RSVA - Power (Global Adjustment Sub-account) | 1580<br>1584<br>1586<br>1588 | (525,140)<br>90,043<br>(1,121,272)<br>(1,470,850)<br>7,949,833 |
| Recovery of Regulatory Asset Balances<br>Residual Balance Disposition and recovery of Def/Var Balances Account (2008)<br>Total  | 1590<br>1595                 | (13,335)<br>0<br>4,968,208                                     |

a. In the former, column D is less than column H which indicates an underrecovery of the RTSR Network charge. In the latter, Account 1586 shows an over-recovery as of December 31, 2009. Please explain this apparent discrepancy.

#### **Response**

The amounts in column D are the connection charges CND billed to its customers based on its 2009 volumes (kWh/KW) and 2010 connection rates. The amounts in column H are the forecasted billings from the IESO and Hydro One for RTSR Connection charges based on the expected 2011 URT rates and CND 2009 volumes (kWh/KW).

The higher values in column H represent an under-recovery of RTSR Connection charges. Thus, resulting in an increase in connection rates.

The amounts in Sheet D1.6 from the Deferral/Variance Account Model are the accounts balance at December 31, 2009 plus projected carrying charges to April 30, 2011.

## 9. Historical wholesale Transmission

#### Ref: RTSR Model

A portion of Sheet C1.1 from the RTSR Model is reproduced below.

|           | Network Line Connection |        |    |         |          |      |        | n  | Line Transformation |              |      |        |  |
|-----------|-------------------------|--------|----|---------|----------|------|--------|----|---------------------|--------------|------|--------|--|
| Month     | Units Billed            | Rate   | A  | mount   | Units Bi | lled | Rate   | A  | mount               | Units Billed | Rate | Amount |  |
| January   | 10,719                  | \$2.01 | \$ | 21,546  | 12,6     | 886  | \$0.50 | \$ | 6,344               |              | \$ - |        |  |
| February  | 7,723                   | \$2.01 | \$ | 15,524  | 7,8      | 819  | \$0.50 | \$ | 3,910               |              | \$ - |        |  |
| March     | 7,600                   | \$2.01 | \$ | 15,276  | 7,8      | 364  | \$0.50 | \$ | 3,932               |              | \$ - |        |  |
| April     | 6,639                   | \$2.01 | \$ | 13,343  | 6,7      | 740  | \$0.50 | \$ | 3,370               |              | \$ - |        |  |
| May       | 5,674                   | \$2.24 | \$ | 12,709  | 5,3      | 357  | \$0.60 | \$ | 3,214               |              | \$ - |        |  |
| June      | 8,135                   | \$2.24 | \$ | 18,223  | 2,1      | 182  | \$0.60 | \$ | 1,309               |              | \$ - |        |  |
| July      | 7,047                   | \$2.24 | \$ | 15,784  | 12,9     | 985  | \$0.60 | \$ | 7,791               |              | \$ - |        |  |
| August    | 8,485                   | \$2.24 | \$ | 19,007  | 8,5      | 546  | \$0.60 | \$ | 5,128               |              | \$ - |        |  |
| September | 6,845                   | \$2.24 | \$ | 15,333  | 6,9      | 903  | \$0.60 | \$ | 4,142               |              | \$ - |        |  |
| October   | 6,834                   | \$2.24 | \$ | 15,309  | 7,0      | 017  | \$0.60 | \$ | 4,210               |              | \$ - |        |  |
| November  | 7,622                   | \$2.24 | \$ | 17,073  | 7,6      | 684  | \$0.60 | \$ | 4,610               |              | \$ - |        |  |
| December  | 8,120                   | \$2.24 | \$ | 18,189  | 8,2      | 271  | \$0.60 | \$ | 4,963               |              | \$ - |        |  |
|           |                         |        |    |         |          |      |        |    |                     |              |      |        |  |
| Total     | 91,443                  | \$2.16 | \$ | 197.316 | 94.0     | 055  | \$0.56 | \$ | 52,922              | -            | \$ - | \$-    |  |

a. Board staff notes that data is missing in the Line Transformation column. If this is an error, please provide the information, Board staff will make the relevant corrections in the model.

#### <u>Response</u>

CND confirms that no data is missing for Line Transformation. Hydro One only bills CND for Network and Line Connection charges. There is no transformation at the wholesale delivery point as the power is received at a voltage below 50 kV.

## 10. Global Adjustment Recovery

Ref: Rate Generator Model

Ref: Deferral/Variance Account Model

Ref: Tariff of Rates and Charges Effective May 1, 2010

Both Sheet J3.21 from the Rate Generator Model and Sheet A1.1 from the Deferral/Variance Account Model indicate a proposed recovery of the Global Adjustment ("GA") sub-account balance through the electricity component of the bill. The Tariff of Rates and Charges Effective May 1, 2010 indicates that the rate rider for the GA sub-account was included in the delivery component of the bill.

a. Please provide the rationale for the proposed change in the recovery of the GA sub-account balance from the delivery to the electricity component of the bill.

## **Response**

CND requests that the proposed recovery of the Global Adjustment ("GA") sub-account balance be included in the delivery component of the bill consistent with the 2010 Tariff of Rates and Charges.

b. Were the GA rate rider to be included in the electricity component of the bill, would it be adjusted by the loss factor? Please explain.

## <u>Response</u>

CND requests that the Global Adjustment be included in the delivery component of the bill, which is billed on loss adjusted consumption.

## 11. Smart Meter Rate Adder

Ref: Smart Meter Model Ref: Manager's Summary

Sheet 8 from the Smart Meter Model indicates a Proposed Smart Meter Rate Adder of \$1.61, whereas p.9 of the Manager's Summary states that Cambridge and North Dumfries Hydro is proposing to increase the Smart Meter Rate Adder to \$2.80 per month.

a. Please explain the discrepancy and indicate which source is correct.

## <u>Response</u>

CND filed an updated Smart Meter Model and Manager's Summary on November 16, 2010 requesting that the Smart Meter Rate Adder be updated to \$1.61 from \$2.80 that was included in the application filed on November 01, 2010.

## 12. Billing Determinants – 2010 CoS Forecast

Ref: Deferral/Variance Account Model

A portion of Sheet B1.3 from the Deferral/Variance Account Model is reproduced below.

#### 2010 COS Forecast

| Rate Class                                      | Fixed Metric | Vol Metric | Metered kWh | Metered kW |
|---|--------------|------------|-------------|------------|
| Residential                                     | Customer     | kWh        | 387,314,732 |            |
| General Service Less Than 50 kW                 | Customer     | kWh        | 170,263,597 |            |
| General Service 50 to 999 kW - Interval Metered | Customer     | kW         | 484,236,276 | 1,244,174  |
| General Service 50 to 4,999 kW                  | Customer     | kW         | 249,869,851 | 554,036    |
| Large Use > 5000 kW                             | Customer     | kW         | 230,297,755 | 446,448    |
| Unmetered Scattered Load                        | Connection   | kWh        | 2,112,232   |            |
| Street Lighting                                 | Connection   | kW         | 9,448,890   | 24,090     |

a. Board Staff has been unable to verify the figures in the "Metered kWh" and "Metered kW" columns. Further, Board staff notes that these numbers do not match corresponding numbers in Sheet B1.1 of the Tax Model. Please provide evidence supporting these amounts. If this is an error, Board staff will make the relevant corrections.

#### **Response**

CND requests that the "Metered kWh" be updated based on the numbers on Sheet B1.1 of the tax model. These numbers are from page 2, of Appendix B of CND Updated Draft Rate Order filed with the Board on May 05, 2010.