Tillsonburg Hydro Inc.

March 7, 2012

Ontario Energy Board
P.O. Box 2319
27^{th} Floor, 2300 Yonge Street
Toronto, Ontario M4P 1E4
Attention: Kirsten Walli, Board Secretary

Dear Ms. Walli:

RE: TILLSONBURG HYDRO INC.
2012 IRM3 DISTRIBUTION RATE APPLICATION EB-2011-0198
REPLY SUBMISSION

In accordance with the Notice of Application and Written Hearing in Tillsonburg Hydro Inc.'s ("Tillsonburg") 2012 IRM3 Electricity Distribution Rate Application, [EB-2011-0198], please find enclosed Tillsonburg's Reply Submission [Appendix U] and an updated LRAM Analysis [Appendix M.1].

The Reply Submission responds to both Board Staff's Submission [considered Appendix S] and the Vulnerable Energy Consumers Coalition ("VECC") Submission [considered Appendix T] that were received on February 25, 2012.

Should you have any questions or require further information, please do not hesitate to contact me.

Yours truly,

S.T. Lund, P.Eng
General Manager

INTRODUCTION

Tillsonburg Hydro Inc. ("Tillsonburg") filed an application (the "Application") with the Ontario Energy Board (the "Board") on December 12, 2011, under section 78 of the Ontario Energy Board Act, 1998, seeking approval for changes to the distribution rates that Tillsonburg charges for electricity distribution, to be effective May 1, 2012. The Application is based on the 2012 3rd Generation Incentive Regulation Mechanism.

The purpose of this document is to provide the Board with Tillsonburg's reply submission to Board Staff and VECC's submissions.

In the interrogatory phase, Board Staff identified data in the original application that they could not agree to the 2009 Cost of Service application or previous RRR filings. Tillsonburg provided explanations that supported the validity of the data in most cases. In the few select areas that Tillsonburg confirmed that an error had occurred, it requested Board Staff to make the necessary corrections to Tillsonburg's model at the time of the Board's Decision on the Application.

Board Staff submitted that Tillsonburg's billing determinants entered on the RTSR workform are reasonable. And that if any updated Uniform Transmission Rates became available, Board Staff will update the applicable data. Tillsonburg agrees that the workform should be updated by Board Staff if new information becomes available.

Tillsonburg requested that the entire tax-savings amount be recorded in USoA 1595 as the calculated rate riders for one or more classes results in energy based kWh rate riders of $0.0000 when rounded to the fourth decimal place. Tillsonburg notes that Board Staff agrees that the credit of $2,229 should be booked into USoA 1595 for future disposition.

Tillsonburg completed the Deferral and Variance Account continuity schedule included in the 2012 IRM Rate Generator Model at Tab 9 for its Group 1 Deferral and Variance Accounts. Tillsonburg notes that Board Staff agreed that the principle balances as of December 31, 2010 reconcile to the balances reported as part of the Reporting and Record-keeping Requirement. ("RRR") and took no issue with the request to dispose of the balances over a one year period.

Tillsonburg notes that Board Staff supports the requested disposition of Account 1521 – Special Purpose Charge over a one year period.

Tillsonburg provides more detailed replies on the following matters:

- Smart Meter Funding Adder ("SMFA");
- Lost Revenue Adjustment Mechanism ("LRAM"); and
- Payments in Lieu of Taxes – PILS 1562

SMART METER FUNDING ADDER

Background

Tillsonburg requested that the Board approve the continuation of its current SMFA of $2.17 per metered customer per month until April 30, 2013. Tillsonburg's request for the continuation of its current SMFA is to smooth bill impacts and minimize rate shock that would result without a SMDR and SMIRR to immediately replace it.

Tillsonburg proposed that its smart meter costs would be disposed of through a stand-alone application. This proposal was made since, when the application was filed on December 9, 2012, Tillsonburg projected that its smart meter implementation plan would be complete when customers could be switched to Time of Use (TOU) rates starting January 15, 2012.

Board Staff's interrogatories noted that the ability to bill TOU rates is beyond the required "minimum functionality" of smart meters. And, that the Board has considered that a utility may seek final disposition of smart meter costs, including forecasted amounts to program completion, if at least 90% of the requested costs are audited actuals.

In response to Board Staff's interrogatories, filed February 8, 2012, Tillsonburg confirmed that it had completed 100% of its required smart meter installations as at December 31, 2011 and did not anticipate any further costs related to meeting "minimum functionality" in 2012. And now that Tillsonburg had reached 100% implementation in 2011, audited costs would be available to allow Tillsonburg to file a stand-alone application requesting new rate riders to be effective in 2012.

Board Staff's submission agreed that cessation of the SMFA without a replacement until such time as the Board can render its decision on a utility's application for final smart meter cost disposition would create rate fluctuations and possibly result in customer confusion. Until a decision on smart meter cost disposition is rendered, the total deferred revenue requirement would continue to increase in the absence of even a partial recovery through an SMFA.

Board Staff submitted that the Board may wish to consider continuance of the SMFA past April 30, 2012 and establish a specific termination date and presented two options.

Board Staff felt that a termination date of October 31, 2012 may be reasonable. Board Staff felt that this option would allow sufficient time for Tillsonburg to prepare and file a stand-alone application to dispose of smart meter costs and for the Board to process such an application. And Board Staff indicated that such an application should be filed no later than May 31, 2012 to allow sufficient time for the application to be processed in time for a November 1, 2012 implementation.

Alternatively, Board Staff noted that since Tillsonburg is scheduled to file a cost of service application for the 2013 rate year, a termination date of April 30, 2013 may also be reasonable. Under this option, Tillsonburg's smart meter costs would be reviewed as part of it cost of service application rather than a stand-alone application.

Board Staff then noted that in many of the Board's decisions, it had capped the SMFA at $2.50/month per metered customer and that Tillsonburg's had requested continuing its existing SMFA at $2.71. Considering Tillsonburg had completed its smart meter deployment, the Board may wish to reduce the SMFA, if approved, from $2.71 to $2.50 per metered customer per month, or some lower amount.

Submission

Tillsonburg requests that the Board approve the continuation of its current SMFA of $2.17 per metered customer per month and set a termination date of April 30, 2013; and that disposition of Tillsonburg's smart meter costs be considered as part of its cost of service application for the 2013 rate year, rather than a stand-alone application.

Tillsonburg notes that Board Staff submission that Tillsonburg had applied to continue its existing SMFA at a level of $2.71 per metered customer per month is incorrect. Tillsonburg applied to continue its existing SMFA of $2.17. Since Tillsonburg's existing rate of $2.17 is below Board Staff's suggested rate of $2.50 per metered customer, Tillsonburg believes that that Board Staff would consider it reasonable.

Tillsonburg submits that continuation of the current SMFA will smooth bill impacts and minimizes rate shock that would result without a SMDR and SMIRR to immediately replace it were it to expire on April 30, 2012.

Tillsonburg submits that disposition of its smart meter costs as part of its cost of service application is the more practical option as reduces the amount of overall effort required than if both a stand-alone application and a cost of service application were utilized.

Tillsonburg submits that if the existing SMFA only continued to October 31, 2012 and was replaced by SMDR and SMIRR rates, the new rates would only be in effect for six months and expire April 30, 2013.

Tillsonburg submits that it would be a financial burden to file a stand-alone application by the date suggested by Board Staff of May 31, 2012. Due to limited staff resources, additional staff would be required or consultant engaged on a short two month time frame. Staff already has competing priorities in completing the 2012 IRM process, 2011 fiscal year end, IFRS conversion study, the transfer pricing study as ordered by the Board, and preparation for the 2013 Cost of service application.

Tillsonburg submits that since the 2013 Cost of service application is scheduled to be filed in August 2012, staff would be required to respond to the interrogatories of the stand-alone rate application at the same time as working the cost of service application. Without certainty on the decision that would result from the stand alone application, several assumptions would be needed when completing the initial cost of service application which most certainly would need to be updated after filing, adding to staff time requirements and costs.

LOST REVENUE ADJUSTMENT MECHANISM ("LRAM")

Background

Tillsonburg requested to recover a total LRAM claim of $58,030, including $1,751 in carrying charges, over a one year period. The LRAM claim reflected the impact of CDM programs implemented in 2005, 2006, 2008, 2009, and 2010 on 2008, 2009, and 2010 revenues.

Both Board Staff and VECC accepted Tillsonburg's use of the OPA's verification of the energy savings for OPA-funded CDM programs.

Both Board Staff and VECC supported the recovery of 2005, 2006, and 2008 CDM programs savings in 2008.

Both Board Staff and VECC supported the recovery of 2010 CDM programs savings in 2010.

Both Board Staff and VECC did not support the recovery of 2008 and 2009 CDM programs savings in 2009 or 2010 stating that these savings should have been incorporated in the 2009 load forecast at the time of the 2009 rebasing.

The Board's "Guidelines for Electricity Distributor Conservation and Demand Management" (the "CDM Guidelines") (EB-2008-0037), section 5.2 states: "Lost revenues are only accruable until new rates (based on a new revenue requirement and load forecast) are set by the Board, as the savings would be assumed to be incorporated in the load forecast at that time."

Board Staff requested that Tillsonburg provide an updated LRAM amount that only includes lost revenues from 2005, 2006, and 2008 CDM programs in 2008, and the lost revenues from 2010 CDM programs in 2010, including any carrying charges associated with these amounts, and with the subsequent rate riders. This will allow for the issuance of the final rate order in a more timely fashion if the Board is inclined to approve only the lost revenues noted.

Submission

Tillsonburg respectfully agrees with Board Staff's and VECC's interpretation of the Board's CDM Guidelines.

In its Decision (EB-2008-0246) the Board accepted Tillsonburg's 2009 load forecast, which included a CDM adjustment based on 2009 OPA projected results.

Tillsonburg submits that it is eligible for the persisting impacts of 2005 – 2008 programs in 2008 as these savings occurred prior to rebasing. Tillsonburg further submits that it is eligible for 2010 OPA CDM program results in 2010 impacts as these savings occurred post rebasing and have not been claimed. Both Board Staff and VECC support recovery of these amounts.

Tillsonburg's updated LRAM to include only lost revenues from 2005, 2006, and 2008 CDM Programs in 2008, and the lost revenues from 2010 CDM programs in 2010, including any carrying charges associated with these amounts. An updated LRAM summary [Appendix M.1 attached] is shown in the tables below:

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Summary of Lost Revenues

Rate Class	2008 Lost Revenues	2009 Lost Revenues	2010 Lost Revenues	**Total Lost Revenues**
	(a)	(a)	(b)	**(c)**
Third Tranche-Funded Programs				
Residential	$ 9,305	$ -	$ -	**$ 9,305**
GS <50 kW	$ -	$ -	$ -	**$ -**
GS >50 kW < 500	$ -	$ -	$ -	**$ -**
GS >500 < 1499	$ -	$ -	$ -	**$ -**
Total for OPA-Funded Programs	**$ 9,305**	**$ -**	**$ -**	**$ 9,305**
OPA-Funded Programs				
Residential	$ 5,252	$ -	$ 3,237	**$ 8,489**
GS <50 kW	$ 6	$ -	$ 4,124	**$ 4,130**
GS >50 kW < 500	$ -	$ -	$ 3,373	**$ 3,373**
GS >500 < 1499	$ -	$ -	$ 1,201	**$ 1,201**
Total for OPA-Funded Programs	**$ 5,258**	**$ -**	**$ 11,935**	**$ 17,193**
All Programs				
Residential	$ 14,557	$ -	$ 3,237	**$ 17,794**
GS <50 kW	$ 6	$ -	$ 4,124	**$ 4,130**
GS >50 kW < 500	$ -	$ -	$ 3,373	**$ 3,373**
GS >500 < 1499	$ -	$ -	$ 1,201	**$ 1,201**
Total for OPA-Funded Programs	**$ 14,563**	**$ -**	**$ 11,935**	**$ 26,498**
Carrying Charges				**$ 1,005**
Total LRAM				**$ 27,503**

Tillsonburg's requests that its revised LRAM claim of $27,503, ($26,498 plus $1,005 in carrying charges), be recovered over a one year period. The resulting rate riders are shown in the following table:

Customer Class	LRAM	Carrying Charges	Total	Volumetric Forecast (4)		Rate Rider
Residential	$ 17,794	$ 823	$ 18,617	49,583,434	kWh	$ 0.0004
GS < 50	$ 4,130	$ 91	$ 4,221	24,428,744	kWh	$ 0.0002
GS 50 - 499	$ 3,373	$ 72	$ 3,445	101,127	kW	$ 0.0341
GS 500 - 1,499	$ 1,201	$ 19	$ 1,220	53,192	kW	$ 0.0229
	$ 26,498	$ 1,005	$ 27,503			

PAYMENT IN LIEU OF TAXES – PILS 1562

Background

Tillsonburg applied to recover from customers a debit balance of $29,175 ($20,653 principle and $8,522 carrying charges) and filed its tax returns, financial statements, Excel models from prior applications, calculations of amounts recovered from customers, SIMPIL Excel worksheets and continuity schedules that show the principal and interest amounts in the account 1562 deferred PILS balance.

Board Staff noted in their interrogatories, that in the Combined Proceeding EB-2008-0381, the three applicants were all subject to the maximum blended income tax rates based on their specific tax evidence submitted, and noted that it was not a generic proceeding, and therefore the Board's findings on income tax rates in the proceeding do not apply to every distributor.

Tillsonburg completed the models provided with Tillsonburg specific deemed income levels and Tillsonburg specific tax rates at the various income tax levels. The model determined that the appropriate income tax rate applicable was based on deemed income.

Board Staff requested that Tilllsonburg override the models formulas with the tax rate applicable to its actual income rather than its deemed income. With the requested revisions, the amount that would be returned to customers including carrying charges, as at April 30, 2012, is $186,004, the net change is $215,179.

Tillsonburg replied that it does not agree that its own blended income tax rates shown in the above table are those that should be used to calculate its PILs 1562 variances.

Tillsonburg's position is that continued use of the deemed corporate tax rate relative to the level of deemed taxable income is appropriate for the following reasons:

- Tillsonburg followed OEB prescribed methodology for 2001 to 2005
- That methodology involved using deemed income, deemed interest expense on deemed debt levels, deemed rate base, deemed rate of return on equity, deemed common equity ratio, etc.
- A deemed calculation must use deemed tax rates as using actual tax rates is inconsistent, negatively impacts only small LDC's, and therefore is not appropriate
- The original intent of the SIMPIL true-up calculation was to update the deemed tax rate to reflect changes in corporate tax rates, not to change to tax rates based on actual taxable income.
- Changing methodology to use corporate tax rates based on actual taxable income equates to retroactive rate making.

Tillsonburg noted that, as stated in numerous Board decisions, the Board does not endorse retroactive ratemaking. The Board reaffirmed this position in its Decision and Order for Great Lakes Power Limited (EB-2005-0031). On Page 7 of that decision the Board stated:

> "Bill 210 made the interim GLP rate order a final rate order. Therefore we are of the view that changing rates prior to April 1, 2005 would be retroactive ratemaking. As the Board has stated in numerous cases, the Board does not endorse retroactive ratemaking. The Board must be mindful of the negative implications of retroactive rates. When investors and consumers cannot be assured that final rates are indeed final, the resultant risks increases costs for everyone. In addition, intergenerational inequities arise, with today's consumers paying the costs of past events. In this case, it is not appropriate for either the utility or its ratepayers to bear the implications of a retroactive rate change. To burden the utility would be contrary to the regulatory compact. To burden the ratepayers would be wrong, especially given the length of the retroactivity"

In that same decision, the Board stated on page 8:

> "The Ontario Energy Board Act, 1998 does not contain any provisions that deal specifically with retroactive ratemaking, and the Board is therefore not empowered to alter a final rate order retroactively. Furthermore, the Act requires that balances in deferral accounts should be reviewed by the Board at least annually. We infer from this that there is a policy against the adverse impacts and inter-generational inequity that might be caused by out-of-period rate adjustments"

Tillsonburg noted that it completed the Board's SIMPIL models using approved methodology at the time and that the result from those models were used in the determination of final rates. And in following that methodology, the resulting amount in Account 1562 PILS eligible for recovery is $29,175.

Tillsonburg noted that, in 2012, to go back and adjust the methodology for the period 2001 to 2005 results in a significant adverse impact to the utility and creates inter-generational inequity.

Tillsonburg noted that, for the period 2001 to 2005, it has already suffered a significant adverse impact. Tillsonburg's 1999 net loss was $266,665. Tillsonburg made an attempt to recover the 1999 net loss as part of an application dated June 21, 2002 (RP-2002-0134/EB-2002-0396). As a result of the passage of Bill 210 on December 9, 2002, the processing of that application was discontinued and considered closed in accordance with subsection 4 (11) of Bill 210. On February 11, 2004, Tillsonburg wrote to the Minister of Energy pursuant to s.79 (6) of the Ontario Energy Board Act to seek approval to re-file the application. The Minister had not granted nor denied approval by the time the requirement to obtain Ministerial approval was repealed, effective January 1, 2005. Therefore, Tillsonburg filed on January 17, 2005 a new application (EB-2005-0205) requesting a permanent adjustment to distribution rates effective January 1, 2005. As noted in the Board's Decision and Order (EB-2005-0205), due to:

> "the methodology employed in the initial unbundling of its distribution rates in 2000. At that time, distribution companies that had experienced an operating loss in 1999 were deemed to have neither a loss of a gain in that year. Accordingly the rates failed to take into account the loss Tillsonburg had in fact experienced. This approach had the effect of somewhat artificially suppressing its rates and its rate of return on equity. Its rates and rate of return were impoverished to the extent of the unrecognised loss."

In that application (EB-2005-0205), Tillsonburg submitted that it has experienced financial hardship as a result. And, the Board noted that Tillsonburg:

> "has succeeded in demonstrating that the failure to recognize the 1999 loss in its distribution rates has resulted in the suspension or cancellation of projects that may have an impact on the overall reliability and responsiveness of its system. The Board approves the application as amended effective August 1, 2005. In light of the above, the Board finds it is in the public interest to order as follows."

On July 29, 2005, the Board approved an increase to Tillsonburg's distribution rates of $266,665, to be effective August 1, 2005.

Tillsonburg noted that the Board agreed that Tillsonburg has succeeded in proving that it was entitled to recovery of its 1999 net loss yet made the increase effective on August 1, 2005. Tillsonburg submits that the Board has implicitly stated that retroactive ratemaking will not be allowed. The delay to an August 1, 2005 effective date from the requested effective date of January 1, 2005 resulted in non-recovery of $155,555 ($266,665 X 7/12 months) Tillsonburg would have been entitled to.

Tillsonburg noted that non-recovery of the 1999 net loss in the years 2000 to 2005 is a cumulative $1,488,880 ($266,665 per year X 5 years 7 months). Had the 1999 loss been collected in each of those years, Tillsonburg would have been in a higher tax bracket and its actual corporate tax rate would have been higher.

And, if Tillsonburg returns $186,004 following Board Staff's methodology rather than collect $29,175 as filed by Tillsonburg following the PILS methodology in effect during those years, Tillsonburg's lost revenue for the period 2000 to 2005 increases to $1,704,059 ($1,488,880 + $29,175 + $186,004).

Tillsonburg noted that it is inconsistent treatment to disallow recovery of the 1999 loss until August 1, 2005 due to retroactive ratemaking and then allow a change in methodology that requires $186,004 be returned related to a period of time a decade old.

Tillsonburg noted that Bill 210 made all rates final and not open to amendment until after Ministerial approval was repealed, effective January 1, 2005. And that change therefore can only be made prospectively

Board Staff submitted that the financial hardship that Tillsonburg experienced, and the impact of Bill 210 has no relevance the Board's consideration of PILS 1562 balance. Board Staff stated that the existence of the 1562 deferral account keeps the period open from 2001 until present. That distribution rates were made final, but the deferral account allows the Board to make adjustments. Board staff provided the excerpt from Section 93 PILs Tax Gross-up – SIMPIL Model Guide from the 2003 tax year stating:

> "a utility would normally use the income tax rates of the calendar year 2004 to calculate the gross-up of the true-up variance related to the fiscal 2002 year as the true-up would normally be collected from customers in the 2004 rate year. Given the rate setting limitations of Bill 210, LDC's may need to adjust the gross-up amounts in future periods to reflect rates in effect at that time."

Tillsonburg did file its original 2004 PILS using the corporate tax rates that were applicable at the time, and the model determined the appropriate tax rate was the one for the deemed income level. Tillsonburg did file updated PILs models in this application updated for actual corporate tax rates that would be applicable to the deemed income level.

Board Staff submitted Halton Hills was another distributor that had a loss in 1999 Loss resulting from choices made by the distributor's management in response to a directive from the former regulator, Ontario Hydro. And, that Tillsonburg did not participate in proceeding RP-2000-0069.

Board Staff also submitted that Tillsonburg had the opportunity to express its views on the selection of income tax rates used to calculate PILS account 1562 variances and chose not to participate in the Combined Proceeding EB-2008-0381.

In Tillsonburg's reply to Board Staff interrogatories, Tillsonburg requested that if it is decided that $186,004 must be returned to customers, that it be over a 4 year period.

Submission

Tillsonburg submits that the original $29,175 requested for recovery be approved, and disposed of over a one year period.

As Board Staff noted, the Board's findings on income tax rates in the combined proceeding do not apply to every distributor. Tillsonburg submits that the individual circumstances faced by Tillsonburg warrant the continued use of blended income tax rates applicable to regulatory taxable income.

Tillsonburg submits that use of blended income tax rates applicable to regulatory taxable income levels is consistent with the method approved by the Board in Tillsonburg's 2006 Cost of Service application (RP-2005-0020, EB-2005-0420) and its 2009 Cost of Service Application (EB-2008-0246).

Tillsonburg argues that the methodology directed by Board Staff cannot be accepted since it is in contravention to the Board's own policy against the adverse impacts and inter-generational inequity caused by out-of-period rate adjustments, the fact that Bill 210 froze all rates until January 1, 2005, and the fact the Board has already denied retroactive rate adjustments for this period when it approved Tillsonburg's 1999 net loss recovery. The Board does not endorse retroactive ratemaking as stated in its GLP decision (EB-2005-0031):

> "As the Board has stated in numerous cases, the Board does not endorse retroactive ratemaking. The Board must be mindful of the negative implications of retroactive rates. When investors and consumers cannot be assured that final rates are indeed final, the resultant risks increases costs for everyone. In addition, intergenerational inequities arise, with today's consumers paying the costs of past events. In this case, it is not appropriate for either the utility or its ratepayers to bear the implications of a retroactive rate change. To burden the utility would be contrary to the regulatory compact. To burden the ratepayers would be wrong, especially given the length of the retroactivity"

Tillsonburg submits that it disagrees with Board Staff that the 1999 Loss issue and Bill 210 have no relevance since Board Staff's has requested Tillsonburg calculate the impact on the PILS variance of using Tillsonburg's actual combined income tax rate. Had Bill 210 not been implemented, Tillsonburg likely would have been allowed to increase to its rates in 2002 to reflect the 1999 Loss. If Tillsonburg's actual income had been higher from 2002 to 2005, it would have resulted in a higher actual combined income tax rate.

Board Staff noted that Tillsonburg did not participate in RP-2000-069 where Halton Hills received approval for an increase to its unbundled rates to reflect its 1999 Loss. Tillsonburg submits that it made an attempt to recover its 1999 net loss with its own application dated June 21, 2002 (RP-2002-0134/EB-2002-0396). However, with the passage of Bill 210 on December

9, 2002, the processing of that application was discontinued and considered closed. As soon as Tillsonburg was allowed to reapply, its application was successful.

Board Staff noted that Tillsonburg did not participate in EB-2008-0381. Tillsonburg submits that it did not participate since its resources were fully involved in the preparation of its 2009 Cost of Service application and it believed that the issue was a review of the accuracy of the PILs models and variance determination, free of punitive implications. Tillsonburg was not aware that a fundamental shift in methodology would occur or that it would have a material impact. Tillsonburg relied on the fact that the method used in determining PILS recovery in rates had been use of a blended income tax rate based on the regulatory taxable income from 2001 to 2005, which also the same approach accepted for the both Tillsonburg's 2006 and 2009 Cost of service applications.

Tillsonburg submits that if the Board does approve Board Staff's submission that $186,004 is to be returned to customers that it be returned over a 4 year period in order to smooth customer bill impacts and minimize the operational impact.

LRAM

Date	Residential (1) 3Tranche	Residential (2) OPA	Residential Balance	Carrying Charges (3) Current	Carrying Charges Balance	GS < 50 (2) OPA	GS < 50 Balance	Carrying Charges (1) Current	Carrying Charges Balance	GS 50 - 499 (2) OPA	GS 50 - 499 Balance	Carrying Charges (1) Current	Carrying Charges Balance	GS 500 - 1,499 (2) OPA	GS 500 - 1,499 Balance	Carrying Charges (1) Current	Carrying Charges Balance	Total LRAM	Total Carrying
2008																			
Jan 31, 2008	$ 775		$ 775		$ -		$ -		$ -		$ -		$ -		$ -		$ -		
Feb 29, 2008	$ 775		$ 1,550	$ 3	$ 3		$ -	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Mar 31, 2008	$ 775		$ 2,325	$ 7	$ 10		$ -	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Apr 30, 2008	$ 775		$ 3,100	$ 8	$ 18		$ -	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
May 31, 2008	$ 775		$ 3,875	$ 11	$ 29		$ -	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jun 30, 2008	$ 775		$ 4,650	$ 13	$ 42		$ -	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jul 31, 2008	$ 775	$ 875	$ 6,300	$ 13	$ 55	$ 1	$ 1	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Aug 31, 2008	$ 775	$ 875	$ 7,950	$ 18	$ 73	$ 1	$ 2	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Sep 30, 2008	$ 775	$ 875	$ 9,600	$ 22	$ 95	$ 1	$ 3	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Oct 31, 2008	$ 775	$ 875	$ 11,250	$ 27	$ 122	$ 1	$ 4	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Nov 30, 2008	$ 775	$ 875	$ 12,900	$ 31	$ 153	$ 1	$ 5	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Dec 31, 2008	$ 780	$ 877	$ 14,557	$ 37	$ 190	$ 1	$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
	$ 9,305	$ 5,252		$ 190		$ 6		$ -		$ -		$ -		$ -		$ -		$ 14,563	$ 190
2009																			
Jan 31, 2009			$ 14,557	$ 30	$ 220		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Feb 28, 2009			$ 14,557	$ 27	$ 247		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Mar 31, 2009			$ 14,557	$ 30	$ 277		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Apr 30, 2009			$ 14,557	$ 12	$ 289		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
May 31, 2009			$ 14,557	$ 12	$ 301		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jun 30, 2009			$ 14,557	$ 12	$ 313		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jul 31, 2009			$ 14,557	$ 7	$ 320		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Aug 31, 2009			$ 14,557	$ 7	$ 327		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Sep 30, 2009			$ 14,557	$ 7	$ 334		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Oct 31, 2009			$ 14,557	$ 7	$ 341		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Nov 30, 2009			$ 14,557	$ 7	$ 348		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Dec 31, 2009			$ 14,557	$ 7	$ 355		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
	$ -	$ -		$ 165		$ -		$ -		$ -		$ -		$ -		$ -		$ -	$ 165
2010																			
Jan 31, 2010			$ 14,557	$ 7	$ 362		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Feb 28, 2010			$ 14,557	$ 6	$ 368		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Mar 31, 2010			$ 14,557	$ 7	$ 375		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Apr 30, 2010			$ 14,557	$ 7	$ 382		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
May 31, 2010			$ 14,557	$ 7	$ 389		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jun 30, 2010			$ 14,557	$ 7	$ 396		$ 6	$ -	$ -		$ -	$ -	$ -		$ -	$ -	$ -		
Jul 31, 2010		$ 537	$ 15,094	$ 11	$ 407	$ 687	$ 693	$ -	$ -	$ 562	$ 562	$ -	$ -	$ 200	$ 200	$ -	$ -		
Aug 31, 2010		$ 540	$ 15,634	$ 11	$ 418	$ 687	$ 1,380	$ 1	$ 1	$ 562	$ 1,124	$ -	$ -	$ 200	$ 400	$ -	$ -		
Sep 30, 2010		$ 540	$ 16,174	$ 11	$ 429	$ 687	$ 2,067	$ 1	$ 2	$ 562	$ 1,686	$ 1	$ 1	$ 200	$ 600	$ -	$ -		
Oct 31, 2010		$ 540	$ 16,714	$ 16	$ 445	$ 687	$ 2,754	$ 2	$ 4	$ 562	$ 2,248	$ 2	$ 3	$ 200	$ 800	$ 1	$ 1		
Nov 30, 2010		$ 540	$ 17,254	$ 16	$ 461	$ 687	$ 3,441	$ 3	$ 7	$ 562	$ 2,810	$ 2	$ 5	$ 200	$ 1,000	$ 1	$ 2		
Dec 31, 2010		$ 540	$ 17,794	$ 18	$ 479	$ 689	$ 4,130	$ 4	$ 11	$ 563	$ 3,373	$ 3	$ 8	$ 201	$ 1,201	$ 1	$ 3		
	$ -	$ 3,237		$ 124		$ 4,124		$ 11		$ 3,373		$ 8		$ 1,201		$ 3		$ 11,935	$ 146

LRAM

Date	Residential (1) 3Tranche	Residential (2) OPA	Residential Balance	Carrying Charges (3) Current	Carrying Charges Balance	GS < 50 (2) OPA	GS < 50 Balance	Carrying Charges (1) Current	Carrying Charges Balance	GS 50 - 499 (2) OPA	GS 50 - 499 Balance	Carrying Charges (1) Current	Carrying Charges Balance	GS 500 - 1,499 (2) OPA	GS 500 - 1,499 Balance	Carrying Charges (1) Current	Carrying Charges Balance	Total LRAM	Total Carrying
2011																			
Jan 31, 2011			$ 17,794	$ 22	$ 501		$ 4,130	$ 5	$ 16		$ 3,373	$ 4	$ 12		$ 1,201	$ 1	$ 4		
Feb 28, 2011			$ 17,794	$ 20	$ 521		$ 4,130	$ 5	$ 21		$ 3,373	$ 4	$ 16		$ 1,201	$ 1	$ 5		
Mar 31, 2011			$ 17,794	$ 22	$ 543		$ 4,130	$ 5	$ 26		$ 3,373	$ 4	$ 20		$ 1,201	$ 1	$ 6		
Apr 30, 2011			$ 17,794	$ 21	$ 564		$ 4,130	$ 5	$ 31		$ 3,373	$ 4	$ 24		$ 1,201	$ 1	$ 7		
May 31, 2011			$ 17,794	$ 22	$ 586		$ 4,130	$ 5	$ 36		$ 3,373	$ 4	$ 28		$ 1,201	$ 1	$ 8		
Jun 30, 2011			$ 17,794	$ 21	$ 607		$ 4,130	$ 5	$ 41		$ 3,373	$ 4	$ 32		$ 1,201	$ 1	$ 9		
Jul 31, 2011			$ 17,794	$ 22	$ 629		$ 4,130	$ 5	$ 46		$ 3,373	$ 4	$ 36		$ 1,201	$ 1	$ 10		
Aug 31, 2011			$ 17,794	$ 22	$ 651		$ 4,130	$ 5	$ 51		$ 3,373	$ 4	$ 40		$ 1,201	$ 1	$ 11		
Sep 30, 2011			$ 17,794	$ 21	$ 672		$ 4,130	$ 5	$ 56		$ 3,373	$ 4	$ 44		$ 1,201	$ 1	$ 12		
Oct 31, 2011			$ 17,794	$ 22	$ 694		$ 4,130	$ 5	$ 61		$ 3,373	$ 4	$ 48		$ 1,201	$ 1	$ 13		
Nov 30, 2011			$ 17,794	$ 21	$ 715		$ 4,130	$ 5	$ 66		$ 3,373	$ 4	$ 52		$ 1,201	$ 1	$ 14		
Dec 31, 2011			$ 17,794	$ 22	$ 737		$ 4,130	$ 5	$ 71		$ 3,373	$ 4	$ 56		$ 1,201	$ 1	$ 15		
	$ -	$ -		$ 258		$ -		$ 60		$ -		$ 48		$ -		$ 12		$ -	$ 378
2012																			
Jan 31, 2012			$ 17,794	$ 22	$ 759		$ 4,130	$ 5	$ 76		$ 3,373	$ 4	$ 60		$ 1,201	$ 1	$ 16		
Feb 29, 2012			$ 17,794	$ 21	$ 780		$ 4,130	$ 5	$ 81		$ 3,373	$ 4	$ 64		$ 1,201	$ 1	$ 17		
Mar 31, 2012			$ 17,794	$ 22	$ 802		$ 4,130	$ 5	$ 86		$ 3,373	$ 4	$ 68		$ 1,201	$ 1	$ 18		
Apr 30, 2012			$ 17,794	$ 21	$ 823		$ 4,130	$ 5	$ 91		$ 3,373	$ 4	$ 72		$ 1,201	$ 1	$ 19		
	$ -	$ -		$ 86		$ -		$ 20		$ -		$ 16		$ -		$ 4		$ -	$ 126
Total	**$ 9,305**	**$ 8,489**	**$ 17,794**	**$ 823**		**$ 4,130**		**$ 91**		**$ 3,373**		**$ 72**		**$ 1,201**		**$ 19**		**$ 26,498**	**$ 1,005**
			$ 823			**$ 91**				**$ 72**				**$ 19**				**$ 1,005**	
			$ 18,617			**$ 4,221**				**$ 3,445**				**$ 1,220**				**$ 27,503**	
Volumetric Forecast (4)			**49,583,434**	**kWh**		**24,428,744**	**kWh**			**101,127**	**kW**			**53,192**	**kW**				
Rate Rider			**$ 0.0004**			**$ 0.0002**				**$ 0.0341**				**$ 0.0229**					
Resulting Recovery			**$ 19,833**			**$ 4,886**				**$ 3,448**				**$ 1,218**			**Amount Rate recovers:**	**$ 29,385**	
Shortfall (Excess)			**$ (1,216)**			**$ (665)**				**$ (3)**				**$ 2**			**Shortfall (Excess)**	**$ (1,882)**	

Footnotes:

(1) For purposes of carrying charge determination, prior year third tranche program related LRAM has been assumed to occur evenly during the year.

(2) For purposes of carrying charge determination, current year OPA program related LRAM has been assumed to begin during the later half of the initial year.

(3)

Carrying Charge Rate October 1, 2007 - March 31, 2008	Actual	5.14%
Carrying Charge Rate April 1, 2008 - June 30, 2008	Actual	4.08%
Carrying Charge Rate July 1, 2008 - December 31, 2008	Actual	3.35%
Carrying Charge Rate January 1, 2009 - March 31, 2009	Actual	2.45%
Carrying Charge Rate April 1, 2009 - June 30, 2009	Actual	1.00%
Carrying Charge Rate July 1, 2009 - June 30, 2010	Actual	0.55%
Carrying Charge Rate July 1, 2010 - September 30, 2010	Actual	0.89%
Carrying Charge Rate October 1, 2010 - December 31, 2010	Actual	1.20%
Carrying Charge Rate January 1, 2011 - December 31, 2011	Actual	1.47%
Carrying Charge Rate January 1, 2012 - April 30, 2012	Estimated	1.47%

(4) As per Board approved volumetric forecast [same volumes as used in the IRM Rate generator Tab '10. Billing Det. for Def_var.']

Tillsonburg Hydro Inc.				
Lost Revenue Adjustment Mechanism				
Summary of Lost Revenues				
Rate Class	2008 Lost Revenues	2009 Lost Revenues	2010 Lost Revenues	**Total Lost Revenues**
	(a)	(a)	(b)	**(c)**
Third Tranche-Funded Programs				
Residential	$ 9,305	$ -	$ -	**$ 9,305**
GS <50 kW	$ -	$ -	$ -	**$ -**
GS >50 kW < 500	$ -	$ -	$ -	**$ -**
GS >500 < 1499	$ -	$ -	$ -	**$ -**
Total for OPA-Funded	**$ 9,305**	**$ -**	**$ -**	**$ 9,305**
OPA-Funded Programs				
Residential	$ 5,252	$ -	$ 3,237	**$ 8,489**
GS <50 kW	$ 6	$ -	$ 4,124	**$ 4,130**
GS >50 kW < 500	$ -	$ -	$ 3,373	**$ 3,373**
GS >500 < 1499	$ -	$ -	$ 1,201	**$ 1,201**
Total for OPA-Funded	**$ 5,258**	**$ -**	**$ 11,935**	**$ 17,193**
All Programs				
Residential	$ 14,557	$ -	$ 3,237	**$ 17,794**
GS <50 kW	$ 6	$ -	$ 4,124	**$ 4,130**
GS >50 kW < 500	$ -	$ -	$ 3,373	**$ 3,373**
GS >500 < 1499	$ -	$ -	$ 1,201	**$ 1,201**
Programs	**$ 14,563**	**$ -**	**$ 11,935**	**$ 26,498**
Carrying Charges				**$ 1,005**
Total LRAM				**$ 27,503**

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2008 CDM Program Year

Line No.	ıding Mechanism/ Program/Rate/ Rate Cl	2005 Lost Volumes Carried Over to Year 2008 (kWh)	(kW)	Distribution Rates (1) 2008 ($/kWh)	($/kW)	Lost Revenues 2008 ($)
		(a)	(b)	(c)	(d)	(e) = [(a) x (b) + (b) x (d)]
	Third Tranche Funded CDM Programs					
	Residential					
	Retailer Program	37,000	1			
	Subtotal for Residential Class	37,000	1	$ 0.016		$ 588
	Total for Tranche-Funded Prograı	**37,000**	**1**			**$ 588**

Notes:

(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2008 CDM Program Year

Line No.	unding Mechanism/ Program/Rate/ Rate Clas	2006 Lost Volumes Carried Over to Year 2008 (kWh)	2008 (kW)	Distribution Rates (1) 2008 ($/kWh)	2008 ($/kW)	Lost Revenues 2008 ($)
		(a)	(b)	(c)	(d)	(e) = [(a) x (b) + (b) x (d)]
	Third Tranche Funded CDM Programs					
	Residential					
	Every Kilowatt Counts Program	548,216	13			
	Seasonal Lights Program	7,684	-			
	Subtotal for Residential Class	548,216	13	$ 0.016		$ 8,717
	Total for Tranche-Funded Programs	**548,216**	**13**			**$ 8,717**

Notes:

(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2008 CDM Program Year

		2007 Lost Volumes Carried Over to Year		Distribution Rates [1]		Lost Revenues
		2008		2008		2008
Line No.	Funding Mechanism/ Program/Rate/ Rate Class	(kWh)	(kW)	($/kWh)	($/kW)	($)
		(a)	(b)	(c)	(d)	(e) = [(a) x (b) + (b) x (d)]
	Third Tranche Funded CDM Programs					
	NIL	-	-	$ -	$ -	$ -

Notes:

(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2008 CDM Program Year

		2008 Lost Volumes Carried Over to Year						Distribution Rates [1]						Lost Revenues			
		2008		2009		2010		2008		2009		2010		2008	2009	2010	**Total**
Line No.	unding Mechanism/ Program/Rate/ Rate Clas	(kWh)	(kW)	(kWh)	(kW)	(kWh)	(kW)	($/kWh)	($/kW)	($/kWh)	($/kW)	($/kWh)	($/kW)	($)	($)	($)	**($)**
		(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m) = [(a) x (g) + (b) x (h)]	(n) = [(c) x (i) + [(d) x (j)]	(o) = [(e) x (k) + [(f) x (l)]	**(p) =(m) + (n) + (o)**
	OPA-Funded Programs																
	Residential																
	Great Refrigerator Roundup	92,436	10	-	-	-	-										
	Cool & Hot Savings Rebate	29,381	19	-	-	-	-										
	Every Kilowatt Counts	149,147	8	-	-	-	-										
	peaksaver®	-	-	-	-	-	-										
	Summer Savings	59,319	15	-	-	-	-										
	Subtotal for Residential Class	330,284	52	-	-	-	-	$ 0.016		$ 0.017		$ 0.019		$ 5,252	$ -	$ -	**$ 5,252**
	GS <50 kW																
	Power Savings Blitz	-	-	-	-	-	-										
	Electricity Retrofit Incentive Program	-	-	-	-	-	-										
	HPNC	586	1	-	-	-	-										
	Total for GS<50	586	1	-	-	-	-	$ 0.010		$ 0.012		$ 0.015		$ 6	$ -	$ -	**$ 6**
	GS >50 kW < 500																
	Electricity Retrofit Incentive Program	-	-	-	-	-	-										
	Total for GS > 50 kW , 500	-	-	-	-	-	-	$ -	$ 0.832	$ -	$ 1.044	$ -	$ 1.542	$ -	$ -	$ -	**$ -**
	GS >500 < 1499																
	Subtotal for GS >500 <1499	-	-	-	-	-	-	$ -	$ 0.477	$ -	$ 0.545	$ -	$ 0.830	$ -	$ -	$ -	**$ -**
	Total for OPA-Funded Programs	**330,869**	**52**	**-**	**-**	**-**	**-**							**$ 5,257**	**$ -**	**$ -**	**$ 5,257**

Notes:
(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2009 CDM Program Year

Line No.	Funding Mechanism/ Program/Rate/ Rate Class	2009 Lost Volumes Carried Over to Year: 2009 (kWh) (c)	2009 (kW) (d)	2010 (kWh) (e)	2010 (kW) (f)	Distribution Rates: 2009 ($/kWh) (i)	2009 ($/kW) (j)	2010 ($/kWh) (k)	2010 ($/kW) (l)	LRAM Revenue: 2009 ($) (n) = [(c) x (i) + [(d) x (j)]	2010 ($) (o) = [(e) x (k) + [(f) x (l)]	**Total ($) (p) =(m) + (n) + (o)**
	OPA-Funded Programs											
	Residential											
	Great Refrigerator Roundup	-	-	-	-							
	Cool & Hot Savings Rebate	-	-	-	-							
	Every Kilowatt Counts	-	-	-	-							
	peaksaver®	-	-	-	-							
	Subtotal for Residential Class	-	-	-	-	$ 0.017		$ 0.019		$ -	$ -	**$ -**
	GS <50 kW											
	Power Savings Blitz	-	-	-	-							
	Electricity Retrofit Incentive Program	-	-	-	-							
	HPNC	-	-	-	-							
	Total for GS<50	-	-	-	-	$ 0.012		$ 0.015		$ -	$ -	**$ -**
	GS >50 kW < 500											
	Electricity Retrofit Incentive Program	-	-	-	-							
	Total for GS > 50 kW , 500	-	-	-	-	$ -	$ 0.832	$ -	$ 1.044	$ -	$ -	**$ -**
	GS >500 < 1499											
	Subtotal for GS >500 <1499	-	-	-	-	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
	Total for OPA-Funded Programs	**-**	**-**	**-**	**-**					**$ -**	**$ -**	**$ -**

Notes:

(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Tillsonburg Hydro Inc.
Lost Revenue Adjustment Mechanism
Lost Volumes and Revenues for 2010 CDM Program Year

Line No.	Funding Mechanism/ Program/Rate/ Rate Class	2010 Lost Volumes 2010 (kWh)	(kW)	Distribution Rates 2010 ($/kWh)	($/kW)	LRAM Revenues 2010 ($)
		(e)	(f)	(k)	(l)	(o) = [(e) x (k) + [(f) x (l)]
	OPA-Funded Programs					
	Residential					
	Great Refrigerator Roundup	96,574	15			
	Cool & Hot Savings Rebate	53,195	35			
	Every Kilowatt Counts	25,103	2			
	peaksaver®	126	32			
	Subtotal for Residential Class	174,998	84	$ 0.019		$ 3,237
	GS <50 kW					
	Power Savings Blitz	167,532	55			
	Electricity Retrofit Incentive Program	2,497	0			
	HPNC	52,872	23			
	Total for GS<50	222,902	78	$ 0.015		$ 4,124
	GS >50 kW < 500					
	Electricity Retrofit Incentive Program	182,312	32			
	Total for GS > 50 kW , 500	182,312	32	$ -	$ 1.044	$ 3,373
	GS >500 - < 1499					
	Electricity Retrofit Incentive Program	64,933	12			
	Subtotal for GS >500 <1499	64,933	12	$ -	$ -	$ 1,201
	Total for OPA-Funded Programs	**645,144**	**206**			**$ 11,935**

Notes:

(1) The distribution rates used to calculate lost revenues is based on eight-twelfths (May to December of year one) and a four-twelfths (Jan to April of year two).

Approved wires only rates per rate schedule - monthly fixed charge

Customer Class	*1-Jan-08*	*1-May-08*	*2008*	*1-Jan-09*	*1-Sep-09*	*2009*	*1-Jan-10*	*1-May-10*	*2010*
Residential	11.65	11.65	11.65	11.65	11.39	11.57	11.39	10.53	10.81
General Service < 50kW	25.04	25.04	25.04	25.04	24.77	24.95	24.77	24.81	24.79
General Service > 50kW <500	111.79	111.79	111.79	111.79	111.50	111.69	111.50	120.13	117.30
General Service > 500 kW <1500	1,158.65	1,158.65	1,158.65	1,158.65	1,000.00	1,105.63	1,000.00	1,221.12	1,148.43
General Service >1500 kW	1,158.65	1,158.65	1,158.65	1,158.65	1,158.16	1,158.49	1,158.16	1,537.31	1,412.65
Sentinel Lights / Unmetered	1.18	1.18	1.18	1.18	1.18	1.18	1.18	1.08	1.11

Approved wires only rates per rate schedule - variable charge (per kWh)

Customer Class	*1-Jan-08*	*1-May-08*	*2008*	*1-Jan-09*	*1-Sep-09*	*2009*	*2010*	*1-May-10*	*2010*
Residential	0.0159	0.0159	0.0159	0.0159	0.0195	0.0171	0.0195	0.0180	0.0185
General Service < 50kW	0.0100	0.0100	0.0100	0.0100	0.0151	0.0117	0.0151	0.0151	0.0151

Approved wires only rates per rate schedule - demand charge (per kW)

Customer Class	*1-Jan-08*	*1-May-08*	*2008*	*1-Jan-09*	*1-Sep-09*	*2009*	*2010*	*1-May-10*	*2010*
General Service > 50kW <500	0.8317	0.8317	0.8317	0.8317	1.4654	1.0435	1.4654	1.5788	1.5415
General Service > 500 kW <1500	0.4774	0.4774	0.4774	0.4774	0.6794	0.5449	0.6794	0.8296	0.7803
General Service >1500 kW	0.4774	0.4774	0.4774	0.4774	2.2975	1.0857	2.2975	3.0496	2.8023
Sentinel Lights / Unmetered	7.3109	7.3109	7.3109	7.3109	12.4459	9.0273	12.4459	11.3691	11.7231