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December 16, 2011

BY EMAIL & COURIER

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge St, Suite 2701  
Toronto ON M4P 1E4

Dear Ms. Walli:

**Board File No. EB-2011-0273**  
**Grimsby Power Inc. – 2012 Cost of Service Application**  
**Energy Probe --- Final Argument**

Pursuant to Directions from the Board issued during the Oral Hearing on December 12, 2011, please find attached the Final Argument of Energy Probe Research Foundation (Energy Probe) in respect of the EB-2011-0273 proceeding for consideration by the Board.

Should you require additional information, please do not hesitate to contact me.

Yours truly,

David S. MacIntosh  
Case Manager

cc: James Sidlofsky, Border Ladner Gervais LLP (By email)  
Doug Curtiss, Grimsby Power (By email)  
Mioara Domokos, Grimsby Power (By email)  
Randy Aiken, Aiken & Associates (By email)  
Interested Parties (By email)

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**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 Grimsby  
Power Inc. for an order approving just and reasonable rates and  
other charges for electricity distribution to be effective January  
1, 2012.

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**ENERGY PROBE RESEARCH FOUNDATION  
("ENERGY PROBE")**

**ARGUMENT**

**December 16, 2011**

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**GRIMSBY POWER INC.  
2012 RATES**

**EB-2011-0273**

**ARGUMENT OF ENERGY PROBE RESEARCH FOUNDATION**

**A - INTRODUCTION**

This is the Argument of the Energy Probe Research Foundation ("Energy Probe") related to the setting of 2012 rates for Grimsby Power Inc. ("Grimsby Power") effective January 1, 2012.

Grimsby Power filed a proposed partial Settlement Agreement ("Partial Agreement") with the Board on December 7, 2011. The Board accepted this Partial Agreement in the December 9, 2011 Decision on Partial Settlement and Procedural Order No. 3.

Page 6 in the Partial Agreement included a table showing the issues which were classified as a Complete Settlement, an Incomplete Settlement and No Settlement.

Energy Probe is not making any specific submissions on the issues shown under the heading of Incomplete Settlement (Issues 1.1, 1.3, 2.5, 2.6, 6.1 and 8.4). These issues are, by and large, issues that are related to or are impacted by OM&A. As an example, Issue 2.5 related to whether the working capital allowance for the test year is appropriate. The only outstanding component of that issue is an adjustment in the working capital allowance to reflect the OM&A budget approved by the Board.

The list of issues for which no settlement was obtained includes Issues 4.1, 4.2 and 4.4. Energy Probe is making submissions only on Issue 4.1, which deals with the overall OM&A forecast for the test year. Issues 4.2 and 4.4 are essentially covered by Issue 4.1, in the view of Energy Probe.

**B - ISSUE 4.1 - IS THE OVERALL OM&A FORECAST FOR THE TEST YEAR APPROPRIATE?**

Energy Probe has no issues with respect to the conversion of the test year OM&A from CGAAP to MIFRS. The following submissions with respect to OM&A are CGAAP based.

i) Initial Reductions

Grimsby Power is requesting Board approval for an OM&A forecast of \$2,375,758 (Tr. Vol. 1, page 83) on a CGAAP basis for the 2012 test year. This amount reflects the original forecast of \$2,459,977 (Exhibit 4, page 3) less three adjustments.

The three adjustments proposed by Grimsby Power are all reductions and were discussed by Ms. Domokos (Tr. Vol. 1, page 14). These reductions include an amount of \$60,588 of MDMR related costs (Board Staff Interrogatory #15d), a savings increase of \$11,240 related to the provincial sales tax (Board Staff Interrogatory #55b), and the removal of \$12,391 related to retail service transactions that should have been recorded in a deferral account rather than in OM&A.

Energy Probe supports these adjustments as being appropriate and submits that the Board should approve each of these changes.

ii) The Requested Increase

Based on the requested level of \$2,375,758 on a GCAAP basis, Grimsby Power is requesting an increase in OM&A costs over the last year of actual data in 2010 of 31.6%. This figure can be seen in the second last line in the table associated with the graph provided below.

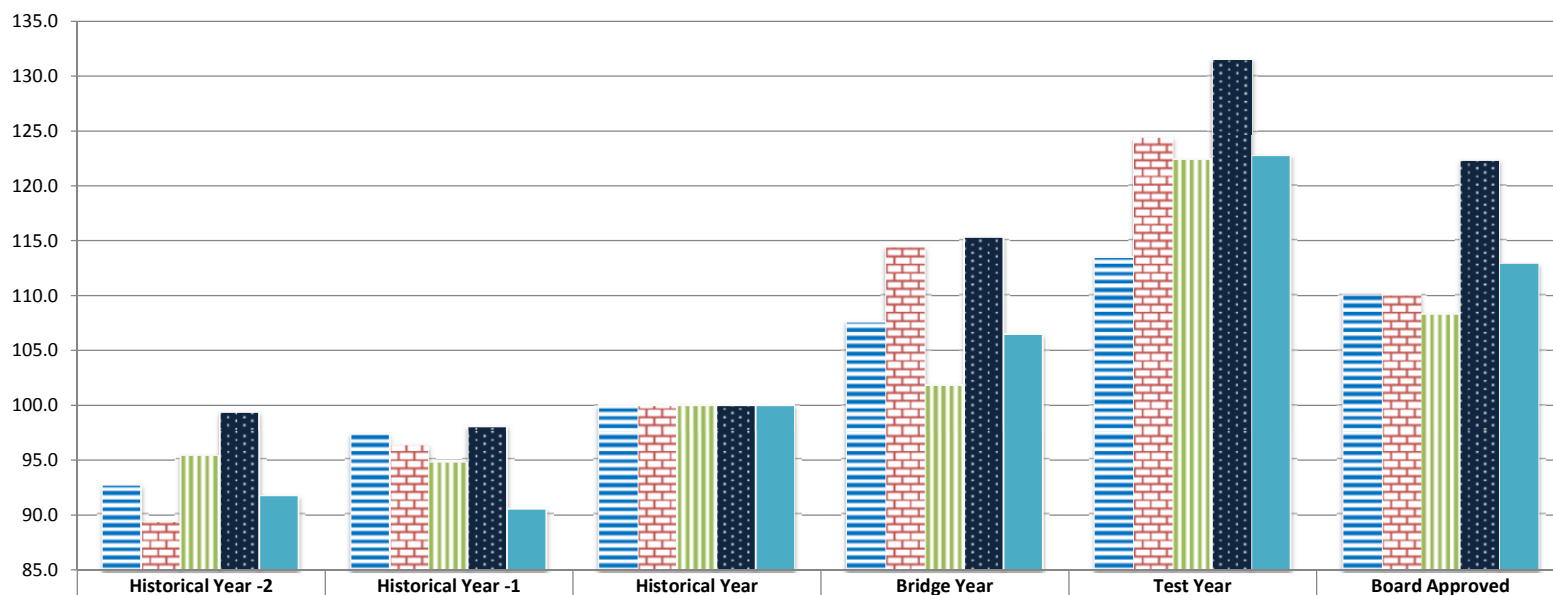
As shown in the response to part (c) of Energy Probe Interrogatory #13, the annual compound growth in actual OM&A costs between 2006 and 2010 was 4.6%. As a result, the proposed increase of 31.6% over a two year period is substantially in excess of the increases that have taken place in recent years.

Energy Probe submits that Grimsby Power is following the same trajectory in OM&A that the Board has seen in a number of recent applications where parties were unable to agree on an appropriate level of OM&A expenses for the Applicants' test years.

The bar graph on the following page shows the forecasted growth in OM&A expenditures for three historical years, the bridge year and the test year for Burlington Hydro Inc. ("Burlington"), Hydro One Brampton Networks Inc. ("Brampton") and Horizon Utilities Corporation ("Horizon"), along with the request by Grimsby Power. The graph also illustrates the Board's Decisions with respect to Burlington, Brampton and Horizon. The Energy Probe proposal for Grimsby Power has also been included in the graph and is discussed in more detail below.

The graph shows the relative level of OM&A expenses for each of the utilities for three historical years, the bridge year and test year. The expenses have been indexed to 100 for

# **GROWTH IN OM&A EXPENDITURES BOARD APPROVED VS. PROPOSED INCREASES RECENT BOARD DECISIONS**



	Historical Year -2	Historical Year -1	Historical Year	Bridge Year	Test Year	Board Approved
Burlington - EB-2009-0259	92.7	97.3	100.0	107.6	113.4	110.0
Brampton - EB-2010-0132	89.3	96.3	100.0	114.3	124.3	110.0
Horizon - EB-2011-0131	95.4	94.7	100.0	101.8	122.3	108.2
Grimsby - EB-2011-0273 - Revised	99.3	98.0	100.0	115.2	131.6	122.2
Grimsby - Energy Probe Proposal	91.7	90.5	100.0	106.4	122.7	112.8

▤ Burlington - EB-2009-0259

▤ Brampton - EB-2010-0132

▤ Horizon - EB-2011-0131

▤ Grimsby - EB-2011-0273 - Revised

▤ Grimsby - Energy Probe Proposal

each of the utilities in their last historical year when the application was filed, which is two years prior to the test year. Specifically, the Burlington figures reflect 2006 through 2008 actual data, a bridge year forecast for 2009 and a test year forecast for 2010. The Brampton and Horizon data reflect actual data for 2007 through 2009, a bridge year forecast for 2010 and a 2011 test year. The Grimsby Power data reflects actual data for 2008 through 2010, and forecasts for the 2011 bridge year and the 2012 test year. As noted above, the Board approved figures for Burlington, Brampton and Horizon are also shown in the graph. The actual data underpinning the index numbers are provided in Appendix A to this argument.

As can be seen in the graph, the increase in OM&A expenses was slow and steady in each of the historical years. The level of increases varied by utility in the bridge year, with significant increases shown for Burlington and Brampton. Both of these utilities show a further significant increase between and the bridge and test years. While the increase shown for the bridge year in Horizon was moderate, it was followed by a significant increase in the test year. The data for Grimsby Power illustrate a significant increase in the bridge year of 15.2% followed by a further increase of a similar magnitude (14.2%) in the test year. Regardless of whether the increase took place mainly in the test year, in the bridge year or in both years, the results were essentially the same. The rebasing application reflected a significant increase in the OM&A costs, notwithstanding the fact that historical costs were rising at a much slower pace.

Energy Probe submits that a review of the Board Decisions with respect to Burlington, Brampton and Horizon is appropriate given the similarities between the Grimsby Power proposals and those of the three distributors noted.

In the EB-2009-0259 Decision and Order dated March 1, 2010 for Burlington Hydro Inc., the Board found that (page 16):

*"The Board estimates that a reduction of at least \$375,000 is warranted for the specific items listed above. However, the Board also finds that Burlington has not adequately controlled its overall costs and the rate at which those costs are increasing over the period and will therefore reduce the OM&A by a total of \$450,000. **The resulting level of controllable OM&A of \$14.347 million represents an almost 10% increase over 2008 actual. The Board concludes that it is reasonable to expect Burlington to operate within this level of increased expenditure.**" (emphasis added)*

The Board further concluded that at an overall level, the increase of 13.4% in total controllable OM&A from 2008 actual (to 2010 test year) was *"excessive in light of prevailing conditions"* and *"reasonable expectations regarding cost control"* (page 15).

In the EB-2010-0132 Decision and Order dated April 4, 2011 for Hydro One Brampton Networks Inc., the Board approved an increase in the 2011 test year OM&A expenses of 10% over the 2009 actual spending.

In the Hydro One Brampton Decision, the Board provided further rationale for the 10% increase (page 23):

*"Given the relatively modest growth in customers forecast for the test period, and the relatively modest rate of inflation, and the lack of any compelling evidence why a large increase is warranted, the Board finds this increase to be excessive. The Board finds that an increase of 10% over 2009 actual spending is reasonable. **Given the 2.2% per annum forecast growth in customers, this allows for slightly less than 3% per annum increase in spending per customer, which is more than the rate of inflation.**"* (emphasis added)

In the EB-2010-0131 Decision and Order dated July 7, 2011 for Horizon Utilities Corporation, the Board approved an increase in the 2011 test year OM&A expenses based on an average annual increase of about 3% since the last Board approved budget in 2008 (page 31). This resulted in an increase of about 8.2% in 2011 relative to the historical year of 2009.

Energy Probe submits that the Board should not follow the methodology used in the Horizon decision for Grimsby Power. The Board approved OM&A figure or the last cost of service decision for Grimsby Power was for 2006 and was in an amount of \$1,550,966 (Exhibit 4, page 2). Applying a 3% increase on a compound basis to this figure results in a 2012 amount of approximately \$1.85 million. Energy Probe submits that this figure is too low.

However, Energy Probe does submit that the Board should apply similar reasoning as the other two decisions (Burlington and Brampton) when determining an appropriate increase for OM&A for Grimsby Power.

As noted in the Brampton decision, the 10% increase over two years was based on customer/connection growth of 2.2% and 2.8% for inflation and other factors. The Burlington increase was also 10% over a two year period. A review of the Burlington evidence reveals that the growth in customers/connections over the forecast period was 1.8%.

Based on the forecast shown in Table 3.3 in Exhibit 3 at page 7, the annual growth in customers/connections for Grimsby Power between 2010 and 2012 is 1.8%, the same as for Burlington and slightly less than that for Brampton.

As noted earlier, the growth in OM&A costs at Grimsby Power was, on average, 4.6% over the 2006 through 2010 period. Over this same period, the growth in the average GDP IPI FDD measure of inflation was 1.9%. This figure is the average of 1.9% for 2007, 2.1% for 2008, 2.3% for 2009 and 1.3% for 2010 used by the Board as the inflation

factor in the IRM applications in those years. The growth in customers/connections over this period averaged 1.2%, as can be calculated from the figures in Table 3.3 in Exhibit 3. This leaves growth in costs related to factors other than customer growth and inflation of 1.5%, as illustrated in the following table.

	<u>2006 - 2010</u>	<u>2011 - 2012</u>
Inflation (GDP IPI FDD)	1.9%	1.5%
Customer/Connection Growth	1.2%	1.8%
Other Factors	<u>1.5%</u>	<u>1.5%</u>
Total OM&A Impact (CGAAP)	4.6%	4.8%

Note: The 2011-2012 inflation factor of 1.5% is the average of the Board's figures of 1.3% for 2011 and 1.7% for 2012

In the EB-2009-0259 Decision for Burlington Hydro the Board noted the requested increase between the 2008 historical year and 2010 test year of 13.4% in controllable OM&A was excessive in light of prevailing conditions and in light of reasonable expectations regarding cost control. Inflation is slightly lower in the 2011 through 2012 period than it was in 2006 through 2010, but Energy Probe submits that this does not constitute any material change in prevailing conditions. Reasonable expectations regarding cost control have not changed.

Given the similarity in growth between Grimsby Power and Burlington and Brampton, the continuation of the prevailing conditions that existed when the Board issued the Burlington and Brampton decisions, and the continued expectations regarding cost control, Energy Probe submits that the Board should approve an increase in OM&A for rate setting purposes of 10% between 2010 and 2012.

### iii) 2010 Base Costs

Unlike the Burlington and Brampton decisions, Energy Probe submits that there are additional adjustments that should be made to the 2010 OM&A figure before the application of the 10% escalator for Grimsby Power.

In particular, Energy Probe submits that two adjustments should be made to the 2010 actual OM&A expenditure of \$1,805,717, as shown on page 3 of Exhibit 4.

The first adjustment is an increase to better reflect the fact that Grimsby Power was not fully staffed in 2010. Normally Energy Probe would not suggest that any change to the actual costs should be considered since most distributors will have some vacancies during any given year. However, Energy Probe notes that Grimsby Power is a relatively small distributor, with only 17 FTE positions in 2010 (Exhibit 4, Table 4.24). As a result, Energy Probe submits that an adjustment to full employment should be considered.



The evidence at Exhibit 4, page 21 indicates that the CEO was hired in February 2010 and that this position was vacant prior to that time. Energy Probe submits that a reasonable estimate for an increase in compensation related costs in 2010 is \$10,000.

The second adjustment relates to the change in capitalization that the company put into effect in 2011. Energy Probe submits that given the similar levels of capital and OM&A expenditures in 2010 and 2011, the 2011 increase in OM&A shown in Exhibit 4, Table 4.8 of \$139,820 is a reasonable estimate of the impact in 2010 had the change been in place then. Mr. Curtiss agreed that this assumption would be correct (Tr. Vol. 1, page 41).

These two adjustments to the 2010 actual OM&A costs would result in an adjusted 2010 actual figure of \$1,955,537, as illustrated in the table below. This then would be the appropriate figure to which the 10% increase should be applied, resulting in a 2012 forecast of \$2,151,091, also shown the following table.

	<u>Amount</u>	<u>Source</u>
2010 Actual OM&A	\$1,805,717	Ex. 4, page 3
Compensation Adjustment	\$10,000	Estimate based on Table 4.24
Capitalization Adjustment	<u>\$139,820</u>	Ex. 4, Table 4.8
Adjusted 2010 Actual	\$1,955,537	
Escalation Factor	<u>10%</u>	
2012 Forecast	\$2,151,091	

#### iv) New Costs in 2012

Energy Probe submits that there should be two additional adjustments made to the 2012 figure of \$2,151,091 derived above to reflect costs that did not exist in 2010.

The first is an increase of \$4,117 for LEAP related costs and the second is an increase of \$51,484 for smart meter system costs. The LEAP increase is shown in the response to Board Staff Technical Conference Question #12c. The smart meter related increase is shown in the response to Board Staff Interrogatory #15a and excludes the MDMR component.

The resulting forecast for 2012 proposed by Energy Probe for inclusion in the revenue requirement is, therefore, \$2,206,692.

#### v) Impact of Proposal

The impact of the Energy Probe proposed OM&A test year forecast of \$2,206,692 has been reflected in the bar graph above in the Board Approved column. In the table below the graph, this figure represents an increase of 22.2% over the actual 2010 OM&A cost, and more importantly, an increase of 12.8% over the adjusted 2010 cost.

The Energy Probe proposal of adjusting both the 2010 starting costs and the 2012 costs for new expenditures results in steady increase in the costs in both the bridge and test years. As shown in the graph and the associated table, the 2011 bridge year forecast represents an increase of 6.4% over the adjusted 2010 figure, followed by a test year increase of 6% to an indexed level of 112.8.

The overall reduction from the revised Grimsby Power forecast totals \$169,066 or approximately 7.1% of the revised request.

#### vi) Average OM&A Cost per Customer

In addition to the envelope approach discussed above, Energy Probe has reviewed the average OM&A cost per customer to determine a reasonable forecast of 2012 costs to be included in the revenue requirement.

Grimsby Power filed the OM&A cost per customer in Table 4.2 of Exhibit 4. A revised version was filed in the response to Energy Probe Technical Conference Question #13.

The average compound increase in OM&A per customer between 2006 and 2010 was 3.0%. Based on the revised OM&A forecast of \$2,375,758, the test year OM&A cost per customer is \$226.56. This is an increase of 26.3% over the 2010 actual cost per customer of \$179.46.

However, as noted earlier, Energy Probe submits that the 2010 actual figure is misleadingly low and should reflect the adjustments made to arrive at the adjusted 2010 figure of \$1,955,537. Based on this figure and 10,062 customers in 2010 shown in Table 4.2, the 2010 average cost per customer is restated to be \$194.35.

The 2012 figure of \$226.56 that results from the revised OM&A forecast still represents a significant increase of more than 16% over the 2010 to 2012 period. Energy Probe submits this increase is excessive.

In the Brampton decision the Board implicitly used a 2.8% factor to reflect inflationary and other factors in addition to customer growth. In the Burlington decision, the implicit increase was 3.2%.

Energy Probe submits that an increase of 4.0% should be the maximum that the Board should approve for 2011 and 2012 in this proceeding. This increase is more than double the inflation rate of 1.7% that the Board recently indicated would be used for IRN adjustments applicable to January 1, 2012 rate applications, and is substantially above the implicit figures applicable to Brampton and Burlington.

With this 4% escalator applied to the adjusted 2010 cost per customer of \$194.35, the 2012 figure would be \$210.21. With 10,486 customers forecast for 2012, this results in a total OM&A forecast of \$2,204,262, virtually identical to the figure that resulted from the envelope approach discussed above.

#### vii) Specific Adjustments to OM&A

Energy Probe submits that there are specific adjustments that should be made to the OM&A expenditures. These adjustments are highlighted in point form below. Energy Probe has not done an exhaustive analysis on a line-by-line item given the relatively small amounts associated with each item.

Grimsby Power provided a cost driver table in Table 4.8 of Exhibit 4 that showed the main drivers between the OM&A expenses on a year to year basis for 2006 through 2010.

Energy Probe has attempted to update this cost driver table for 2011 and 2012 to reflect a number of changes and corrections made by Grimsby Power. These changes include the correction to Table 4.10 that reduced the smart meter system costs from \$129,960 to \$112,072. The removal of the \$60,588 in MDMR costs has reduced this cost driver further to \$51,484. The staffing cost driver has been updated for both 2011 and 2012 to reflect the total compensation charged to OM&A as found in the revised Table 4.24 provided in the response to Undertaking J1.2. HST savings have been increased by \$11,240 based on the response to Board Staff Interrogatory #55b. The third party service provider driver has been reduced by \$8,260 to reflect the updated driver for process meter data (Undertaking J1.3) and by a further \$16,912 to reflect the updated driver for training costs (Undertaking J1.4).

**Revised Cost Driver Table**

	<u>2011</u>	<u>2012</u>
Opening Balance	1,805,716	2,080,519
(1) Staffing (Payroll and Benefits)	42,270	101,115 Undertaking J1.2
(2) Change in Allocation Method	139,820	14,314
(3) Third Party Service Providers	12,744	77,335 Undertakings J1.3, J1.4
(4) Smart Meter System Costs	0	51,484 BS IR 15
(5) Computer Network and Website	0	28,568
(6) Meter Maintenance	52,500	(-31,922)
(7) LEAP Program	3,974	143
(8) HST Saving	0	(-29,963) BS IR 55b
(9) Remaining Balance	<u>23,495</u>	<u>84,165</u>
Closing Balance	2,080,519	2,375,758

\* Remaining Balance - As shown in the revised cost driver table above, Grimsby Power has forecast an increase of more than \$107,000. Energy Probe submits that this cost driver is excessive and has not been explained as anything more than the difference between the sum of the identified cost drivers and the difference between one year and the next (Exhibit 4, page 24). Over the 2006 through 2010 period, this cost driver has been both positive and negative and has averaged an increase of about \$4,500 per year. Given the lack of evidence to support the \$107,660 between 2010 and 2012, Energy Probe submits that a reduction of \$100,000 is appropriate.

\* HR Consultant - The evidence in this proceeding (Exhibit 4, page 22) indicates that the cost increase of \$26,880 is related to professional services required to assist with union negotiations and to assist in a compensation review. Energy Probe submits that these costs should be amortized over four years, resulting in a reduction to the 2012 revenue requirement of \$20,160. The collective agreement is likely to be for a period similar to the existing agreement of three years (Tr. Vol. 1, page 44) and Grimsby Power has not provided any evidence of the need for an HR consultant on an ongoing basis. In fact, Mr. Curtiss indicated that no specific projects have been budgeted for 2013 related to the HR costs (Tr. Vol. 1, page 45).

\* Network Security Audit - The cost of this audit, which is forecast to be \$10,000 and is described at pages 22-23 of Exhibit 4, should be amortized over 4 years, as it is not an annual expense that will be incurred. This results in a \$7,500 reduction to the 2012 OM&A forecast.

\* CIS Related Costs - These costs are paid to Canadian Niagara Power. While a justification of the increase in 2009 and 2010 has been provided (Exhibit 4, page 21), no justification has been provided for the increase of \$6,000 that is forecast between 2010 and 2012. Energy Probe submits this increase should be disallowed.

\* Training Costs - Grimsby Power is forecasting a permanent increase in third party training costs in 2012 of \$15,159 (Undertaking J1.4). The forecast for 2012 of \$49,199 is substantially higher than the 2010 expenditures of \$15,970 and the 2011 forecast of \$34,040, both of which are detailed in the undertaking response. Energy Probe submits that the 2011 level should be sufficient for the 2012 test year, given the actual number of people employed at Grimsby Power. Energy Probe submits that the increased amount should be disallowed resulting in a reduction of \$15,000 in 2012. Energy Probe notes that even if the \$49,000 in training costs in 2012 is appropriate because it represents a catch up of training that did not take place in previous years, it is unlikely that on-going training at this level is required in subsequent years.

\* Process Meter Data - As shown in the response to Undertaking J1.3 there is an increase of \$37,740 related to this item. This is the net increase in costs associated with a third party cost to provide a consolidated end to end solution to process meter data (Exhibit 4, page 21). The cost of the new system is \$61,200 as compared to the reduction in the cost associated with third party service providers of \$23,460 (Undertaking J1.3). As indicated by Mr. Curtiss this is not a new activity; it is something that is already done (Tr. Vol. 1, page 67). Mr. Curtiss indicated that some of the cost was for internal resources which would be redirected elsewhere. This was also stated in the response to Undertaking J1.3. However, no evidence was provided as to where these internal labour resources were to be redirected. Energy Probe submits that the Board should disallow one-half of the increase of \$37,740, or approximately \$19,000 from the 2012 revenue requirement.

The above reductions total more than \$167,000 and do not reflect a detailed line by line analysis of the cost increases, nor do they reflect any changes related to employee compensation, both of which would result in additional proposed reductions. Energy Probe notes that the overall reduction proposed based on the envelope approach above is a reduction of approximately \$169,000.

## **C - COSTS**

Energy Probe requests that it be awarded 100% of its reasonably incurred costs. Energy Probe has attempted to minimize its time on this application, while at the same time ensuring a thorough review. This has been accomplished through cooperation with other intervenors to ensure no significant overlaps in cross-examination.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED**

**December 16, 2011**

**Randy Aiken**

**Consultant to Energy Probe**

**APPENDIX A - OM&A DATA USED FOR INDEXING**

	<u>Historical Year -2</u>	<u>Historical Year -1</u>	<u>Historical Year</u>	<u>Bridge Year</u>	<u>Test Year</u>	<u>Board Approved</u>
Burlington - EB-2009-0259	12,090,104	12,692,225	13,045,099	14,036,567	14,796,994	14,347,000
Brampton - EB-2010-0132	15,925,811	17,173,680	17,836,429	20,393,300	22,176,435	19,620,000
Horizon - EB-2011-0131	37,004,670	36,749,191	38,804,535	39,500,000	47,457,439	42,000,000
Grimsby - EB-2011-0273 - Revised	1,793,136	1,770,474	1,805,717	2,080,519	2,375,758	2,206,692 *
Grimsby - Energy Probe Proposal	1,793,136	1,770,474	1,955,537	2,080,519	2,375,758	2,206,692 *

\* Proposed by Energy Probe