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August 16, 2011

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)
Interrogatories**

Please find enclosed the interrogatories of VECC in the above-noted proceeding.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

Ontario Energy Board

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

AND IN THE MATTER OF an application by Oshawa
PUC Networks Inc. for an order approving just and
reasonable rates and other charges for electricity
distribution to be effective January 1, 2012.

**INTERROGATORIES OF
Vulnerable Energy Consumers Coalition
("VECC")**

August 16, 2011

REQUESTOR NAME:	VECC
INFORMATION REQUEST ROUND NO:	#1
TO:	Oshawa PUC Networks Inc.
DATE:	August 16, 2011
CASE NO:	EB-2011-0073
APPLICATION NAME:	2012 Electricity Distribution Rate Application

Notes: In these interrogatories Oshawa PUC Networks Inc. is referred to as "Oshawa"

Issue 1: General

1.0 Issue 1.2: Is service quality, based on the Board's specified performance indicators acceptable?

Service Quality Customer Calls: Reference Exhibit 2, page 33

Preamble: The evidence shows that Oshawa achieved less than 60% of the Board minimum standard for answering calls in person within 30 seconds. This represents the 3rd consecutive yearly decline of this service quality indicator.

- 1.1 Please explain the reasons for the decline in this service indicator.
- 1.2 Please explain how Oshawa intends to rectify the situation. In particular please explain how the introduction of an IVR system address the reasons provided in 1.1.
- 1.3 How many staff currently are assigned to customer calls?
- 1.4 What is the expected increase in staff and when are they expected to be hired?
- 1.5 Did Oshawa undertake a study of its all center requirements and how to address customer information needs? If so please provide this study and indicate how the studies recommendations are being addressed.

Issue 2: Rate Base Exhibit 2

2.0 Issue 2.3: Are the Capital Expenditures Appropriate

Board Approved vs. Actual capital expenditures: Reference: Exhibit 2, page 4, Table 1 Summary of Rate Base

Preamble: At Table 1 the Board approved Rate Base for 2008 is noted as \$63,257,706. Oshawa actual rate base for 2008 was \$59,828,110. The

evidence indicates that Oshawa did not attain the Board approved rate base until 2010.

- 2.1 Please explain why Oshawa did not meet its planned capital expenditures for 2008.
- 2.2 Please provide the list of capital projects that were planned for 2008 and were not completed in that year
- 2.3 Using the table provided in Board Staff interrogatory: Issue 2.3 IR #9; and for rows 1 through 13 please complete a column showing the capital amounts that were projected in the 2008 rate application filing.
- 2.4 Please calculate the rate base related overearnings (based on Board approved 2008 cost of capital) that accrued to Oshawa due to under spending on capital projects in 2008.

3.0 Issue 2.5: Is the working capital allowance for the test year appropriate?

Working Capital: Reference Exhibit 2, page 7; Ins 1-7

Preamble: Oshawa states that it did not complete a lead-lag study to support its request for a capital allowance. Instead it is requesting the default requirement of 15% of the forecast cost of power and controllable expenses. The Board's Filing guidelines state that 2012 is the last year in which a 15% working capital allowance will be used.

- 3.1 Why did Oshawa not undertake a lead-lag study to calculate its actual working capital needs?
- 3.2 What impact would it have if Oshawa were to reduce its working capital allowance to 13% of forecast controllable and power costs?

4.0 Issue 2.6: Is the proposed rate base appropriate?

Long-term Load Transfers: Reference Exhibit E2; pages 49 and 52

Preamble: The evidence states that Oshawa is spending \$296,931 in 2011 and \$225,288 in 2012 on the elimination of long-term load transfer by expanding its plant to directly connect the customers in question.

- 4.1 Did Oshawa attempt to negotiate the transfer of the customers to the physical serving utility rather than expand its own plant? If not, please explain why this option was eliminated.
- 4.2 Has Oshawa undertaken a benefit-cost analysis for connecting the load transfer customers. If so please provide this study. If not explain why such a study was not undertaken.

- 4.3 For the each of the long-term load transfer projects outlined in the evidence please provide the number and type of customers (residential, commercial etc) that will be connected.
- 4.4 For the test year are there other long-term load transfer projects capital costs (i.e. not listed separately because they fall under the materiality threshold). If yes please provide a list of these projects and their costs.

5.0 Issue 2.6: Is the proposed rate base appropriate?

Customer Contributions: Reference Exhibit 2, pages, 39, 42

- 5.1 In respect to customer connections at for 2009 at Table 8 it shows customer connections of \$258,104 as being offset by an equal amount of customer contributions. At the same entry at Table 11 for the 2012 test year there is no similar offset for the \$458,000 related to customer connections. Please explain this apparent inconsistency.

6.0 Issue 2.6: Is the proposed rate base appropriate?

Grants & Contributions: Reference Exhibit 2, pages 35-42

- 6.1 In Tables 7 through 10, the Fixed Asset Continuity Schedules for 2008 through 2011, line 1995 Contributions and Grants the net book value averaged approximately 21.3 million. In the 2012 test year the equivalent amount is \$19.8 million. Please provide the explanation and supporting evidence for the expected decline in grants and contributions.

7.0 Issue 2.6: Is the proposed rate base appropriate?

Fleet Vehicles: Reference Exhibit 2 pages 35 – 55

- 7.1 Please provide inventory of all fleet vehicles; whether currently owned or leased and year of vehicle.
- 7.2 Please explain what changes were made to Oshawa fleet during the period of IRM rates, that is 2008 through 2011.
- 7.3 Please file Oshawa's fleet acquisition and retirement policy. If no policy exists please explain how Oshawa determines when to retire and replace vehicles.

8.0 Issue 2.6: Is the proposed rate base appropriate?

Pole Replacements: Reference Tables 8 -11 Exhibit 2 pages – 25-55

- 8.1 Pole Replacement: Reference Exhibit 2 page 56; page 126 (METSCO Report). At page 59 of the METSCO (Exhibit 2, page 126) it states that approximately 230 poles need to be replaced during the 10 years. Oshawa identifies two projects and total costs of \$638,156 in pole replacements for 2012. Are the projects identified at Exhibit 2, page 56 part of the pole replacements identified in the METSCO Report?
- 8.2 The Annual pole replacement plan is stated as: \$208,878 in 2008; \$454,620 in 2009; and \$314,145 in 2010. In 2011 the cost is estimated to be \$336,675. The 2012 forecast \$638,156 for this program. Please explain why there is such a significant increase in spending on this program.

9.0 Issue 2.6 Is the proposed rate base appropriate?

Transformer Project: Exhibit 2, pages 55 and 56

- 9.1 The evidence states that \$4,951,977 is expected to be expended on Station Transformers and Equipment upgrades. The evidence also states that the expected completion date of this project is 2015. Please clarify whether the \$4.9 million is the entire cost of the project and whether all these monies are expected to be expended in 2012.

Issue 3: Loads, Customers – Throughput Revenue

10.0 Issue 3.1 Is the load forecast methodology appropriate?

Regression Model: Reference: Exhibit 3, pages 14-15

- 10.1 Did Oshawa test any other economic or customer factors in developing its regression model (e.g., GDP and/or customer count)?
- 10.1.1 If yes, please provide the results (i.e., R Square, Adjusted R Square and Variable Coefficients/t-stats) for these alternatives.
- 10.1.2 If no, why not?
- 10.2 Please provide the source documents for both a) the historical unemployment rates used to develop the regression model and b) the forecast unemployment rates used to forecast power purchases for 2011 and 2012.

11.0 Issue 3.1: Is the load forecast methodology appropriate?

Reference: Exhibit 3, page 17

- 11.1 Please provide Heating and Cooling graphs similar to those shown but for the 20-year period up to 2010.
- 11.2 Please explain more fully why “weather extremes becoming greater over time” supports the use of a seven year trend value as opposed to a 10 or 20 year average value.
- 11.3 Please provide a schedule that sets out the 2011 and 2012 weather normal values Oshawa has used for HDD and CDD (Note: Annual totals are sufficient.)
 - 11.3.1 In the same table please include the 2011 and 2012 HDD and CDD values based on:
 - 10 and 20 year historical averages;
 - 10 and 20 trend lines.

12.0 Issue 3.1: Is the load forecast methodology appropriate?

Reference: Exhibit 3, page 17

- 12.1 What was the average historical loss factor over the seven year period used to develop the regression model?

13.0 Issue 3.1: Is the load forecast methodology appropriate?

Reference: Exhibit 3, pages 21-22

- 13.1 Page 22 (lines 9-10) states that billing kW were forecast using the forecast energy by class and the average historical ratio of kW to kWh. However, the ratio values for 2011 and 2012 in the subsequent table appear to be those for 2010. Please reconcile.
- 13.2 For each class that is demand billed, please provide a regression analysis that looks at the time trend of the kW to kWh ratio. If this trend is significant (i.e., the t-stat for the time trend coefficient is significant) please provide the 2011 and 2012 ratios based on this time trend analysis.

14.0 Issue 3.1: Is the load forecast methodology appropriate?

Reference: Exhibit 3, pages 14 and 17

14.1 Please confirm that the purchased energy forecast developed using the regression model is reduced for the anticipated CDM savings prior to the analysis on page 17-21 that breaks down the forecast by rate class.

14.2 Please confirm that the 2012 billing energy forecast of 1,077 GWh is after the adjustment for CDM.

14.2.1 If yes, what were the CDM adjustments made to purchased energy for 2011 and 2012?

14.2.2 If no, please indicate where the CDM adjustment is reflected.

15.0 Issue 3.2: Are the proposed customer/connections and load forecasts (both kWh and kW) for the test year appropriate?

Reference: Exhibit 3, page 18

15.1 Are the historical and forecast customer counts year end values or average annual values?

15.2 What was the actual customer count for each class as of the end of June 2011?

16.0 Issue 3.2: Are the proposed customer/connections and load forecasts (both kWh and kW) for the test year appropriate?

Reference: Exhibit 3, page 16

16.1 Please provide a table that sets out for 2009 and 2010 the following:

- The actual purchases for each year
- The actual HDD and CDD values for each year
- The “weather normal” HDD and CDD values for each year (as defined by Oshawa)
- The HDD and CDD coefficients per Oshawa’s regression model
- The weather normal adjustment for each year based on the product of a) the HDD and CDD coefficients and b) the differences between the actual and “weather normal” values for HDD and CDD respectively.
- The estimated “weather normal purchases” calculated by adjusting actual purchases by the values calculated in the preceding bullet.

17.0 Issue 3.3: Is CDM appropriately reflected in the load forecast?

**Reference: Exhibit 3, pages 14 -15
Oshawa Weather Normalization Regression Model, CDM
Tab**

Preamble: The following table is an extract from Oshawa's Excel-based Weather Normalization Model – CDM Tab:

CDM Projected Program Results

#	Program Year	Results Status	2006	2007	2008	2009	2010	2011	2012	2013	2014
1	2011 Programs	Forecast	0	0	0	0	0	5,224,000	5,224,000	5,224,000	5,224,000
2	2012 Programs	Forecast	0	0	0	0	0	6,900,000	5,224,000	5,224,000	5,224,000
3	2013 Programs	Forecast	0	0	0	0	0	0	6,000,000	5,224,000	5,224,000
4	2014 Programs	Forecast	0	0	0	0	0	0	0	0	5,224,000
5	2015 Programs	Forecast	0	0	0	0	0	0	0	0	0
Total			0	0	0	0	0	12,124,000	16,448,000	15,672,000	20,896,000

- 17.1 For purposes of the record in this proceeding, please provide a copy of Oshawa's CDM Strategy.
- 17.2 Please confirm that Oshawa's CDM savings target for 2011-2014 is 52.24 GWh.
- 17.3 Please describe the current status of Oshawa's 2011 CDM program activity.
- 17.4 Please confirm that a CDM adjustment of 16 GWh was included in the purchased energy forecast for that year.
- 17.5 Is the 16 GWh target (per Oshawa's CDM Strategy) measured as "billed savings" or "purchased power savings"?
 - 17.5.1 If "billed savings" does the adjustment that Oshawa has made to the 2012 purchased power forecast need to be revised?
- 17.6 Please explain why the total savings for the 2011-2014 period are 65.14 GWh (per the sum of the annual savings noted in the Preamble) as opposed to 52.24 GWh.
- 17.7 Please explain why (per the Table in the Preamble) the total savings in 2012 (16.44 GWh) include savings from 2013 programs of 6 GWh.
- 17.8 Please explain why the savings are the same in first program year as they are in later years. Doesn't this (falsely) assume that all programs are implemented/effective January 1st? Is this reasonable?
- 17.9 Please explain why there is no apparent adjustment after the first year of a program for loss of persistence.

18.0 Issue 3.3: Is CDM appropriately reflected in the load forecast?

Reference: Exhibit 3, pages 14 -15 and 19
 Oshawa Weather Normalization Regression Model, CDM Tab

Preamble: The following table is an extract from Oshawa's Excel-based Weather Normalization Model – CDM Tab:

Net Energy Savings (kWh)

#	Program Year	Results Status	2006	2007	2008	2009	2010	2011	2012
1	2006 Programs	Final	4,361,626	4,361,626	4,361,626	4,361,626	757,518	757,518	692,923
2	2007 Programs	Final	0	2,127,143	2,107,867	2,107,867	2,107,867	2,107,712	2,041,924
3	2008 Programs	Final	0	0	12,530,058	11,855,512	11,843,974	11,843,974	11,626,537
4	2009 Programs	Final	0	0	0	6,169,186	5,473,352	5,473,352	5,470,422
5	2010 Programs	Interim	0	0	0	0	5,000,000	5,000,000	5,000,000
Total			4,361,626	6,488,769	18,999,551	24,494,190	25,182,711	25,182,555	24,831,806

18.1 Please confirm that embedded in the historical purchase data used to develop the regression model are the historical CDM savings (increasing from 4 GWh in 2006 to 25 GWh in 2010) shown in the preamble.

18.2 Is it reasonable to assume that the regression model reflects this growing trend in CDM?

18.2.1 If not, why not?

18.2.2 If yes, is it reasonable to assume that captured in the purchase power forecast for 2011 and 2012 based on the regression model are CDM savings of more than 25 GWh.

19.0 Issue 3.5: Are the proposed revenue offsets appropriate?

Regulatory/Non Utility Reference: Exhibit 3, pages 30-31

19.1 Please explain more fully how the regulatory changes described at page 30 (lines 2-6) and 31 (lines 5-7) will reduce the revenues from specific charges and how the reductions forecast for 2011 (\$115,335) and 2012 (a further \$55,000) were determined.

19.2 Please explain more fully the basis for the reductions to Revenues from Non-Utility Operations (Account #4375) forecast for 2011 and 2012.

Issue: 4: Operating Costs

20.0 Issue 4.1 Is the overall OM&A forecast appropriate?

Bad Debt Expense: Reference Exhibit 4 page 37

Preamble: Oshawa's Bad Debt expense is forecast to more than double between 2008 and 2012 (300,631 2008 Actual to 619,201 forecast in 2012).

20.1 Please explain what steps Oshawa has taken since 2008 to mitigate Bad Debt.

- 20.2 At Exhibit 4 page 37 Oshawa states that revised customer service rules will cause a 25% increase in Bad Debt expenses. Please provide a description of the rules that are being referenced and the study or analysis undertaken which supports the 25% increase in the forecasted bad debt.

21.0 Issue 4.1: Is the overall OM&A forecast appropriate?

Meter Reading Expenses: Reference Exhibit 4, page 32

Preamble: The evidence shows a 52% increase in the cost of meter reading since 2008. At page 32 of Exhibit 4 Oshawa states that savings from manual readings have been mostly negated.

- 21.1 Please explain why 2 new FTEs were required as part of the smart meter billing.
- 21.2 Please provide the cost in 2008 for manual billing reading and the forecast cost in 2012 for any remaining manual billing reading.
- 21.3 Please provide a description of the new customer service rules and the associated cost of these rules, including the analysis underpinning the estimates.

22.0 Issue 4.1 Is the overall OM&A forecast appropriate?

Cost Drivers/Re-Allocations Reference Exhibit 4

- 22.1 With respect to the cost changes between 2008 Board approved for each of the OM&A categories listed in Table 1 Exhibit 4, page 7 (i.e. Operations/Maintenance/Billing/Community Relations/Admin) please provide the total of the increase (decrease) in comparison to 2012 forecast that is due to reallocation. Please reference where in the evidence the re-allocated amount can be found. For example:

Account	2008 Approved	2012 Forecast	Amount of change related to reallocation from capital account	Reference to where reallocation (i.e. reduction) in associated account can be found
Operations	162,576	1,404,342	<i>Example, Account 5020 + 340K</i>	

- 22.1 Please create a similar table (or add the necessary column to the table above) which shows the increase (decrease) for each of the

five categories related to an increase (decrease) in FTEs. Please list the number of FTEs and the associated 2012 costs.

23.0 Issue 4.1 Is the overall OM&A forecast appropriate?

One Time Costs: Reference Exhibit 4, pages, 36, 39

Preamble: At Exhibit 4, page 39 Oshawa states that other than regulatory costs, it has not included any one-time costs in the application.

23.0 In respect to Maintenance of Station Equipment (Account 5114 Exhibit 4, page 36) the evidence states that the costs are associated with “*plans to have all substations ground grid tested in 2012.*” If all stations are being tested what “*similar tests and preventative maintenance procedures*” will be undertaken in future years?

24.0 Issue 4.2: Are the methods used to allocate shared services?

Management Fees: Reference Exhibit 4 page 30, 40-41

24.1 Please provide the service agreement between OPUC and OPUCN in respect to Management Fees.

24.2 If not included in the service agreement, or if no service agreement exists, please provide a list of management services provided by OPUC to OPUCN.

25.0 Issue 4.4: Are the compensation costs and employee levels appropriate?

Management Benefits: Reference Exhibit 4 page 52

25.1 Please explain the sources of the increase in “Current Benefits” for Management from \$190,930 in 2008 to the forecast of \$278,261 in 2012.

26.0 Issue 4.4 Are the compensation costs and employee levels appropriate?

Reference Exhibit 4, page 58

26.1 Please provide the source for the used of a 3% increase for non-union staff.

Issue 5: Cost of Capital

No Questions

Issue 6: Calculation of Revenue Deficiency

No Questions

Issue 7: Cost Allocation

25.0 Issue 7.1: Is the Applicant's cost allocation appropriate?

**Reference: Exhibit 7, pages 2, 5 and 7
OEB Staff IR #47 a)**

- 25.1 As part of the response to OEB Staff IR #47 a), please fully explain the basis for the weighting factors used for Services (Account 1855), Billing and Collection (Accounts 5315-5340, except 5335), Meter Reading and Meter Capital. In doing so, please indicate how the fact smart meters are now in rate base has been taken into account.
- 25.2 Please provide a schedule that sets out the derivation of revenues by class at existing rates (reduced by the transformer ownership allowance where necessary).

26.0 Issue 7.2: Are the proposed revenue-to-cost ratios appropriate?

Reference: Exhibit 7, pages 4 and 7

- 26.1 On page 7 of its 2007 Cost Allocation Report the Board states that "Distributors should not move their revenue-to-cost ratios further away from one". Given this direction, why is Oshawa proposing to reduce the ratio for GS 5—999 from 93.4% to 90%.
- 26.2 Please confirm that the customer classes with ratios outside the Board's target ranges are GS<50; GS 1,000-4,000; Large Use and Sentinel Lights.
- 26.3 Please confirm that moving these classes to the upper/lower end of the ranges (as applicable) would result in a revenue shortfall of just under \$70,000. If not, what would be the shortfall?
- 26.4 If just the ratios for Street Lighting, Sentinel Lighting and GS 50-999 were all increased to the same value in order to address this shortfall, what would the resulting ratio for each be?

Issue 8: Rate Design

27.0 Issue 8.1: Are the customer charges and fixed-variable splits for class appropriate?

Reference: Exhibit 8, pages 5 – 9

Preamble: The Application states that Oshawa has adjusted the splits towards the ceiling where the MSC is below the ceiling (page 6).

- 27.1 Please explain why, in those cases where the MSC is below the ceiling, Oshawa has not simply maintained the existing fixed-variable split.
- 27.2 Please indicate what the MSC would be for each customer class if the existing fixed-variable split were maintained and flag those classes where the resulting fixed charge for 2012 would exceed the ceiling for the class.
- 27.3 Please explain why, in those cases where the current MSC is excess of the guidelines, Oshawa is still proposing to increase the MSC further (as a result of maintaining the fixed-variable split).
- 27.4 The Application states (page 9) that the transformer discount is provided to those GS 50-999 and GS>1,000 customers who own their transformers. However the proposed variable rate for Large Use appears to also have been grossed up to include the cost of the transformer ownership allowance. Given this, why isn't the Large Use customer class also identified as receiving the transformer discount (Note: The alternative would be to not gross up the Large Use rate and then not provide the discount to this customer).

28.0 Issue 8.3 Are the proposed loss factors appropriate?

Reference Exhibit 8, page 11

- 28.1 Oshawa notes that its loss factor is expected to decrease from 1.04030 to 1.0487. Has Oshawa's asset management plan explicitly identified the reduction in loss factors as an objective. If so what projects are being undertaken in pursuit of this objective?

Issue 9: Deferral and Variance Accounts

29.0 Issue 9.1: Are the account balances, cost allocation methodology and disposition period appropriate?

Reference: Exhibit 9, page 7

29.1 What was the actual capital spending in 2009 on concrete pole replacement and how many poles were actually replaced?

30.0 Issue 9.2 Are the proposed rate riders appropriate?

**References: Exhibit 9 Page 24 Table 8 ;
Smart meter Spreadsheet Oshawa_Smart Meters Rev. Requirements
Workings_20110531.xls**

- 30.1 Please provide a breakdown in Table 8 (supported by the Spreadsheet) of the Revenue Requirements 2009-2012 and Revenue Collected between the Residential and GS< 50 kw classes.
- 30.2 Please reconcile the 2012 Rate Adder (refund) to the excess/deficit if revenue collected from each class. Adjust as required.
- 30.3 When will Oshawa file evidence for a full prudence review of SM costs?

Issue 10 LRAM/SSM

31.0 Issue: 10.2 Are the input assumptions used by Oshawa PUC appropriate?

**Reference: Exhibit 8 Page s 11-14 Table 14 and Table 15
See Attached Spreadsheet**

- 31.1 Please Confirm that the 2010 OPA results are based on preliminary assessment.
- 31.2 Please indicate when the final results will be available and how this will be dealt with.
- 31.3 For OPA EKC 2006 please confirm that CFL measures installed in 2006 had a lifetime of 4 years and annual savings of 104 kwh.
- 31.4 If not already done, adjust the 2012 Spreadsheet [Oshawa_LRAM_2012 cost of service 20110531.xls] and Tables for OPA EKC 2006 savings and LRAM to reflect the fact that the lifetime of CFLs installed in 2006 has expired.
- 31.5 Please populate the Spreadsheet provided in Last Year's Case (attached) for 2010.

- 31.6 Please include in RED any changes to the historic claims together with full explanations.
- 31.7 Confirm the input assumptions and derivation of kwh savings for all third tranche MARR programs that are part of the 2010 claim. Show how these fit with the corresponding 2009 savings.
- 31.8 For each 3rd tranche MARR program indicate if there will be any future LRAM (or SSM) claims.
- 31.9 If the response to VECC IRs leads to changes please amend Tables 14 and 15 accordingly.

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

Rate Class	Program
	Library Watt- Reader Program Total 2006
	OPA EKC Pgm Coupons (Summer/ Fall 2006)
	Residential Replace Bulk with Individual Meters 2006
	Retrofit Non-Profit Housing Total 2006
	OPA Direct Intall 2008
	OPA Peaksaver Total 2008
	OPA Refrigerator Roundup Total 2008
	OPA Summer Sweepstakes 2008
Residential Total	
	Retro Fit Traffic Signal Lights with LED Fixtures Total
Unmetered Scattered Load Total	
	OPA Direct Install Total 2008
	OPA ERIP - Community Baptist Church 2008
	OPA ERIP - King Ritson Dental Clinic 2008
	OPA ERIP - Pier 1 Imports 2008
Commercial Total	
	OPA ERIP - Foley Group Total
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total
	OPA ERIP - Nordco Inc Total
	OPA ERIP - Syran Developments Ltd Total
GS >50KW-200 Total	
	OPA ERIP - Canadian Tire Total
	OPA ERIP - Kassinger Construction, 2007 Total
GS 200KW-1000 Total	
Grand Total	

REFERENCE VECC IR 31.5

VECC interrogatories a) Comparison Ta

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		2
		Lost Revenue
Rate Class	Program	Total LRAM
	Library Watt- Reader Program Total 2006	\$
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$
	Residential Replace Bulk with Individual Meters 2006	\$
	Retrofit Non-Profit Housing Total 2006	\$
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	\$
	OPA Refrigerator Roundup Total 2008	\$
	OPA Summer Sweepstakes 2008	
Residential Total		\$
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$
Unmetered Scattered Load Total		\$
	OPA Direct Install Total 2008	\$
	OPA ERIP - Community Baptist Church 2008	\$
	OPA ERIP - King Ritson Dental Clinic 2008	\$
	OPA ERIP - Pier 1 Imports 2008	\$
Commercial Total		\$
	OPA ERIP - Foley Group Total	\$
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$
	OPA ERIP - Nordco Inc Total	\$
	OPA ERIP - Syran Developments Ltd Total	\$
GS >50KW-200 Total		\$
	OPA ERIP - Canadian Tire Total	\$
	OPA ERIP - Kassinger Construction, 2007 Total	\$
GS 200KW-1000 Total		\$
Grand Total		\$

REFERENCE VECC IR 31.5

to 2009 claim:

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Load
		Total Net KWh Saved (After FR)
Rate Class	Program	
	Library Watt- Reader Program Total 2006	5,588
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	557,998
	Residential Replace Bulk with Individual Meters 2006	4,800
	Retrofit Non-Profit Housing Total 2006	48,630
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	29,049
	OPA Refrigerator Roundup Total 2008	795,902
	OPA Summer Sweepstakes 2008	
Residential Total		1,441,968
	Retro Fit Traffic Signal Lights with LED Fixtures Total	757,957
Unmetered Scattered Load Total		757,957
	OPA Direct Install Total 2008	393,516
	OPA ERIP - Community Baptist Church 2008	19,467
	OPA ERIP - King Ritson Dental Clinic 2008	23,201
	OPA ERIP - Pier 1 Imports 2008	80,454
Commercial Total		516,638
	OPA ERIP - Foley Group Total	41,607
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	635,164
	OPA ERIP - Nordco Inc Total	19,700
	OPA ERIP - Syran Developments Ltd Total	36,447
GS >50KW-200 Total		732,918
	OPA ERIP - Canadian Tire Total	387,620
	OPA ERIP - Kassinger Construction, 2007 Total	41,299
GS 200KW-1000 Total		428,919
Grand Total		3,878,400

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		2006
		Lost Revenue
Rate Class	Program	Total LRAM
	Library Watt- Reader Program Total 2006	\$ 64
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$ 6,096
	Residential Replace Bulk with Individual Meters 2006	\$ 57
	Retrofit Non-Profit Housing Total 2006	\$ 684
	OPA Direct Intall 2008	\$ 7,536
	OPA Peaksaver Total 2008	\$ 235
	OPA Refrigerator Roundup Total 2008	\$ 8,087
	OPA Summer Sweepstakes 2008	\$ 2,499
Residential Total		\$ 25,258
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$ 14,780
Unmetered Scattered Load Total		\$ 14,780
	OPA Direct Install Total 2008	
	OPA ERIP - Community Baptist Church 2008	\$ 177
	OPA ERIP - King Ritson Dental Clinic 2008	\$ 326
	OPA ERIP - Pier 1 Imports 2008	\$ 876
Commercial Total		\$ 1,379
	OPA ERIP - Foley Group Total	\$ 101
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$ 1,496
	OPA ERIP - Nordco Inc Total	\$ 27
	OPA ERIP - Syran Developments Ltd Total	\$ 48
GS >50KW-200 Total		\$ 1,672
	OPA ERIP - Canadian Tire Total	\$ 363
	OPA ERIP - Kassinger Construction, 2007 Total	\$ 34
GS 200KW-1000 Total		\$ 397
Grand Total		\$ 43,486

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		9 Claim
		Lost Load
Rate Class	Program	Total Net KWh Saved (After FR)
	Library Watt- Reader Program Total 2006	5,418
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	512,254
	Residential Replace Bulk with Individual Meters 2006	4,800
	Retrofit Non-Profit Housing Total 2006	57,456
	OPA Direct Intall 2008	633,250
	OPA Peaksaver Total 2008	19,748
	OPA Refrigerator Roundup Total 2008	679,555
	OPA Summer Sweepstakes 2008	210,009
Residential Total		2,122,490
	Retro Fit Traffic Signal Lights with LED Fixtures Total	757,957
Unmetered Scattered Load Total		757,957
	OPA Direct Install Total 2008	
	OPA ERIP - Community Baptist Church 2008	9,720
	OPA ERIP - King Ritson Dental Clinic 2008	17,888
	OPA ERIP - Pier 1 Imports 2008	48,108
Commercial Total		75,716
	OPA ERIP - Foley Group Total	108,135
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	1,596,421
	OPA ERIP - Nordco Inc Total	41,464
	OPA ERIP - Syran Developments Ltd Total	79,797
GS >50KW-200 Total		1,825,817
	OPA ERIP - Canadian Tire Total	387,620
	OPA ERIP - Kassinger Construction, 2007 Total	41,302
GS 200KW-1000 Total		428,922
Grand Total		5,210,902

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Change
		Lost Revenue
Rate Class	Program	Total LRAM
	Library Watt- Reader Program Total 2006	\$ 7
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$ 991
	Residential Replace Bulk with Individual Meters 2006	\$ 4
	Retrofit Non-Profit Housing Total 2006	\$ (66)
	OPA Direct Intall 2008	\$ (7,536)
	OPA Peaksaver Total 2008	\$ 134
	OPA Refrigerator Roundup Total 2008	\$ 2,021
	OPA Summer Sweepstakes 2008	\$ (2,499)
Residential Total		\$ (6,945)
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$ 2,350
Unmetered Scattered Load Total		\$ 2,350
	OPA Direct Install Total 2008	\$ 7,044
	OPA ERIP - Community Baptist Church 2008	\$ 174
	OPA ERIP - King Ritson Dental Clinic 2008	\$ 93
	OPA ERIP - Pier 1 Imports 2008	\$ 576
Commercial Total		\$ 7,887
	OPA ERIP - Foley Group Total	\$ (63)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$ (918)
	OPA ERIP - Nordco Inc Total	\$ (9)
	OPA ERIP - Syran Developments Ltd Total	\$ (18)
GS >50KW-200 Total		\$ (1,008)
	OPA ERIP - Canadian Tire Total	\$ (91)
	OPA ERIP - Kassinger Construction, 2007 Total	\$ (9)
GS 200KW-1000 Total		\$ (100)
Grand Total		\$ 2,185

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		ges
		Lost Load
Rate Class	Program	Total Net KWh Saved (After FR)
	Library Watt- Reader Program Total 2006	170
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	45,744
	Residential Replace Bulk with Individual Meters 2006	-
	Retrofit Non-Profit Housing Total 2006	(8,826)
	OPA Direct Intall 2008	(633,250)
	OPA Peaksaver Total 2008	9,301
	OPA Refrigerator Roundup Total 2008	116,347
	OPA Summer Sweepstakes 2008	(210,009)
Residential Total		(680,522)
	Retro Fit Traffic Signal Lights with LED Fixtures Total	0
Unmetered Scattered Load Total		0
	OPA Direct Install Total 2008	393,516
	OPA ERIP - Community Baptist Church 2008	9,747
	OPA ERIP - King Ritson Dental Clinic 2008	5,313
	OPA ERIP - Pier 1 Imports 2008	32,346
Commercial Total		\$ 440,922
	OPA ERIP - Foley Group Total	(66,528)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	(961,257)
	OPA ERIP - Nordco Inc Total	(21,764)
	OPA ERIP - Syran Developments Ltd Total	(43,350)
GS >50KW-200 Total		(1,092,899)
	OPA ERIP - Canadian Tire Total	(0)
	OPA ERIP - Kassinger Construction, 2007 Total	(3)
GS 200KW-1000 Total		(3)
Grand Total		(1,332,502)

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

Rate Class	Program
	Library Watt- Reader Program Total 2006
	OPA EKC Pgm Coupons (Summer/ Fall 2006)
	Residential Replace Bulk with Individual Meters 2006
	Retrofit Non-Profit Housing Total 2006
	OPA Direct Intall 2008
	OPA Peaksaver Total 2008
	OPA Refrigerator Roundup Total 2008
	OPA Summer Sweepstakes 2008
Residential Total	
	Retro Fit Traffic Signal Lights with LED Fixtures Total
Unmetered Scattered Load Total	
	OPA Direct Install Total 2008
	OPA ERIP - Community Baptist Church 2008
	OPA ERIP - King Ritson Dental Clinic 2008
	OPA ERIP - Pier 1 Imports 2008
Commercial Total	
	OPA ERIP - Foley Group Total
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total
	OPA ERIP - Nordco Inc Total
	OPA ERIP - Syran Developments Ltd Total
GS >50KW-200 Total	
	OPA ERIP - Canadian Tire Total
	OPA ERIP - Kassinger Construction, 2007 Total
GS 200KW-1000 Total	
Grand Total	

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REFERENCE VECC IR 31.5

VECC interrogatories b) Factors driving

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Revenue
Rate Class	Program	from assets
	Library Watt- Reader Program Total 2006	\$
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$
	Residential Replace Bulk with Individual Meters 2006	\$
	Retrofit Non-Profit Housing Total 2006	\$
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	\$
	OPA Refrigerator Roundup Total 2008	\$
	OPA Summer Sweepstakes 2008	
Residential Total		\$
	Retro Fit Traffic Signal Lights with LED Fixtures Total	
Unmetered Scattered Load Total		\$
	OPA Direct Install Total 2008	\$
	OPA ERIP - Community Baptist Church 2008	\$
	OPA ERIP - King Ritson Dental Clinic 2008	\$
	OPA ERIP - Pier 1 Imports 2008	\$
Commercial Total		\$
	OPA ERIP - Foley Group Total	\$
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$
	OPA ERIP - Nordco Inc Total	\$
	OPA ERIP - Syran Developments Ltd Total	\$
GS >50KW-200 Total		\$
	OPA ERIP - Canadian Tire Total	
	OPA ERIP - Kassinger Construction, 2007 Total	
GS 200KW-1000 Total		\$
Grand Total		\$

Changes from OPA assumptions from 200

Changes from rate increases effective May
Decrease from technology end of useful lif
Change from Direct Install program reports
Decrease from technology end of useful lif
Change from Direct Install program reports

No LRAM was claimed in the 2009 claim fr

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Load
Rate Class	Program	
	Library Watt- Reader Program Total 2006	170
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	45,744
	Residential Replace Bulk with Individual Meters 2006	-
	Retrofit Non-Profit Housing Total 2006	(56)
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	9,301
	OPA Refrigerator Roundup Total 2008	116,347
	OPA Summer Sweepstakes 2008	
Residential Total		171,507
	Retro Fit Traffic Signal Lights with LED Fixtures Total	
Unmetered Scattered Load Total		-
	OPA Direct Install Total 2008	(238,032)
	OPA ERIP - Community Baptist Church 2008	13
	OPA ERIP - King Ritson Dental Clinic 2008	(6,287)
	OPA ERIP - Pier 1 Imports 2008	(7,881)
Commercial Total		\$ (252,187)
	OPA ERIP - Foley Group Total	(66,528)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	(961,257)
	OPA ERIP - Nordco Inc Total	(21,764)
	OPA ERIP - Syran Developments Ltd Total	(43,350)
GS >50KW-200 Total		(1,092,899)
	OPA ERIP - Canadian Tire Total	
	OPA ERIP - Kassinger Construction, 2007 Total	(3)
GS 200KW-1000 Total		(3)
Grand Total		(1,173,582)

Market / Commercial Measure

2009 claim, corrected to Cor

2009 claim, corrected to Cor

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REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Revenue
Rate Class	Program	from rate change
	Library Watt- Reader Program Total 2006	\$ 4
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$ 356
	Residential Replace Bulk with Individual Meters 2006	\$ 4
	Retrofit Non-Profit Housing Total 2006	\$ 39
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	\$ 16
	OPA Refrigerator Roundup Total 2008	\$ 544
	OPA Summer Sweepstakes 2008	
Residential Total		\$ 962
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$ 2,350
Unmetered Scattered Load Total		\$ 2,350
	OPA Direct Install Total 2008	\$ 3,789
	OPA ERIP - Community Baptist Church 2008	\$ (3)
	OPA ERIP - King Ritson Dental Clinic 2008	\$ (5)
	OPA ERIP - Pier 1 Imports 2008	\$ (14)
Commercial Total		\$ 3,767
	OPA ERIP - Foley Group Total	\$ (25)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$ (376)
	OPA ERIP - Nordco Inc Total	\$ (7)
	OPA ERIP - Syran Developments Ltd Total	\$ (12)
GS >50KW-200 Total		\$ (420)
	OPA ERIP - Canadian Tire Total	\$ (91)
	OPA ERIP - Kassinger Construction, 2007 Total	\$ (9)
GS 200KW-1000 Total		\$ (100)
Grand Total		\$ 6,559

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mercial in 2010 claim.

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ore than 4 decimal places

REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Load
Rate Class	Program	ies (2)
	Library Watt- Reader Program Total 2006	
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	
	Residential Replace Bulk with Individual Meters 2006	
	Retrofit Non-Profit Housing Total 2006	
	OPA Direct Intall 2008	
	OPA Peaksaver Total 2008	
	OPA Refrigerator Roundup Total 2008	
	OPA Summer Sweepstakes 2008	
Residential Total		-
	Retro Fit Traffic Signal Lights with LED Fixtures Total	
Unmetered Scattered Load Total		-
	OPA Direct Install Total 2008	
	OPA ERIP - Community Baptist Church 2008	
	OPA ERIP - King Ritson Dental Clinic 2008	
	OPA ERIP - Pier 1 Imports 2008	
Commercial Total		-
	OPA ERIP - Foley Group Total	
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	
	OPA ERIP - Nordco Inc Total	
	OPA ERIP - Syran Developments Ltd Total	
GS >50KW-200 Total		-
	OPA ERIP - Canadian Tire Total	
	OPA ERIP - Kassinger Construction, 2007 Total	
GS 200KW-1000 Total		-
Grand Total		-

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REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Revenue
Rate Class	Program	other
	Library Watt- Reader Program Total 2006	
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	
	Residential Replace Bulk with Individual Meters 2006	
	Retrofit Non-Profit Housing Total 2006	\$ (105)
	OPA Direct Intall 2008	\$ (7,536)
	OPA Peaksaver Total 2008	
	OPA Refrigerator Roundup Total 2008	
	OPA Summer Sweepstakes 2008	\$ (2,499)
Residential Total		\$ (10,140)
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$ 2,350
Unmetered Scattered Load Total		\$ 2,350
	OPA Direct Install Total 2008	\$ 7,515
	OPA ERIP - Community Baptist Church 2008	\$ 177
	OPA ERIP - King Ritson Dental Clinic 2008	\$ 210
	OPA ERIP - Pier 1 Imports 2008	\$ 732
Commercial Total		\$ 8,635
	OPA ERIP - Foley Group Total	
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	
	OPA ERIP - Nordco Inc Total	
	OPA ERIP - Syran Developments Ltd Total	
GS >50KW-200 Total		\$ -
	OPA ERIP - Canadian Tire Total	
	OPA ERIP - Kassinger Construction, 2007 Total	
GS 200KW-1000 Total		\$ -
Grand Total		\$ 845

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REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Load	
Rate Class	Program		
	Library Watt- Reader Program Total 2006		
	OPA EKC Pgm Coupons (Summer/ Fall 2006)		
	Residential Replace Bulk with Individual Meters 2006		
	Retrofit Non-Profit Housing Total 2006	(8,770)	(3)
	OPA Direct Intall 2008	(633,250)	(4)
	OPA Peaksaver Total 2008		
	OPA Refrigerator Roundup Total 2008		
	OPA Summer Sweepstakes 2008	(210,009)	(5)
Residential Total		(852,029)	
	Retro Fit Traffic Signal Lights with LED Fixtures Total		
Unmetered Scattered Load Total		-	
	OPA Direct Install Total 2008	631,548	(6)
	OPA ERIP - Community Baptist Church 2008	9,733	(7)
	OPA ERIP - King Ritson Dental Clinic 2008	11,601	(7)
	OPA ERIP - Pier 1 Imports 2008	40,227	(7)
Commercial Total		693,109	
	OPA ERIP - Foley Group Total		
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total		
	OPA ERIP - Nordco Inc Total		
	OPA ERIP - Syran Developments Ltd Total		
GS >50KW-200 Total		-	
	OPA ERIP - Canadian Tire Total		
	OPA ERIP - Kassinger Construction, 2007 Total		
GS 200KW-1000 Total		-	
Grand Total		(158,920)	

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REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Revenue	
Rate Class	Program		Total
	Library Watt- Reader Program Total 2006	\$	7
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	\$	991
	Residential Replace Bulk with Individual Meters 2006	\$	4
	Retrofit Non-Profit Housing Total 2006	\$	(66)
	OPA Direct Intall 2008	\$	(7,536)
	OPA Peaksaver Total 2008	\$	134
	OPA Refrigerator Roundup Total 2008	\$	2,021
	OPA Summer Sweepstakes 2008	\$	(2,499)
Residential Total		\$	(6,945)
	Retro Fit Traffic Signal Lights with LED Fixtures Total	\$	2,350
Unmetered Scattered Load Total		\$	2,350
	OPA Direct Install Total 2008	\$	7,044
	OPA ERIP - Community Baptist Church 2008	\$	174
	OPA ERIP - King Ritson Dental Clinic 2008	\$	92
	OPA ERIP - Pier 1 Imports 2008	\$	577
Commercial Total		\$	7,888
	OPA ERIP - Foley Group Total	\$	(63)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	\$	(918)
	OPA ERIP - Nordco Inc Total	\$	(9)
	OPA ERIP - Syran Developments Ltd Total	\$	(18)
GS >50KW-200 Total		\$	(1,008)
	OPA ERIP - Canadian Tire Total	\$	(91)
	OPA ERIP - Kassinger Construction, 2007 Total	\$	(9)
GS 200KW-1000 Total		\$	(100)
Grand Total		\$	2,185

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REFERENCE VECC IR 31.5

Lost Revenues and Load by Class and Program Summary

(2006, 2007, 2008 programs)

		Lost Load
Rate Class	Program	
	Library Watt- Reader Program Total 2006	170
	OPA EKC Pgm Coupons (Summer/ Fall 2006)	45,744
	Residential Replace Bulk with Individual Meters 2006	-
	Retrofit Non-Profit Housing Total 2006	(8,826)
	OPA Direct Intall 2008	(633,250)
	OPA Peaksaver Total 2008	9,301
	OPA Refrigerator Roundup Total 2008	116,347
	OPA Summer Sweepstakes 2008	(210,009)
Residential Total		(680,522)
	Retro Fit Traffic Signal Lights with LED Fixtures Total	
Unmetered Scattered Load Total		-
	OPA Direct Install Total 2008	393,516
	OPA ERIP - Community Baptist Church 2008	9,747
	OPA ERIP - King Ritson Dental Clinic 2008	5,313
	OPA ERIP - Pier 1 Imports 2008	32,346
Commercial Total		440,922
	OPA ERIP - Foley Group Total	(66,528)
	OPA ERIP - Kassinger Construction, Jul 08 lighting Total	(961,257)
	OPA ERIP - Nordco Inc Total	(21,764)
	OPA ERIP - Syran Developments Ltd Total	(43,350)
GS >50KW-200 Total		(1,092,899)
	OPA ERIP - Canadian Tire Total	-
	OPA ERIP - Kassinger Construction, 2007 Total	(3)
GS 200KW-1000 Total		(3)
Grand Total		(1,332,502)

is claim.

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Revised LRAM Total Amounts and Rate Rider by Class

Customer Class	Lost Revenue including Carrying Charges	2008	Volume	Metric	Proposed Rate Rider
Residential	\$ 130,923.35		490,807,351	kWh	\$0.0003
Commercial	\$ 108,913.83		134,251,798	kWh	\$0.0008
GS >50KW-1000	\$ 14,904.32		861,504	kW	\$0.0173
Unmetered Scattered Load	\$ 17,324.68		2,963,094	kWh	\$0.0058
TOTALS	\$ 272,066.18	\$-			