

Natural Gas Resource Limited 39 Beech Street East Aylmer, ON N5H 1A1

March 5, 2013

Ms. Kirstin Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

Re: 2012 IRM Application EB-2012-0342

Dear Ms. Walli:

Natural Gas Resource Limited ("NRG") hereby files its response to VECC's March 1, 2013 letter of comment with respect to our February 12, 2013 draft rate order with respect to its 2012 IRM application for rates effective October 1, 2012 and implemented April 1, 2013.

VECC has requested a live excel version of our as submitted rate model, which will be emailed to VECC upon OEB confirmation of receipt of this submission, copy to Board Staff.

This document is being filed pursuant to the Board's e-Filing Services.

Yours Truly,

Lauríe O'Meara

Laurie O'Meara Controller



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Date Filed: March 5, 2013

1 Calculation of Current Revenue Requirement

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3 VECC has requested an explanation as to how this "Current Revenue Requirement" of 4 \$5,580,347 has been calculated.

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6 The model as presented calculates the Current Revenue Requirement using the current tariff 7 sheets rates (model worksheet "B1.1 Current Distribution Rates") times the Re-basing Billing

8 Determinants (model worksheet "B1.2 Billing Determinants") to determine the current revenue

- 9 requirement (model worksheet "B1.3 Current Rev Reg From Rates").
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11 Table 1 - B1.1 Current Distribution Rates

Current Distribution Tariff Sheet Rates

| | Rate Group | Monthly Service Charge | Delivery First 1,000 m ³ | Delivery Over 1,000 m ³ | Delivery Next 24,000 m ³ | Delivery Over 25,000 m ³ | Delivery - Firm | Demand - Firm | Commodity | Delivery - Int - Lower | Delivery - Int - Upper |
|----|--|---------------------------|--|---------------------------------------|--|--|-----------------|---------------|-----------|---------------------------|---------------------------|
| | RATE 1 - General Service Rate - Residential | 13.50 | 15.4014 | 10.5303 | | | | | 0.0363 | | |
| | RATE 1 - General Service Rate - Commercial | 13.50 | 15.4014 | 10.5303 | | | | | 0.0363 | | |
| | RATE 1 - General Service Rate - Industrial | 13.50 | 15.4014 | 10.5303 | | | | | 0.0363 | | |
| | RATE 2 - Seasonal Service - Apr to Oct | 15.00 | 13.905 | | 9.4826 | 6.1698 | | | 0.0363 | | |
| | RATE 2 - Seasonal Service - Nov to Mar | 15.00 | 17.527 | | 15.696 | 15.2899 | | | 0.0363 | | |
| | RATE 3 - Special Large Volume Contract Rate | 150.00 | | | | | 3.7644 | 29.0974 | 0.0363 | 7.9412 | 10.9612 |
| | RATE 4 - General Service Peaking - Apr to Dec | 15.00 | 14.7971 | 10.5218 | | | | | 0.0363 | | |
| | RATE 4 - General Service Peaking - Jan to Mar | 15.00 | 18.8772 | 16.9052 | | | | | 0.0363 | | |
| | RATE 5 - Interruptible Peaking Contract Rate | 150.00 | | | | | 6.9150 | 1 | 0.0363 | 5.4612 | 8.4612 |
| 40 | RATE 6 - Integrated Grain Processors Co-Operative Aylmer | | | | | | | | | | |
| 12 | Ethanol Production Facility | 150.00 | | | | | 3.7539 | 18.1837 | | 7.9412 | 10.9612 |

13 Table 2 - B1.2 Billing Determinants

Re-Basing Billing Determinants

| | Monthly Service | Delivery | Delivery | Delivery | Delivery | | | | Delivery - Int - | Delivery - Int - |
|--|-----------------|----------------------------|---------------------------|----------------------------|----------------------------|-----------------|---------------|------------|------------------|------------------|
| Rate Group | Charge | First 1,000 m ³ | Over 1,000 m ³ | Next 24,000 m ³ | Over 25,000 m ³ | Delivery - Firm | Demand - Firm | Commodity | Lower | Upper |
| RATE 1 - General Service Rate - Residential | 6,560 | 12,369,781 | 733,800 | | | | | 13,103,581 | | |
| RATE 1 - General Service Rate - Commercial | 414 | 1,760,200 | 2,371,550 | | | | | 4,131,750 | | |
| RATE 1 - General Service Rate - Industrial | 42 | 131,100 | 466,928 | | | | | 598,028 | | |
| RATE 2 - Seasonal Service - Apr to Oct | 73 | 123,779 | | 329,621 | - | | | 453,400 | | |
| RATE 2 - Seasonal Service - Nov to Mar | 73 | 5,688 | | 43,772 | - | | | 49,460 | | |
| RATE 3 - Special Large Volume Contract Rate | 4 | | | | | 2,195,299 | 256,932 | 2,195,299 | | |
| RATE 4 - General Service Peaking - Apr to Dec | 23 | 215,710 | 221,214 | | | | | 436,924 | | |
| RATE 4 - General Service Peaking - Jan to Mar | 23 | 4,368 | 12,970 | | | | | 17,338 | | |
| RATE 5 - Interruptible Peaking Contract Rate | 5 | | | | | 947,162 | | 947,162 | | |
| RATE 6 - Integrated Grain Processors Co-Operative Aylmer | | | | | | | | | | |
| Ethanol Production Facility | 1 | | | | | 33,416,816 | 1,298,256 | | | |
| | 7,122 | 14,610,626 | 3,806,462 | 373,393 | - | 36,559,277 | 1,555,188 | 21,932,942 | - | - |



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Calculation of Current Revenue

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2 Table 3 - B1.3 Current Rev Req From Rates

Revenue Requirement from Rates

| | | Monthly | | | Delivery | Deliver | | | | | | | | |
|--------------------------------|--|---------------------------|----------------------------------|----------------|----------------|------------------------|---------------|---------------|------------------------|------------------|--------------|-------------|-------------|----------------------------|
| | | Service | Delivery | | Next 24,00 | | | | | | | | elivery - I | |
| | Rate Group | Charge | First 1,000 m | | m ³ | m³ | Firm | Firm | | nodity | - Low | /er | - Upper | Total |
| | RATE 1 - General Service Rate - Residential RATE 1 - General Service Rate - Commercial | \$ 1,062,707 \$ 67.068 | | | \$ - \$ - | \$ - ¢ | \$ - \$ - | \$ - \$ - | | 4,757 1,500 | | - \$ | · - | \$ 3,049,854 \$ 589,395 |
| | RATE 1 - General Service Rate - Commercial | \$ 6,804 | . , | | ş - \$ - | э - с - | | э- с. | ş S | 217 | | - 9 | | \$ 76,381 |
| | RATE 2 - Seasonal Service - Apr to Oct | \$ 7,665 | | | \$ 31,257 | \$ - | \$ - | ş- | ŝ | 165 | | - ŝ | | \$ 56,298 |
| | RATE 2 - Seasonal Service - Nov to Mar | \$ 5,475 | | | \$ 6,870 | | \$ - | , \$ - | \$ | 18 | | - \$ | - 3 | \$ 13,360 |
| | RATE 3 - Special Large Volume Contract Rate | \$ 7,200 | \$ - | \$ - | \$ - | \$ - | \$ 82,640 | \$ 74,761 | \$ | 797 | \$ | - \$ | ; - | \$ 165,397 |
| | RATE 4 - General Service Peaking - Apr to Dec | \$ 3,105 | \$ 31,919 | | \$- | \$- | \$ - | \$ - | \$ | 159 | 1 | - \$ | ; - | \$ 58,458 |
| | RATE 4 - General Service Peaking - Jan to Mar | \$ 1,035 | | | \$ - | \$ - | \$ - | \$ - | \$ | 6 | | - \$ | | \$ 4,058 |
| | RATE 5 - Interruptible Peaking Contract Rate | \$ 9,000 | Ş - | \$ - | \$ - | Ş - | \$ 65,496 | \$ - | \$ | 344 | Ş | - \$ | ; - | \$ 74,840 |
| | RATE 6 - Integrated Grain Processors Co-Operative Aylmer Ethanol Production Facility | \$ 1,800 | \$ - | ć | \$ - | Ś- | \$1,254,434 | ¢ 226 071 | \$ | | Ś | - \$ | | \$1,492,305 |
| 3 | | , | \$ 2,247,358 | \$ 401,640 | \$ 38,127 | 1 | | \$ 310,832 | | - 7,962 | | - \$ | | \$ 5,580,347 |
| 4 5 | As an example: | | | | | | | | | | | | | |
| 6 | Monthly Service Charge | | | | | | | | | | | | | |
| - | | | D.III. | | | | | | ~ | | | | | |
| 7 | Monthly Service Char | ge time | es Billir | ng Mo | nths 1 | Fimes | Numb | er of | Cu | stor | ners | S | | |
| 7 8 | | • | | - | | | | | | | | | ners | equals |
| | Monthly Service Char | • | | - | | | | | | | | | ners | equals |
| 8 | Monthly Service Char I.e. Rate Class 1 – R | • | | - | | | | | | | | | ners | equals |
| 8 9 | Monthly Service Char I.e. Rate Class 1 – R | esiden | tial - <mark>\$</mark> | 13.50 | times | s <u>12 r</u> | <u>nonths</u> | times | s <mark>6</mark> | <mark>560</mark> | CU | stor | | |
| 8 9 10 | Monthly Service Char I.e. Rate Class 1 – R <mark>\$1,062,707</mark> | esiden | tial - <mark>\$</mark> | 13.50 | times | s <u>12 r</u> | <u>nonths</u> | times | s <mark>6</mark> | <mark>560</mark> | CU | stor | | |
| 8 9 10 11 | Monthly Service Char I.e. Rate Class 1 – R \$1,062,707 Note for annualized rates NR | esiden | tial - <mark>\$</mark> | 13.50 | times | s <u>12 r</u> | <u>nonths</u> | times | s <mark>6</mark> | <mark>560</mark> | CU | stor | | |
| 8 9 10 11 12 | Monthly Service Char I.e. Rate Class 1 – R \$1,062,707 Note for annualized rates NR | esiden | tial - <mark>\$</mark> | 13.50 | times | s <u>12 r</u> | <u>nonths</u> | times | s <mark>6</mark> | <mark>560</mark> | CU | stor | | |
| 8 9 10 11 12 13 | Monthly Service Char I.e. Rate Class 1 – R \$1,062,707 Note for annualized rates NR by season. | esiden RG use | tial - <mark>\$</mark> s 12 m | 13.50 onths | times | s <u>12 r</u> seaso | nonths | time: G us | s <mark>6</mark> es | 560 the |) cu: nur | stor nbe | r of | months |

16 **\$1,905,119**