Toronto Hydro-Electric System Limited

EB-2010-0295 Exhibit I2 Tab 3

Schedule 1 Filed: 2011 Jan 10 Corrected: 2011 Jan 19

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## INTERROGATORIES OF VULNERABLE ENERGY CONSUMERS COALITION

1	IN	INTERROGATORY 1:			
2	<b>Reference</b> (s):		THESL Supplementary Evidence, pages 2-3		
3			EDA Evidence, paragraphs #3 and #64		
4					
5	a)	Please clarify w	hether the percentages shown in Table #1 represent:		
6		• The proportion of late payment revenue paid by each customer class, or			
7		• The proport	ion of late revenues that were allocated to each customer class as an		
8		offset in the	determination of distribution rates.		
9	b)	Does THESL a	gree with the EDA Evidence statement that "the (LPP) revenues were		
10		used to mitigate	the rates of all customers? If not, who benefited from LPPs?		
11	c)	If the response	to part (b) is affirmative, please explain how the revenues from late		
12		payment charge	s were used to "benefit" THESL's customers. In doing so, please		
13		explain how the	revenues were assigned to THESL's various customer classes during		
14		the "exposure p	eriod (as described in the EDA Evidence, paragraphs #46-#48).		
15					
16	RE	ESPONSE:			
17	a)	The allocation p	percentages shown in Table 1 are based on a three-year historical		
18		average (2007-2	2009) of Late Payment Penalties collected from each rate class.		
19					
20	b)	Yes. Historical	or forecast LPP revenues were used as revenue offsets to reduce the		
21		base distribution	n revenue requirement, recoverable from all customers.		
22					
23	c)	During the initi	al portion of the 'exposure' period, THESL and its predecessors		
24		operated as non	-profit Hydro-Electric Commissions and all revenues received were		
25		used for the ope	eration of the utilities. During the latter portion of the 'exposure		

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1	period', after the commencement of OEB regulation, either historical or forecast LPP	
2	revenues (depending on the regulatory regime) were considered as revenue offsets.	
3		
4	In THESL's case, LPP revenues are currently allocated as revenue offsets to the	
5	various classes in proportion to the three-year historical average of LPP revenues	/C
6	received by class	