

Wellington North Power Inc.
2012 Rate Rebasing Application
EB-2011-0249

Vulnerable Energy Consumers Coalition

Supplemental Interrogatories

(Note: Numbering continues from original VECC IRs)

#38 Reference: VECC #9 a)

- a) The revenues at proposed rates for 2012 shown in the response do no match those in Exhibit 8/Tab 9/Schedule 4 (page 742). Please reconcile and correct as required.

Wellington North Power Inc. - Response:

- a) The table below illustrates the latest version of the Summary of Operating Revenue and this supersedes the table that was included in WNP's response to VECC IR #9a:

Summary of Operating Revenue Table	2008 Board Approved	2008 Actual	Variance from 2008 Board Approved	2009 Actual	2010 Actual	2012 Test at Current Rates	2012 Test at Proposed Rates	2011 Actual
	(\$'s)	(\$'s)	(\$'s)	(\$'s)	(\$'s)	(\$'s)	(\$'s)	(\$'s)
Distribution Revenue								
Residential	851,679	806,376	(45,303)	875,796	865,808	867,143	1,166,677	902,621
GS < 50 kW	290,734	219,253	(71,481)	294,035	289,627	290,017	395,300	308,694
GS 50 - 999 kW	290,734	266,713	(24,021)	374,212	333,145	282,658	304,479	329,632
GS 1,000 - 4,999 kW	218,697	141,075	(77,622)	186,098	199,619	185,342	308,719	197,514
Sentinel Lights	7,220	4,421	(2,799)	9,583	10,542	8,037	2,558	10,534
Street Lighting	48,741	22,889	(25,852)	62,062	65,742	65,692	89,263	70,811
Unmetered Scattered Loads	2,394	442	(1,952)	221	248	106	155	215
Total	1,710,199	1,461,168	(249,031)	1,802,007	1,764,731	1,698,994	2,267,150	1,820,021
% of Total Revenue	90.49%	87.73%		82.60%	90.91%	91.64%	93.60%	93.42%
Other Distribution Revenue								
Late Payment Charges	18,034	18,614	580	20,947	20,833	26,047	26,047	26,047
Specific Service Charges	54,450	61,681	7,231	65,097	58,820	57,043	57,043	45,870
Other Distribution Revenue	107,210	80,579	(26,631)	76,761	54,642	54,537	54,537	60,733
Other Income and Expenses	0	43,489	43,489	216,839	42,262	17,321	17,321	(4,531)
Total	179,694	204,363	24,669	379,642	176,558	154,947	154,947	128,119
% of Total Revenue	9.51%	12.27%		17.40%	9.09%	8.36%	6.40%	6.58%
Grand Total:	1,889,893	1,665,531	-224,362	2,181,649	1,941,289	1,853,941	2,422,099	1,948,142

The table below supersedes the Reconciliation of Rate Class Revenue table that was included as part of WNP's application as Table 8-16 in Exhibit 8, Tab 9, Schedule 4:

Rate Class	No. of Customers / Connections in Test Year	Test Year Consumption		Proposed Rates			Transformer Allowance Credit	Revenues at Proposed Rates
		kWh	kW	Monthly Service Charge	Volumetric kWh	Volumetric kW		
Residential	3,160.27	24,515,702		\$ 18.67	\$ 0.02			\$ 1,166,470
GS < 50 kW	488.50	10,548,580		\$ 38.00	\$ 0.02			\$ 395,754
GS 50 - 999 kW	40.42		50,418	\$ 276.09		\$ 3.66	(\$13,915)	\$ 304,478
GS 1,000 - 4,999 kW	4.39		85,396	\$2,483.74		\$ 2.08		\$ 308,720
Sentinel Lights	16.80		80	\$ 5.13		\$ 18.95		\$ 2,558
Street Lighting	886.42		1,925	\$ 6.98		\$ 7.78		\$ 89,262
Unmetered Scattered Load	0.59	3,967		\$ 15.16	\$ 0.01			\$ 155
Total	4,597	35,068,250	137,820					\$ 2,267,398

Rate Class	Service Revenue Requirement	Transformer Allowance Credit	Total	Revenues at Proposed Rates	Service Revenue Requirement	Difference (Proposed less Service Req't)	
Residential	\$ 1,166,677		\$1,166,677	\$ 1,166,470	\$ 1,166,677	\$207	0.018%
GS < 50 kW	\$ 395,300		\$ 395,300	\$ 395,754	\$ 395,300	(\$455)	-0.115%
GS 50 - 999 kW	\$ 318,394	(\$13,915)	\$ 304,479	\$ 304,478	\$ 304,479	\$1	0.000%
GS 1,000 - 4,999 kW	\$ 308,719		\$ 308,719	\$ 308,720	\$ 308,719	(\$1)	0.000%
Sentinel Lights	\$ 2,558		\$ 2,558	\$ 2,558	\$ 2,558	\$0	0.000%
Street Lighting	\$ 89,263		\$ 89,263	\$ 89,262	\$ 89,263	\$0	0.000%
Unmetered Scattered Load	\$ 155		\$ 155	\$ 155	\$ 155	\$0	0.046%
Total	\$ 2,281,066		\$2,267,150	\$ 2,267,398	\$ 2,267,150	(\$247)	-0.051%

Both of the above tables now reconcile, shown in the yellow highlighted cells in each table:

- The Summary of Operating Revenue 2012 Test at Proposed Rates total distribution revenue at \$2,267,150;
- The total Rate Class Service Revenue Requirement, including Transformer Allowance credit, equalling \$2,267,150.

#39 Reference: VECC #13 a)

- a) In the response provided the HDD and CDD values for the years 2009 and 2011 are the same for both Actual and Weather Normal. Please re-do the table using the Weather Normal values (per 2012) for 2009 and 2010.

Wellington North Power Inc. - Response:

- a. As requested, the table has been updated using Weather Normal values for 2009 and 2010 – please see table below:

		A	B	C	D	E	F	G	H	I	J	J.A
									F*(D-B)	G*(E-C)	A+H+I	
		Actual			Weather Normal		Coefficients		Weather Normal Adjustment			
Year	Month	Actual Purchases	HDD	CDD	HDD	CDD	HDD	CDD	HDD	CDD	Weather Normal Purchases	Variance
2009	Jan	7,391,553	816.5	0.0	702.0	0.0			(328,781)	-	7,062,772	-328,781
	Feb	6,382,454	620.1	0.0	665.7	0.0			131,041	-	6,513,495	131,041
	Mar	6,590,037	556.5	0.0	583.4	0.0			77,154	-	6,667,191	77,154
	Apr	5,694,696	352.0	0.5	347.2	0.4			(13,730)	(564)	5,680,402	-14,294
	May	5,229,715	232.5	2.8	204.9	8.4			(79,395)	31,803	5,182,123	-47,592
	Jun	5,369,116	98.2	16.9	41.9	56.4			(161,662)	222,732	5,430,186	61,070
	Jul	5,288,185	21.5	26.6	8.2	98.0			(38,204)	402,722	5,652,703	364,518
	Aug	5,739,569	20.0	69.1	15.1	74.7			(14,018)	31,464	5,757,016	17,447
	Sep	5,417,984	75.8	10.7	60.2	35.7			(44,695)	141,082	5,514,371	96,387
	Oct	6,096,676	296.5	0.0	228.3	9.6			(196,016)	53,907	5,954,566	-142,109
	Nov	6,171,735	351.5	0.0	413.1	0.0			176,886	-	6,348,621	176,886
	Dec	7,187,686	619.0	0.0	629.8	0.0			30,908	-	7,218,594	30,908
2010	Jan	7,343,340	725.8	0.0	669.4	0.0			(161,983)	-	7,181,357	-161,983
	Feb	6,539,527	625.3	0.0	668.4	0.0			123,872	-	6,663,398	123,872
	Mar	6,459,810	485.0	0.0	595.0	0.0			316,062	-	6,775,872	316,062
	Apr	5,603,257	265.0	3.0	342.4	0.5			222,282	(14,210)	5,811,329	208,072
	May	5,757,226	139.0	20.7	204.7	8.7			188,812	(67,733)	5,878,305	121,079
	Jun	5,683,543	51.7	21.9	37.5	62.6			(40,892)	229,611	5,872,262	188,719
	Jul	6,025,352	7.7	136.0	7.0	104.8			(1,896)	(175,682)	5,847,774	-177,578
	Aug	6,165,214	6.0	129.8	13.6	78.8			21,727	(287,713)	5,899,228	-265,986
	Sep	5,702,200	93.2	26.8	62.3	33.0			(88,621)	34,870	5,648,450	-53,751
	Oct	6,032,362	238.8	0.0	229.1	11.2			(27,771)	63,222	6,067,813	35,451
	Nov	6,433,663	410.0	0.0	416.7	0.0			19,349	-	6,453,012	19,349
	Dec	7,232,578	668.7	0.0	622.9	0.0	2872.5	5638.8	(131,581)	-	7,100,997	-131,581
2011	Jan	7,467,524	777.5	0.0	697.4	0.0			(230,146)	-	7,237,378	-230,146
	Feb	6,794,516	645.3	0.0	666.1	0.0			59,765	-	6,854,281	59,765
	Mar	7,168,803	610.8	0.0	585.0	0.0			(74,030)	-	7,094,772	-74,030
	Apr	5,870,756	334.7	0.0	346.5	0.4			33,979	2,320	5,907,055	36,299
	May	5,663,513	175.6	14.1	204.8	8.5			83,995	(31,716)	5,715,792	52,280
	Jun	5,588,002	58.4	20.7	41.3	57.3			(49,167)	206,315	5,745,150	157,148
	Jul	6,163,969	0.7	139.9	8.0	99.0			21,067	(230,655)	5,954,381	-209,588
	Aug	6,240,041	2.7	88.2	14.9	75.3			35,037	(72,937)	6,202,142	-37,899
	Sep	5,830,412	72.3	21.2	60.5	35.3			(33,777)	79,671	5,876,306	45,894
	Oct	6,203,366	223.0	2.8	228.4	9.8			15,467	39,449	6,258,282	54,916
	Nov	6,371,649	336.2	0.0	413.6	0.0			222,334	-	6,593,983	222,334
	Dec	7,022,209	555.3	0.0	628.8	0.0			211,065	-	7,233,274	211,065
Variance Total for 2011												288,037

A spreadsheet containing the data from the above table has been provided. This has been uploaded on the OEB's RESS site with the filename below:

(Filename: [WellingtonNorth_SupplIR-Responses_Appendix_July12](#))

#41 Reference: Board Staff #15 c) & d)

- a) Why were the reading from different weather stations used for the periods 1991-1994 and 1995-2010? If one of the weather stations reported data for all 10 years please re-do the regression analysis and the prediction for 2012 using this data.

Wellington North Power Inc. - Response:

- a. WNP believe that the Collingwood station would produce the most reliable data for the LDC due to its proximity to the LDC's service territory. Unfortunately the Collingwood site only became available in 1995. The next closest site was Owen Sound which was used for the years 1991 – 1994 in order to complete the 10 and 20 year data requested in the filing requirements.

#42 Reference: Energy Probe #15 c)

- a) The billed kWh shown in the response for 2011 under “Previously” does not match that reported in Table 3-15 (page 345) of the Application. Please reconcile.
- b) Please confirm that the change in deficiency calculation provided in the response should also include the change in “revenue at current rates” that occurs as a result of the load forecast change. If so, please revise the response as required.

Wellington North Power Inc. - Response:

- a. As requested, the table below has been amended to show the “previously” billed kWh that was reported in Table 3-15 of Exhibit 3, Tab 2, Schedule of WNP’s application:

Year	Purchases	Predicted	Adjusted		Previously	
			Billed kWh	Billed	Billed kWh	Billed kW
2005	27,205,667					
2006	27,434,752					
2007	28,138,783					
2008	25,315,444					
2010	27,630,193					
2011 Bridge Year		27,176,279	25,358,081	52,395	24,614,814	52,326
2012 Test Year		27,224,679	25,403,243	52,464	24,614,814	52,419

- b) WNP has repeated the exercise requested under Energy Probe IR #15c). In its approach, WNP has applied the latest Cost of Power Calculations based on the RPP Report effective May 1, 2012 (as requested in Board Staff IR #5) with the table on the following page summarizing:
 - i) WNP’s Cost of Power Account forecast for 2012 Test Year as per its application;
 - ii) The change to the Cost of Power as a result of applying the latest calculations as per RPP Report issued by the OEB on April 2, 2012 effective May 1, 2012;

The impact to the Cost of Power account forecast for 2012 Test Year by following the technique requested in Energy Probe's IR #15 c

	WNP's Application	Applying latest CoP Calculations	Modelling Change for 3 Sensitive Customers
Cost of Power Account	2012	2012	2012
4705-Power Purchased	\$7,352,944	\$7,974,180	\$8,040,743
4708-Charges-WMS	\$522,517	\$522,111	\$526,504
4714-Charges-NW	\$492,859	\$492,528	\$492,563
4716-Charges-CN	\$320,665	\$320,446	\$320,469
4730-Rural Rate Assistance	\$110,532	\$110,446	\$111,376
4750-Low Voltage	\$145,890	\$145,762	\$145,772
Sub Total	8,945,407	9,565,473	9,637,426
	Difference:	\$620,066	\$71,953

As a consequence of the changes mentioned above (ii) and (iii), the table below summarizes the implications compared to WNP's rate application:

	Applying last CoP Calculations	Subsequent Change of Modelling 3 Sensitive Customers	Overall Change Compared to WNP's
Revenue Deficiency	\$6,391.85	\$741.80	\$7,133.65
Deemed Interest	\$2,389.24	\$275.86	\$2,665.09
Income Taxes	\$592.50	\$72.22	\$664.73
Rate Base	\$93,478.83	\$10,792.89	\$104,271.72
Taxable Income	\$3,822.61	\$465.95	\$4,288.56
Return on Rate Base	\$5,799.34	\$669.58	\$6,468.93

WNP has submitted a detailed sheet that itemizes the above components – this has been uploaded on to the OEB's RESS site with the filename below:

(Filename: [WellingtonNorth_SupplIR_Responses_Appendix_July12](#))

The table below summarizes the change in revenues at existing 2011 rates:

Description	2012 Test Existing Rates	2012 Test Existing Rates
Revenue		
Revenue Deficiency		
Distribution Revenue	1,685,387	1,684,370
Other Operating Revenue (Net)	141,585	141,585
Total Revenue	1,826,971	1,826,711

#43 Reference: Energy Probe #17 d)

- a) The response does not address the question posed which asked for details on the calculation of the values shown in Table 3-25 (i.e., forecast billing kW). Please provide.

Wellington North Power Inc. - Response:

- a) The table below summarizes the calculations used to derive the kW values for the rate classes requested.

Weather Normalized Billed Energy Forecast (kWh)				
Year	General Service 50 - 999 kW	General Service 1,000 - 4,999 kW	Streetlights	Sentinel Lights
2011	19,937,405	37,393,947	716,131	30,417
2012	19,595,187	38,290,749	711,588	26,247
Billed Energy - before CDM adjusted				
2011	20,034,083	37,575,273	719,604	30,564
2012	19,784,217	38,660,131	718,453	29,529
kWh Ratios - history based 2004 to 2010)				
2004	0.186%	0.219%	0.274%	0.278%
2005	0.192%	0.220%	0.274%	0.278%
2006	0.206%	0.232%	0.275%	0.278%
2007	0.298%	0.229%	0.229%	0.232%
2008	0.293%	0.240%	0.273%	0.282%
2009	0.310%	0.220%	0.275%	0.282%
2010	0.299%	0.229%	0.275%	0.278%
Average	0.255%	0.22689%	0.268%	0.272%
kW Used:				
2011	51,072	85,253	1,928	83
2012	50,435	87,714	1,925	80

The methodology applied is as follows:

- A review of the historical ratios of kWh/kW to create an average ratio that could be used for the 2011 Bridge Year and 2012 Test Year. For applicable rate class for each year, the following calculation was performed:

Aggregating the billed (without losses) kWh data for each year

Aggregating the sum of the billed kW for each year

The above historical review provides the ratios shown in the table above.

- WNP then used the ratio data for the period 2004 to 2010 inclusive to give an average ratio. For the 2011 Bridge Year and 2012 Test Year, the average ratio was multiplied by the Forecasted kWh Billed volume to give a kW amount for these years.

#44 Reference: Energy Probe #18

- a) Please explain why the 2012 weather normal values changed from those in the Application (per Table 3-26). Which set of values represents WNPI's forecast?

Wellington North Power Inc. - Response:

- a. The table below summarizes the changes between WNP's application (Table 3-26 of Exhibit 3, Tab 2, Schedule 1) and the response provided to Energy Probe's IR #18:

	WNP's Application (Table 3-26 Ex3, T2, S1)	WNP's IR Response (Energy Probe #18)	Change	
	2012 Weather Normal	2012 Weather Normal		
Predicted kWh Purchases	101,453,329	101,389,132	-64,197	-0.06%
Billed kWh	93,710,023	93,688,362	-21,661	-0.02%
By Class:				
Residential				
Customers	3,160	3,160	0	0.00%
kWh	24,526,192	24,515,702	-10,489	-0.04%
General Service < 50 kW				
Customers	489	489	0	0.00%
kWh	10,553,093	10,548,580	-4,513	-0.04%
General Service 50 - 999 kW				
Customers	40	40	0	0.00%
kWh	19,595,187	19,588,615	-6,572	-0.03%
kW	50,435	50,418	-17	-0.03%
General Service 1,000 - 4,999 kW				
Customers	4	4	0	0.00%
kWh	38,290,749	38,290,664	-85	0.00%
kW	85,443	85,396	-47	-0.05%
Street Lights				
Customers	886	886	0	0.00%
kWh	711,588	711,587	-2	0.00%
kW	1,925	1,925	0	0.00%
Sentinel Lights				
Connections	17	17	0	0.00%
kWh	29,247	29,246	0	0.00%
kW	80	80	0	0.00%
Unmetered Loads				
Connections	1	1	0	0.00%
kWh	3,967	3,967	0	0.00%
Total				
Customer/Connections	4,597	4,597	0	0.00%
kWh	93,710,023	93,688,362	-21,661	-0.02%
kW from applicable classes	137,883	137,820	-63	-0.05%

In responding to Energy Probe IR #18, WNP inputted the 2011 actual "Purchased with Losses" data and also re-ran the regression analysis. In re-running this regression analysis, WNP included 2011 "Purchased with Losses" actual data which in-turn updated the 2012 Test Year Forecast. The effect of including 2011 actual data resulted in a lower Forecasted billed and Purchases kWh's and billed kW's compared to its application.

The forecast produced in response to Energy Probe IR #18 is WNP's forecast. (This forecast supersedes the forecast submitted with WNP's initial application.)

#45 Reference: Energy Probe #20

- a) The response to part (a) states that interest associated with deferral and variance accounts was included in the Application's forecast whereas the response to part (b) states it was not. Please reconcile and confirm what the interest and dividend income for each year is excluding interest on deferral and variance accounts.

Wellington North Power Inc. - Response:

- a. In WNP's response to Energy Probe IR#20, the interest and dividend income were incorrectly shown as negative values. The table below shows the corrected values excluding interest on deferral and variance accounts as requested:

Summary of Other Distribution Revenue							
Expense Description	2008 Board Approved	2008 Actual	Variance from 2008 Board Approved	2009 Actual	2010 Actual	2011 Actual	2012 Test
Other Distribution Revenue							
4082-Retail Services Revenues	7,312	7,565	253	7,944	8,591	7,521	8,679
4084-Service Transaction Requests (STR) Revenues	193	156	(38)	118	221	157	199
4210-Rent from Electric Property	32,886	36,281	3,395	34,597	30,617	30,334	27,267
4090- Electric Services Incidental to Energy Sales	11,487	20,194	8,707	11,901	0	0	0
4325-Other Electric Revenues	14,482	2,945	(11,537)	9,278	2,681	38,286	26,527
4330-Costs & Expenses of Merchandising & Jobbing		0		(510)	(1,024)	(29,237)	(21,928)
4225-Late Payment Charges	18,033	18,614	581	20,947	20,833	26,047	26,047
4235-Miscellaneous Service Revenues	54,450	61,681	7,231	65,097	58,820	45,870	57,043
4350-Losses from Disposition of Future Use Utility Plant	0	0	0	0	0	0	0
4355-Gain on Disposition of Utility and Other Property	0	20,100	20,100	233,782	16,713	134	0
4360-Loss on Disposition of Utility and Other Property	0	0	0	0	0	0	0
4375- Revenues from Non-Utility Operations	126,864	131,943	5,079	260,539	134,925	138,883	141,661
4380-Expenses from Non-Utility Operations	(80,962)	(99,996)	(19,034)	(252,966)	(122,267)	(136,532)	(139,262)
4385-Non-Utility Rental Income	0	9,473	9,473	0	0	0	0
4390-Miscellaneous Non-Operating Income	4,673	0	(4,673)	(8,569)	150	880	150
4405-Interest and Dividend Income	20,197	20,510	313	5,216	5,553	7,896	9,818
Sub-Total	209,615	229,466	19,852	387,372	155,812	130,239	136,200
4080-Distribution Services Revenue- SSS Admin Fee	21,795	13,438	(8,357)	13,433	13,557	13,673	13,792
Total	231,409	242,904	11,494	400,805	169,369	143,912	149,992
Specific Service Charges	54,450	61,681	7,231	65,097	58,820	45,870	57,043
Late Payment Charges	18,033	18,614	581	20,947	20,833	26,047	26,047
Other Distribution Revenues	88,155	80,579	(7,576)	76,761	54,642	60,733	54,537
Other Income and Expenses	70,772	82,030	11,258	238,001	35,073	11,262	12,366
Total	231,409	242,904	11,494	400,805	169,369	143,912	149,992

#46 Reference: VECC #33 a) and OEB Staff #26 a)

- a) Please confirm that Hydro One's LV charges (i.e. the rates) for 2012 remained unchanged from those for 2011.

Wellington North Power Inc. - Response:

- a. It can be seen from the table below that the Hydro One LV rates for the period of January 2012 to May 2012 (inclusive) are the same as those applied in December 2011. Therefore, it is WNP's opinion that the rates for Hydro One's LV charges for 2012 remain unchanged as those applied, on prorated basis, for December 2011, (note that in December 2011, the rates were prorated).

It should be noted that there were variations to Hydro One's LV rates experienced through the year of 2011.)

	Hydro One's LV Rates		
	Common ST Lines	LVDS	
Jan-11	\$0.485	\$1.548	
Feb-11	\$0.485	\$1.548	
Mar-11	\$0.485	\$1.548	
Apr-11	\$0.490	\$1.550	
Apr-11	\$0.680	\$1.980	April 2011 two sets of rates and prorate factor was applied (66.6% at lower rate and 33.3% at higher rate)
May-11	\$0.680	\$1.978	
Jun-11	\$0.680	\$1.978	
Jul-11	\$0.680	\$1.978	
Aug-11	\$0.680	\$1.978	
Sep-11	\$0.680	\$1.978	
Oct-11	\$0.680	\$1.978	
Nov-11	\$0.680	\$1.978	
Dec-11	\$0.680	\$1.978	December 2011 two sets of rates and prorate factor was applied (66.6% at higher rate and 33.3% at lower rate)
Dec-11	\$0.668	\$1.944	
Jan-12	\$0.668	\$1.944	
Feb-12	\$0.668	\$1.944	
Mar-12	\$0.668	\$1.944	
Apr-12	\$0.668	\$1.944	
May-12	\$0.668	\$1.944	

#47 Reference: VECC #27

- a) Please provide the project compensation to be capitalized in 2012.

Wellington North Power Inc.- Response:

- a. WNP forecasts that the Project Compensation that will be capitalized in the 2012 Test Year will be approximately \$245,942. This based upon the following assumptions:
- All Capital Projects planned for 2012 Test Year that were described in Exhibit 2, Tab 5, Schedule 6 of WNP's application are completed during the year and according to the estimated costs;
 - There are no other capital projects added to or removed from the 2012 Test Year Capital Projects plan;
 - The Board approve WNP's 2012 rate application that enables the LDC to fund these 2012 capital projects. However, given the delay in filing its application, WNP is aware that all proposed projects for the 2012 Test year will be completed.

**#48 Reference: VECC #28, 29 and Exhibit 4, Tab 2, Schedule 10, page 451;
Exhibit 4, Tab 2, Schedule 6, page 427**

- a) In response to VECC IR # 28 c) WNP states that the FTE requirements are 14.5 not 19.5. However, 19.5 FTE are noted in at page 451 of the evidence (and repeated in each interrogatory response) and elsewhere (page 427 and 454) as 14.5. Please explain the reconcile these two different FTE figures.
- b) Please confirm that the total compensation for 14.5 FTEs forecast in 2012 is \$1,024,005 (revised in VECC IR #29 from the original \$1,029,770 as shown in Table 4-24 of the evidence).

Wellington North Power Inc.- Response:

- a. WNP's response to VECC's IR #28 was incorrect.
WNP's FTE forecast for the 2012 Test Year is 19.5 FTE which includes five Board of Director members.
Currently there are:
 - Five Board of Directors at WNP;
 - 12.5 FTE employed at WNP,
 - As per the 2012 Cost of Service application (Table 1-9 of Exhibit 1, Tab 1 Schedule 15), the LDC is seeking to hire a further two FTE.
- b) WNP can confirm that that the total compensation for 14.5 FTEs forecast in 2012 is \$1,024,005 (revised in VECC IR #29 from the original \$1,029,770 as shown in Table 4-24 of the evidence).