Response to VECC Interrogatories 2012 IRM3 Electricity Distribution Rates Niagara-on-the-Lake Hydro Inc. EB-2011-0186

Interrogatory 1

LRAM

VECC Question #1

Reference: Manager's Summary, Page 8, 2012 IRM - LRAM Rate Rider Calculation

Preamble: NOTL is applying in this application for an additional LRAM claim.

- a) Please confirm the scope of the LRAM claim in this application.
- b) Please confirm that the LRAM amounts NOTL is seeking to recover in this application are new amounts not included in past LRAM recoveries.

Response 1 a

NOTL's claim consists of:

- 2010 program results
- 2006-2009 program results that persist into 2010 and 2011

Response 1 b

LRAM Amounts NOTL is seeking to recover in this application are new amounts and have not previously been claimed.

NOTL's previous LRAM claim consisted of:

- 2006 2009 program results
- 2006-2008 program results that persist to 2009

Interrogatory 2

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VECC Question # 2

Reference: Burman Energy Consultants Inc. Report LRAM Support, Page 2

Preamble: The report indicates that in lieu of OPA published program evaluation results for 2010, 2009 program results were used as a best representative estimate for 2010 program year results. Adjustments to these estimates may be required to accurately reflect final OPA program evaluation results for 2010 programs.

When will the OPA results for the 2010 Programs be available and how may this affect the LRAM?

Response 2

NOTL's 2010 program results have been updated to include the "2010 Final CDM Results Summary" released by the OPA September 16, 2011. Updated Attachments have been included ("NOTL_Attachment A-D LRAM_20111116.xls"). A slight change may be required to adjust values that persist into 2011 as the 2010 Final Detailed Report is yet to be released.

Rate Class

Nate Olass			
	Updated LRAM \$	A	s Filed LRAM \$
OPA Programs			
RESIDENTIAL	\$30,952.03	\$	30,929.11
GENERAL SERVICE <50KW	\$15,565.17	\$	20,270.28
GENERAL SERVICE >50KW	\$6,422.43	\$	6,722.00
	\$52,939.63	\$	57,921.39

Interrogatory 3

VECC Question #3

Reference: Burman Energy Consultants Inc. Report, September 6, 2011, Attachment A

Preamble: Attachment A shows the OPA program results for 2010 and 2011 by customer class for the years implemented for each program.

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- a) Please provide the net and gross program results for the residential programs implemented in 2006 and 2007 separately for each year.
- b) For several of the programs, the year implemented includes 2011. Please discuss the CDM activity for these programs in 2011.
- c) What input assumptions were used to calculate the energy savings in 2011? Does NOTL have any preliminary results from the OPA for 2011?
- d) In 2011, the Every Kilowatt Counts Power Savings Event has a lower net kWh savings than 2010. Please explain the difference.

Response 3a

Please see "NOTL_Attachment A-D LRAM_201111116.xls - VECC IR Q3a tab".

Response 3b

Only those programs implemented up to 2010 were included. Burman Energy regrets a small typographical error indicating inclusion of results from 2011 program implementation in 2011.

Response 3c

2011 Calculations are persistent values from 2006-2010 programs. No results from 2011 programs were included in LRAM calculations.

Response 3d

Please see updated Attachments to reflect actual 2010 results. Results persisting into 2011 may be adjusted once the finalized 2010 detailed report is released.

Interrogatory 4

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VECC Question #4

Reference: Burman Energy Consultants Inc. Report, September 6, 2011, Attachment D

- a) For each program for each year, please confirm the number of units, measure life, LRAM free ridership, annual energy savings (kWh/a) and annual peak demand savings (kW/a) at the program/measure level.
- b) List and confirm OPA's input assumptions for Every Kilowatt Counts (EKC) 2006 and 2007 separately including the measure life, unit kWh savings and free ridership for Compact Fluorescent Lights (CFLs) and Seasonal Light Emitting Diodes (LED). Confirm some of these assumptions were changed in 2007 and again in 2009 and compare the values.
- c) Demonstrate that savings for EKC 2006 Mass Market measures 13-15 W Energy Star CFLs have been removed from the LRAM claim in 2010 and 2011.
- Adjust the LRAM claim as necessary to reflect the measure lives and unit savings for any/all measures that have expired starting in 2010.

Response 4a

Assumptions for programs run from 2006-2009 have been included in "Attachment D – OPA assumptions". Assumptions for 2010 programs have not yet been released by the OPA. Attachment D will be updated as soon as the detailed report is released.

Response 4b

Assumptions used by the OPA for all programs can be found in detail in "Attachment D – OPA Assumptions".

Specific assumptions for 2006-2007 and 2009 EKC can be found in "NOTL_Attachment A-D LRAM_20111116.xls - VECC IR Q4b tab"

Response 4c

Please see "NOTL Attachment A-D LRAM 20111116.xls - VECC IR Q4c tab"

Response 4d

Useful life of technologies has already been taken into account during LRAM calculations.

Interrogatory 5

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VECC Question #5

Reference: Manager's Summary, Pages 7 to 8

- a) Please reproduce the table shown at the bottom of Page 7, from Page 4 of the consultant's report, to show the components by rate class of the requested LRAM claim for 2010 and 2011 separately.
- b) Please provide the calculation of the requested LRAM one-year recovery rate riders for each applicable rate class for 2010 and 2011 separately.

Response 5a

The reproduced Table is as follows (please note that this is an updated Table as stated in Response 4 to the OEB staff Interrogatory 4):

2012 IRM - LRAM Rate Rider Calculation									
		LRAM			Metrics	One Year Rate Riders			
Rate Class	Total	2010	2011	(2009 Audited RRR)	Wetros	\$/unit (kWh or kW)			
						Rounded to			
						4 decimal			
OPA Programs						places			
Residential	\$30,952	\$15,473	\$15,479	63,529,367	kWh	0.0005			
GS<50kW	\$15,565	\$7,783	\$7,783	33,919,641	kWh	0.0005			
GS>50 kW	\$6,422	\$2,077	\$4,345	194,671	kW	0.0330			
Total	\$52,940	\$25,333	\$27,607						

Response 5b

The calculation is as follows (please note the rounding effect such that the sum of the rate riders from the two calculations is different from the riders based on the total of 2010 and 2011 results):

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2010 RESULTS									
2012 IRM - LRAM Rate Rider Calculation									
Rate Class	LRAM \$	Billing Determinants (2009 Audited RRR)	Metrics	One Year Rate Riders \$/unit (kWh or kW)					
OPA Programs				Rounded to 4 decimal places					
Residential	\$15,473	63,529,367	kWh	0.0002					
GS<50kW	\$7,783	33,919,641	kWh	0.0002					
GS>50 kW	\$2,077	194,671	kW	0.0107					
Total	\$25,333								

2011 RESULTS

2012 IRM - LRAM Rate Rider Calculation

Rate Class	LRAM \$	Billing Determinants (2009 Audited RRR)	Metrics	One Year Rate Riders \$/unit (kWh or kW)
				Rounded to 4
OPA Programs				decimal places
Residential	\$15,479	63,529,367	kWh	0.0002
GS<50kW	\$7,783	33,919,641	kWh	0.0002
GS>50 kW	\$4,345	194,671	kW	0.0223
Total	\$27,607			

Interrogatory 6

VECC Question #6

Reference: Manager's Summary, Page 16

Preamble: 346 overtime hours for management and hourly staff are included in NOTL's wind-storm disaster costs.

- a) Please provide the number of hourly staff and management staff that worked overtime.
- b) What type of duties did management staff perform?
- c) What is NOTL's policy regarding the payment of overtime to management staff?

Response 6 a

11 hourly staff and 2 management staff worked overtime.

Response 6 b

The Operations Manager and Line Supervisor are qualified Linemen and both directed the line crews and performed line work such as assisting line crew in

repairing overhead lines, transformers and poles, or patrolling/switching/reenergizing feeders that were down.

Response 6c

Management staff regularly work additional hours to complete budgets and rate filings etc. upon which they receive no additional compensation. During extraordinary or emergency situations, such as the wind storm natural disaster, overtime is paid.

VECC Question # 7

Reference: Manager's Summary, Page 17

- a) Material costs are provided for distribution OH lines, poles and transformers. Please provide quantities and unit costs.
- b) LDCs and outside contractor costs in the amount of \$14,510 is shown. Please provide a breakdown of these costs including a description of work performed, hours involved and unit costs.
- c) Under Other costs, an amount of \$10,275 is shown for vehicles/safety. Please provide a description of these costs including need and unit costs.
- d) Please outline NOTL's capitalization policy, i.e. when poles/lines/transformers need to be repaired/replaced, what are the criteria used to determine whether the costs will be capitalized or expensed?
- e) Is NOTL planning to capitalize any of the costs incurred and included in the Z-factor claim? If so, please identify the assets and the related costs.

Response 7 a

Please see Table on following two pages:

Niagara-on-the-Lake Hydro Inc. EB-2011-0186 Responses to VECC Interrogatories Filed: November 16, 2011 Page 8 of 15

Item Number	Materials	Quantities	Un	it Cost	Exte	nsion Cost
103412	Bolt, Machine, Galv, 3/4" x 12"	27	\$	2.50	\$	68
103414	Bolt, Machine, Galv, 3/4" x 14"	64	\$	2.90	\$	186
105810	Bolt, Machine, Galv, 5/8" x 10"	55	\$	1.19	\$	65
105812	Bolt, Machine, Galv, 5/8" x 12"	54	\$	1.38	\$	75
105814	Bolt, Machine, Galv, 5/8" x 14"	31	\$	1.54	\$	48
108009	Bolt, Cap, Silicon Bronze 1/2" x 1-1/2"	61	\$	1.80	\$	110
108010	Bolt, Cap, Silicon Bronze 1/2" x 1-1/2"	10	\$	2.88	\$	29
108015	Nut, Hex, Silicon Bronze, 1/2"	21	\$	0.74	\$	16
108020	Washer, Lock, SPL, Silicon Bronze, 1/2"	21	\$	0.74	\$	16
108021	Washer, Flat, Silicon Bronze, 1/2"	42	\$	1.05	\$	44
108035	Washer, Square, Galv, 5/8" - 2" x 2"	30	\$	0.34	\$	10
108040	Washer, Square, Galv, 3/4" - 2" x 2"	38	\$	0.30	\$	11
108045	Washer, Curved, Galv, 3/4" - 3" x 3"	28	\$	0.93	\$	26
110005	Nut, Eye, D-Ring, 5/8"	3	\$	4.29	\$	13
110010	Nut, Eye, D-Ring, 3/4"	10	\$	5.92	\$	59
110024	Stud, Insulator Mtg, 3/4" x 2-1/8"	14	\$	3.08	\$	43
110030	Bracket, Stand-Off, Insulator, 9" (Chicken Wing)	2	\$	18.65	\$	37
110030	Bracket, Stand-Off, Insulator, 9" (Chicken Wing)	14	\$	19.03	\$	266
110040	Bracket, Pole Top, Tangent	17	\$	21.20	\$	360
110040	Bracket, Pole Top, Tangent	11	\$	21.38	\$	235
110060	Bracket, Arrestor/Cutout, 27kV	1	\$	20.15	\$	20
110060	Bracket, Arrestor/Cutout, 27kV	3	\$	19.09	\$	57
110163	Guard, Cable Throat Clips, 2-1/4"	9	\$	5.83	\$	52
110165	Guard, Cable Stap, 2-1/4"	27	\$	0.58	\$	16
110275	Clamp, Grip Wedge, #4 - #1/0 ACSR	26	\$	3.65	\$	95
110318	Clamp, Neutral Conductor, #2 - #336	6	\$	16.43	\$	99
110320	Clamp, Strain Waveseat, #6 - #3/0	9	\$	14.86	\$	134
110330	Rod, Ground, 3/4" x 8'	1	\$	14.89	\$	15
110341	Connector, 3/4" GRD Rod, Amp - #4	4	\$	27.03	\$	108
120010	Guy, Insulator Strain, Fibreglass 54" Rod	1	\$	27.13	\$	27
120017	Guy, Hook, Combination Type	2	\$	7.84	\$	16
141100	Insulator, Line Post, Polymer, Vert/Hor 35kV (c/w	3	\$	83.15	\$	249
141100	Insulator, Line Post, Polymer, Vert/Hor 35kV (c/w	17	\$	83.25	\$	1,415
141126	Spreader, Secondary, Triplex	2	\$	7.35	\$	15
153540	Pole, 35', Pine Class 4, CCA PEG FTreat	4	\$	327.05	\$	1,308
154030	Pole, 40', Pine Class 3, CCA PEG FTreat	1	\$	439.85	\$	440
154530	Pole, 45', Pine Class 3, CCA PEG FTreat	5		542.07	\$	2,710
200001	Wedge Tap, Shell, White/Red, WPBR	25	\$	1.19	\$	30
200003	Wedge Tap, Shell, Blue, WPBB	90	\$	1.32	\$	119
200101	Wedge Tap, Cover, Blue, WCCB	40	\$	2.34	\$	94
202102	Wedge Tap, WCR33, #4 - #6	5	\$	5.41	\$	27
202105	Wedge Tap, WCR32	6	\$	5.71	\$	34
202108	Wedge Tap, WCR30	10	\$	5.78	\$	58
202109	Wedge Tap, WCR29	20	\$	5.20	\$	104
202110	Wedge Tap, WCB14	18	\$	5.95	\$	107
202205	Wedge Tap, WCB13	12	\$	5.87	\$	70
202209	Wedge Tap, WCB13	8	\$	5.46	\$	44
202215	Wedge Tap, WCB11	34	\$	5.91	\$	201
202222	Wedge Tap, WCB18	41	\$	5.88	\$	241
202311	Wedge Tap, WCY53	3	\$	22.39	\$	67

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202420	Clamp, Neutral, Stirrup, #6 - #1/0	1	\$ 13.64	\$	14
202425	Clamp, Neutral, Stirrup, #1/0 - #556	4	\$ 29.54	\$	118
210006	Clamp, Live Line, #8 - #2/0, (Bronze)	12	\$ 9.42	\$	113
210025	Connector, TX Tank GRD, #1/0 - #8Cu, (TTC4)	5	\$ 5.47	\$	27
210040	Connector, Lug, Paral-Cond, #6 - #250	26	\$ 4.94	\$	128
210050	Connector, Lug, Comp., 1 Hole, #4 Cu/Al	8	\$ 4.01	\$	32
210066	Connector, Lug, Comp., 2 Hole, #3/0 Cu/Al	3	\$ 1.45	\$	4
220035	Connector, Splice, Comp., #3/0 (AAC for U/G)	18	\$ 1.58	\$	28
220068	Connector, Splice, Auto., #2 ACSR F/Tn	10	\$ 7.09	\$	71
220070	Connector, Splice, Auto., #1/0 ACSR F/Tn	8	\$ 27.82	\$	223
220074	Connector, Splice, Auto., #4/0 ACSR F/Tn	7	\$ 17.41	\$	122
220100	Connector, Insulink, Non Tension, #6 - #6 Al, Blu-	6	\$ 0.67	\$	4
220110	Connector, Insulink, Non Tension, #4 - #4 Al	25	\$ 0.72	\$	18
220120	Connector, Insulink, Non Tension, #2 - #4 Al	33	\$ 0.69	\$	23
220125	Connector, Insulink, Non Tension, #2 - #2 Al	45	\$ 0.70	\$	32
280105	Wire, OH, Primary, #1/0 ACSR Bare 6/1	50	\$ 1.12	\$	56
300057	Tape, Vinyl, 3/4" x 66' - Black, 3M	14	\$ 2.26	\$	32
300075	Connector, Cold Shrink, 3M	20	\$ 12.26	\$	245
403200	Conduit, PVC, Rigid, 2" x 10'	3	\$ 1.25	\$	4
661257	Trans, 75kVA, 2400V - 120/240V, Pole, Used	1	\$ 75.00	\$	75
661561	Trans, 10kVA, 16000-600/347V Pole	1	\$1,252.80	\$	1,253
661563	Trans, 25kVA, 16000-600/347V Pole	1	\$1,526.81	\$	1,527
661631	Trans, 10kVA, 16000-120/240V Pole	1	\$ 931.66	\$	932
661633	Trans, 25kVA, 16000-120/240V Pole	2	\$1,474.00	\$	2,948
661635	Trans, 50kVA, 16000-120/240V Pole	1	\$2,046.96	\$	2,047
681325	Switch, Cutout, Fused, 27kV, 100A	1	\$ 91.78	\$	92
681325	Switch, Cutout, Fused, 27kV, 100A	3	\$ 93.68	\$	281
681400	Arrester, Polymer, Gapless, Distribution, 3kV	1	\$ 36.88	\$	37
681410	Arrester, Polymer, Gapless, Distribution, 21kV	2	\$ 53.27	\$	107
681410	Arrester, Polymer, Gapless, Distribution, 21kV	2	\$ 57.40	\$	115
705153	Fuse, Type K, 25kV, 65A, SMU	3	\$ 173.50	\$	521
705155	Fuse, Type K, 25kV, 100A, SMU	2	\$ 174.23	\$	348
705919	Fuse, Link, Type-K, 15kV, 3A	4	\$ 3.27	\$	13
705921	Fuse, Link, Type K, 15kV, 6A	10	\$ 3.15	\$	32
705931	Fuse, Link, Type K, 15kV, 65A	5	\$ 7.24	\$	36
920200	Transformer, Salisbury Bushing Cover (Birdcage)	3	\$ 18.45	\$	55
920585	Penrox (Oxide Inhbitor)	1	\$ 4.25	\$	4
	TOTAL MATERIALS USED			\$	21,404

Response 7 b

Please see response to OEB staff interrogatory 7 b.

Response 7 c

Please see response to OEB staff interrogatory 7 c.

Response 7 d

Please see below:

NIAGARA-ON-THE-LAKE HYDRO INC. Capitalization Policy

Created September 6, 2005

This policy should provide guidance and outlines the primary decisions for determining whether a specific purchase should be capitalized or expensed. Any decisions that are still not clearly defined by this policy should involve further discussion and potentially the opinion of our independent auditor.

In general terms, a purchased item may be capitalized if 1) the useful life of an asset is extended, 2) the quality of the asset has been improved as a result, 3) productivity has improved as a result and 4) the value of the purchase is above a specified materiality threshold.

There a four main types of expenditures that can be considered for capitalization, namely 1) additions, 2) improvements (betterments) and replacements, 3) rearranging and reinstallations and 4) repairs. A decision flowchart is attached to assist with the determination process.

The materiality value for capitalization consideration is \$500.

Response 7 e

NOTL is not planning to capitalize any of the costs incurred and included in the claim.

VECC Question #8

Reference: Manager's Summary, Pages 17 to 18

Preamble: NOTL indicates that it does not have insurance for parts of the distribution system that were damaged and that its property insurance only covers NOTL headquarters office and major distribution assets such as transformer stations and distribution stations.

- a) Please provide a complete list of the parts of the distribution systems that were damaged. For each damaged asset, please provide an explanation why NOTL does not have insurance.
- b) Does NOTL have any insurance coverage for storm damage? If yes, please provide details of the coverage, the costs eligible for recovery, and the status of any claims including payments to date.
- c) Please provide information on the allowance for storm damage included in NOTL's base revenue requirement.
- d) Please provide a breakdown showing how much of NOTL's allowance for storm damage has been spent to date in 2011.
- e) Is NOTL eligible for any outside financial assistance? Please discuss.
- f) Has NOTL made any claims for other outside assistance to offset the storm damage costs?
 - i) If not, why not?
 - ii) If yes, please provide details including the status of each claim and payments
- g) Is NOTL's shareholder making any contributions to the cost?
 - i) If not, why not?
 - ii) If yes, please provide details.

Response 8 a

• 1st part

The following items were damaged and replaced:

- o 10 wood poles
- o 6 pole top transformers
- o miscellaneous items such as wedge grips, triplex, bolts, cut-outs, fuses, sleeves, etc.

• 2nd part

Please see Response 8 b below as to why NOTL does not have insurance.

Response 8 b

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The peril of wind is covered under NOTL's MEARIE Property policy. However, the transmission and distribution (T&D) assets not insured. The following exclusion is taken from NOTL's MEARIE Property policy:

Section D 1(9) - all electrical transmission and distribution lines, line transformers, cables, pipes and pipelines, and equipment or apparatus connected therewith, except those on the described premises or in the open on land within 1000 feet of the premises described in the Schedule of Locations:

MEARIE does not at this time offer coverage for T&D assets under the MEARIE Property Program. MEARIE is also not aware of this coverage being offered in the commercial market place.

Response 8 c

NOTL annually experiences several less stormy conditions (e.g. lightning, windy conditions or ice accumulation). The historical cost of repairing such damage is rather consistent and is built into our underground and overhead maintenance accounts. NOTL does not have a specific allowance for 'storm damage'. All costs associated with replacing a transformer fuse during a lightning event for example, are reported in the 'Transformer Maintenance' account.

Response 8 d

As stated above, NOTL does not have a specific allowance. However, NOTL's operations and maintenance expenditures for overhead, underground and transformers are approx. \$348,000 versus a budget of \$275,000 as of October 1, 2011.

Response 8 e

NOTL is not eligible for outside financial assistance.

Response 8 f

NOTL has not made any claims for outside assistance.

Response 8 f i)

Not applicable. See Response 8 e.

Response 8 g

Yes

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Response 8 g i

Although, to the best of our knowledge, the Z factor application does not carry a requirement for the shareholder to contribute to the costs, NOTL's shareholder is contributing \$5820.08. This is by virtue of NOTL absorbing the cost of a recently received invoice from Tiltran for repairs on the breaker in the amount of \$5,820.08.

VECC Question #9

Reference: Manager's Summary, Page 19

Preamble: NOTL's evidence indicates "Reasonable and capped terms of compensation to Canadian Niagara Power were pre-established in a Mutual Aid Agreement that was originally signed by nine area LDCs in late 2006."

a) Please describe what is meant by "reasonable and capped terms of compensation."

Response 9

Please see "Schedule B – Fee for Services Methodology" of the Mutual Aid Agreement for details of how compensation is calculated. The Mutual Aid Agreement is appended to the IRRs to the OEB IRs.

VECC Question #10

Reference: Manager's Summary, Page 20

Preamble: Under the Prudence Criteria, NOTL indicates that materials utilized during the disaster were primarily obtained from NOTL's existing inventory.

- a) Please explain why NOTL has included these material costs in its Z-factor claim.
- b) Are the costs claimed based on the actual inventory cost or the cost of replacing the inventory? Is there a difference between the two?
- c) Please indicate the type and unit cost of the materials used that were not obtained from NOTL's existing inventory.

Response 10 a

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Damaged assets were replaced with items from our inventory. This is consistent with the approach approved in the 2006 Canadian Niagara Power application.

Response 10 b

NOTL did not utilize any special inventory treatment for the storm damage. We utilize an averaging cost system in which material is charged out based on the average purchase cost. We would expect the replacement cost to be greater than the cost claimed due to the effect of inflation.

Response 10 c

Please see the following scanned copy taken from the CNP invoice:

Page	15	of	15	

Cost Elem.	Cost elem.name	Val.in RO	Quantity	PUM	Description	Material
* 8900	Trans Wood Poles	12.22 12.22	6	EA EA	Nut, Oval Eye, 3/4"	000000000
**		12.22	6	EA .		

Cost Elem.	Cost element name	Val.in Rd	quantity	PON	Material Description Material	Post
8906	Distr C&D Prim OH	58.61 58.61		EA EA	Hot Line Clamp, No.8 to No.2/0 00000000000000000000000000000000000	2011
••(2007.1)	Problems Call	58.61	6	EA		(\$100

Cost Elem.	Cost elem.name	Val.in 20	Quentity	aun.	Material Description	Material	1
8926 8926 8926 8926 8926	Services - OH/UG Services - OH/UG Services - OH/UG Services - OH/UG Services - OH/UG	29.43 11.77 12.53	50 20 20	EA EA EA EA	Wedge Grip, No. 4 - No.1/0 ACSR Insulink Connector, No.2 to No.2 Insulink Connector, No.2 to No.2 Insulink Connector, No.2 to No.4 Wedge Grip, No. 4 - No.1/0 ACSR	000000000000006059 0000000000000006059 0000000000	20
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Cost Blem.	Cost elem.name	Val.in RC	Quantity	200	Material Description	Mat
8907 8907 8907 8907 8907	Distr C&D Sec OF Distr C&D Sec OF Distr C&D Sec OF Distr C&D Sec OF Distr C&D Sec OF	916.39 442.40 353.78	309 309 50 50 20 120 618	M M EA EA EA EA M	# 2 O.H. TRIPLEX NS75 # 2 O.H. TRIPLEX NS75 AUTO SPLICE 1/0 ACSR F/TN #2 AND #4 AUTO SLEEVES SLEEVE 3/0 ACSR AUTO	000
**		2,969.18	120 618	EA M	The Table 1	-