

**Exhibit 3:**

**REVENUE**

Exhibit 3: Revenue

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**Tab 1 (of 2): Load and Revenue Forecast**

1

## HISTORICAL & FORECAST VOLUMES

### 2 Population and Load Trends

3 Bluewater Power is comprised of six separate geographic areas in Lambton County with  
 4 the majority of the customers located in the City of Sarnia. The breakdown of customers  
 5 by service territory is detailed in Table 1 below.

6

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**Table 1 – Percent of customers by Service Territory**

Sarnia	86.1%
Petrolia	6.7%
Point Edward	3.0%
Alvinston	1.1%
Oil Springs	1.0%
Watford	2.1%
	100.0%

8 Overall, the City of Sarnia has experienced a low level of growth since 2006 as detailed  
 9 in the Census Information contained in Table 2 below. Whereas, Lambton County (which  
 10 includes Sarnia and all other municipalities served by Bluewater Power) has  
 11 experienced a negative growth value (-1.6%) between the years 2006 and 2011.

12

**Table 2 – Census Information**

	Sarnia	Lambton County	Ontario
Population in 2011	72,366	126,199	12,851,821
Population in 2006	71,419	128,204	12,160,282
2006 to 2011 population change (%)	1.3	-1.6	5.7

13 This population trend has affected both new housing starts and commercial growth in  
 14 Bluewater Power's service territory. Housing starts are depicted in Table 3 below and  
 15 the results demonstrate that 2011 represent a slight rebound to the 2010 results, but  
 16 remain significantly lower than the prior three years.

17

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**Table 3 – New Housing Starts**

	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>
Single Detached	152	201	201	194	177	177	250	252	174	191	148
Total Starts	155	374	203	194	243	191	258	278	299	203	223

2 \*Housing starts sourced from CMHC, and includes Sarnia, St Clair Township (not part of Bluewater Power territory), and  
 3 Point Edward Village.

4 Sarnia has a large industrial customer base centered on the refining and petrochemical  
 5 industry. The recession in 2008 and 2009 affected a number of plants either through  
 6 closures or reduced operations. Bluewater Power has seen the total number of  
 7 customers in the Large Use rate class (> 5000 kW) decrease from 5 to 3, which  
 8 represents a 40% decrease. The loss of the two large customers was discussed in our  
 9 2009 COS Application (EB-2008-0221) and we note that the load forecast was adjusted  
 10 accordingly at that time.

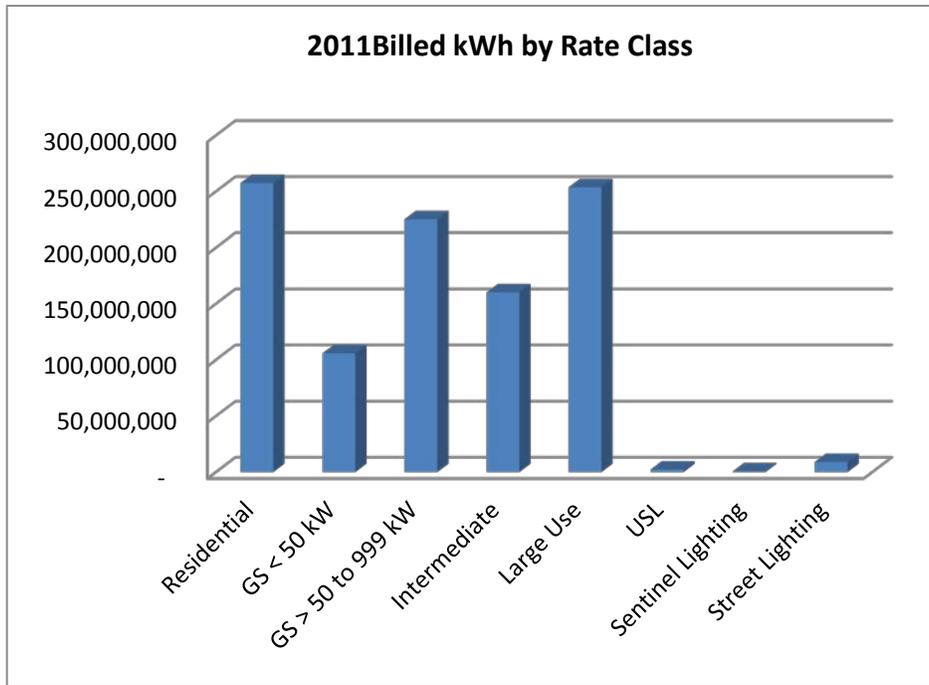
11 In addition, the number of customers in the Intermediate rate class (demand between  
 12 1000 and 4999 kW) has decreased from 16 customers down to 12. This represents a  
 13 25% decrease in the number of customers in this class.

14 Given the large industrial base, a significant portion of Bluewater Power's load comes  
 15 from rate classes other than residential. The data for consumption by rate class is  
 16 detailed in Tables 4 and 5 below. The combined throughput related to General Service  
 17 > 50 kW, Intermediate and Large Use customers is approximately 2.5 times the  
 18 throughput related to residential customers. Industrial load has suffered a more  
 19 pronounced decline as a result of the recent economic decline, such that distributors  
 20 with customer demographics similar to Bluewater Power have exhibited significant base  
 21 load erosion in the recent past. These impacts are furthered by conservation efforts that  
 22 producing a downward trend in the average use per customer, which is further discussed  
 23 in the CDM discussion in Exhibit 3, Tab 1, Schedule 3.

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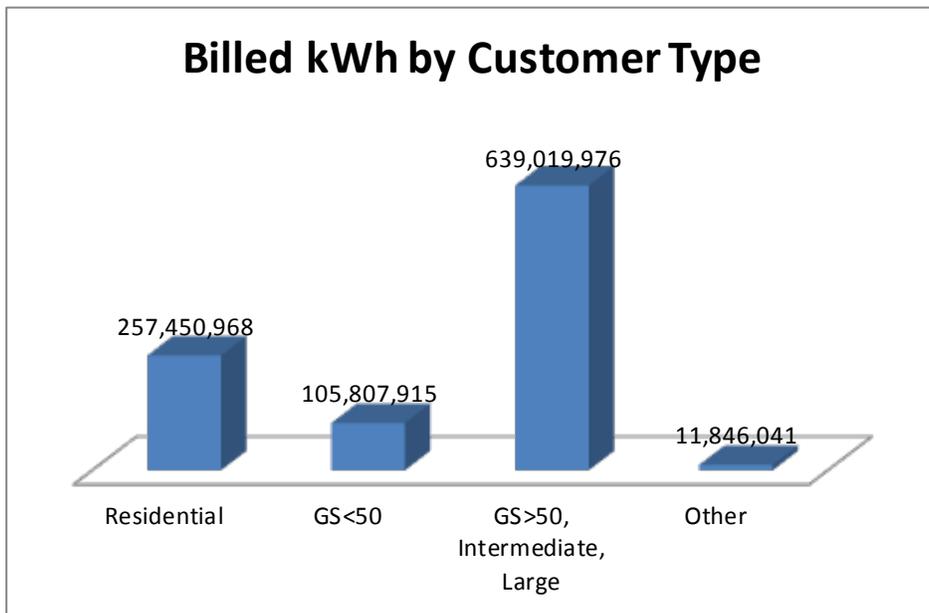
**Table 4**



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**Table 5**



4

1 **Customer Count and Volumetric Forecasts**

2 The following three tables provide the summary of the actual and forecast customer  
 3 count, energy (kWh) forecast and demand (kW) forecast. A full discussion of the  
 4 development of the load forecast is provided in the load forecast report in Exhibit 3, Tab  
 5 1, Schedule 2, Attachment 1. The variance analysis is contained in Schedule 4 of this  
 6 Exhibit.

7 Table 6 contains the customer count by year. The actual and forecast kWh and kW  
 8 forecast are contained in Table 7 and Table 8, respectively. The 2013 forecast for both  
 9 kWh and kW contains an adjustment to account for the expected impact of CDM on the  
 10 load forecast. The CDM adjustment is detailed at Exhibit 3, Tab 1, Schedule 3.

11 **Table 6 – Customer Count (average per year)**

Customer Class Name	2009 Approved	2009 Actual	2010 Actual	2011 Actual	2012 Forecast	2013 Forecast
Residential	31,560	31,554	31,552	31,787	31,954	32,122
General Service < 50 kW	3,890	3,412	3,511	3,507	3,525	3,544
General Service > 50 to 999 kW	399	380	393	409	423	438
General Service 1000 to 4999 kW	15	16	16	13	12	12
Large Use	3	4	3	3	3	3
Unmetered Scattered Load (connections)	266	257	257	260	260	260
Sentinel Lighting (connections)	526	497	497	497	497	445
Street Lighting (connections)	10,009	9,837	9,899	9,965	10,052	10,140
<b>TOTAL</b>	<b>46,668</b>	<b>45,957</b>	<b>46,128</b>	<b>46,441</b>	<b>46,726</b>	<b>46,964</b>

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**Table 7 – Historical and Forecast Energy (kWh) Forecast**

Customer Class Name	2009 EDR Approved	2009 Actual	2010 Actual	2011 Actual	2011 Normalized	2012 Estimated	2013 Normalized
Residential	261,847,739	252,958,052	264,765,479	257,450,968	258,340,857	259,667,118	255,687,351
General Service < 50 kW	120,287,121	110,288,359	110,171,154	105,807,915	105,949,255	103,450,605	97,434,167
General Service > 50 to 999 kW	214,354,332	209,789,052	222,842,935	225,133,479	224,210,382	226,737,748	221,905,974
General Service 1000 to 4999 kW	165,546,229	168,518,709	179,379,861	160,156,759	157,283,380	158,216,681	156,701,083
Large Use	280,461,771	246,885,214	257,951,054	253,729,738	253,729,738	252,652,298	247,541,912
Unmetered Scattered Load	2,188,838	2,215,434	2,257,871	2,238,935	2,238,935	2,238,935	2,238,935
Sentinel Lighting	684,138	652,414	644,654	627,674	627,674	627,674	627,674
Street Lighting	8,719,920	8,550,828	8,583,820	8,979,432	8,979,432	9,058,347	8,991,302
<b>TOTAL</b>	<b>1,054,090,088</b>	<b>999,858,062</b>	<b>1,046,596,828</b>	<b>1,014,124,900</b>	<b>1,011,359,653</b>	<b>1,012,649,406</b>	<b>991,128,398</b>

3

4

**Table 8 – Historical and Forecast Demand (kW) Forecast**

Customer Class Name	2009 EDR Approved	2009 Actual	2010 Actual	2011 Actual	2011 Normalized	2012 Estimated	2013 Normalized
Residential							
General Service < 50 kW							
General Service > 50 to 999 kW	588,341	580,406	593,349	623,028	620,473	625,979	627,074
General Service 1000 to 4999 kW	372,459	366,321	382,392	338,998	331,374	333,340	337,859
Large Use	421,890	404,711	398,614	402,202	402,202	400,494	392,393
Unmetered Scattered Load							
Sentinel Lighting	1,637	1,543	1,463	1,452	1,452	1,452	1,452
Street Lighting	23,562	23,964	24,037	24,126	24,126	24,338	24,157
<b>TOTAL</b>	<b>1,407,889</b>	<b>1,376,945</b>	<b>1,399,855</b>	<b>1,389,806</b>	<b>1,379,627</b>	<b>1,385,603</b>	<b>1,382,935</b>

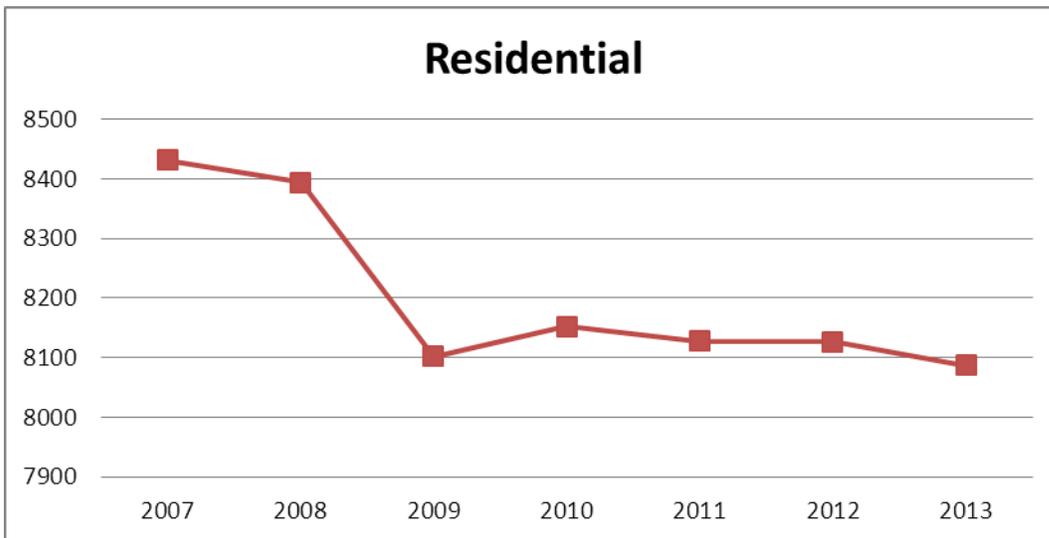
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1 **Average Use Per Customer**

2 Tables 9, 10 and 11 below show the overall trend of the average annual use per  
3 customer (kWh) based on weather normalized data (excluding CDM adjustment), and  
4 the detail is provided in Exhibit 3, Tab 1, Schedule 1, Attachment 1. As evidenced in the  
5 graphs, there is a general downward trend in the use per customer which can be mainly  
6 attributed to the overall "Culture of Conservation" which Bluewater Power began  
7 promoting heavily in 2007.

8 The residential average use per customer has decreased 3.6% from 2007 to 2011,  
9 GS<50 average use per customer has decreased 12.7% from 2007 to 2011, and the  
10 GS>50 average use per customer (kWh) has decreased 16.8% from 2007 to 2011.

11 **Table 9 – Residential Average kWh per customer per year**

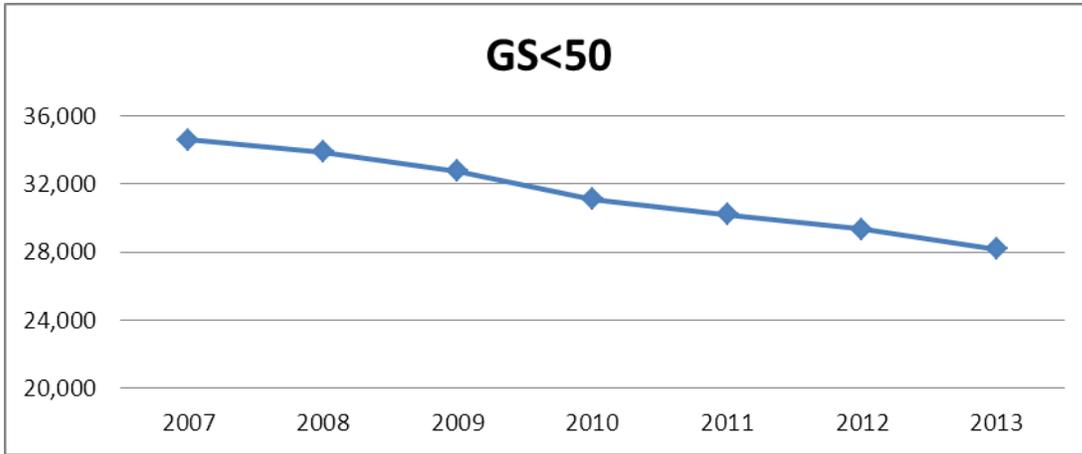


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**Table 10 – GS<50 Average kWh per customer per year**

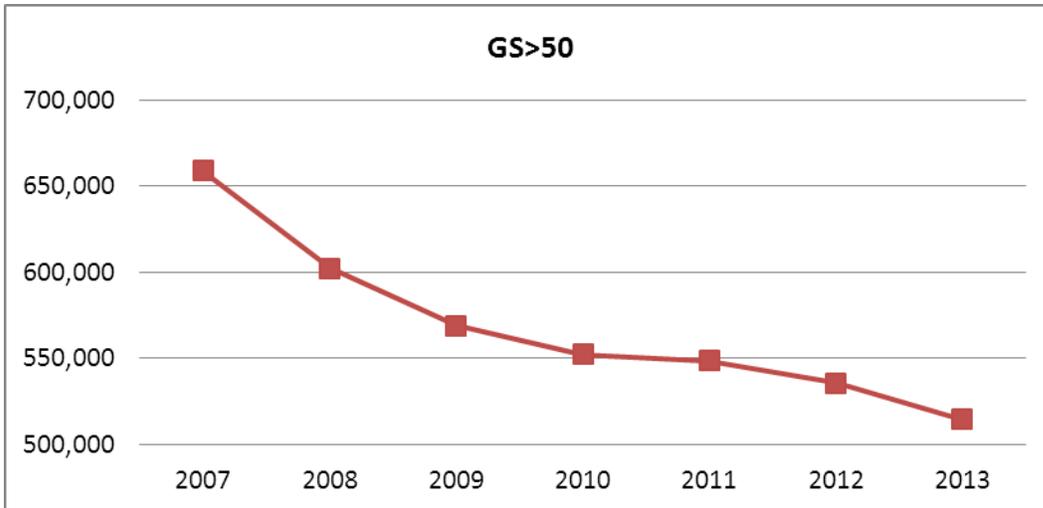


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**Table 11 – GS>50 Average kWh per customer per year**



5

6

1 As demonstrated in Exhibit 3, Tab 1, Schedule 1, Attachment 1, there are no variances  
 2 greater than 10% in the average use per customer for the residential, GS<50, GS>50,  
 3 Intermediate, Sentinel or Streetlighting rate classes. Variances on the average use per  
 4 customer for the Large Use class, and the USL class are discussed below.

5 Large Use Class

6 Table 10 below details the average use per customer contained in Appendix 1.

7 **Table 10 – Large Use Average Use per customer (kWh)**

<u>Year</u>	<u>Large User</u>	<u>% change</u>	<u>Avg # customers</u>
2007	69,993,397		5
2008	72,241,283	3.2%	4.17
2009	67,332,331	-6.8%	3.67
2010	85,983,685	27.7%	3
2011	84,576,579	-1.6%	3
2012F	84,217,433	-0.4%	3
2013F	83,859,811	-0.4%	3

8 There is an increase of 27.7% shown for 2010 as compared to 2009 that is related to the  
 9 2 customers that were in the process of ceasing operations. As these customers ramp  
 10 down their operations, the average in the category trended lower; however, once the  
 11 customers are completely closed in 2010 the average use per customer no longer  
 12 reflects their decreased load. The customers that remained in the category resulted in a  
 13 higher average consumption

14

1 Unmetered Scattered Load

2 Table 11 shows the trend contained in Appendix 1 related to unmetered scattered load.

3 **Table 11 – USL Average Use per Customer (kWh)**

<b><u>Year</u></b>	<b><u>USL</u></b>	<b><u>% change</u></b>
2007	12,515	
2008	9,293	-25.7%
2009	8,620	-7.2%
2010	8,785	1.9%
2011	8,611	-2.0%
2012F	8,611	0.0%
2013F	8,611	0.0%

4 The unmetered scattered load rate category contains the load related to traffic lights.

5 Throughout the calendar year 2007, Bluewater Power completed a project to convert the  
6 traffic lights to LED, which resulted in decreased annual consumption.

**Bluewater Power - Average Use Per Customer**

**Actual**

Year	Residential		GS<50		GS>50		Intermediate		Large User		Street		Sentinel		USL		HDD	CDD
2007	8,556		35,159		660,384		11,368,134		69,993,397		888		1,304		12,515		3,255.9	613.6
2008	8,391	-1.9%	34,526	-1.8%	602,486	-8.8%	11,365,395	0.0%	72,241,283	3.2%	887	0.0%	1,198	-8.2%	9,293	-25.7%	3,432.0	538.5
2009	8,017	-4.5%	32,321	-6.4%	551,834	-8.4%	10,587,563	-6.8%	67,332,331	-6.8%	869	-2.0%	1,313	9.6%	8,620	-7.2%	3,387.9	355.8
2010	8,391	4.7%	31,383	-2.9%	567,692	2.9%	11,211,241	5.9%	85,983,685	27.7%	867	-0.2%	1,297	-1.2%	8,785	1.9%	3,179.4	632.3
2011	8,099	-3.5%	30,172	-3.9%	550,785	-3.0%	12,319,751	9.9%	84,576,579	-1.6%	901	3.9%	1,263	-2.6%	8,611	-2.0%	3,341.3	579.7

**Normalized and Forecast Normalized**

Year	Residential		GS<50		GS>50		Intermediate		Large User		Street		Sentinel		USL			
2007	8,432		34,622		658,940		11,368,134		69,993,397		888		1,304		12,515			
2008	8,394	-0.4%	33,901	-2.1%	602,189	-8.6%	11,365,395	0.0%	72,241,283	3.2%	887	0.0%	1,198	-8.2%	9,293	-25.7%		
2009	8,102	-3.5%	32,784	-3.3%	568,830	-5.5%	10,587,563	-6.8%	67,332,331	-6.8%	869	-2.0%	1,313	9.6%	8,620	-7.2%		
2010	8,152	0.6%	31,100	-5.1%	552,217	-2.9%	11,211,241	5.9%	85,983,685	27.7%	867	-0.2%	1,297	-1.2%	8,785	1.9%		
2011	8,127	-0.3%	30,212	-2.9%	548,527	-0.7%	12,319,751	9.9%	84,576,579	-1.6%	901	3.9%	1,263	-2.6%	8,611	-2.0%		
2012F	8,126	0.0%	29,344	-2.9%	535,733	-2.3%	13,184,723	7.0%	84,217,433	-0.4%	901	0.0%	1,263	0.0%	8,611	0.0%		
2013F	8,087	-0.5%	28,204	-3.9%	514,429	-4.0%	13,262,960	0.6%	83,859,811	-0.4%	901	0.0%	1,263	0.0%	8,611	0.0%		

Calculation based on : annual kWh / annual average customer count

## 1           **APPROACH TO WEATHER NORMALIZED LOAD** 2           **FORECAST**

3     Bluewater Power has used weather normalized forecasts in its determination of load for  
4     those rate classes that are weather sensitive. The weather sensitive rate classes are  
5     Residential, General Service <50 kW and General Service 50 to 999 kW. The remaining  
6     rate classes, being General Service 1,000 to 4,999 kW (“Intermediate”), Large Use,  
7     Street Lighting, Sentinel Lighting and Unmetered Scattered Load are not considered  
8     weather sensitive and the forecasts for those rate classes are based on consumption  
9     trends over the last five years.

10  
11    Regression models were chosen in order to utilize the most recent historical  
12    consumption and weather data, and allows for the estimation of the statistical  
13    relationship between consumption, weather, and other variables that affect monthly  
14    consumption. In general, this is a more rigorous approach than using average use per  
15    customer or a single regression equation for wholesale purchases.

16  
17    The weather normalization is based on a report prepared by Elenchus Research  
18    Associates (“ERA”). The ERA report titled ‘2012-2013 Weather Normalized Load  
19    Forecast for Bluewater Power’ dated June 2012, is labeled as Exhibit 3, Tab 1, Schedule  
20    2, Attachment 1 and referenced as “The load forecast report”.

21  
22    The methodology uses actual unadjusted data for 2007 to 2011 which is then modeled  
23    through separate multiple regression equations to determine a weather normalized  
24    forecast for 2012 and 2013 for the weather sensitive classes. Bluewater Power has  
25    adopted the most recent 10 year (2002-2011) monthly degree day average as the  
26    definition of weather normal.

27  
28    The load forecast report provides details on the regression models including all variables  
29    and assumptions used. The report provides an explanation on the weather normalization

1 methodology, details the development of the billing kW for the applicable classes and  
2 addresses the movement of customers between rate classes.

3

4 A separate discussion of the impacts of conservation and demand management impacts  
5 on the load forecast is found at Exhibit 3, Tab 1, Schedule 3.

6

7 An excel file containing the load data used to derive the load forecast is provided by  
8 Bluewater Power, and has been filed through the RESS.

9

10 There is one variance between the load forecast for Bluewater Power and the forecast  
11 presented in the load forecast report. That variance is the number of sentinel  
12 connections reported in the load forecast for 2013 is 445, whereas the Elenchus load  
13 forecast report the number of connections is reported as 497. After the load forecast  
14 was completed by Elenchus, Bluewater Power finalized a review of the billing data and  
15 the number of sentinel connections was verified to be 445.

# **2012 – 2013 Weather Normalized Load Forecast for Bluewater Power**

**A Report Prepared by  
Elenchus Research Associates Inc.**

**On Behalf of  
Bluewater Power**

**June 2012**



## 1 INTRODUCTION

This report outlines the methodology used to derive the weather normal load forecast prepared for the Bluewater Power cost-of-service rate application for 2013. A weather normal load forecast has been derived for the bridge year (2012) and test year (2013). The forecast for Bluewater Power is based on monthly class specific retail data. Class specific retail data do not include losses; therefore, distribution system losses are not part of the class retail volumes.

In order to isolate demand determinants at the class specific level, separate multiple regression equations have been estimated to weather normalize and forecast kWh consumption for the residential and GS<50 classes. For the GS>50 class, a multi-step process is used since this class has undergone significant changes for certain customers. Over the analysis time period, several customers have been reclassified into the GS>50 class from other classes. Therefore, a “net GS>50 kWh” time series has been defined excluding these reclassified customers and a multiple regression equation to normalize and forecast consumption has been derived. Separate forecasting and normalizing equations have been developed for the reclassified customers in order to complete the class normalization and forecast. Related issues also exist for the intermediate and large user classes, although these classes are not considered weather sensitive. More details on the process are provided in the sections following.

Consumption for intermediate and large user classes, street lighting and sentinel lighting and unmetered scattered load (USL) is not considered weather sensitive, and these forecasts are based on trend consumption. Monthly data for intermediate and large user class consumption were regressed against monthly weather data and found to have very little correlation with weather.

## **2 CLASS SPECIFIC FORECASTS – WEATHER SENSITIVE**

In order to determine the relationship between observed weather and energy consumption, monthly weather observations describing the extent of heating or cooling required within the month are necessary. Environment Canada publishes monthly observations on heating degree days (HDD) and cooling degree days (CDD) for selected weather stations across Canada. Heating degree days for a given day are the number of Celsius degrees that the mean temperature is below 18°C. Cooling degree days for a given day are the number of Celsius degrees that the mean temperature is above 18°C. For Bluewater Power, the monthly HDD and CDD as reported at Windsor Airport (YQG) have been used.

In order to measure the change in economic activity, a data series must be chosen which represents, as much as possible, regional economic activity. For Bluewater Power, monthly full-time employment for the Windsor-Sarnia area, as reported in Statistics Canada’s Monthly Labour Force Survey (Table 282-0054, Full-time employment, Windsor-Sarnia, Ontario [3570]) is utilized.

Calendar variables are also included. These include explanatory variables such as number of days in the month or number of peak days in the month.

### **2.1 RESIDENTIAL CLASS**

Using the monthly class consumption and explanatory variables, the following regression model has been estimated for residential class kWh consumption.

Table 1: Residential kWh Model  
OLS using observations 2006:01-2011:12 (T = 72)  
Dependent variable: ReskWh

	coefficient	t-ratio	p-value
const	-16,212,084.1	-2.7	0.008684
HDD	14,064.6	16.8	1.13E-25
CDD	71,999.4	22.7	3.23E-33
Monthdays	804,658.6	4.5	2.83E-05
W_S_FTE	27,026.6	2.3	0.026964

R-squared	0.90	Adjusted R-squared	0.89
F(4, 67)	145.7	P-value(F)	2.75E-32
D-W	1.2	Theil's U	0.33

The explanatory variable W\_S\_FTE represents Windsor-Sarnia economic region full-time employment in '000s. Actual versus predicted residential kWh values and the annual prediction errors are displayed in the table below.

*Table 2: Residential kWh Actual vs Predicted*

Year	Actual Res kWh	Predicted Res kWh	Error
2006	258,763,018	258,617,294	-0.1%
2007	266,618,398	268,433,894	0.7%
2008	263,566,439	266,454,122	1.1%
2009	252,958,052	244,642,624	-3.3%
2010	264,765,479	263,177,408	-0.6%
2011	257,450,968	262,797,012	2.1%
<b>Mean Absolute Percentage Error</b>			<b>1.3%</b>

## 2.2 GS<50 kW CLASS

Using the monthly class consumption and explanatory variables, the following regression model has been estimated for GS<50 class kWh consumption.

Table 3: GS<50 kWh Model

OLS using observations 2006:01-2011:12 (T = 72)

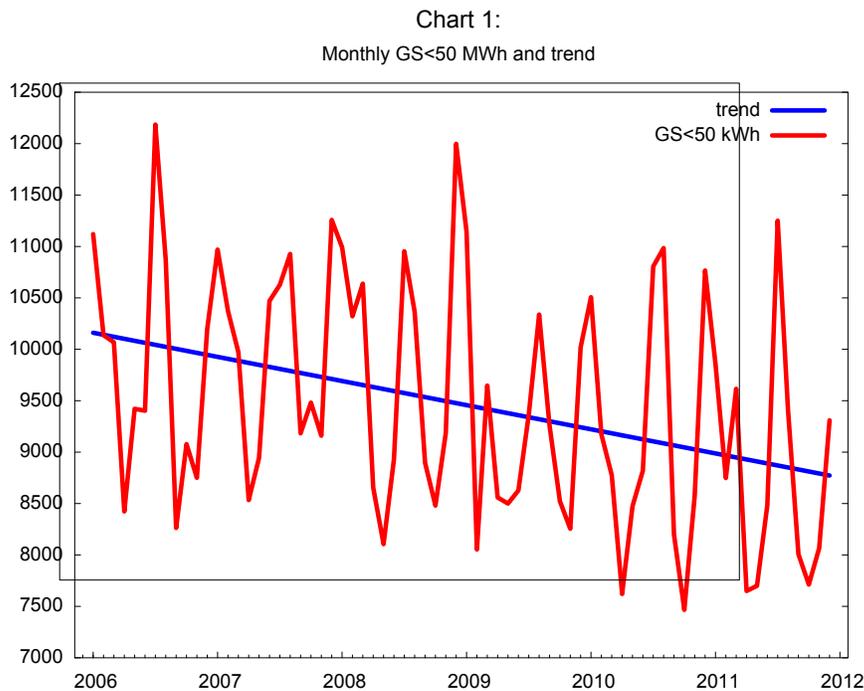
Dependent variable: GS<50kWh

	coefficient	t-ratio	p-value
const	-3,763,381.2	-2.1	0.042515
HDD	5,174.8	14.7	1.82E-22
CDD	19,020.5	18.0	3.60E-27
Monthdays	386,433.6	6.5	1.41E-08
time	-21,274.2	-9.2	2.2E-13
d_W_S_FTE	23,169.8	1.1	0.27963

R-squared	0.88	Adjusted R-squared	0.88
F(5, 66)	100.5	P-value(F)	1.72E-29
D-W	1.7	Theil's U	0.30

The explanatory variable called d\_W\_S\_FTE is the first difference of Windsor-Sarnia full-time employment ('000s); that is  $W\_S\_FTE_t - W\_S\_FTE_{t-1}$ . The explanatory variable

called time is an index variable that starts at 1 in the first month and increases by 1 for each month that passes. The negative value and statistical significance as indicated in the table above represents the trend of lower consumption in this class, despite increasing customer numbers (i.e., declining use per customer). This can be seen in the following chart of monthly consumption for the class. The trend has been confirmed to be continuing in 2012 based on preliminary data.



Actual versus predicted kWh values and the annual prediction errors are displayed in the table below.

*Table 4: GS<50 kWh Actual vs Predicted*

<i>Year</i>	<i>Actual GS&lt;50 kWh</i>	<i>Predicted GS&lt;50 kWh</i>	<i>Error</i>
2006	117,915,371	119,055,814	1.0%
2007	119,898,584	119,480,518	-0.3%
2008	117,516,343	116,286,309	-1.0%
2009	110,288,359	109,061,312	-1.1%
2010	110,171,154	110,553,380	0.3%
2011	105,807,915	107,160,392	1.3%
	<b>Mean Absolute Percentage Error</b>		<b>0.9%</b>

### 2.3 GS>50 kW CLASS

As indicated in the introduction, the forecast for the GS>50 class involves a multi-step process since this class has undergone significant changes for certain customers. Over the analysis time period, several customers have been reclassified into the GS>50 class from other classes. Therefore, a “net GS>50 kWh” time series has been defined excluding these reclassified customers and a multiple regression equation to normalize and forecast consumption has been derived. Separate forecasting and normalizing equations have been developed for the reclassified customers in order to complete the class normalization and forecast.

#### **SPECIFIC CUSTOMER DETAILS**

As of April 2011, two customers, Customer A<sup>1</sup> and Customer B were moved from the Intermediate Class to the GS>50 kW class. In February 2011, Customer C was moved to the GS>50 kW class from the Intermediate Class. This customer was previously moved to the Intermediate Class from the Large User Class in September 2009. Both Customer A and Customer B have load that is weather dependent (cooling only) and regression models have been developed to forecast and normalize these customers' consumption. On the other hand, consumption for Customer C is flat and not weather dependent. As of April 2012, the Customer C premises have been vacated and the equipment at the site has been auctioned and removed. As a result, the monthly consumption for this customer is expected to be no more than 150 kW per month for the remainder of 2012 and 2013.

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<sup>1</sup> Customer names have been removed for confidentiality reasons.

Displayed below are the regression models for Customer A and Customer B. Charts are provided that display these customers' consumption and regression model predictions.

Table 5: Customer B kWh Model

OLS using observations 2010:01-2011:12 (T = 24)

Dependent variable: Customer B kWh

	coefficient	t-ratio	p-value
const	375,022.9	5.8	1.27E-05
time	-1,318.9	-3.1	0.005
CDD	410.2	8.4	8.12E-08
Peakdays	3,919.7	1.5	0.14
d_W_S_FTE	2,184.4	1.5	0.15
R-squared	0.90	Adjusted R-squared	0.87
F(4, 19)	40.6	P-value(F)	4.68E-09
D-W	1.4	Theil's U	0.35

Table 6: Customer A kWh Model

OLS using observations 2007:01-2011:12 (T = 60)

Dependent variable: Customer A kWh

	coefficient	t-ratio	p-value
const	-275,766.8	-3.7	4.98E-04
CDD	235.6	8.5	9.79892E-12
Monthdays	12,726.9	5.9	2.62E-07
W_S_FTE	1,149.6	6.7	1.27259E-08
R-squared	0.79	Adjusted R-squared	0.78
F(3, 56)	71.3	P-value(F)	4.09E-19
D-W	1.6	Theil's U	0.46

Chart 2:

Actual and fitted Customer B kWh

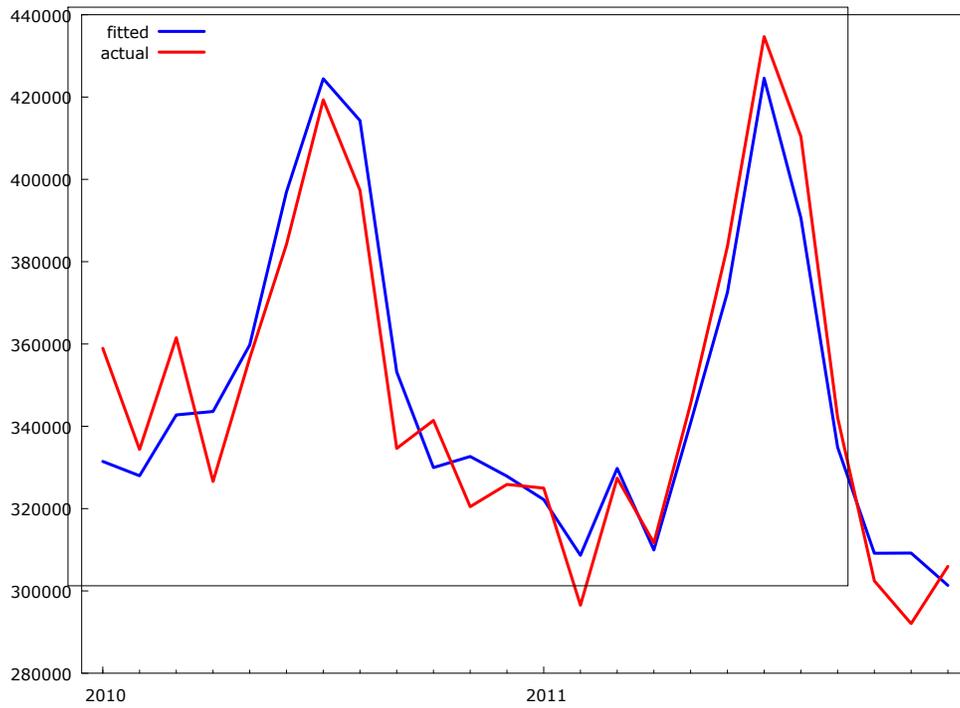
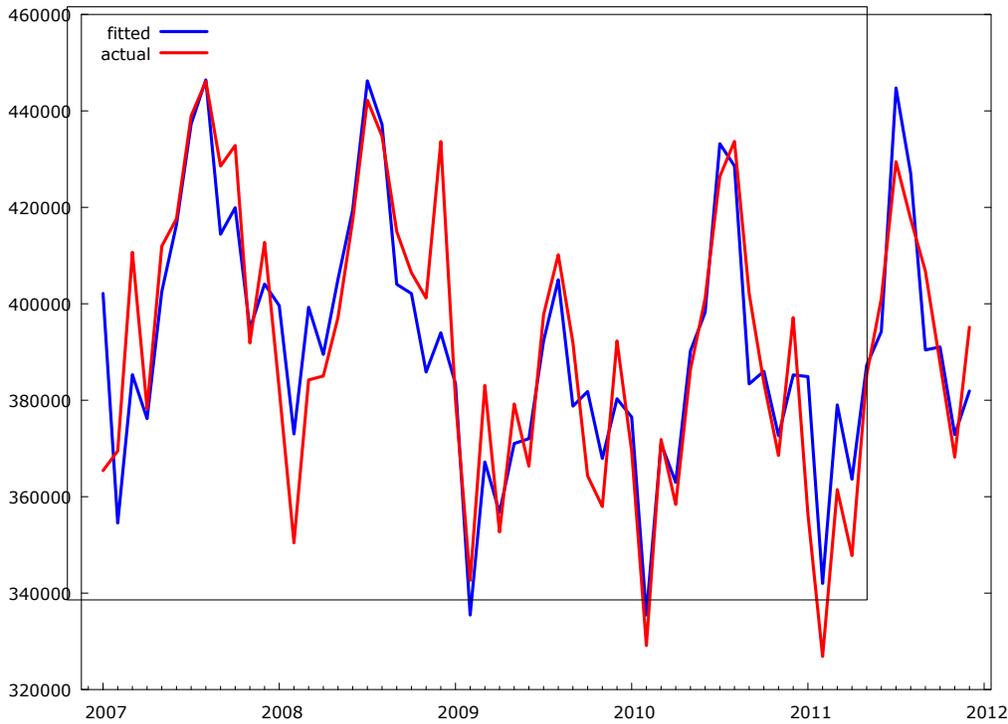


Chart 3:

Actual and fitted Customer A kWh



Another GS>50 customer, Customer D, closed the OLG Slots on their site, effective April 30. For the first 17 days of May 2012, this customer consumed 36 per cent less energy than for the same days in 2011. Based on Environment Canada reported degree-days, there was no cooling required for either of these periods. Therefore, we have reduced the monthly consumption of this customer by 36% for the remainder of 2012 and 2013.

**NET GS>50 KWH CONSUMPTION**

Net GS>50 kWh is actual GS>50 kWh less the three above customers consumption. The net and actual consumption will differ only for 2011. The estimated regression model for Net GS>50 kWh consumption is displayed in the table below.

Table 7: Net GS>50 kWh Model  
OLS using observations 2006:01-2011:12 (T = 72)  
Dependent variable: NetGS>50kWh

	coefficient	t-ratio	p-value
const	-9,817,132.2	-2.4	0.018516031
HDD	7,298.6	12.8	1.03E-19
CDD	26,263.4	12.2	9.86E-19
Monthdays	745,584.8	6.1	5.04E-08
W_S_FTE	8,974.4	1.1	0.272081129
R-squared	0.77	Adjusted R-squared	0.76
F(4, 67)	57.6	P-value(F)	5.56E-21
D-W	2.0	Theil's U	0.36

The predicted values for the additional customers are then added to the Net GS>50 kWh to determine predicted total GS>50 kWh. These values along with actual values and the annual prediction errors are displayed in the table below.

*Table 8: GS>50 kWh Actual vs Predicted*

Year	Actual GS>50 kWh	Predicted GS>50 kWh	Error
------	------------------	---------------------	-------

2006	217,640,501	216,204,570	-0.7%
2007	219,082,316	220,546,277	0.7%
2008	219,505,715	220,653,229	0.5%
2009	209,789,052	212,385,888	1.2%
2010	222,842,935	218,643,790	-1.9%
2011	225,133,479	225,925,879	0.4%
		<b>Mean Absolute Percentage Error</b>	<b>0.9%</b>

### 3 WEATHER NORMALIZATION AND FORECASTS

#### 3.1 WEATHER SENSITIVE CLASS FORECASTS

Bluewater Power has adopted the most recent 10 year monthly degree day average as the definition of weather normal, which to our knowledge, is consistent with most LDCs load forecast filings for cost-of-service rebasing applications. The table below displays the most recent 10 year average of heating degree days and cooling degree days as reported by Environment Canada for Windsor Airport.

**Table 9: 10-yr HDD and CDD, Windsor Airport**

	2002-2011 10-yr normal	
	HDD	CDD
Jan	668.6	0.0
Feb	591.4	0.0
Mar	482.6	0.0
Apr	254.0	3.9
May	119.4	24.3
Jun	13.4	105.2
Jul	0.5	174.4
Aug	1.8	147.2
Sep	32.6	58.6
Oct	204.1	8.7
Nov	364.0	0.0
Dec	585.6	0.0
<b>Annual</b>	<b>3,318.1</b>	<b>522.4</b>

Forecasts for Ontario's employment outlook for 2012 and 2013 from four Canadian Chartered Banks, as available while preparing the load forecast, are summarized below.

**Table 10: - Employment Forecast – Ontario**  
(figures in annual percentage change)

	BMO (Mar 2, 2012)	RBC (Dec 2011)	Scotia (Mar 6, 2012)	TD (Jan 4, 2012)	avg
2012	0.5	1.0	0.7	0.7	0.7
2013	1.1	1.4	1.0	1.4	1.2

Incorporating the forecast economic variables, 10-yr weather normal heating and cooling degree days, and calendar and index variables, the following weather corrected consumption and forecast values are calculated:

<b>Table 11: Weather Corrected Consumption for Bluewater Power</b>				
Year	Actual residential kWh	%chg	10-yr (2002-2011) Weather Normal	%chg
2007	266,618,398	3.0%	262,738,068	-1.1%
2008	263,566,439	-1.1%	263,688,670	0.4%
2009	252,958,052	-4.0%	255,651,704	-3.0%
2010	264,765,479	4.7%	257,211,136	0.6%
2011	257,450,968	-2.8%	258,340,847	0.4%
2012F			259,667,118	0.5%
2013F			259,773,254	0.0%
Year	Actual GS<50 kWh	%chg	Weather Normal	%chg
2007	119,898,584	1.7%	118,066,516	-2.8%
2008	117,516,343	-2.0%	115,389,459	-2.3%
2009	110,288,359	-6.2%	111,867,708	-3.1%
2010	110,171,154	-0.1%	109,179,568	-2.4%
2011	105,807,915	-4.0%	105,949,255	-3.0%
2012F			103,450,605	-2.4%
2013F			99,956,659	-3.4%
Year	Actual GS>50 kWh	%chg	Weather Normal	%chg

2007	219,082,316	0.7%	218,603,348	-0.4%
2008	219,505,715	0.2%	219,397,395	0.4%
2009	209,789,052	-4.4%	216,250,255	-1.4%
2010	222,842,935	6.2%	216,768,079	0.2%
2011	225,133,479	1.0%	224,210,382	3.4%
2012F			226,737,748	1.1%
2013F			225,433,209	-0.6%

**GS>50 kW FORECAST**

Due to the reclassification of three customers within calendar year 2011 (Customer C in February, Customer B and Customer A in April), determination of normalized and forecast normalized kW for the class is slightly more complex. A multistep approach has been adopted. The intent is to ensure that an appropriate kW/kWh ratio is used to project normalized kW in 2012 and 2013. This is done by annualizing the reclassified customers' demand (kW) and consumption (kWh) for 2011. This overstates the actual consumption for 2011, but provides an appropriate kW/kWh ratio and starting point for 2012 and 2013. The table below displays actual kW, net kW (if new customers were not reclassified) and annualized (for 2011) kW, if each customer were added as of January 1<sup>st</sup>. A similar calculation is done for kWh to determine the kW/kWh ratio for 2012 and 2013.

Table 12: GS>50 Class kW

Date	Actual GS>50 kW	kW/kWh	Reclassified kW	Net GS>50 kW	kW/kWh	Net kWh	kW/kWh
2006	591,300	0.00272	0	591,300	0.00272	217,640,501	0.00272
2007	601,223	0.00274	0	601,223	0.00274	219,082,316	0.00274
2008	593,870	0.00271	0	593,870	0.00271	219,505,715	0.00271
2009	580,406	0.00277	0	580,406	0.00277	209,789,052	0.00277
2010	593,349	0.00266	0	593,349	0.00266	222,842,935	0.00266
2011	623,028	0.00277	16,757	606,271	0.00278	218,732,839	0.00278

GS>50 kW - Annualized  
Reclassification

Date	Net kW	Annualized reclass	Annualized kW	Annualized kWh	kW/kWh
2006	591,300	0	591,300	217,640,501	0.00272
2007	601,223	0	601,223	219,082,316	0.00274
2008	593,870	0	593,870	219,505,715	0.00271
2009	580,406	0	580,406	209,789,052	0.00277
2010	593,349	0	593,349	222,842,935	0.00266
2011	606,271	19,168	625,438	226,541,916	0.00276

The following table summarizes the kW sales for the GS>50 kW class. Normalized kW values are calculated based on the annual ratio of class kW to class kWh. For the bridge year and test year, the ratio for 2011 calculated using the annualized consumption of the three reclassified customers is used.

**Table 13: GS>50 Class kW (Actual, Normalized, and Forecast)**

Year	Actual kW	% change	Class kW/kWh ratio	Normalized kW	% change
2007	601,223	1.7%	0.002744279	599,909	0.6%
2008	593,870	-1.2%	0.002705488	593,577	-1.1%
2009	580,406	-2.3%	0.002766617	598,282	0.8%
2010	593,349	2.2%	0.002662634	577,174	-3.5%
2011	623,028	5.0%	0.002767371	620,473	7.5%
2012F			0.002757098	625,979	0.9%
2013F			0.002757098	622,378	-0.6%

### 3.2 NON-WEATHER SENSITIVE CLASSES

For classes that do not have weather sensitivity (intermediate and large users, street and sentinel lighting, unmetered scattered load), class consumption is forecast based on the average annual consumption growth from 2007 to 2011. As indicated above, due to changes in customer composition for both the intermediate and large user class, a multi-step process is used for both of these classes.

#### INTERMEDIATE CLASS: SPECIFIC CUSTOMER DETAILS

The Intermediate class has undergone significant changes over the past several years. Two large customers in this class, Customer E and Customer F, have closed. Customer E closed in June 2011 and Customer F closed in July 2009. Customer F was previously in the Large User class until reclassified as an Intermediate class customer in March 2008. Additionally, as included in the discussion of the GS>50 kW class, three Intermediate class customers, Customer A, Customer B, and Customer C, were reclassified to the GS>50 kW class in 2011. To account for these changes, a ‘net’

Intermediate class excluding these reclassified customers is calculated. This class will accurately reflect 'actual' Intermediate class consumption in months from April 2011 onwards, the date of the last reclassification. Therefore, the 'net' Intermediate consumption is the appropriate base for 2012 and 2013 consumption and is also the appropriate basis for historical growth patterns. The table below displays actual and net class consumption.

**Table 14: Intermediate Class kWh**

Date	Actual Int kWh	%chg	Reclassified kWh	Net Int kWh	%chg
2006	174,273,598		20,461,223	153,812,375	
2007	170,522,010	-2.2%	24,736,496	145,785,513	-5.2%
2008	179,952,089	5.5%	35,534,071	144,418,017	-0.9%
2009	168,518,709	-6.4%	29,228,093	139,290,617	-3.6%
2010	179,379,861	6.4%	25,723,943	153,655,917	10.3%
2011	160,156,759	-10.7%	2,873,379	157,283,380	2.4%
<b>2012</b>				<b>158,216,681</b>	<b>0.6%</b>
<b>2013</b>				<b>159,155,521</b>	<b>0.6%</b>

A 'net' class kW is also calculated in order to establish the appropriate base for 2012 and 2013. This is shown in the following table.

**Table 15: Intermediate Class kW**

Date	Actual Int kW	%chg	Reclassified kW	Net Int kW	%chg
2006	357,342		37,172	320,170	
2007	370,714	3.7%	48,670	322,044	0.6%
2008	394,728	6.5%	67,247	327,482	1.7%
2009	366,321	-7.2%	58,221	308,100	-5.9%
2010	382,392	4.4%	53,445	328,947	6.8%
2011	338,998	-11.3%	7,624	331,374	0.7%
<b>2012</b>				<b>333,340</b>	<b>0.6%</b>
<b>2013</b>				<b>335,318</b>	<b>0.6%</b>

**LARGE USER CLASS: SPECIFIC CUSTOMER DETAILS**

The Large User class has also undergone change with the loss of two large customers. Customer F was reclassified from the Large User class to Intermediate as of March 2008 and subsequently closed. Customer C was reclassified from the Large User class to Intermediate as of September 2009 (and subsequently again reclassified to GS>50 kW). To account for these changes, a ‘net’ Large User class excluding these reclassified customers is calculated. This class will accurately reflect ‘actual’ Large User class consumption in months after August 2009, the date of the last reclassification. Therefore, the ‘net’ Large User consumption is the appropriate base for 2012 and 2013 consumption and is also the appropriate basis for historical growth patterns. The table below displays actual and net class consumption.

**Table 16: Large User Class kWh**

Date	Actual LU kWh	%chg	Reclassified kWh	Net LU kWh	%chg
2006	339,361,533		74,672,149	264,689,384	
2007	349,966,983	3.1%	73,048,546	276,918,437	4.6%
2008	301,005,345	-14.0%	40,486,067	260,519,278	-5.9%
2009	246,885,214	-18.0%	20,281,809	226,603,405	-13.0%
2010	257,951,054	4.5%	0	257,951,054	13.8%
2011	253,729,738	-1.6%	0	253,729,738	-1.6%
2012				252,652,298	-0.4%
2013				251,579,433	-0.4%

A ‘net’ class kW is also calculated in order to establish the appropriate base for 2012 and 2013. This is shown in the following table.

**Table 17: Large User Class kW**

Date	Actual LU kW	%chg	Reclassified kW	Net LU kW	%chg
2006	552,133		135,150	416,983	
2007	544,917	-1.3%	123,844	421,073	1.0%
2008	483,880	-11.2%	76,093	407,788	-3.2%
2009	404,711	-16.4%	41,601	363,110	-11.0%
2010	398,614	-1.5%	0	398,614	9.8%
2011	402,202	0.9%	0	402,202	0.9%
2012				400,494	-0.4%
2013				398,793	-0.4%

**STREET LIGHTING, SENTINEL LIGHTING, AND UNMETERED SCATTERED LOAD (USL)**

Class consumption for street lighting, sentinel lighting and USL classes is based on average annual customer connection growth. For sentinel lighting and USL, no change from 2011 is forecast for customer attachments. For street lights, the customer attachments are forecast to grow at 0.9% per annum, which is the average annual growth rate in attachments from 2007 to 2010. The following table displays street light, sentinel light and USL customer attachments since 2007 and the forecast attachments for 2012 and 2013.

Table 18: Street light, Sentinel Light and USL Customer Connections

Date	Street	%chg	Sent	%chg	USL	%chg
2007	9,618	0.8%	526	0.0%	238	-1.0%
2008	9,742	1.3%	526	0.0%	232	-2.7%
2009	9,837	1.0%	497	-5.5%	257	11.0%
2010	9,899	0.6%	497	0.0%	257	0.0%
2011	9,965	0.7%	497	0.0%	260	1.2%
2012	10,052	0.9%	497	0.0%	260	0.0%
2013	10,140	0.9%	497	0.0%	260	0.0%

Kilowatt-hour use per customer connection per year is displayed below.

Table 19: Street Light, Sentinel Light and USL kWh use per customer connection

Date	Street	%chg	Sent	%chg	USL	%chg
2007	888	-1.3%	1,304	2.5%	12,515	0.6%
2008	887	0.0%	1,198	-8.2%	9,293	-25.7%
2009	869	-2.0%	1,313	9.6%	8,620	-7.2%
2010	867	-0.2%	1,297	-1.2%	8,785	1.9%
2011	901	3.9%	1,263	-2.6%	8,611	-2.0%

Historical consumption and the resulting kWh forecast are shown below.

Table 20: Street light, Sentinel Light and USL kWh

Date	Street	%chg	Sent	%chg	USL	%chg
2007	8,536,684	-0.5%	685,929	2.5%	2,978,570	-0.5%
2008	8,642,642	1.2%	629,997	-8.2%	2,152,148	-27.7%
2009	8,550,828	-1.1%	652,414	3.6%	2,215,434	2.9%

2010	8,583,820	0.4%	644,654	-1.2%	2,257,871	1.9%
2011	8,979,432	4.6%	627,674	-2.6%	2,238,935	-0.8%
2012	9,058,347	0.9%	627,674	0.0%	2,238,935	0.0%
2013	9,137,954	0.9%	627,674	0.0%	2,238,935	0.0%

Resulting Street and Sentinel kW are displayed below.

Table 21: Street and Sentinel Light kW

Date	Street	%chg	kW/kWh	Sent	%chg
2007	23,751	-1.3%	0.00278	1,634	1.6%
2008	23,964	0.9%	0.00277	1,590	-2.7%
2009	23,964	0.0%	0.00280	1,543	-3.0%
2010	24,037	0.3%	0.00280	1,463	-5.2%
2011	24,126	0.4%	0.00269	1,452	-0.8%
2012	24,338	0.9%	0.00269	1,452	0.0%
2013	24,551	0.9%	0.00269	1,452	0.0%

## 4 CUSTOMER COUNT SUMMARY

The table below displays the annual average customer count summary for all classes. Customer count projections for most classes are based on the average annual growth in customer connections seen since 2007. Exceptions are for classes where no change is expected (sentinel, USL, intermediate and large user).

Table 22: Annual Average Customer Count

Customers	Res	%chg	GS<50	%chg	GS>50	%chg	Intermediate	%chg	LU	%chg	Street	%chg	Sent	%chg
2007	31,161	0.6%	3,410	-0.2%	332	-3.8%	15	6.5%	5	0.0%	9,618	0.8%	526	0.0%
2008	31,412	0.8%	3,404	-0.2%	364	9.8%	16	5.6%	4	-16.7%	9,742	1.3%	526	0.0%
2009	31,554	0.5%	3,412	0.2%	380	4.3%	16	0.5%	4	-12.0%	9,837	1.0%	497	-5.5%
2010	31,552	0.0%	3,511	2.9%	393	3.3%	16	0.5%	3	-18.2%	9,899	0.6%	497	0.0%

2011	31,787	0.7%	3,507	-0.1%	409	4.1%	13	-18.8%	3	0.0%	9,965	0.7%	497	0.0%
2012	31,954	0.5%	3,525	0.5%	423	3.5%	12	-7.7%	3	0.0%	10,052	0.9%	497	0.0%
2013	32,122	0.5%	3,544	0.5%	438	3.5%	12	0.0%	3	0.0%	10,140	0.9%	497	0.0%

## 5 FORECAST SUMMARY

Table 23:

	2011 Actual	2011 Normalized	2012f Normalized	2013f Normalized
Residential (kWh)	257,450,968	258,340,847	<b>259,667,118</b>	<b>259,773,254</b>
GS<50 (kWh)	105,807,915	105,949,255	<b>103,450,605</b>	<b>99,956,659</b>
GS>50 (kWh)	225,133,479	224,210,382	<b>226,737,748</b>	<b>225,433,209</b>
(kW)	623,028	620,473	<b>625,979</b>	<b>622,378</b>
Int (kWh)	160,156,759	160,156,759	<b>158,216,681</b>	<b>159,155,521</b>
(kW)	338,998	338,998	<b>333,340</b>	<b>335,318</b>
LU (kWh)	253,729,738	253,729,738	<b>252,652,298</b>	<b>251,579,433</b>
(kW)	402,202	402,202	<b>400,494</b>	<b>398,793</b>
Street Lights (kWh)	8,979,432	8,979,432	<b>9,058,347</b>	<b>9,137,954</b>
(kW)	24,126	24,126	<b>24,338</b>	<b>24,551</b>
Sentinel Lights (kWh)	627,674	627,674	<b>627,674</b>	<b>627,674</b>
(kW)	1,452	1,452	<b>1,452</b>	<b>1,452</b>
USL (kWh)	2,238,935	2,238,935	<b>2,238,935</b>	<b>2,238,935</b>
Total Retail kWh	1,014,124,900	1,014,233,022	<b>1,012,649,406</b>	<b>1,007,902,640</b>

Table 24:

Bluewater Power - Average Use Per Customer  
(annual kWh / annual average customer count)

Actual

<u>Year</u>	<u>Residential</u>	<u>GS&lt;50</u>	<u>GS&gt;50</u>	<u>Intermediate</u>	<u>Large User</u>	<u>Street</u>	<u>Sentinel</u>	<u>USL</u>	<u>HDD</u>	<u>CDD</u>
2007	8,556	35,159	660,384	11,368,134	69,993,397	888	1,304	12,515	3,255.9	613.6
2008	8,391	34,526	602,486	11,365,395	72,241,283	887	1,198	9,293	3,432.0	538.5
2009	8,017	32,321	551,834	10,587,563	67,332,331	869	1,313	8,620	3,387.9	355.8
2010	8,391	31,383	567,692	11,211,241	85,983,685	867	1,297	8,785	3,179.4	632.3
2011	8,099	30,172	550,785	12,319,751	84,576,579	901	1,263	8,611	3,341.3	579.7

Normalized and Forecast Normalized

<u>Year</u>	<u>Residential</u>	<u>GS&lt;50</u>	<u>GS&gt;50</u>	<u>Intermediate</u>	<u>Large User</u>	<u>Street</u>	<u>Sentinel</u>	<u>USL</u>
2007	8,432	34,622	658,940	11,368,134	69,993,397	888	1,304	12,515
2008	8,394	33,901	602,189	11,365,395	72,241,283	887	1,198	9,293
2009	8,102	32,784	568,830	10,587,563	67,332,331	869	1,313	8,620
2010	8,152	31,100	552,217	11,211,241	85,983,685	867	1,297	8,785
2011	8,127	30,212	548,527	12,319,751	84,576,579	901	1,263	8,611
2012	8,126	29,344	535,733	13,184,723	84,217,433	901	1,263	8,611
2013	8,087	28,204	514,429	13,262,960	83,859,811	901	1,263	8,611

## 1                   **APPROACH TO CONSERVATION AND DEMAND** 2                   **MANAGEMENT**

3       Sections 2.6.1.2 and 2.6.1.3 of the Board's Filing Requirements dated June 28, 2012  
4       specify that an LDC must provide a description of how CDM impacts have been  
5       accounted for in the historical period and how the CDM target is factored into the Test  
6       Year load forecast.

7  
8       It is Bluewater Power's assumption that the Board expects LDCs to make an appropriate  
9       adjustment to their weather normalized load forecast to ensure customers realize, at the  
10      earliest date possible, the effects of conservation efforts undertaken to meet the  
11      government's provincial target in 2014. As noted by the Board in its Decision in the  
12      Hydro One Brampton Inc. proceeding (EB-2010-0132)<sup>1</sup>:

13                   *"The Board is of the view that CDM targets will be achieved on an incremental,*  
14                   *staged basis and that any adjustment to the test year's rates should be*  
15                   *commensurate with the quantum of forecast savings for the test year."*

16      The CDM Adjustment to Bluewater Power's load forecast, as prepared by Elenchus,  
17      addresses both past and future reductions from CDM programs. Load reductions from  
18      the persistence of previous CDM programs are known quantities available from the  
19      OPA's CDM final results analysis. Bluewater Power has also made an adjustment for  
20      incremental CDM program results based on projected that Bluewater Power will meet its  
21      2014 CDM target.

22  
23      The specific adjustment related to the 2014 CDM target for the 2013 Test Year kWh  
24      forecast is 30% of Bluewater Power's assigned cumulative target of 53.8 MWh which  
25      equates to 16.1MWh. The CDM reduction equal to 30% of Bluewater Power's provincial  
26      target is comprised of two components; the first component is the projected CDM  
27      savings from new incremental CDM results in 2013 of 10%, while the second component  
28      is the persisting effect of CDM programs from 2011(10%) and 2012 (10%) for a  
29      cumulative total of 30% in 2013.

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<sup>1</sup> EB-2010-0132, issued April 4, 2011, page 8.

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The CDM Adjustment results for Energy reductions are presented in the Table 1 and a description of the methodology used to derive those results follows.

**Table 1 - CDM Adjustment per Class – Energy (kWh)**

	Weather Normalized	2006-2010 CDM Programs		Weather Normalized	2011-2014 CDM Target	Weather Normalized
	2013F	6 yr. Avg.	2013	Revised	(30% of Target)	Adjusted
	(Elenchus)	(2006/11)	Persistence (from 2006-2010 programs)	2013F		2013F
Reference	A	B	C	D=A+B-C	E	F=D-E
Residential	259,773,254	5,183,287	5,098,813	259,857,728	4,170,377	<b>255,687,351</b>
GS<50	99,956,659	1,532,546	2,465,842	99,023,363	1,589,196	<b>97,434,167</b>
GS>50	225,433,209	847,979	755,826	225,525,362	3,619,388	<b>221,905,974</b>
Intermediate	159,155,521	414,214	312,786	159,256,950	2,555,866	<b>156,701,083</b>
Large Use	251,579,433	0	0	251,579,433	4,037,521	<b>247,541,912</b>
Street Lights	9,137,954	0	0	9,137,954	146,652	<b>8,991,302</b>
Sentinel Lights	627,674	0	0	627,674	0	<b>627,674</b>
USL	2,238,935	0	0	2,238,935	0	<b>2,238,935</b>
<b>Total Customer (kWh)</b>	<b>1,007,902,639</b>	<b>6,911,633</b>	<b>8,320,481</b>	<b>1,007,247,398</b>	<b>16,119,000</b>	<b>991,128,398</b>

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With respect to the energy forecast adjustment, Bluewater Power proceeded first by grossing up the weather normalized forecast prepared by Elenchus by the average results of the 2006-2010 CDM programs of the previous six years (2006 to 2011). The theory in step one is to approximate a gross forecast without reflecting the impacts of conservation. Secondly, the grossed up forecast was then reduced by an amount related to the expected persistence in CDM reductions from those same programs (2006 to 2010) in 2013. This provides a revised 'net' load forecast from which the 30% CDM incremental target for 2013 is subtracted. The CDM target reduction is allocated by class based on their respective revised energy volume. Bluewater Power does not expect CDM reductions for the unmetered classes (i.e., USL and Sentinel) and they have been excluded from the 30% allocation of the 2014 target.

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The CDM Adjustment results for Demand reductions are presented in the Table 2 and a description of the methodology used to derive those results follows.

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**Table 2 - CDM Adjustment per Class – Demand (kW)**

	Weather Normalized	2006-2010 CDM Programs		Weather Normalized	2011-2014 CDM Target	Weather Normalized
	2013F (Elenchus)	6 yr. Avg. (2006/11)	2013 Persistence (from 2006-2010 programs)	Revised 2013F	Proportional	Adjusted 2013F
	A	B	C	D=A+B-C	E	F=D-E
<b>GS&gt;50 (kW)</b>	622,378	15,768	844	637,302	10,228	<b>627,074</b>
<b>Intermediate</b>	335,318	8,507	455	343,370	5,511	<b>337,859</b>
<b>Large Use</b>	398,793	0	0	398,793	6,400	<b>392,393</b>
<b>Street Lights (kW)</b>	24,551	0	0	24,551	394	<b>24,157</b>
<b>Sentinel Lights (kW)</b>	1,452	0	0	1,452	0	<b>1,452</b>
<b>Total Demand</b>	<b>1,382,492</b>	<b>24,275</b>	<b>1,299</b>	<b>1,405,468</b>	<b>22,533</b>	<b>1,382,935</b>

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Bluewater Power adjusted the demand (kW) forecast for past CDM programs by grossing it up by the six year average of the 2006-2010 programs and reducing it by the expected 2013 CDM persistence. The demand forecast is then further adjusted to reflect the reduction in the energy forecast from the 2014 CDM target. The reduction in demand is proportional to that in energy (i.e., a 10% reduction in energy will yield a 10% reduction in demand).

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Bluewater Power notes that no Large Use, streetlight or sentinel customers participated in past CDM programs between 2006 and 2010 therefore these classes do not have an adjustment related to the 2006-2010 program results.

14

Overall, the CDM adjusted weather normalized load forecast (kWh) for the 2013 Test Year for Bluewater Power is 991,128,398 kWh or 1.7% less than the base load forecast prepared by Elenchus. Bluewater Power recognizes that any variances that arise from the actual verified results from the OPA in 2013 as compared to this reduction will be booked to the LRAM Variance Account for future disposition.

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The supporting schedule detailing the 2006-2010 CDM program results are provided in Exhibit 3, Tab 1, Schedule 3, Attachment 1.

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**Bluewater Power - Calculation of 2013 CDM Forecast Reduction**

	Original	2006 - 2011 CDM Savings (based on 2006-2010 programs)									Revised	Share of Total Volume	Target	Adjusted	Change from Original forecast	% change from Original	
	2013f Normalized - ERA Forecast	2006	2007	2008	2009	2010	2011	2012	2013	Average 2006-2011	2013F		16,119,000	2013F			
Residential (kWh)	259,773,254	2,450,277	4,597,857	6,243,841	6,710,145	5,688,994	5,408,608	5,214,531	5,098,813	5,183,287	259,857,728	25.9%	4,170,377	255,687,351	-4,085,903	-1.6%	
GS<50 (kWh)	99,956,659			2,913	1,195,586	2,465,842	2,465,842	2,465,842	2,465,842	1,532,546	99,023,363	9.9%	1,589,196	97,434,167	-2,522,492	-2.5%	
GS>50 (kWh)	225,433,209		44,916	44,916	669,934	1,282,480	443,040	443,040	443,040	847,979	225,525,362	22.5%	3,619,388	221,905,974	-3,527,235	-1.6%	
Intermediate	159,155,521		31,710	31,710	472,973	905,429	312,786	312,786	312,786	414,214	159,256,950	15.9%	2,555,866	156,701,083	-2,454,438	-1.5%	
Large Users	251,579,433										251,579,433	25.0%	4,037,521	247,541,912	-4,037,521	-1.6%	
Street Lights (kWh)	9,137,954										9,137,954	0.9%	146,652	8,991,302	-146,652	-1.6%	
Sentinel Lights (kWh)	627,674										627,674	0.0%	-	627,674	0	0.0%	
USL (kWh)	2,238,935										2,238,935	0.0%	-	2,238,935	0	0.0%	
<b>Total Customer (kWh)</b>	<b>1,007,902,639</b>	2,450,277	4,674,483	6,323,380	9,048,638	10,342,746	8,630,276	8,436,199	8,320,481	6,911,633	1,007,247,398	100.0%	16,119,000	<b>991,128,398</b>	-16,774,241	-1.7%	
GS>50 (kW)	622,378	12,267	15,030	22,583	23,462	20,469	845	845	845	15,776	637,309		10,228	627,081.40	4,703	0.8%	
Intermediate	335,318	6,609	8,098	12,167	12,641	11,028	455	455	455	8,500	343,363		5,511	337,852.05	2,534	0.8%	
Large Users	398,793										398,793		6,400	392,392.89	-6,400	-1.6%	
Street Lights (kW)	24,551										24,551		394	24,156.99	-394	-1.6%	
Sentinel Lights (kW)	1,452										1,452		-	1,452	0	0.0%	
<b>Total Demand</b>	<b>1,382,492</b>	18,876	23,128	34,750	36,102	31,496	1,299	1,299	1,299	24,275	1,405,468		22,533	<b>1,382,935</b>	443	0.0%	
<u>Allocation of kWh and kW savings to Other Rate Classes based on percentage of load forecast</u>																	
CDM (kWh) GS>50 Classes			76,626	76,626	1,142,907	2,187,910	755,826	755,826	755,826								
GS>50 (kWh)	58.6%	-	44,916	44,916	669,934	1,282,480	443,040	443,040	443,040								
Intermediate	41.4%	-	31,710	31,710	472,973	905,429	312,786	312,786	312,786								
CDM (kW) GS>50 Classes		18,876	23,128	34,750	36,102	31,496	1,299	1,299	1,299								
GS>50 (kW)	65.0%	12,267	15,030	22,583	23,462	20,469	845	845	845								
Intermediate (kW)	35.0%	6,609	8,098	12,167	12,641	11,028	455	455	455								

\*Data is sourced from the 2006-2010 OPA Final Results

## VARIANCE ANALYSIS OF LOAD FORECAST

Table 1 provides a variance analysis of the number of customers by rate class each year. The number of customers presented represents the average number of customers in the respective year. A discussion of the annual variances greater than 10% is provided below.

**Table 1 – Number of Customers by year**

	2009 EDR Approved	2009 Actual	variance 2009 approved vs. 2009 actual	2010 Actual	2010 vs. 2009	2011 Actual	2011 vs. 2010	2012 Forecast	2012 vs 2011	2013 Forecast	2013 vs. 2012
Residential	31,560	31,554	0.0%	31,552	0.0%	31,787	0.7%	31,954	0.5%	32,122	0.5%
General Service < 50 kW	3,890	3,412	-12.3%	3,511	2.9%	3,507	-0.1%	3,525	0.5%	3,544	0.5%
General Service > 50 to 999 kW	399	380	-4.8%	393	3.4%	409	4.1%	423	3.4%	438	3.5%
General Service 1000 to 4999 kW	15	16	6.7%	16	0.0%	13	-18.8%	12	-7.7%	12	0.0%
Large Use	3	4	33.3%	3	-25.0%	3	0.0%	3	0.0%	3	0.0%
Unmetered Scattered Load	266	257	-3.4%	257	0.0%	260	1.2%	260	0.0%	260	0.0%
Sentinel Lighting	526	497	-5.5%	497	0.0%	497	0.0%	497	0.0%	445	-10.5%
Street Lighting	10,009	9,837	-1.7%	9,899	0.6%	9,965	0.7%	10,052	0.9%	10,140	0.9%
TOTAL	46,668	45,957	-1.5%	46,128	0.4%	46,441	0.7%	46,726	0.6%	46,964	0.6%

### Variance 2009 Board approved vs. 2009 Actual

- GS<50 – 12.3% decrease.

- The number of GS<50 customers approved in Bluewater Power 2009 COS Application was 3,890. However, in the year 2009 (after our 2009 rates were approved) an issue with the “query” used in our billing system to count the number of customers was uncovered; it was determined that the number of customers for this rate class had been overstated for a number of years. The query incorrectly included customers with closed accounts. The query was modified and the correct number of active customers is now accounted for. The actual number of customers in

1                   2009 was 3,412 which led to the -12.3% variance from the 2009 approved  
2                   value.

3                   • Large – 33% increase

4                   ○ The number of customers approved in the 2009 forecast was 3, however  
5                   there were 4 customers until August 2009 at which point one of the Large  
6                   Use customers ceased operations and was moved to the Intermediate  
7                   rate class to reflect their lower usage.

8                   Variance 2010 vs. 2009 actual

9                   • Large – 25% decrease

10                  ○ 2010 reflects the loss of the Large Use customer noted above that moved  
11                  to the Intermediate rate class in August 2009 taking the number of  
12                  customers as 4 in 2009 to 3 in 2010.

13                 Variance 2011 vs. 2010

14                 • Intermediate – 18.8% decrease

15                 ○ The number of customers in the Intermediate rate class dropped from 16  
16                 in 2010 to 13 in 2011. This reflects one customer that was in the Large  
17                 Use rate class, that was moved to the Intermediate rate class in 2009  
18                 and was further reclassified to the GS>50 rate class in 2011. Two  
19                 additional customers were reclassified from the Intermediate rate class to  
20                 the GS>50 rate class in April 2011 to reflect their lower usage.

21                 Variance 2013 vs. 2012

22                 • Sentinel – 10.5% decrease

23                 ○ The number of sentinel connections decreased from 497 to 445 in 2013.  
24                 This is related to a billing update to the number of devices or fixtures in  
25                 operation.

1 There are no other material changes to the customer numbers forecast for 2012 and  
 2 2013.

3 **Variance Analysis on Energy Forecast (kWh)**

4 Table 2 details the kWh variance between 2009 Actual results and the kWh included in  
 5 Bluewater Power's 2009 Board approved values. The table also includes the 2009  
 6 normalized results as compared to the 2009 Board approved values. Normalized in the  
 7 context of this kWh forecast refers to 'weather normalized' in the case of weather  
 8 sensitive rate classes (residential, GS<50 and GS>50). For the other rate classes,  
 9 normalized represents the actual results.

10

11 The largest variance is in the Large Use rate class where the actual results were 12%  
 12 lower than the kWh approved for 2009. This is due to a fire at one of the large customer  
 13 sites, and operations were ceased for a five month period. This led to a reduction in  
 14 consumption of approximately 32,000,000 kWh, and a reduction in demand of  
 15 approximately 33,000 kW.

16

**Table 2 – kWh Variance for 2009**

	2009 EDR Approved	2009 Actual	Variance 2009 Actual vs. 2009 Approved	2009 Normalized	2009 normalized vs. 2009 approved
Residential	261,847,739	252,958,052	-3.4%	255,651,704	-2.4%
General Service < 50 kW	120,287,121	110,288,359	-8.3%	111,867,708	-7.0%
General Service > 50 to 999 kW	214,354,332	209,789,052	-2.1%	216,250,255	0.9%
General Service 1000 to 4999 kW	165,546,229	168,518,709	1.8%	168,518,709	1.8%
Large Use	280,461,771	246,885,214	-12.0%	246,885,214	-12.0%
Unmetered Scattered Load	2,188,838	2,215,434	1.2%	2,215,434	1.2%
Sentinel Lighting	684,138	652,414	-4.6%	652,414	-4.6%
Street Lighting	8,719,920	8,550,828	-1.9%	8,550,828	-1.9%
TOTAL	<b>1,054,090,088</b>	<b>999,858,062</b>		<b>1,010,592,266</b>	

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18 Table 3 shows the main variance in 2011 as compared to 2010 is a 10.7% decrease in  
 19 the Intermediate rate category. At the start of 2011 there were 16 customers in the rate  
 20 category, and by the end of 2011 there were 13 customers so the reduction in the

1 throughput is directly related to two customers being reallocated to the GS>50 rate  
 2 class, and one customer closing completely.

3 **Table 3 – kWh Variance for 2010 and 2011**

	2010 actual	2010 normalized	2010 normalized vs. 2009 normalized	2011 Actual	2011 normalized	2011 normalized vs. 2010 normalized
Residential	264,765,479	257,211,136	0.6%	257,450,968	258,340,847	0.4%
General Service < 50 kW	110,171,154	109,179,568	-2.4%	105,807,915	105,949,255	-3.0%
General Service > 50 to 999 kW	222,842,935	216,768,079	0.2%	225,133,479	224,210,382	3.4%
General Service 1000 to 4999 kW	179,379,861	179,379,861	6.4%	160,156,759	160,156,759	-10.7%
Large Use	257,951,054	257,951,054	4.5%	253,729,738	253,729,738	-1.6%
Unmetered Scattered Load	2,257,871	2,257,871	1.9%	2,238,935	2,238,935	-0.8%
Sentinel Lighting	644,654	644,654	-1.2%	627,674	627,674	-2.6%
Street Lighting	8,583,820	8,583,820	0.4%	8,979,432	8,979,432	4.6%
<b>TOTAL</b>	<b>1,046,596,828</b>	<b>1,031,976,043</b>		<b>1,014,124,900</b>	<b>1,014,233,022</b>	

4 Table 4 shows there are no material variances projected for 2012 as compared to 2011.  
 5 The reductions in the values for 2013 compared to 2012 relate to the reduction in the  
 6 forecast attributable to CDM projected savings. This was discussed in Exhibit 3, Tab 1,  
 7 Schedule 3.

8 **Table 4 – kWh Variance for 2012 and 2013**

	2011 normalized	2012 Forecast - normalized	2012 normalized vs. 2011 normalized	2013 Forecast - Normalized	2013 normalized vs. 2012 normalized
Residential	258,340,847	259,667,118	0.5%	255,687,351	-1.5%
General Service < 50 kW	105,949,255	103,450,605	-2.4%	97,434,167	-5.8%
General Service > 50 to 999 kW	224,210,382	226,737,748	1.1%	221,905,974	-2.1%
General Service 1000 to 4999 kW	160,156,759	158,216,681	-1.2%	156,701,083	-1.0%
Large Use	253,729,738	252,652,298	-0.4%	247,541,912	-2.0%
Unmetered Scattered Load	2,238,935	2,238,935		2,238,935	
Sentinel Lighting	627,674	627,674		627,674	
Street Lighting	8,979,432	9,058,347	0.9%	8,991,302	-0.7%
<b>TOTAL</b>	<b>1,014,233,022</b>	<b>1,012,649,406</b>		<b>991,128,398</b>	

1 **Variance on Demand (kW) Forecast**

2 The variance analysis on the demand forecast is based on actual data. The majority of  
 3 the customers that are weather sensitive are not demand based (with the exception of  
 4 the GS>50 kW customers), therefore the table below does not include 'normalized' data.  
 5 The only variance greater than 10% is for the Intermediate rate category comparing  
 6 2011 to 2010 demand. There is a decrease of 11.3% which is related to the movement  
 7 of 3 customers out of the intermediate rate category in 2011 as noted above.

8

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**Table 5 – Variance on Demand (kW)**

	2009 Approved	2009 Actual	Variance 2009 actual vs. 2009 approved	2010 Actual	2010 vs. 2009 actual	2011 Actual	2011 vs. 2010	2012 Forecast	2012 vs. 2011	2013 Forecast	2013 vs. 2012
Residential											
General Service < 50 kW											
General Service > 50 to 999 kW	588,341	580,406	-1.3%	593,349	2.2%	623,028	5.0%	625,979	0.5%	627,074	0.2%
General Service 1000 to 4999 kW	372,459	366,321	-1.6%	382,392	4.4%	338,998	-11.3%	333,340	-1.7%	337,859	1.4%
Large Use	421,890	404,711	-4.1%	398,614	-1.5%	402,202	0.9%	400,494	-0.4%	392,393	-2.0%
Unmetered Scattered Load											
Sentinel Lighting	1,637	1,543	-5.7%	1,463	-5.2%	1,452	-0.8%	1,452		1,452	
Street Lighting	23,562	23,964	1.7%	24,037	0.3%	24,126	0.4%	24,338	0.9%	24,157	-0.7%

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## OVERVIEW OF DISTRIBUTION REVENUE

2 Bluewater Power's base Revenue Requirement proposed to be recovered through rates  
 3 is \$21,876,690, plus an additional amount of \$501,229 to be recovered related to  
 4 transformer allowance credits, for a gross revenue requirement of \$22,377,919.

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6

**Table 1 – Base Revenue Requirement**

Rate Class	Base Revenue Requirement	Add: Transformer Allowance Revenue Required	Gross Revenue Requirement
Residential	12,026,198	0	12,026,198
General Service < 50 kW	3,118,381	0	3,118,381
General Service > 50 to 999 kW	3,450,825	74,131	3,524,955
General Service 1000 to 4999 kW	871,603	187,823	1,059,426
Large Use	1,441,059	239,276	1,680,335
Unmetered Scattered Load	123,755	0	123,755
Sentinel Lighting	60,776	0	60,776
Street Lighting	784,092	0	784,092
TOTAL	21,876,690	501,229	22,377,919

7

8 The attachment included as Exhibit 3, Tab 1, Schedule 5, Attachment 1 includes the  
 9 2012 and 2013 projected revenues using the currently approved distribution rates  
 10 (effective May 1, 2012).

11 The attachment included as Exhibit 3, Tab 1, Schedule 5, Attachment 2 includes an  
 12 overview of distribution revenue from the 2009 Board Approved values, 2009 Actual,  
 13 2010 Actual, 2011 Actual, and 2012 Bridge Year (at existing rates), and 2013 Test Year  
 14 (at proposed rates). The 2009, 2010, and 2011 results match the Audited Financial  
 15 Statements. The amounts indicated represent the revenue attributable to fixed and  
 16 variable distribution charges only and exclude any rate riders. A variance analysis on the  
 17 distribution revenue is at Exhibit 3, Tab 1, Schedule 6.

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**C3 Revenue from Current Distribution Charges**

Customer Class Name	2012 PROJECTED REVENUE FROM EXISTING VARIABLE CHARGES							
	Variable Distribution Rate	per	Volume	Gross Variable Revenue	Transform. Allowance Rate	Transform. Allowance kW's	Transform. Allowance \$'s	Net Variable Revenue
Residential	\$0.0188	kWh	259,667,118	4,881,742				4,881,742
General Service < 50 kW	\$0.0166	kWh	103,450,605	1,717,280				1,717,280
General Service > 50 to 999 kW	\$3.5617	kW	625,979	2,229,549	(\$0.60)	136,586	(81,952)	2,147,598
General Service 1000 to 4999 kW	\$1.2790	kW	333,340	426,342	(\$0.60)	298,810	(179,286)	247,056
Large Use	\$1.4610	kW	400,494	585,122	(\$0.60)	400,191	(240,114)	345,007
Unmetered Scattered Load	\$0.0426	kWh	2,238,935	95,379				95,379
Sentinel Lighting	\$22.6299	kW	1,452	32,859	(\$0.60)			32,859
Street Lighting	\$16.5512	kW	24,338	402,823	(\$0.60)			402,823
<b>TOTAL VARIABLE REVENUE</b>				<b>10,371,095</b>		<b>835,586</b>	<b>(501,352)</b>	<b>9,869,743</b>

Customer Class Name	2012 PROJECTED DISTRIBUTION REVENUE AT EXISTING RATES							
	Fixed Rate	Customers (Connections)	Fixed Charge Revenue	Variable Revenue	TOTAL	% Fixed Revenue	% Variable Revenue	% Total Revenue
Residential	\$13.8000	31,954	5,291,582	4,881,742	10,173,324	52.01%	47.99%	54.87%
General Service < 50 kW	\$23.7100	3,525	1,002,933	1,717,280	2,720,213	36.87%	63.13%	14.67%
General Service > 50 to 999 kW	\$142.0000	423	720,792	2,147,598	2,868,390	25.13%	74.87%	15.47%
General Service 1000 to 4999 kW	\$3,121.6300	12	449,515	247,056	696,571	64.53%	35.47%	3.76%
Large Use	\$24,427.6000	3	879,394	345,007	1,224,401	71.82%	28.18%	6.60%
Unmetered Scattered Load	\$15.6800	260	48,922	95,379	144,300	33.90%	66.10%	0.78%
Sentinel Lighting	\$3.4300	497	20,457	32,859	53,315	38.37%	61.63%	0.29%
Street Lighting	\$2.1400	10,052	258,135	402,823	660,958	39.05%	60.95%	3.56%
<b>DISTRIBUTION REVENUE</b>			<b>8,671,729</b>	<b>9,869,743</b>	<b>18,541,473</b>	<b>46.77%</b>	<b>53.23%</b>	<b>100.00%</b>

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**C3 Revenue from Current Distribution Charges**

Customer Class Name	2013 PROJECTED REVENUE FROM EXISTING VARIABLE CHARGES							
	Variable Distribution Rate	per	Volume	Gross Variable Revenue	Transform. Allowance Rate	Transform. Allowance kW's	Transform. Allowance \$'s	Net Variable Revenue
Residential	\$0.0188	kWh	255,687,351	4,806,922				4,806,922
General Service < 50 kW	\$0.0166	kWh	97,434,167	1,617,407				1,617,407
General Service > 50 to 999 kW	\$3.5617	kW	627,074	2,233,449	(\$0.60)	123,551	(74,131)	2,159,319
General Service 1000 to 4999 kW	\$1.2790	kW	337,859	432,122	(\$0.60)	313,038	(187,823)	244,299
Large Use	\$1.4610	kW	392,393	573,286	(\$0.60)	398,793	(239,276)	334,010
Unmetered Scattered Load	\$0.0426	kWh	2,238,935	95,379				95,379
Sentinel Lighting	\$22.6299	kW	1,452	32,859	(\$0.60)			32,859
Street Lighting	\$16.5512	kW	24,157	399,827	(\$0.60)			399,827
<b>TOTAL VARIABLE REVENUE</b>				<b>10,191,251</b>		<b>835,382</b>	<b>(501,229)</b>	<b>9,690,022</b>

Customer Class Name	2013 PROJECTED DISTRIBUTION REVENUE AT EXISTING RATES							
	Fixed Rate	Customers (Connections)	Fixed Charge Revenue	Variable Revenue	TOTAL	% Fixed Revenue	% Variable Revenue	% Total Revenue
Residential	\$13.8000	32,122	5,319,403	4,806,922	10,126,325	52.53%	47.47%	54.97%
General Service < 50 kW	\$23.7100	3,544	1,008,339	1,617,407	2,625,746	38.40%	61.60%	14.25%
General Service > 50 to 999 kW	\$142.0000	438	746,352	2,159,319	2,905,671	25.69%	74.31%	15.77%
General Service 1000 to 4999 kW	\$3,121.6300	12	449,515	244,299	693,814	64.79%	35.21%	3.77%
Large Use	\$24,427.6000	3	879,394	334,010	1,213,404	72.47%	27.53%	6.59%
Unmetered Scattered Load	\$15.6800	260	48,922	95,379	144,300	33.90%	66.10%	0.78%
Sentinel Lighting	\$3.4300	445	18,316	32,859	51,175	35.79%	64.21%	0.28%
Street Lighting	\$2.1400	10,140	260,395	399,827	660,223	39.44%	60.56%	3.58%
<b>DISTRIBUTION REVENUE</b>			<b>8,730,635</b>	<b>9,690,022</b>	<b>18,420,657</b>	<b>47.40%</b>	<b>52.60%</b>	<b>100.00%</b>

**Summary of Historical and Proposed Distribution Revenue**

	2009 Board Approved	2009 Actual	Variance 2009 Board Approved - 2009 Actual	2010 Actual	Variance 2010 - 2009 Actual	2011 Actual	Variance 2011 - 2010	2012 Bridge Year	Variance 2012 - 2011	2013 Test Year	Variance from 2012 Bridge Year
Residential	10,039,409	9,157,764	(881,645)	10,031,282	873,518	10,032,358	1,076	10,173,324	140,966	12,026,198	1,852,874
General Service < 50 kW	3,306,729	2,800,099	(506,630)	2,972,249	172,150	2,822,474	(149,775)	2,720,213	(102,261)	3,118,381	398,168
General Service > 50 to 999 kW	2,657,066	2,541,703	(115,363)	2,735,517	193,814	2,752,119	16,602	2,868,390	116,271	3,450,825	582,435
General Service 1000 to 4999 kW	823,088	811,958	(11,130)	815,189	3,231	695,136	(120,053)	696,571	1,435	871,603	175,032
Large Use	1,275,057	1,087,819	(187,238)	1,271,343	183,524	1,290,125	18,782	1,224,401	(65,724)	1,441,059	216,659
Unmetered Scattered Load	114,970	94,221	(20,749)	120,612	26,391	127,429	6,817	144,300	16,871	123,755	(20,545)
Sentinel Lighting	31,021	27,528	(3,493)	38,682	11,154	43,478	4,796	53,315	9,837	60,776	7,461
Street Lighting	413,272	360,409	(52,863)	465,903	105,494	544,686	78,783	660,958	116,272	784,092	123,133
<b>TOTAL Distribution Revenue</b>	<b>18,660,611</b>	<b>16,881,501</b>	<b>(1,779,110)</b>	<b>18,450,777</b>	<b>1,569,276</b>	<b>18,307,805</b>	<b>(142,972)</b>	<b>18,541,473</b>	<b>233,668</b>	<b>21,876,690</b>	<b>3,335,217</b>

1           **VARIANCE ANALYSIS ON DISTRIBUTION REVENUE**

2           Bluewater Power's total proposed Service Revenue Requirement is \$22,956,938. The  
3           amount of 'other revenue' is forecast at \$1,080,249 for a base revenue requirement of  
4           \$21,876,690. Below is a general description of the annual variances related to the  
5           change in distribution revenue.

6

7           **2009 Board Approved vs. 2009 Actual**

8           The variance of - \$1,779,110 is mainly related to the fact that the 2009 Board Approved  
9           rates did not come into effect until May 1, 2009 therefore one-third of 2009 revenue was  
10          at 'old rates' and, therefore, Bluewater Power only realized the increase in the 2009  
11          revenue requirement after May 2009.

12

13          **2010 Actual vs. 2009 Actual**

14          There was a positive variance of \$1,569,276 for the same reason as noted above; 2009  
15          only reflected a partial year at rebased rates whereas 2010 included a full twelve months  
16          at the rebased rates. Although there is a positive variance over 2009 actual results, the  
17          2010 revenue of \$18,450,777 was lower than the 2009 approved revenue of  
18          \$18,660,611. One of the main drivers of the negative variance throughout the IRM  
19          period related to an issue with the customer counts for the GS<50 rate class as  
20          described in Exhibit 3, Tab 1, Schedule 4. The 2009 COS Application included  
21          approximately 480 more customers in this rate class than actually existed. This issue  
22          impacted the fixed revenue, and Bluewater Power realized \$145,000 lower revenues per  
23          year as a result.

24

1    **2011 Actual vs. 2010 Actual**

2    There was a negative variance of \$142,972 mainly attributable to the loss of one  
3    customer in the Intermediate rate category that ceased operations in 2011 after going  
4    into receivership. The loss of this customer accounted for \$120,053 of the total  
5    variance.

6    **2012 Bridge Year vs. 2011 Actual**

7    There was a positive variance of \$233,666 mainly in the residential and GS>50 rate  
8    classes offset by a slight decrease in the Large Use rate class.

9    **2013 Test Year vs. 2012 Bridge Year**

10   The variance of \$3,335,217 is related to the fact that the 2013 Test Year values are  
11   calculated at the proposed rates, and the 2012 bridge year revenue is calculated at 2012  
12   rates. The variance of \$3.3 million is the excess revenue proposed in order to recover  
13   the revenue deficiency.

Exhibit 3: Revenue

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**Tab 2 (of 2): Other Revenue**

## OVERVIEW OF OTHER REVENUE

Other distribution revenue is any revenue that is distribution in nature but that is sourced from means other than distribution rates.

Bluewater Power has categorized the other distribution revenue into the following categories, which is detailed in the OEB Appendix 2-F at Exhibit 3, Tab 2, Schedule 1, Attachment 1:

1. Specific Service Charges
2. Late Payment Charges
3. Other Distribution Revenue
4. Other Income or Deductions
5. Investment Income

This schedule will detail the revenue associated with each category from 2009 Board Approved to 2013 Test Year, and a variance analysis with each. A summary of the Other Revenue is detailed in Table 1 below. The full amount of \$1,080,249 for the 2013 Test Year is a revenue offset, meaning this amount of revenue is projected to be recovered from sources other than distribution rates therefore the Service Revenue Requirement can be reduced by this amount to determine the remaining amount to be recovered through rates.

**Table 1 – Summary of Other Revenue**

	2009 Board Approved	2009 Actual	2010 Actual	2011 Actual	2012 CGAAP	2012 MIFRS	2013 MIFRS
Specific Service Charges	135,320	1,105,751	209,404	174,751	151,520	151,520	157,724
Late Payment Charges	225,433	285,586	230,017	244,953	240,000	240,000	232,694
Other Distribution Revenue	294,111	577,137	577,970	538,535	526,902	526,902	413,474
Other Income or Deductions	316,850	397,514	396,875	628,599	214,394	209,394	180,257
Investment Income	(243,636)	52,701	111,557	312,894	169,332	169,332	96,099
<b>Total</b>	<b>728,078</b>	<b>2,418,689</b>	<b>1,525,823</b>	<b>1,899,732</b>	<b>1,302,148</b>	<b>1,297,148</b>	<b>1,080,248</b>

1     **1. Specific Service Charges**

2     Bluewater Power charges fees for certain services. Exhibit 3, Tab 2, Schedule 1,  
3     Attachment 2 contains the trend table of other revenue from Service Charges from 2009  
4     to 2012. All of these fees are booked to Account 4235.

5  
6     Bluewater Power is proposing the continuation of Current Service Charges at current  
7     levels and the addition of two additional service charges shown below under the heading  
8     of Proposed Service Charges. The proposed charges are based on standards charges  
9     established by the OEB. The need to request the inclusion of these charges in Bluewater  
10    Power's list of Specific Service Charges is based on the projected need for the service in  
11    our territory. The list of the current and proposed service charges and the associates  
12    rates are detailed below:

13  
14    Current Service Charges

15	• Duplicate Invoices for previous billing	\$15.00
16	• Income tax letter	\$15.00
17	• Legal letter charge	\$15.00
18	• Account set up charge/change of occupancy	\$10.00
19	• Returned cheque charge (plus bank charges)	\$15.00
20	• Special meter reads	\$30.00
21	• Collection of account charge – no disconnection	\$30.00
22	• Disconnect/reconnect – at meter, regular hours	\$65.00
23	• Disconnect/reconnect – at meter after hours	\$185.00
24	• Microfit Monthly charge (per month – new rate)	\$5.40

25  
26    Proposed Service Charges

27	• Account history	\$15.00
28	• Meter Dispute test	\$30.00

29  
30    A detailed discussion of the two new proposed service charges is contained in Exhibit 8,  
31    Tab 3, Schedule 4.

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Table 2 below contains the annual revenue amounts booked to Account 4235, and the projected revenues for the 2012 Bridge Year and the 2013 Test Year.

**Table 2 – Specific Service Charge Revenue – Account 4235**

Account Description	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
Miscellaneous - Micro Fit Monthly Charge	-	-	-	-	1,500	1,500	5,184
Miscellaneous - Special Meter Reading	-	-	-	30	120	120	30
Miscellaneous - Meter Dispute Test (new 2013)	-	-	-	-	-	-	30
Miscellaneous - Duplicate Invoice for previous billing	-	-	-	-	-	-	150
Miscellaneous - NSF Cheques	9,120	6,992	5,941	5,822	6,200	6,200	6,255
Miscellaneous - Reconnect Nighttime	1,110	370	555	490	500	500	370
Miscellaneous - Reconnect Daytime	7,280	13,023	6,810	11,799	9,200	9,200	10,530
Miscellaneous - Account History (New 2013)	-	-	-	-	-	-	150
Miscellaneous - Income Tax Statements	1,935	3,645	3,798	3,452	4,000	4,000	3,630
Miscellaneous - Arrears/Lawyers Certificate	5,145	3,821	4,255	3,521	4,000	4,000	3,855
Miscellaneous - Collection Charges	60,900	84,445	60,742	82,354	74,000	74,000	75,840
Miscellaneous - Change of Occupancy Charge	50,350	47,361	47,596	48,154	48,000	48,000	47,700
Miscellaneous - Miscellaneous One Time		946,094	79,707	19,130	4,000	4,000	4,000
<b>TOTAL</b>	<b>135,840</b>	<b>1,105,751</b>	<b>209,404</b>	<b>174,751</b>	<b>151,520</b>	<b>151,520</b>	<b>157,724</b>
Year over Year variance		969,911	(896,347)	(34,653)	(23,231)	0	6,204

6

**Variance 2009 Actual – 2009 Board Approved - \$969,911**

There were two significant non-recurring revenue items that occurred in 2009 that were not forecast as follows:

Great West Life Refund	\$162,178
Customer Contract Payment	\$769,250
<u>Other Miscellaneous</u>	<u>\$ 14,666</u>
<b>Total</b>	<b>\$946,094</b>

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2 **Variance 2010 – 2009 Actual - (\$896,347)**

3 There were small decreases in the volumes related to NSF cheques, daytime  
4 reconnects and the amount received through collection charges in 2010. The primary  
5 driver of the decrease in 2010 reflects the loss of the two significant non-recurring  
6 revenue items noted above for 2009.

7 **Variance 2011 - 2010 – (\$34,653)**

8 There was a small increase in 2011 in the volumes related to daytime reconnections and  
9 collection charges. There was a decrease in the one-time items, with the total in 2011  
10 being \$19,130 and the total in 2010 being made-up of non-recurring items as follows:

11

12	Apprenticeship credit from College	\$15,046
13	One-time DRC recovery from bad debt write-offs	\$15,015
14	SR&ED tax credit	\$46,870
15	<u>Other miscellaneous</u>	<u>\$ 2,776</u>
16	Total	\$79,707

17

18 **Other Variances**

19 The variance from 2011 to 2012 is projected to be (\$23,231) related to volume changes  
20 for the service charges. The variance 2012 to 2013 is projected to be \$6,204 which is  
21 mainly attributable to the increase in the number of monthly service charges related to  
22 the increase of microFIT contracts.

23

1     **2. Late Payment Charges**

2     Bluewater Power imposes the following late payment charges to customer accounts  
 3     when the total amount of the bill has not been paid within the time outlined in the  
 4     Distribution System Code Section 2.7:

5

6	Late payment – per month	1.50%
7	Late payment – per annum	19.56%

8

9     The amount assessed as late payment charges over the last four years has been  
 10    relatively stable. The only notable variance is the 2009 total, which relates to the fact that  
 11    late payment revenue associated with water billing was improperly booked to account  
 12    4225 for that year only. In 2010 and the first three months of 2011, the revenue  
 13    associated with water billing was recorded in Account 4375 as it was non-utility related.  
 14    As of April 1, 2011, the water billing function is now performed by BPSC and the late  
 15    payment amounts are allocated to BPSC.

16

17                   **Table 3 – Late Payment Charge Revenue**

Account Description	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
Late Payment Charges - Water		62,475	-	-	-	-	-
Late Payment Charges	225,433	223,111	230,017	244,953	240,000	240,000	232,694
<b>Total</b>	<b>225,433</b>	<b>285,586</b>	<b>230,017</b>	<b>244,953</b>	<b>240,000</b>	<b>240,000</b>	<b>232,694</b>
Year-over-year variance		60,153	(55,569)	14,936	(4,953)	0	(7,306)

18

19

20     **3. Other Distribution Revenue**

21     Other distribution revenue includes Retailer Service Charges which include a standard  
 22     set-up charge for new retailers, a monthly fixed charge per retailer, a monthly variable  
 23     charge per retail customer; a standard distributor consolidated billing charge per retail  
 24     customer, a service transaction request fee and a service transaction processing fee.

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**Table 4 – Retail Service Revenue**

	OEB Account	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 IFRS
Retail Service Revenue (includes monthly charges, variable charges)	4082	68,097	60,838	56,983	48,541	50,000	50,000	46,297
Service Transaction Request revenue	4084	5,092	1,746	3,756	3,805	2,000	2,000	2,037
<b>Total</b>		<b>73,189</b>	<b>62,584</b>	<b>60,739</b>	<b>52,346</b>	<b>52,000</b>	<b>52,000</b>	<b>48,334</b>
Year over Year variance			(10,605)	(1,845)	(8,393)	(346)	0	(3,666)

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The largest variance in Table 4 is a decrease of \$10,605 from 2009 Actual compared to 2009 Board Approved which is the result of a decline in the number of retail customers. Bluewater Power has projected a further decrease in the number of retail customers for 2013 which results in a slightly lower revenue projection from these charges.

**Table 5– Account 4210 – Rent from Electric Property**

	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
Vehicle rental revenue		80,916	85,454	46,642	44,677	44,677	50,176
Building rental revenue		22,400	22,800	22,800	22,800	22,800	17,200
Return on invested capital		62,244	57,456	57,456	56,077	56,077	55,402
Pole rental revenue	136,320	142,269	147,819	152,679	152,400	152,400	151,967
<b>Total</b>	<b>136,320</b>	<b>307,829</b>	<b>313,529</b>	<b>279,577</b>	<b>275,954</b>	<b>275,954</b>	<b>274,745</b>
Year over Year variance		171,509	5,700	(33,952)	(3,623)		(1,209)

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Other distribution revenue amounts booked to account 4210 - "Rent from Electric Property" includes pole rental revenue, vehicle rental revenue, building rental revenue and revenue received from Affiliates in relation to a return on invested capital on vehicles and computer software. The 2009 Board Approved values only include the pole rental revenue. The other items were booked to account 4325 in the 2009 COS Application, however; since 2009 the vehicle rental revenue, building rental revenue and return on invested capital amount are booked to account 4210.

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There was a decrease in 2011 related to the sale of a fully depreciated large bucket truck to an affiliate. The sale reduced the demand from the affiliate for vehicles to rent from Bluewater Power.

**Table 6 – Account 4086 – SSS Administration Charge Revenue**

	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
SSS Administration Fee Revenue	84,603	89,114	90,530	93,861	93,000	93,000	90,395
Year over Year variance		4,511	1,416	3,331	(861)	0	(2,605)

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Other distribution revenue also includes SSS Administration Fees which is a charge of \$0.25 per customer per month for all customers that receive their electricity commodity from Bluewater Power. The revenue was previously booked to account 4080, however recent changes to the Uniform System of Accounts (January 2012), now have this revenue booked to a new Account 4086. There is no material annual variance for this account.

**Table 7 – Account 4220 – Other Electric Revenue**

	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013MIFRS
Other Electric Revenue	0	117,610	113,172	112,751	105,948	105,948	-
Year over Year variance		117,610	(4,438)	(421)	(6,803)	0	(105,948)

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Finally, other distribution revenue includes Account 4220 – “Other Electric Revenues”. This account is to “include revenues derived from electric operations not included in any of the foregoing accounts”. Bluewater Power used this account to record management fee revenue realized from Affiliates from 2009 to 2012. After analyzing the management fees for the 2013 Test Year, and undergoing a Transfer Pricing Study (as discussed in Exhibit 4, Tab 5, Schedule 1, Attachment 2), it was determined that this offset was more accurately recognized as an OM&A reduction to management salaries rather than as revenue. The impact on the 2013 Test Year Revenue Requirement is the same using either accounting method. The amount offset to OM&A in 2013 for Management, as well

1 as for charges related to Finance, IT and Human Resources is \$186,938, plus an offset  
 2 to Directors fees in the amount of \$8,056. The resulting negative variance of \$105,948  
 3 reflects the loss of the revenue offsets in 2013, but that loss is more than compensated  
 4 by the reduction to OM&A.

5

6 **4. Other Income and Deductions**

7 Other Income and Deductions include revenue booked to account 4325/4330 Revenue  
 8 and Expenses from Jobbing, Account 4355/4360 Gain and Loss on Disposal, and  
 9 Account 4390 – Miscellaneous non-operating income which is related to sale of scrap  
 10 metal.

11

12 Table 8 details the net revenue associated with billable jobs that are distribution related.  
 13 The types of jobs would include trenching for service wire, revenue associated with  
 14 connection of renewable generation, upgrades driven by customers or relocates due to a  
 15 road widening requested by a road authority, etc.

16

17

**Table 8 – Account 4325/4330 – Net Revenue from Jobbing**

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	OEB Account	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
Management Fees and Rent Earned from Affiliates	4325	134,310						
Revenues from Jobbing	4325	226,774	597,536	1,655,256	1,475,205	757,575	757,575	641,026
Expenses from Jobbing	4330	(92,578)	(372,896)	(1,304,982)	(896,293)	(568,181)	(568,181)	(480,769)
<b>Net Revenue</b>		<b>268,506</b>	<b>224,640</b>	<b>350,274</b>	<b>578,912</b>	<b>189,394</b>	<b>189,394</b>	<b>160,257</b>
Year over Year variance			(43,866)	294,764	228,638	(389,518)	0	(29,137)

19 **Variance 2009 to 2009 Board Approved**

20 As noted in the explanation for Table 5, Bluewater Power now records rent for building  
 21 space and vehicle rental revenue, as well as return on invested capital in Account 4210;  
 22 however, the 2009 Board Approved budget included this revenue in Account 4325.

1 Accordingly, there is not a negative variance of \$134,310 as these items contribute to a  
2 positive variance of \$171,509 in Account 4210 as demonstrated in Table 5 above.

3

4 The other revenue and costs booked to these accounts relates to one-time billable work  
5 which is unpredictable and therefore difficult to forecast. The revenue and expense in  
6 2009 Actuals reflect the unexpected revenue due to the connection of solar farms under  
7 the OPA's RESOP program.

8 **Variance 2010 to 2009 - \$294,764**

9 This variance is due to the one-time billable work related to connecting new solar and  
10 landfill gas generation facilities to Bluewater Power's distribution network. Although  
11 there was some level of work in 2009, the demand in 2010 was significantly higher. The  
12 work continued into 2011 as discussed next.

13

14 **Variance 2011 to 2010 - \$228,638**

15 This variance is also due to the same generation projects that were started in 2010 and  
16 completed in 2011 as discussed in the previous paragraph. Although the revenue was  
17 higher in 2010, the costs in 2011 were lower as the invoices issued in 2011 also  
18 included a true-up from prior years.

19

20 **Variance 2012 to 2011 - (\$389,518)**

21 This negative variance is due to 2012 being more reflective of typical recurring on-  
22 demand billable work. There are no one-time billable projects expected in 2012.

23

24 **Variance 2013 to 2012 - (\$29,137)**

25 This negative variance is due to the lower than anticipated billable work experienced in  
26 2012. The lower level of work reflects the dampened demand due to the economy and

1 the near saturation of renewal energy in our service territory. As a result, the 2013 test  
 2 year budget has been reduced slightly.

3

4 The other Income and Deductions accounts also include profit and loss related to  
 5 disposal of assets related to Accounts 4355/4360, and the sale of scrap metal which is  
 6 booked to account 4390. Table 9 details the annual amounts recorded to these  
 7 accounts. The 2009 net gain of approximately \$152,000 (Accounts 4355/4360) was  
 8 related to the gain on sale of the civil fleet to an affiliate upon the creation of the affiliate  
 9 in 2009 as discussed in our 2009 COS Application.

10

11 It should be noted that MIFRS directs that gains on retirement of capital assets be  
 12 booked to account 4357 – Gain from Retirement of Utility and Other Property which is an  
 13 adjustment to depreciation expense for ratemaking purposes. See discussion of  
 14 Bluewater Power’s Asset Retirement Policy at Exhibit 2, Tab 2, Schedule 3. As a result,  
 15 there are no amounts included in these revenue offset accounts for 2012 MIFRS and  
 16 2013 MIFRS. An amount of \$10,000 has been budgeted for the 2013 Test Year relating  
 17 to gains from retirements and this amount has been applied as a reduction to the 2013  
 18 Test Year depreciation expense as shown in Appendix 2-CH ‘Depreciation and  
 19 Amortization Expense’ at Exhibit 4, Tab 7, Schedule 1.

20

21 **Table 9 – Accounts 4355/4360 and 4390 – Gain and Loss on Assets and Material**

	OEB Account	2009 Board Approved	2009	2010	2011	2012	2012 MIFRS	2013 MIFRS
Gain on disposition	4355	15,026	358,539	20,735	23,293	5,000	0	0
Loss on disposition	4360		(206,378)					
Misc. non-operating income	4390	33,318		25,866	26,394	20,000	20,000	20,000
<b>Total</b>		<b>48,344</b>	<b>152,161</b>	<b>46,601</b>	<b>49,687</b>	<b>25,000</b>	<b>20,000</b>	<b>20,000</b>
Year over year variance			103,817	(105,560)	3,086	(24,687)	(5,000)	-

22

23

1      **5. Interest and Dividend Income**

2      Account 4405 is used to record interest revenues on securities, notes, loans, deposits,  
 3      and all other interest bearing assets. Bluewater Power does not own any shares of any  
 4      corporations and therefore has no dividend income. Table 10 details the amounts and  
 5      nature of interest income, which includes carrying charges income.

6  
 7

**Table 10 – Interest and Dividend Income**

	OEB Account	2009 Board Approved	2009	2010	2011	2012 CGAAP	2012 MIFRS	2013 MIFRS
Interest on advances to affiliates	4405		15,662	22,554	9,832	-	-	-
Interest on bank accounts	4405		37,039	22,146	25,934	23,610	23,610	43,610
Interest on promissory note receivable	4405		-	-	75,902	84,955	84,955	-
Carrying charges income	4405	(243,636)	-	66,857	201,226	60,767	60,767	52,489
<b>Total</b>	<b>4405</b>	<b>(243,636)</b>	<b>52,701</b>	<b>111,557</b>	<b>312,894</b>	<b>169,332</b>	<b>169,332</b>	<b>96,099</b>
Year over year variance			296,337	58,856	201,337	(143,562)	-	(73,233)

8

9      **Variance 2009 to 2009 Board Approved - \$296,337**

10      The only amount booked to Account 4405 in the 2009 COS Application related to the  
 11      expected carrying charges at that time. The amount included as a debit in this account  
 12      was not specifically approved as part of the settlement with Intervenor, as approved by  
 13      the Board. During the year 2009 and beyond, no debits were actually booked to  
 14      Account 4405 in relation to Carrying Charges as the OEB direction that followed  
 15      provided greater clarity that Carry Charge debits should not be booked to this account.

16

17      With respect to interest income, there was no amount forecast for interest on bank  
 18      accounts in the 2009 COS Application as we were expected to be in a borrowing  
 19      position.

1 **Variance 2010 to 2009 - \$58,856**

2 This variance is due to our accounting for carrying charges. Bluewater Power had  
3 recorded all carrying charges income or expense, to Account 6035 in 2009. In 2010,  
4 carrying charges income was separated into 'income' being recorded to Account 4405,  
5 and 'expense' being recorded to Account 6035.

6

7 **Variance 2011 to 2010 - \$201,337**

8 This variance is due to a significant increase in carrying charges income relating to  
9 smart meters as well as interest from a new promissory note receivable with an affiliate.

10

11 **Variance 2012 to 2011 – (\$143,562)**

12

13 This variance is due to a significant decrease in carrying charges income. Upon filing  
14 our smart meter rate application in 2012, it was determined that only certain carrying  
15 charges would be allowed for recovery.

16

17 **Variance 2013 to 2012 – (\$73,233)**

18

19 This variance is due to the promissory note receivable with an affiliate being repaid prior  
20 to year end of 2012. This issue is discussed in the section on Affiliate Transactions  
21 included as Exhibit 1, Tab 2, Schedule 8.

22

1

2     **6. Accounts 4375/4380 – Revenues/Expenses of Non Rate-Regulated**  
3     **Operations**

4     Bluewater Power records revenue and expenses related to the OPA CDM programs to  
5     accounts 4375/4380. This amount is related to the salaries and related expenses that  
6     are removed from OM&A expenses and are allocated to the OPA accounts. The  
7     revenue and expenses relating to streetlight installations are also booked to Accounts  
8     4375/4380. Prior to 2012, revenues associated with water billing were booked to these  
9     accounts. However, as disclosed in Exhibit 1, Tab 2, Schedule 8, the Services  
10    Company now assumes responsibility for water billing and street light installation work.

### Appendix 2-F Other Operating Revenue

USoA #	USoA Description	2009 Actual	2010 Actual	2011 Actual <sup>2</sup>	2011 Actual <sup>2</sup>	Bridge Year <sup>3</sup>	Bridge Year <sup>3</sup>	Test Year
		CGAAP	CGAAP	CGAAP		2012 CGAAP	2012 MIFRS	2013 MIFRS
4235	Specific Service Charges	\$ 1,105,751	\$ 209,404	\$ 174,751		\$ 151,520	\$ 151,520	\$ 157,724
4225	Late Payment Charges	\$ 285,586	\$ 230,017	\$ 244,953		\$ 240,000	\$ 240,000	\$ 232,694
4082	Retail Services Revenues	\$ 60,838	\$ 56,983	\$ 48,541		\$ 50,000	\$ 50,000	\$ 46,297
4086	Distribution Service Revenue	\$ 89,114	\$ 90,530	\$ 93,861		\$ 93,000	\$ 93,000	\$ 90,395
4084	STR Revenue	\$ 1,746	\$ 3,756	\$ 3,805		\$ 2,000	\$ 2,000	\$ 2,037
4210	Rent from Electric property	\$ 307,829	\$ 313,529	\$ 279,577		\$ 275,954	\$ 275,954	\$ 274,745
4220	Other Electric Revenue	\$ 117,610	\$ 113,172	\$ 112,751		\$ 105,948	\$ 105,948	\$ -
4325	Revenues from Jobbing	\$ 597,536	\$ 1,655,256	\$ 1,475,205		\$ 757,575	\$ 757,575	\$ 641,026
4330	Expenses from Jobbing	-\$ 372,896	-\$ 1,304,982	-\$ 896,293		-\$ 568,181	-\$ 568,181	-\$ 480,769
4355	Gain on disposition	\$ 358,539	\$ 20,735	\$ 23,293		\$ 5,000	\$ -	\$ -
4360	Loss on disposition	-\$ 206,378						
4390	Misc. non-operating income	\$ 20,713	\$ 25,866	\$ 26,394		\$ 20,000	\$ 20,000	\$ 20,000
4405	Interest and dividend income	\$ 52,701	\$ 111,557	\$ 312,894		\$ 169,332	\$ 169,332	\$ 96,099
<b>Specific Service Charges</b>		\$ 1,105,751	\$ 209,404	\$ 174,751	\$ -	\$ 151,520	\$ 151,520	\$ 157,724
<b>Late Payment Charges</b>		\$ 285,586	\$ 230,017	\$ 244,953	\$ -	\$ 240,000	\$ 240,000	\$ 232,694
<b>Other Distribution Revenues:</b>		\$ 577,137	\$ 577,970	\$ 538,535	\$ -	\$ 526,902	\$ 526,902	\$ 413,474
<b>Other Income or Deductions</b>		\$ 397,514	\$ 396,875	\$ 628,599	\$ -	\$ 214,394	\$ 209,394	\$ 180,257
<b>Investment Income</b>		\$ 52,701	\$ 111,557	\$ 312,894	\$ -	\$ 169,332	\$ 169,332	\$ 96,099
<b>Total</b>		\$ 2,418,689	\$ 1,525,823	\$ 1,899,732	\$ -	\$ 1,302,148	\$ 1,297,148	\$ 1,080,248

Description	Account(s)
Specific Service Charges:	4235
Late Payment Charges:	4225
Other Distribution Revenues:	4080, 4082, 4084, 4090, 4205, 4210, 4215, 4220, 4240, 4245
Other Income and Expenses:	4305, 4310, 4315, 4320, 4325, 4330, 4335, 4340, 4345, 4350, 4355, 4360, 4365, 4370, 4375, 4380, 4385, 4390, 4395, 4398, 4405, 4415

**Note:** Add all applicable accounts listed above to the table and include all relevant information.  
 The above table assumes adoption of MIFRS as of January 1, 2013. If the adoption year differs, please adjust the table accordingly.

#### Account Breakdown Details

For each "Other Operating Revenue" and "Other Income or Deductions" Account, a detailed breakdown of the account components is required. See the example below for Account 4405, Interest and Dividend Income.

#### Account 4405 - Interest and Dividend Income

Reporting Basis	2009 Actual	2010 Actual	2011 Actual <sup>2</sup>	2011 Actual <sup>2</sup>	Bridge Year	Bridge Year	Test Year
	CGAAP	CGAAP	CGAAP		CGAAP	MIFRS	MIFRS
Interest on advances to affiliates	\$ 15,662	\$ 22,554	\$ 9,832				
Interest on bank accounts	\$ 37,039	\$ 22,146	\$ 25,934		\$ 23,610	\$ 23,610	\$ 43,610
Interest on promissory note receivable			\$ 75,902		\$ 84,955	\$ 84,955	
Carrying Charges Income		\$ 66,857	\$ 201,226		\$ 60,767	\$ 60,767	\$ 52,489
<b>Total</b>	\$ 52,701	\$ 111,557	\$ 312,894	\$ -	\$ 169,332	\$ 169,332	\$ 96,099

**Notes:**  
 1 List and specify any other interest revenue

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2009 Approved		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	338,412	\$0.25	84,603
Duplicate invoices for previous billing	4235			
Income tax letter	4235	129	\$15.00	1,935
Account history	4235			
Returned Cheque charge (plus bank charges)	4235	608	\$15.00	9,120
Legal letter charge	4235	343	\$15.00	5,145
Account set up charge / change of occupancy charge	4235	5,035	\$10.00	50,350
Special Meter reads	4235			
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235			
Late Payment - per month	4225		1.50%	225,433
Collection of account charge -- no disconnection	4235	2,030	\$30.00	60,900
Disconnect/Reconnect at meter -- during regular hours	4235	112	\$65.00	7,280
Disconnect/Reconnect at meter -- after regular hours	4235	6	\$185.00	1,110
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,099	\$22.35	136,320
Retailer Service Agreement -- standard charge	4082			
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	133	\$20.00	2,660
Retailer Service Agreement -- monthly variable charge (per customer)	4082	81,846	\$0.50	40,923
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	81,792	\$0.30	24,538
Retailer-Consolidated Billing -- monthly credit (per customer)	4082		\$0.30	
Service Transaction Request -- request fee (per request)	4084	8,955	\$0.25	2,239
Service Transaction Request -- processing fee (per processed request)	4084	5,705	\$0.50	2,853
<b>TOTAL</b>				<b>655,408</b>

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2009 Actual		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	356,456	\$0.25	89,114
Duplicate invoices for previous billing	4235			
Income tax letter	4235	243	\$15.00	3,645
Account history	4235			
Returned Cheque charge (plus bank charges)	4235	466	\$15.00	6,992
Legal letter charge	4235	255	\$15.00	3,821
Account set up charge / change of occupancy charge	4235	3,157	\$15.00	47,361
Special Meter reads	4235			
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235			
Late Payment - per month	4225		1.50%	223,111
Collection of account charge -- no disconnection	4235	2,815	\$30.00	84,445
Disconnect/Reconnect at meter -- during regular hours	4235	200	\$65.00	13,023
Disconnect/Reconnect at meter -- after regular hours	4235	2	\$185.00	370
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,366	\$22.35	142,269
Retailer Service Agreement -- standard charge	4082			
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	172	\$20.00	3,447
Retailer Service Agreement -- monthly variable charge (per customer)	4082	55,501	\$0.50	27,751
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	50,000	\$0.30	15,000
Retailer-Consolidated Billing -- monthly credit (per customer)	4082			
Service Transaction Request -- request fee (per request)	4084	3,432	\$0.25	858
Service Transaction Request -- processing fee (per processed request)	4084	2,358	\$0.50	1,179
<b>TOTAL</b>				<b>662,386</b>

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2010 Actual		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	362,120	\$0.25	90,530
Duplicate invoices for previous billing	4235			
Income tax letter	4235	129	\$15.00	3,798
Account history	4235			
Returned Cheque charge (plus bank charges)	4235	608	\$15.00	5,941
Legal letter charge	4235	343	\$15.00	4,255
Account set up charge / change of occupancy charge	4235	5,035	\$10.00	47,596
Special Meter reads	4235			
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235			
Late Payment - per month	4225		1.50%	230,017
Collection of account charge -- no disconnection	4235	2,030	\$30.00	60,742
Disconnect/Reconnect at meter -- during regular hours	4235	112	\$65.00	6,810
Disconnect/Reconnect at meter -- after regular hours	4235	6	\$185.00	555
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,614	\$22.35	147,819
Retailer Service Agreement -- standard charge	4082	1	\$100.00	100
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	168	\$20.00	3,360
Retailer Service Agreement -- monthly variable charge (per customer)	4082	66,679	\$0.50	33,340
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	66,680	\$0.30	20,004
Retailer-Consolidated Billing -- monthly credit (per customer)	4082			
Service Transaction Request -- request fee (per request)	4084	4,542	\$0.25	1,136
Service Transaction Request -- processing fee (per processed request)	4084	3,217	\$0.50	1,609
<b>TOTAL</b>				<b>657,611</b>

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2011 Actual		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	375,444	\$0.25	93,861
Duplicate invoices for previous billing	4235			
Income tax letter	4235	243	\$15.00	3,452
Account history	4235			
Returned Cheque charge (plus bank charges)	4235	466	\$15.00	5,822
Legal letter charge	4235	255	\$15.00	3,521
Account set up charge / change of occupancy charge	4235	4,736	\$10.00	48,154
Special Meter reads	4235			
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235			
Late Payment - per month	4225		1.50%	244,953
Collection of account charge -- no disconnection	4235	2,815	\$30.00	82,354
Disconnect/Reconnect at meter -- during regular hours	4235	200	\$65.00	11,799
Disconnect/Reconnect at meter -- after regular hours	4235	2	\$185.00	490
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,831	\$22.35	152,679
Retailer Service Agreement -- standard charge	4082	2	\$100.00	200
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	197	\$20.00	3,940
Retailer Service Agreement -- monthly variable charge (per customer)	4082	55,499	\$0.50	27,750
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	55,500	\$0.30	16,650
Retailer-Consolidated Billing -- monthly credit (per customer)	4082			
Service Transaction Request -- request fee (per request)	4084	2,498	\$0.25	625
Service Transaction Request -- processing fee (per processed request)	4084	1,994	\$0.50	997
<b>TOTAL</b>				<b>697,246</b>

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2012 Projection		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	372,000	\$0.25	93,000
Duplicate invoices for previous billing	4235			
Income tax letter	4235	267	\$15.00	4,000
Account history	4235			
Returned Cheque charge (plus bank charges)	4235	413	\$15.00	6,200
Legal letter charge	4235	257	\$15.00	4,000
Account set up charge / change of occupancy charge	4235	4,800	\$10.00	48,000
Special Meter reads	4235			
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235			
Late Payment - per month	4225		1.50%	240,000
Collection of account charge -- no disconnection	4235	2,528	\$30.00	74,000
Disconnect/Reconnect at meter -- during regular hours	4235	162	\$65.00	9,200
Disconnect/Reconnect at meter -- after regular hours	4235	2	\$185.00	500
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,819	\$22.35	152,400
Retailer Service Agreement -- standard charge	4082	1	\$100.00	100
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	160	\$20.00	3,200
Retailer Service Agreement -- monthly variable charge (per customer)	4082	59,400	\$0.50	29,700
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	56,667	\$0.30	17,000
Retailer-Consolidated Billing -- monthly credit (per customer)	4082			
Service Transaction Request -- request fee (per request)	4084	3,600	\$0.25	900
Service Transaction Request -- processing fee (per processed request)	4084	2,200	\$0.50	1,100
<b>TOTAL</b>				<b>683,300</b>

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**Trend Table of Other Revenue from Service Charges**

Service	USA #	2013 Projection (proposed rates)		
		Volume	Rate	Revenue
Standard Supply Service -- Administrative Charge	4086	361,580	\$0.25	90,395
Duplicate invoices for previous billing	4235	10	\$15.00	150
Income tax letter	4235	242	\$15.00	3,630
Account history	4235	10	\$15.00	150
Returned Cheque charge (plus bank charges)	4235	417	\$15.00	6,255
Legal letter charge	4235	257	\$15.00	3,855
Account set up charge / change of occupancy charge	4235	4,770	\$10.00	47,700
Special Meter reads	4235	1	\$30.00	30
Meter dispute charge plus Measurement Canada fees (if meter found cor	4235	1	\$30.00	30
Late Payment - per month	4225		1.50%	232,694
Collection of account charge -- no disconnection	4235	2,528	\$30.00	75,840
Disconnect/Reconnect at meter -- during regular hours	4235	162	\$65.00	10,530
Disconnect/Reconnect at meter -- after regular hours	4235	2	\$185.00	370
Specific Charge for Access to the Power Poles -- per pole/year	4210	6,819	\$22.35	151,967
Retailer Service Agreement -- standard charge	4082	1	\$100.00	100
Retailer Service Agreement -- monthly fixed charge (per retailer)	4082	172	\$20.00	3,447
Retailer Service Agreement -- monthly variable charge (per customer)	4082	55,501	\$0.50	27,751
Distributor-Consolidated Billing -- monthly charge (per customer)	4082	50,000	\$0.30	15,000
Retailer-Consolidated Billing -- monthly credit (per customer)	4082			
Service Transaction Request -- request fee (per request)	4084	3,432	\$0.25	858
Service Transaction Request -- processing fee (per processed request)	4084	2,358	\$0.50	1,179
<b>TOTAL</b>				<b>671,931</b>