



**Lakefront
Utilities
Inc.**

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Board Secretary
Ontario Energy Board
2300 Yonge Street
27th Floor
Toronto, ON M4P 1E4
November 15, 2012

Dear Ms. Walli,

Re: Lakefront Utilities Inc. Interrogatory Responses to OEB in the proceeding EB-2012-0144

Lakefront Utilities Inc. (LUI) hereby submits its responses to OEB Interrogatories to the Ontario Energy Board ("the Board")

Please find attached to this cover letter:

- 2 paper copies of the Interrogatory Responses to OEB in proceeding EB-2012-0144

A copy of the Interrogatory Responses to OEB has also been filed through the Web Portal and 1 paper copy and electronic copies were forwarded to all intervenors in EB-2012-0144.

In the event of any additional information, questions or concerns, please contact Jennifer Theoret, Director, Finance and Compliance, at jtheoret@lusi.on.ca or (905) 372-2193.

Sincerely,

{Original Signed}

Jennifer Theoret, CA

Director, Finance and Compliance

Lakefront Utilities Inc.

Board Staff Interrogatories

2013 Electricity Distribution Rates

Lakefront Utilities Inc.

EB-2012-0144

RTSR Workform

1. Ref: 2013 IRM3 RTSR Work form, sheet 4

a) Please confirm that the amounts entered into the columns “Non-Loss Adjusted Metered kWh” and “Non-Loss Adjusted Metered kW” have not been Adjusted by LUI’s Board-approved loss factor.

LUI RESPONSE:

The amounts entered in sheet 4 of the RTSR Work form columns “Non-Loss Adjusted Metered kWh” and “Non-Loss Adjusted Metered kW” have not been adjusted by the LUI’s board approved loss factor. The value is then calculated into the loss adjusted kWh and kW in the columns adjacent. With exception to the Unmetered Scattered Load correction.

2. Ref: 2013 IRM3 RTSR Work form, sheet 4

Ref: LUI RRR 2.1.5 Filing, December 31, 2011

Board staff's RRR records show a billed kWh amount for Unmetered Scattered Load of 658,820. LUI has entered an amount of 694,462.

a) Please confirm the billed kWh for this rate class.

LUI RESPONSE:

LUI recognizes that the Unmetered Scattered Load of 658,820 was inputted into the Non-Loss Adjusted Metered kWh column and further calculated the loss onto the loss adjusted figure. This has been adjusted to show the figure of 658, 820 for the Loss adjusted amount.

Rate Class	Unit	Non-Loss Adjusted Metered kWh	Non-Loss Adjusted Metered kW	Applicable Loss Factor	Load Factor	Loss Adjusted Billed kWh	Billed kW
Residential	kWh	49,392,492		1.0565		52,183,168	-
General Service Less Than 50 kW	kWh	33,673,957		1.0565		35,576,536	-
General Service 50 to 2,999 kW	kW	119,990,243	300,133		54.80%	119,990,243	300,133
General Service 3,000 to 4,999 kW - Intermediate Use	kW	23,306,923	42,337		75.45%	23,306,923	42,337
Unmetered Scattered Load	kWh	623,587		1.0565		658,820	-
Sentinel Lighting	kW	29,766	81		50.37%	29,766	81
Street Lighting	kW	1,156,274	3,319		47.75%	1,156,274	3,319

b) If this is an error, Board staff will make the necessary correction to the workform.

LUI RESPONSE:

LUI requests the Board Staff to input a non loss adjusted amount of 623 587 kWh for the Unmetered Scattered Load class and the model will calculate the amount of 658, 820 kWh in the loss adjusted billed kWh.

IRM Rate Generator

3. Ref: 2013 IRM3 Rate Generator, sheet 4

Ref: EB-2011-0250 Final Rate Order

Board staff notes that the current approved tariff for LUI shows a distribution volumetric rate for Sentinel Lighting of \$11.5631. LUI has entered a rate of \$11.56 at sheet 4 of the IRM3 Rate generator.

a) Please confirm the current approved distribution volumetric rate for the Sentinel Lighting rate class.

LUI RESPONSE:

LUI recognizes that in the Rate Generator the Sentinel Lighting class rate is \$11.5631 and appears in the 2013 IRM Rate Generator V2.3 Model as \$11.56 as stated in the question above. This is due to the formatting in the Board's Model, and rounds to the nearest two decimal places. LUI's Final Rate Order from the Cost of Service 2012 shows that the rate is in fact \$11.5631/kW.

Please see figure 3-1 below where LUI has verified that in the cell and formula bar the rate inputted is \$11.5631, and the figure is formatted to appear in two decimal places. The IRM Rate Generator is locked by the board from formatting by the user.

FIGURE 3-1 “4. CURRENT TARRIFF SCHEDULE” RATE GENERATOR

2013_IRM_Rate_Generator_V2.3_201274upload - Microsoft Excel

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Font: Arial, 11, Bold, Italic, Underline, Paragraph, Styles

Conditional Formatting, Styles

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11.5631

It should be noted that this schedule does not list any charges, assessments or credits that are required by law to be invoiced by a distributor and that are not subject to Board approval, such as the Debt Retirement Charge, the Global Adjustment, the Ontario Clean Energy Benefit and the HST.

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MONTHLY RATES AND CHARGES - Delivery Component (If applicable, Effective Date MUST be included in rate description)

Service Charge (per connection)	\$	4.70
Distribution Volumetric Rate	\$	11.56
Low Voltage Service Rate	\$/KW	0.3771
Retail Transmission Rate - Network Service Rate	\$/KW	1.5563
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/KW	1.2486

Ready | 1. Information Sheet | 2. Table of Contents | 3. Rate Class Selection | 4. Current Tariff Schedule | 5. 2013 Continuity Schedule | 6. Billing Det. for Def-var | 7. Allocating Def-var Balances | 8. Calculation of Def-var RR | 9. Rev2Cost_GDPIPI | 10. CHPI | 11. CHPI | 115%

b) If this is an error, Board staff will make the necessary correction to the workform.

LUI RESPONSE:

LUI does not see an error in the IRM Rate Generator V2.3 and does not see any correction necessary by Board Staff, the cell should be formatted to expand two decimal places.

Deferral and Variance Account Balances

4. Ref: 2013 IRM3 Rate Generator, sheet 5

Ref: LUI RRR 2.1.7 Filing, December 31, 2011

Board staff has identified numerous discrepancies between the Group 1 RRR Balances as entered into sheet 5 of the rate generator model and the RRR Information in Board staff's records, as follows:

Variance Account LUI Submission RRR Filing

1550 (114,199) (109,793)

1580 (552,892) (502,187)

1584 35,671 49,787

1586 30,922 47,484

1588 (492,321) (360,048)

1595 273,880 228,481

a) Please provide an explanation for these discrepancies or correct the RRR balances entered into column CG of sheet 5.

LUI RESPONSE:

The explanation for the discrepancies between the rate generator and the RRR filing is that the RRR balances that LUI used to enter into column 'CG ' was the balances for the year end 2.1.1 which does not include the unbilled entries at the end of the year as would the 2.1.7. LUI has corrected this error in the Rate Generator spreadsheet and used the column BS to input the unbilled revenues for the 2011 year end process.

LUI has confirmed that the 2013 Continuity schedule balances to the 2.1.7 filing now.

Copy of Copy of 2013_IRM_Rate_Generator_V2.3OEB4C - Microsoft Excel

	B	C	D	CG	CH	CI	CJ	CK	CL	CM	CN	CO	CP	CQ	CR	CS	CT	CU	CV
19				2.1.7 RRR															
20																			
21		Account Descriptions	Account Number	As of Dec 31-11	Variance RRR vs. 2011 Balance (Principal + Interest)														
22																			
23		Group 1 Accounts																	
24		LV Variance Account	1550	(109,793)	(1)														
25		RSVA - Wholesale Market Service Charge	1580	(502,187)	71														
26		RSVA - Retail Transmission Network Charge	1584	49,787	(1)														
27		RSVA - Retail Transmission Connection Charge	1586	47,484	26														
28		RSVA - Power (excluding Global Adjustment)	1588	367,220	4														
29		RSVA - Power - Sub-account - Global Adjustment	1588	(727,268)	1														
30		Recovery of Regulatory Asset Balances	1590	0	0														
31		Disposition and Recovery/Refund of Regulatory Balances (2008) ¹	1595	0	0														
32		Disposition and Recovery/Refund of Regulatory Balances (2009) ¹	1595	(219,518)	(0)														
33		Disposition and Recovery/Refund of Regulatory Balances (2010) ¹	1595	447,999	0														
34																			
35		Group 1 Sub-Total (including Account 1588 - Global Adjustment)		(546,276)	101														
36		Group 1 Sub-Total (excluding Account 1588 - Global Adjustment)		80,992	100														
37		RSVA - Power - Sub-account - Global Adjustment	1588	(727,268)	1														
38																			
39		Deferred Payments in Lieu of Taxes	1562	(416,304)	1														
40																			
41		Total of Group 1 and Account 1562		(1,062,580)	102														
42																			
43		Special Purpose Charge Assessment Variance Account ¹	1521	(38,670)	0														
44																			
45		LRAM Variance Account	1568	9,786	0														
46																			
47		Total including Accounts 1562, 1521 and 1568		(1,091,464)	102														
48																			
49																			
50																			
51		For all Board Approved dispositions, please ensure that the disposition amount has the same sign (e.g. debit balances are to have a positive figure and credit balance are to have a negative figure) as per the related Board decision.																	
52																			
53																			
		¹ Please provide explanations for the nature of the adjustments. If the adjustment relates to previously																	

Ready | Average: -19375.3272 | Count: 1009 | Numerical Count: 903 | Max: 628764.393 | Sum: -17495920.46 | 82%

b) Please provide the necessary corrections to the information in the continuity table such that the 2011 year end balances are consistent with the RRR information provided to the Board.

LUI RESPONSE:

LUI has corrected the continuity schedule by inputting the 2.1.7 balances into the appropriate column and the unbilled revenue balances into "CG" - Q4 adjustment column to balance properly. See Below.

Lakefront Utilities Inc.
OEB Interrogatory Responses
Page 9 of 23

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c) If necessary, please provide full explanations for any variances between the 2011 balances as calculated and the RRR information provided to the Board.

LUI RESPONSE:

LUI does not find any variances in the 2013 Continuity Schedule which have material differences in the 2011 balances. The variance difference in accounts 1580 and 1586 are related to unbilled revenue entries and old interest. Please see the attached Q4 OEB Rate Generator.

5. Ref: 2013 IRM3 Rate Generator, sheet 5

Ref: Manager's Summary, p. 8

Ref: EB-2011-0250 Response to Board staff IR #33

Ref: EB-2011-0250 Settlement Agreement, page 44

LUI proposes to dispose of a balance in Account 1521 of (\$61,133) in this proceeding. In response to Board staff IR #33 in EB-2011-0250, LUI calculated a balance as at December 31, 2011 of (\$21,302.62), including principal and interest. In that proceeding's Settlement Agreement, the Board approved this amount for disposition and the rate riders for deferral and variance account recovery were calculated accordingly.

a) Please explain the transaction amount of (\$59,749) shown in the 2011 continuity table.

LUI's RESPONSE:

The transaction of \$59,749 that appears in the continuity table is related to transaction revenues that were collected in and related to the year 2011.

b) Please explain the outstanding balance in this account of (\$61,133).

LUI's REPOSE:

LUI, in the Cost of Service Application in 2012 had entered into the Deferral & Variance Account (EDDVAR) template, provided by the OEB, the amount of \$-21,303 (a negative figure), however the actual value of the account in question was a positive \$21,303 at the end of 2010. (the rate payers as at December 31 2010, still owed LUI, an amount of \$21,303), however the collection period had not yet been concluded.

LUI had inadvertently entered the data into the RRR filing, and their own continuity records in the reverse of the actual amount. Had LUI entered the correct positive balance, the 2011 yearend balance in the account would have been \$-38,669, and the disposal would have been \$+21,303 = leaving approx. \$-17,893 that was over collected from rate payers.

The actual value should have been the \$21,303 (positive value). When LUI then proceeded to dispose of the \$-21,303, caused the balance in this account to become a larger negative value of \$-21303 +(\$-38669) = \$-59,972. Plus the associated interest, this balance comes to \$-61,133.

Revenue-to-Cost Ratio Adjustment Model

6. Ref: EB-2011-0250 Final Rate Order

Ref: Revenue to Cost Ratio Adjustment Model, sheet 3

Board staff notes that the current approved tariff for LUI shows a monthly service charge of \$4,069.60 for the GS 3,000-4,999 kW rate class. LUI has entered a rate of \$4,069.59 at sheet 3 of the Revenue to Cost Ratio Adjustment Model.

a) Please confirm the current approved monthly service charge for the GS 3,000– 4,999 kW rate class.

LUI RESPONSE:

LUI recognizes that in the Revenue to Cost Ratio Adjustment Workform the General Service 3,000 to 4,999 KW – Intermediate class rate is '\$4069.59'. LUI's Final Rate Order from the Cost of Service 2012 shows that the rate is rounded up to \$4069.60.

LUI had linked this rate class to the figure in the 2012 Cost of Service Final Rate Design Model which incidentally did not round up as it had in the Final Rate Order.

LUI has now adjusted the rate to \$4069.60/customer properly reflect the rounding as stated in the Tariff of Rates and Charges.

b) If this is an error, Board staff will make the necessary correction to the workform.

LUI RESPONSE:

LUI has now adjusted the rate to \$4069.60/customer properly reflect the rounding as stated in the Tariff of Rates and Charges. Board staff can adjust this figure for the rounding error to \$4069.60.

7. Ref: EB-2011-0250 Final Rate Order

Ref: Revenue to Cost Ratio Adjustment Model, sheet 3

Board staff notes that the current approved tariff for LUI shows a volumetric rate for the Street lighting rate class of \$24.4721. LUI has entered a rate of \$24.4722 at sheet 3 of the Revenue to Cost Ratio Adjustment model.

a) Please confirm the current approved volumetric rate for the Street lighting rate class.

LUI RESPONSE:

LUI recognizes that in the Revenue to Cost Ratio Adjustment Workform the Street lighting class volumetric rate is '\$24.4722/kW'. LUI's Final Rate Order from the Cost of Service 2012 shows that the street lighting volumetric rate is rounded down to '\$24.4721/kW'.

LUI had linked the class rates to the final figures in the 2012 Cost of Service Final Rate Design Model which incidentally did not round down as it had in the Final Rate Order and shows the rate of '\$24.4722/kW'.

LUI has now adjusted the rate to '\$24.4721/kW' to properly reflect the rounding as stated in the Tariff of Rates and Charges. Not considered a material change in the models.

b) If this is an error, Board staff will make the necessary correction to the workform.

LUI RESPONSE:

LUI has now adjusted the rate to \$24.4721/kW to properly reflect the rounding as stated in the Tariff of Rates and Charges. Board staff can adjust this figure for the rounding error to \$24.4721.

8. Ref: EB-2011-0250 Decision and Order, Settlement Agreement, p. 37

Ref: Manager's Summary, p. 10

Ref: Revenue to Cost Ratio Adjustment Model, sheet 6

In LUI's 2012 Settlement Agreement, parties agreed and the Board approved adjustments to the GS 3,000-4,999 kW rate class to take place in equal increments over a four-year period.

a) Please explain why LUI has not made adjustments to the GS 3,000 – 4,999 rate class in this IRM, which represents the first year in the four-year period.

LUI RESPONSE:

As stated in the Cost of Service 2012 settlement agreement pages 35-37 '7. Cost Allocation' the parties acknowledge that Lakefront may make adjustments to the revenue to cost ratios for customer classes that are 100% in the years following 2012 in order to maintain revenue neutrality when the GS 3000 – 4999 kW class is adjusted in those subsequent years to bring that class to the lower boundary of its range; any such adjustments will always be made to the class most above a revenue to cost ratio of 100% first, until lowered to the next highest ratio.

Through the settlement the parties agreed upon the revised proposed revenue to cost ratios with adjustments as referred to in paragraph 7.1 of the settlement agreement.

A particular note must be made that in the GS 3000- 4999kW rate class there is only one customer for Lakefront Utilities Inc. Lakefront also notes that as on page 6 of LUI's Cost of Service Application 2012, Exhibit 7; Table 7-3, the proposed revenue to cost ratios were revised during the settlement agreement from 50.5% for the 2012 year (seen below in figure 8-1) to the amended figure of 57.5% for 2012 and 2013 (seen below in table 8-2). Lakefront established its movement in revenue to cost ratios to mitigate any rate shock in the GS 3,000 – 4,999. LUI intends to keep the revenue to cost ratios as submitted originally.

Examples:

2012 – 57.5%, 2013 – 57.5%, 2014 – 65%, 2015 – 72.5%, 2016 – 80%, & 2017 – 80%

Table 8-1 – Appendix 2-0 Cost Allocation Exhibit 7- Page 6

Class	Proposed Revenue-to-Cost Ratios			Policy Range
	2012	2013	2014	
	%	%	%	
Residential	97.64			85 - 115
GS < 50 kW	107.43			80 - 120
GS 50 - 2999 KW	112.18			80 - 120
GS 3000 - 4999	50.50	57.50	65.00	80 - 120
Large User, if applicable				85 - 115
Street Lighting	80.00			70 - 120
Sentinel Lighting	90.00			80 - 120
Unmetered Scattered Load (USL)	90.00			80 - 120
Other class, if applicable				
Embedded distributor, if applicant is a host distributor				

Table 8-2 – Appendix 2-0 Cost Allocation Amended November 28, 2011

Class	Proposed Revenue-to-Cost Ratios			Policy Range
	2012	2013	2014	
	%	%	%	
Residential	89.90			85 - 115
GS < 50 kW	99.64			80 - 120
GS 50 - 2999 KW	139.13			80 - 120
GS 3000 - 4999	57.50	57.50	65.00	80 - 120
Large User, if applicable				85 - 115
Street Lighting	111.73			70 - 120
Sentinel Lighting	117.24			80 - 120
Unmetered Scattered Load (USL)	81.95			80 - 120
Other class, if applicable				
Embedded distributor, if applicant is a host distributor				

b) Please complete a new Revenue to Cost Ratio Adjustment Model which calculates the adjustment evenly over the years 2013 to 2016.

LUI RESPONSE:

At the request of the board LUI completed a different version Revenue to Cost Ratio Adjustment Model which calculates the Intermediate customer as moving from the 57.50% in 2012 to 80% by 2016. This shows an increase of 5.625% per year for LUI's only intermediate class customer and decreases in the GS 50 to 2,999 kW by 5.625% yearly to redistribute the class that is at the top of its board approved target. This change results in the fixed adjustment required to the base service charge of \$526.45 to that customer and adjustment of the distribution volumetric rate of \$0.2048. Following the Cost of Service Application 2012 this particular rate class GS 3000-4999 kW experienced an increase from 28.6% to the 57.5%. This accounts for 5 of the yearly increases proposed by the board.

Rate Class	Direction	Current Year	Transition Year	Transition Year	Transition Year	Transition Year	Transition Year
		2012	1 2013	2 2014	3 2015	4 2016	5 2017
Residential	No Change	89.90%	89.90%	89.90%	89.90%	89.90%	89.90%
General Service Less Than 50 kW	No Change	99.64%	99.64%	99.64%	99.64%	99.64%	99.64%
General Service 50 to 2,999 kW	Change	139.13%	133.51%	127.88%	122.26%	116.63%	116.63%
General Service 3,000 to 4,999 kW - Intermediate Use	Change	57.50%	63.13%	68.75%	74.38%	80.00%	80.00%
Unmetered Scattered Load	No Change	81.94%	81.94%	81.94%	81.94%	81.94%	81.94%
Sentinel Lighting	No Change	117.24%	117.24%	117.24%	117.24%	117.24%	117.24%
Street Lighting	No Change	111.73%	111.73%	111.73%	111.73%	111.73%	111.73%

c) Please adjust the IRM rate generator accordingly.

LUI RESPONSE:

LUI has adjusted the IRM rate generator accordingly to the board request. See uploaded file named Q8 OEB Rate Generator LUI. LUI intends to use the originally submitted 2013 IRM Revenue to Cost Ratio Adjustment Workform and IRM rate generator.

LRAMVA Recovery

9. Ref: Manager's Summary, p. 8

Ref: Guidelines for Electricity Distributor Conservation and Demand Management (EB-2012-0003), Section 13: LRAM

LUI proposes to dispose of the balance of its LRAMVA in account 1568 of \$9,786. In the CDM Guidelines, Section 13.4, it states that distributors may apply for disposition of the balance in the LRAMVA on an annual basis, as part of their IRM rate applications, if the balance is deemed significant by the applicant.

a) Please provide evidence that supports the assumption that Lakefront's LRAMVA amount is significant.

LUI has provided the LRAM balances into the IRM application as per the model requirement and also due to the unknown material threshold for the disposition of the LRAM. As per the Ontario Energy Board Guidelines for Electricity Distributor Conservation and Demand Management EB – 2012-0003 section 13.4 Disposition of LRAMVA LUI is directed that 'Distributors may apply for the disposition of the balance in the LRAMVA on an annual basis, as part of their Incentive Regulation Mechanism rate applications, if the balance is deemed significant by the applicant.' This is significant to a distributor observing that in the Ontario Energy Board Guidelines for Electricity Distributor Conservation and Demand Management EB – 2012-0003 section 13.2 it also states 'Distributors will generally be expected to include a CDM component in their load forecast in Cost of Service Proceedings to ensure that its customers are realizing the true effects of conservation at the earliest possible date to mitigate that variance between forecasted revenue losses and actual revenue losses.' Therefore to realize the true balancing effects of the LRAM assumptions, LUI feels the amount of \$9,786 is significant.

b) Please provide the following supporting evidence as outlined in the 2012 CDM Guidelines: A statement that indicates the amount, if any, that Lakefront's last approved load forecast was adjusted to reflect forecasted CDM impacts in association with Lakefront's 2011-2014 CDM Targets.

LUI RESPONSE:

As per Ontario Energy Board Guidelines for Electricity Distributor Conservation and Demand Management EB – 2012-0003, LUI's last approved load forecast in 2011 was adjusted by 1.359KW for 2012 rates, 2.718KW for year 2012.

10. Ref: Manager's Summary, p. 8

Ref: Chapter 3 of the Filing Requirements for Electricity

Transmission and Distribution Applications, p. 16

Please provide the following supporting evidence for the requested disposition of the LRAMVA as required by the Filing Requirements:

A) A statement indicating that the distributor has used the most recent input assumptions available at the time of the program evaluation when calculating its LRAM amount;

LUI RESPONSE:

LUI has used the most recent input assumptions available as per the Guidelines for Electricity Conservation and Demand Management EB- 2012 – 0003 states;

- OPA's 2011 Prescriptive Measure and Assumptions, Release Version 1, March 2011;
- OPA's 2011 Quasi- Prescriptive Measures and Assumptions Lists, Release Version 1, December 2010 and,
- OPA's Avoided Supply Cost Assumptions Table, Appendix A, OPA Cost Effectiveness Guide, October 15, 2010

B) statement indicating that the distributor has relied on the most recent and appropriate final evaluation report from the OPA in support of its LRAM calculation;

LUI RESPONSE:

LUI has relied on the most recent and appropriate final evaluation report from the OPA in the calculation and support of its LRAM claim. The 2011 Final Annual Report Data Lakefront Utilities Inc. dated August 31, 2012.

- C) Separate tables for each rate class that shows the LRAM amounts requested by the year they are associated with and the year the lost revenues took place; LRAM calculations, determined by calculating the energy savings by customer class and valuing those energy savings using the distributor's Board-approved variable distribution charge appropriate to the class;

LUI RESPONSE:

See table below. LUI calculated the LRAM amount using the August 31st 2012 OPA reported Incremental Energy Savings (kWh) gross savings that were summarized in the program results by class for the year 2011. LUI included the results that were pre 2011 programs completed in 2011. LUI then using the appropriate board approved variable distribution charge by class to complete the calculation of energy savings into a dollar value.

2011 LRAM - DVAD 1568			GROSS SAVINGS		
2011 PROGRAMS		2011	2011 OPA REPORT SAVINGS	2011 OPA REPORT SAVINGS	
CLASS		DISTRIBUTION VOLUMETRIC	kWh	kW	TOTAL
RESIDENTIAL	\$/kWh	0.0134	372,126	122	\$ 4,986
GS LESS THAN 50	\$/kWh	0.0081	331,938	109	\$ 2,689
GS 50 - 2999 KW	\$/Kw	3.4201	1,027,211	79	\$ 270
GS 3000-4999 KW	\$/Kw	1.0268			
USL	\$/kWh	0.0293			
SENTINEL	\$/Kw	11.4737			
STREET LIGHT	\$/Kw	24.3414			
TOTAL 2011			1,731,275	310	\$ 7,945
2010 PROGRAMS		2010	2010/2011 OPA REPORT SAVINGS	2010/2011 OPA REPORT SAVINGS	
CLASS		DISTRIBUTION VOLUMETRIC	kWh	kW	TOTAL
RESIDENTIAL	\$/kWh	0.0133			\$ -
GS LESS THAN 50	\$/kWh	0.0085	216,552	37	\$ 1,841
GS 50 - 2999 KW	\$/Kw	3.5044			\$ -
GS 3000-4999 KW	\$/Kw	1.0229			
USL	\$/kWh	0.0292			
SENTINEL	\$/Kw	11.4303			
STREET LIGHT	\$/Kw	18.4232			
TOTAL 2010			216,552	37	\$ 1,841
TOTAL 2010 & 2011			1,947,827	347	\$ 9,786

D) A statement, and if applicable a table, that indicates if carrying charges are being requested on the LRAM amount;

LUI RESPONSE:

LUI did not calculate the carrying charges for the year 2011 or 2012. LUI received the final OPA report in a time frame that was not conducive to the board deadline of IRM date. Carrying charges are not included in the amount \$9,786.00.

E) For Board-approved programs, a third party report, in accordance with the OPA's EM&V Protocols as set out in Section 6.1 of the CDM Code, that provides a review and verification of the LRAM calculations, including:

- o Confirmation of the use of correct input assumptions and LRAM

Calculations

- o Verified participation amounts

- o The net and gross kW and kWh impacts of each program and for each class, both gross and net of free riders, separated by year

- o Verification of any carrying charges requested; and

□ For OPA Contracted Province-Wide Programs the distributor must provide documentation (i.e. final evaluation report from the OPA) of the distributor's results.

LUI RESPONSE:

LUI does not require any third party report as it does not have any specialized Board Approved programs for CDM.