



PUC Distribution Inc.
500 Second Line EAST, P.O. Box 9000
SAULT STE. MARIE, ONTARIO, P6A 6P2

May 14, 2013

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

Dear Ms. Walli:

**Re: PUC Distribution Inc. ("PUC")
2013 Cost of Service Rate Application; Board File No. EB-2012-0162
Supplemental Interrogatory Responses**

Please find attached PUC's 2013 Cost of Service Rate Application Supplemental Interrogatory Responses.

Attached to this cover letter:

- 2 paper copies of the 2013 Cost of Service Electricity Distribution Rate Application Supplemental Interrogatory Responses.
- A copy of the supplemental responses and an excel copy of the revised Revenue Requirement Workform have been filed through the OEB web portal.

Sincerely,

Jennifer Uchmanowicz
Rates and Regulatory Affairs Officer
PUC Distribution Inc.
Email: Jennifer.uchmanowicz@ssmpuc.com
Phone: 705-759-3009

PUC DISTRIBUTION INC.
2013 COST OF SERVICE RATE APPLICATION
EB-2012-0162
SUPPLEMENTAL INTERROGATORIES

EXHIBIT 1**1.0-VECC – 42**

Reference: Exhibit 1, Appendix D, pg. 10

a) Please provide a summary of proposed changes which show by interrogatory changes to the original application (example below).

Reference	Item	Regulated Return on Capital	Regulated Rate of Return	Rate Base	Working Capital	Working Capital Allowance	Amortization	PILs	OM&A	Service Revenue Requirement	Base Revenue Requirement	Gross Revenue Deficiency
Reference	Item	Regulated Return on Capital	Regulated Rate of Return	Rate Base	Working Capital	Working Capital Allowance	Amortization	PILs	OM&A	Service Revenue Requirement	Base Revenue Requirement	Gross Revenue Deficiency
	Original Submission August 2010	\$10,824,124	7.08%	\$152,808,317	\$125,598,185	\$18,839,728	\$7,816,331	\$1,212,310	\$10,183,838	\$30,036,603	\$28,980,640	\$5,012,440
OEB IR# 24 (a) & (b)	Adjust Infrastructure Ontario Debt to 1 Day Change	\$11,168,589 \$344,475	7.31% 0.23%	\$152,808,317 \$0	\$125,598,185 \$0	\$18,839,728 \$0	\$7,816,331 \$0	\$1,212,310 \$0	\$10,183,838 \$0	\$30,381,077 \$344,475	\$29,325,115 \$344,475	\$5,356,914 \$344,475
	PILs Correction - Input Error - Bldg amount in Class 1b Change	\$11,168,589 \$0	7.31% \$0	\$152,808,317 \$0	\$125,598,185 \$0	\$18,839,728 \$0	\$7,816,331 \$0	\$1,213,484 \$1,175	\$10,183,838 \$0	\$30,382,252 \$1,175	\$29,326,289 \$1,175	\$5,358,089 \$1,175
EP IR# 13 (e)	AFUDC Rate on Capitalized Interest Change	\$11,196,054 \$27,455	7.31% \$0	\$153,183,959 \$375,842	\$125,598,185 \$0	\$18,839,728 \$0	\$7,823,920 \$7,589	\$1,213,336 -\$148	\$10,183,838 \$0	\$30,417,147 \$34,896	\$29,361,185 \$34,896	\$5,392,984 \$34,896
EP TCQ # 9 & EP IR # 19 (a)	Adjust Purchase kWh for CDM Adjmts Change	\$11,196,054 \$0	7.31% \$0	\$153,183,959 \$0	\$125,598,185 \$0	\$18,839,728 \$0	\$7,823,920 \$0	\$1,213,336 \$0	\$10,183,838 \$0	\$30,417,147 \$0	\$29,361,185 \$0	\$5,279,238 -\$113,746
EP TCQ # 9 & VECC TCQ # 1 (b) & (c)	Adjust Purchase kWh for CDM Adjmts @ Application Power Rates Change	\$11,204,832 \$8,778	7.31% \$0	\$153,304,058 \$120,099	\$126,398,846 \$800,661	\$18,959,827 \$120,099	\$7,823,920 \$0	\$1,215,199 \$1,863	\$10,183,838 \$0	\$30,427,788 \$10,641	\$29,371,826 \$10,641	\$5,289,879 \$10,641
EP IR # 11 (b) & VECC TCQ # 1 (a)	Adjust Oct 15/10 Navigant Numbers, Power, GA & \$68.38 RPP Rates Change	\$11,202,097 -\$2,735	7.31% \$0	\$153,266,641 -\$37,417	\$126,149,397 -\$249,449	\$18,922,410 -\$37,417	\$7,823,920 \$0	\$1,214,619 -\$680	\$10,183,838 \$0	\$30,424,473 -\$3,315	\$29,368,510 -\$3,315	\$5,286,564 -\$3,315
VECC TCQ # 1 (b) & (c)	Adjust NW & CN kW for Purchase & CDM Adjmts Change	\$11,212,740 \$10,642	7.31% \$0	\$153,412,249 \$145,608	\$127,120,117 \$970,720	\$19,068,018 \$145,608	\$7,823,920 \$0	\$1,216,877 \$2,259	\$10,183,838 \$0	\$30,437,374 \$12,901	\$29,381,412 \$12,901	\$5,299,465 \$12,901
Decision EB-2010-0002	Adjust NW & CN kW for IESO & HONI January 1, 2011 Price Increases Change	\$11,221,588 \$8,848	7.31% \$0	\$153,333,306 \$121,057	\$127,927,161 \$807,044	\$19,189,074 \$121,057	\$7,823,920 \$0	\$1,218,755 \$1,878	\$10,183,838 \$0	\$30,448,100 \$10,726	\$29,392,137 \$10,726	\$5,310,191 \$10,726
OEB IR # 21	OMERS increase for 2012 & 2013 Change	\$11,222,972 \$1,384	7.31% \$0	\$153,552,243 \$18,938	\$128,053,411 \$126,250	\$19,208,012 \$18,938	\$7,823,920 \$0	\$1,219,049 \$294	\$10,310,088 \$126,250	\$30,576,028 \$127,928	\$29,520,065 \$127,928	\$5,438,118 \$127,928
EP IR 23 (c) / 29 (a) & (b) EP TCQ 14 (a)	Removal of Street Light Return & PILs Change	\$11,222,972 \$0	7.31% \$0	\$153,552,243 \$0	\$128,053,411 \$0	\$19,208,012 \$0	\$7,823,920 \$0	\$1,219,049 \$0	\$10,310,088 \$0	\$30,576,028 \$0	\$29,586,071 \$66,006	\$5,504,124 \$66,006
EP IR 40 & EP TCQ 21 (a)	PILs - Computer Hardware to Correct CCA Account Change	\$11,222,972 \$0	7.31% \$0	\$153,552,243 \$0	\$128,053,411 \$0	\$19,208,012 \$0	\$7,823,920 \$0	\$1,193,531 -\$25,518	\$10,310,088 \$0	\$30,550,510 -\$25,518	\$29,560,553 -\$25,518	\$5,478,606 -\$25,518
EP IR 41 / EP TCQ 21(b)	PILs - Land Rights CCA Change	\$11,222,972 \$0	7.31% \$0	\$153,552,243 \$0	\$128,053,411 \$0	\$19,208,012 \$0	\$7,823,920 \$0	\$1,192,976 -\$655	\$10,310,088 \$0	\$30,549,955 -\$655	\$29,559,998 -\$655	\$5,478,051 -\$655

PUC Response

PUC has provided a summary below with the changes proposed as a result of the interrogatories.

Ref.	Item	Reg. Return on Capital	Reg. Rate of Return	Rate Base	Working Capital	Working Capital Allowance	Amortization	PILs	OM&A	Service Rev. Requirement	Base Revenue Requirement	Gross Deficiency
	Original Sub. Nov. 6, 2012	5,704,389	6.20%	91,994,402	74,468,429	9,680,896	3,302,877	276,281	10,928,870	20,212,417	17,944,453	3,174,855
IR2-EP-11	Cost of Power	5,732,990	6.20%	92,455,658	78,016,550	10,142,152	3,302,877	281,241	10,928,870	20,245,978	17,978,014	3,208,416
	Change	28,601	0.00%	461,256	3,548,121	461,256	-	4,960	-	33,561	33,561	33,561
Feb. 14, 2013 OEB Decision	Cost of Capital Parameters	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,990,862
	Change	(202,293)	-0.22%	-	-	-	-	(17,445)	-	(217,554)	(217,554)	(217,554)
3-Staff-24 3-VECC-19	CDM savings Adjustment	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	(32,970)
4-Staff 40 4-VECC-41	LRAM Rate Rider	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
7-Staff-47 7-Staff-48	Cost allocation meter reading	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
8-Staff-50 8-VECC-38	RTSR, WMS, RPRR Rate Changes	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
9-Staff-51	Primary Metered Loss Factor	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
9-Staff-52	HST/OVAT Disposition Amount	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
9-Staff-54	KWs used for Global Adj. sub account disposition	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,302,877	263,796	10,928,870	20,028,424	17,760,460	2,957,892
	Change	-	0.00%	-	-	-	-	-	-	-	-	-
9-Staff-58 9-Staff-59 9-EP-24	withdraw of 1575 and request for 1576	5,530,697	5.98%	92,455,658	78,016,550	10,142,152	3,323,668	263,796	10,928,870	20,047,031	17,779,067	2,976,499
	Change	-	0.00%	-	-	-	20,791	-	-	18,607	18,607	18,607

1-SEC-32s

Ref: 1-Staff-1(b)

Please provide the date the completed Application was filed, the date a completed application was required per the Filing Requirements, and a detailed explanation for any period by which the filing date was later than the requirement.

PUC Response

The application was filed November 6, 2012. Additional information was filed December 4, 2012. The completed application was required August 30, 2012 as per the filing requirements. The delay in filing was due to resource limitations and numerous on-going initiatives/projects.

1-SEC-33s

Ref: 1-SEC-4

Please advise any significant cost differences the Applicant faces to serve schools in the GS>50KW class compared to the other utilities in the comparison table provided in the original interrogatories. Please quantify any of those cost differences to the extent possible.

PUC Response

PUC is not aware of any significant cost differences to serve schools in the GS>50kW class compared to other utilities. There are many factors that influence the ability to provide accurate and meaningful comparisons. For example, the board approved revenue to cost ratios, volumetric vs. fixed charges, service territory size, physical attributes of the service territory, rural vs. urban customer mix etc.

1-Staff-61s

Ref: 1-Staff-5; Ref: Revenue Requirement Work Form (RRWF) PUC

Distribution_IRR_Rev_Reqt_Work_Form_20130404.xlsm

On Sheet 8 of the update RRWF, cell L52, PUC is showing a revenue sufficiency of 2,184. Please correctly update the RRWF to ensure that this equals zero.

PUC Response

PUC has filed, with the supplemental interrogatories an updated RRWF that corrects the revenue sufficiency of \$2,184.

1-SEC-34s

Ref: 1-SEC-3(a)

With respect to the Shareholders Agreement for PUC Services Inc.:

- a) Please explain why the agreement is signed by the shareholder, the City, and by PUC Inc. rather than PUC Services Inc.;
- b) Please provide a brief description of each of the last three times the requirement in Schedule A (k) was used, and the outcome in each case.

PUC Response

- a) The heading in the document refers to PUC Services. The reference to PUC Inc. in the signature section is incorrect.
- b) The requirement in Section A (k) has never been used.

1-SEC-35s

Ref: 1-SEC-3(a)

With respect to the Shareholders Agreement for PUC Distribution Inc.:

- a) Please provide a description of each time the requirement in Schedule A (h) was used in 2012, and the outcome in each case;
- b) Please provide a brief description of each of the last three times the requirement in Schedule A (n) was used, and the outcome in each case;
- c) Please provide a brief description of each of the last time the requirement in Schedule A (p) was used, and the outcome in each case; and
- d) Please provide a brief description of each of the last time the requirement in Schedule A (q) was used, and the outcome in each case

PUC Response

- a) Approval was requested and received in 2012 through the 2013 budget for capital expenditures in excess of the required levels (Schedule A (h)).
- b) The requirement in Schedule A (n) has not been used.
- c) Approval of the 2013 budget (Schedule A (p)) was requested and received in 2012.

- d) Approval of a strategic plan (Financial Long Term Plan) was requested and received as part of the budget process in 2012 (Financial Long Term Plan).

1-SEC-36s

Ref: 1-SEC-3(b)

With respect to the lack of a strategic or business plan:

- a) Please explain why the Workforce and Succession Plan found in Appendix G refers, on page 2, to the “Strategic Business Plan”. To what document is that referring?
- b) In the absence of any current business plan or strategic plan, please describe the long- term framework within which business decisions are made and provide any documents that establish, approve or describe that framework.

PUC Response

- a) The “Strategic Business Plan” reference is in regards to the human resource component included in the annual budgeting process.
- b) The annual planning process includes updating and review of a long term financial model (shown below) based on the asset management plan and approved annual budget.

PUC Distribution Inc.

Long Term Financial Model

	2011	Forecast 2012	Budget 2013	Forecast 2014	Forecast 2015	Forecast 2016	Forecast 2017	Forecast 2018	Forecast 2019	Forecast 2020
Income Analysis										
Total Revenue	\$16,203,259	\$18,534,783	\$20,794,583	\$20,401,338	\$20,578,842	\$20,758,505	\$23,869,865	\$24,083,217	\$24,299,096	\$24,517,533
Total Operating Expenses	\$5,159,341	\$6,427,723	\$6,153,732	\$6,164,606	\$6,287,899	\$6,413,657	\$6,541,930	\$6,672,768	\$6,806,224	\$6,942,348
Total General and Admin Expenses	\$3,481,564	\$4,309,233	\$5,161,520	\$5,009,750	\$5,109,945	\$5,212,144	\$5,316,387	\$5,422,715	\$5,531,169	\$5,641,793
Depreciation	\$3,335,388	\$4,287,547	\$3,400,000	\$3,756,293	\$4,078,913	\$4,447,984	\$4,823,637	\$5,206,004	\$5,615,217	\$6,031,415
Total Interest Expense	\$1,703,660	\$1,741,076	\$2,386,901	\$2,767,776	\$2,944,311	\$3,115,373	\$3,152,549	\$3,058,273	\$2,963,325	\$2,867,672
Payment in Lieu of Taxes	\$466,500	\$171,678	\$288,157	\$245,268	\$46,751	\$0	\$474,410	\$333,537	\$180,939	\$24,958
Total Expenses	\$14,146,454	\$16,937,257	\$17,390,310	\$17,943,694	\$18,467,818	\$19,189,158	\$20,308,913	\$20,693,296	\$21,096,874	\$21,508,186
Income/(Loss) from Operations	\$2,056,805	\$1,597,526	\$3,404,273	\$2,457,644	\$2,111,023	\$1,569,346	\$3,560,952	\$3,389,920	\$3,202,223	\$3,009,346
Working Capital Analysis										
Income	\$2,056,805	\$1,597,526	\$3,404,273	\$2,457,644	\$2,111,023	\$1,569,346	\$3,560,952	\$3,389,920	\$3,202,223	\$3,009,346
Add back depreciation	\$3,335,388	\$4,287,547	\$3,400,000	\$3,756,293	\$4,078,913	\$4,447,984	\$4,823,637	\$5,206,004	\$5,615,217	\$6,031,415
Gain on sale of asset	\$5,550									
	\$5,397,743	\$5,885,073	\$6,804,273	\$6,213,937	\$6,189,936	\$6,017,330	\$8,384,590	\$8,595,924	\$8,817,440	\$9,040,761
Capital Expenditures	(\$15,245,602)	(\$25,369,785)	(\$9,457,335)	(\$8,626,482)	(\$8,799,011)	(\$8,974,992)	(\$9,154,491)	(\$9,337,581)	(\$9,524,333)	(\$9,714,820)
Additional Infrastructure	\$0	\$0	\$0	\$0	(\$1,000,000)	(\$1,000,000)	(\$1,000,000)	(\$1,500,000)	(\$1,500,000)	(\$1,500,000)
Contributed Capital	\$5,648,830	\$450,000	\$550,000	\$561,000	\$572,220	\$583,664	\$595,338	\$607,244	\$619,389	\$631,777
Net Capital Expenditures	(\$9,596,772)	(\$24,919,785)	(\$8,907,335)	(\$8,065,482)	(\$9,226,791)	(\$9,391,327)	(\$9,559,154)	(\$10,230,337)	(\$10,404,944)	(\$10,583,042)
Regulatory Transactions	\$1,038,239	(\$911,469)	(\$1,069,213)	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Proceeds of Loans	\$1,092,003	\$18,507,997	\$5,744,401	\$4,839,289	\$4,936,075	\$5,034,796	\$5,034,796	\$5,034,796	\$5,034,796	\$5,034,796
Principle Repayments	\$0	\$0	(\$1,166,217)	(\$1,369,652)	(\$1,577,479)	(\$1,787,828)	(\$1,900,071)	(\$1,914,233)	(\$1,929,070)	(\$1,944,611)
Increase (decrease) in Working Capital	(\$2,068,787)	(\$1,438,185)	\$1,405,909	\$1,618,093	\$321,741	(\$127,029)	\$1,960,162	\$1,486,151	\$1,518,223	\$1,547,904
Opening Working Capital	\$7,875,682	\$5,806,895	\$4,368,710	\$5,774,619	\$7,392,712	\$7,714,452	\$7,587,424	\$9,547,585	\$11,033,736	\$12,551,959
Increase (decrease) in Working Capital	(\$2,068,787)	(\$1,438,185)	\$1,405,909	\$1,618,093	\$321,741	(\$127,029)	\$1,960,162	\$1,486,151	\$1,518,223	\$1,547,904
Closing Working Capital	\$5,806,895	\$4,368,710	\$5,774,619	\$7,392,712	\$7,714,452	\$7,587,424	\$9,547,585	\$11,033,736	\$12,551,959	\$14,099,864

1-SEC-37s

Ref: 1-SEC-5 and 9

Please provide the 2012 audited financial statements and annual report for PUC Services Inc., PUC Distribution Inc., and PUC Inc., in each case as soon as they are available.

PUC Response

It is anticipated that the 2012 audited financial statements for PUC Services Inc., PUC Distribution Inc., and PUC Inc. will be available after May 15, 2013.

1-SEC-38s

Ref: 1-SEC-9(b)

Please confirm that the amounts in brackets are average monthly balances owed to the Applicant by PUC Services Inc., and the amounts not in brackets are average monthly balances owed to PUC Services Inc. by the Applicant. Please confirm that a total of \$54,239 of interest was paid by PUC Services to the Applicant with respect to the amounts owing, and that no interest was paid by the Applicant to PUC Services Inc. Please provide a calculation of the effective rate of interest on the outstanding balances over the year, and show the calculation. Please advise the effective rate of interest on outstanding balances assumed in calculating the revenue requirement for the test year.

PUC Response

The monthly amounts in brackets are not balances owed to PUC Distribution. These are in fact balances owed by PUC Distribution to PUC Services. The amounts that are not in brackets represent PUC Distribution's positive cash balance and corresponding contribution to the consolidated cash position of the collective "PUC" entities. The total of \$54,239 of interest was not paid by PUC Services to PUC Distribution. The total of \$54,239 was paid by the applicant to PUC Services Inc. The effective rate of interest used to calculate interest on the monthly outstanding inter-company balances payable was 4.47%. There is no interest expense included in revenue requirement for the test year related to short-term borrowing from affiliates.

1-SEC-39s

Ref: 1-SEC-9(f)

Please confirm that the tax credits are grossed-up when credited to miscellaneous income. If they are not grossed-up, please provide a calculation to show that the effect on revenue requirement using the Applicant's methodology is the same as if the Applicant had earned and claimed the tax credits itself.

PUC Response

The tax credits are grossed-up when credited to miscellaneous income.

1-SEC-40s

Ref: 1-SEC-2(c)

Please provide explanatory and numerical details of the "expenses that would be included in depreciation for most LDCs" that "are included in OM&A for PUC Distribution".

PUC Response

PUC Services owns a number of assets such as vehicles, IT equipment, software and furniture that is used to provide services to the affiliated companies. A portion of the depreciation expense (asset charge) and cost of capital is allocated to the affiliates as a cost of performing work for the affiliates. LDC's that own this equipment would have a depreciation expense associated with them that would be recorded as depreciation expense and not included in their operating and administrative expenses. The asset charge allocated to PUC Distribution's operating and administrative expenses in the 2013 Test Year is \$474,000. The cost of capital charge allocated to PUC Distribution's operating and administrative expenses in the 2013 Test Year is \$217,000.

EXHIBIT 2 – RATE BASE

2.0-VECC – 44

Reference: IR 2-VECC-8

- a) Has PUC made adjustments in the RRWF (and continuity schedules) of this application for the actual 2012 actual capital expenditures?
- b) If not please make these adjustments or explain why the application is not being updated.
- c) Please file a revised Appendix 2-A showing the actual 2012 capital projects and amounts.

PUC Response

- a) PUC has not made adjustments in the RRWF of this application for the 2012 actual capital expenditures.
- b) PUC has not updated the application in the interrogatory phase for the 2012 actual capital expenditures. The final audited 2012 financial statements are expected to be available after May 15, 2013.
- c) The 2012 actual capital expenditures by projects as shown in Appendix 2-A is not available at this time.

2-Energy Probe-28s

Ref: 2-Staff-6 & Exhibit 2, Tab 1, Schedule 1, Table 2.1

The response to the Staff interrogatory indicates that the accumulated depreciation figures used in the calculation of rate base shown in Table 2.1 are based on use of the 1/2 year rule in the historical years.

- a) Please confirm that the above is correct.
- b) If confirmed, please provide a version of Table 2.1, as provided in the interrogatory response that uses the actual accumulated depreciation figures used by PUC for financial accounting purposes in the calculation of the depreciation in each of the

historical years. Please also include actual data for 2012. If actual data for 2012 is not yet available, please include the most recent estimate of the 2012 figures available.

- c) Please provide fixed asset continuity schedules for 2012 under the modified CGAAP showing both the 1/2 year rule being used for calculating depreciation and the full-year used for financial accounting.

PUC Response

- a) PUC confirms the accumulated depreciation figures used in the calculation of rate base shown in Table 2.1 are based on use of the 1/2 year rule in the historical years.
- b) PUC has provided below a version of Table 2.1 that uses the actual accumulated depreciation and gross asset figures used by PUC for financial accounting purposes in the calculation of depreciation in each of the historical years 2008 to 2011. The 2012 year is based on actuals for financial accounting purposes except for the disposition of account 1555 – smart meters. For financial reporting purposes the smart meters are treated as an addition in 2012 and for regulatory purposes it is included in the opening balance as it relates to historical year costs.

Description	2008 Actual	2009 Actual	2010 Actual	2011 Actual	2012 Bridge Year (Actual)
Gross Fixed Assets (Average)	80,188,342	83,827,767	87,964,429	93,377,373	117,985,649
Accumulated Depreciation (Avg.)	43,402,038	45,301,791	46,974,228	47,960,583	50,334,626
Net Book Value	36,786,304	38,525,976	40,990,201	45,416,790	67,651,024
Working Capital	56,190,596	54,138,273	61,733,207	68,757,418	70,867,265
Working Capital Allowance 15% (13% in 2013 Test Year)	8,428,589	8,120,741	9,259,981	10,313,613	10,630,090
Rate Base	45,214,893	46,646,717	50,250,182	55,730,403	78,281,113

- c) PUC has provided below the fixed asset continuity schedules for 2012 under the modified CGAAP showing both the 1/2 year rule (as filed in the original application) and what would be under the full-year used for financial accounting.

2012 Modified CGAAP ½ Year Rule

As at December 31, 2012											
Appendix 2-B		Cost				Accumulated Depreciation					
CCA Class	OEB	Description	Opening Balance	Additions	Disposals	Closing Balance	Opening Balance	Additions 1/2 year rule	Disposals	Closing Balance	Net Book Value
N/A	1805	Land	89,159			89,159	0			0	89,159
CEC	1806	Land Rights	836,582			836,582	0			0	836,582
47	1808	Buildings and Fixtures	1,242,326	23,000,000		24,242,326	673,569	254,837		928,406	23,313,920
13	1810	Leasehold Improvements	0			0	0			0	0
47	1815	Transformer Station Equipment - Normally Prima	8,312,486	34,919		8,347,405	3,249,660	207,929		3,457,589	4,889,816
47	1820	Distribution Station Equipment - Normally Prima	9,490,317	104,756		9,595,073	6,253,859	161,530		6,415,389	3,179,684
47	1825	Storage Battery Equipment	19,241			19,241	4,241	1,786		6,027	13,214
47	1830	Poles, Towers and Fixtures	13,413,491	1,249,019		14,662,510	2,877,014	279,951		3,156,965	11,505,545
47	1835	Overhead Conductors and Devices	11,917,662	2,417,886		14,335,548	1,407,870	204,208		1,612,078	12,723,470
47	1840	Underground Conduit	11,202,705	161,164		11,363,869	9,755,948	52,915		9,808,863	1,555,006
47	1845	Underground Conductors and Devices	19,409,591	1,154,576		20,564,167	11,441,337	556,490		11,997,827	8,566,340
47	1850	Line Transformers	15,659,949	161,164		15,821,113	7,540,451	678,639		8,219,090	7,602,023
47	1855	Services	3,623,556	2,656,516		6,280,072	303,293	120,812		424,105	5,855,967
47	1860	Meters	4,478,779			4,478,779	2,925,195	178,573		3,103,768	1,375,011
47	1860	Smart Meters	5,913,667			5,913,667	1,214,530	394,885		1,609,415	4,304,252
N/A	1865	Other Installations on Customer's Premises	0			0	0			0	0
N/A	1905	Land	0			0	0			0	0
CEC	1906	Land Rights	0			0	0			0	0
47	1908	Buildings and Fixtures	0			0	0			0	0
13	1910	Leasehold Improvements	0			0	0			0	0
8	1915	Office Furniture and Equipment	0			0	0			0	0
10	1920	Computer Equipment - Hardware	13,578			13,578	8,841	2,786		11,627	1,951
10	1920	Computer Equipment - Hardware - Smart Meters	11,760			11,760	5,232	2,331		7,563	4,197
12	1925	Computer Software	38,397			38,397	38,368	29		38,397	0
12	1925	Computer Software Smart Meters	492,267			492,267	256,817	98,104		354,921	137,346
10	1930	Transportation Equipment	0			0	0			0	0
8	1935	Stores Equipment	0			0	0			0	0
8	1940	Tools, Shop and Garage Equipment	0			0	0			0	(0)
8	1945	Measurement and Testing Equipment	0			0	0			0	0
8	1950	Power Operated Equipment	0			0	0			0	0
8	1955	Communication Equipment	0			0	0			0	0
8	1960	Miscellaneous Equipment	0			0	0			0	0
47	1970	Load Management Controls - Customer Premise	27,832		(27,832)	0	7,418		7,418	0	0
47	1975	Load Management Controls - Utility Premises	0			0	0			0	0
47	1980	System Supervisory Equipment	3,887,894			3,887,894	2,572,803	130,207		2,703,010	1,184,884
47	1985	Sentinel Lighting Rentals	0			0	0			0	0
47	1990	Other Tangible Property	0			0	0			0	0
47	1995	Contributions and Grants	(6,887,259)	(973,429)		(7,860,688)	(1,281,741)	(145,316)		(1,427,057)	(6,433,631)
	2005	Property under Capital Lease	0			0	0			0	0
		Total before Work in Process	103,193,980	29,966,571	(27,832)	133,132,719	49,254,705	3,180,699	7,418	52,427,986	80,704,733
WIP		Work in Process	4,099,831	(4,099,831)		0	0			0	0
		Total after Work in Process	107,293,811	25,866,740	(27,832)	133,132,719	49,254,705	3,180,699	7,418	52,427,986	80,704,733
	1925	Transportation						0			
	1930	Stores Equipment									
								3,180,699			

2012 Modified CGAAP Full Year Rule

Appendix 2-B			Cost				Accumulated Depreciation				
CCA Class	OEB	Description	Opening Balance	Additions	Disposals	Closing Balance	Opening Balance	Additions Full year	Disposals	Closing Balance	Net Book Value
N/A	1805	Land	89,159			89,159	0			0	89,159
CEC	1806	Land Rights	836,582			836,582	0			0	836,582
47	1808	Buildings and Fixtures	1,242,326	23,000,000		24,242,326	674,424	484,799		1,159,223	23,083,103
13	1810	Leasehold Improvements	0			0	0			0	0
47	1815	Transformer Station Equipment - Normally Prima	8,312,486	34,919		8,347,405	3,295,804	206,475		3,502,279	4,845,126
47	1820	Distribution Station Equipment - Normally Prima	9,490,317	104,756		9,595,073	6,284,041	161,345		6,445,386	3,149,687
47	1825	Storage Battery Equipment	19,241			19,241	4,240	1,786		6,026	13,215
47	1830	Poles, Towers and Fixtures	13,413,491	1,249,019		14,662,510	2,982,724	291,160		3,273,884	11,388,626
47	1835	Overhead Conductors and Devices	11,917,662	2,417,886		14,335,548	1,484,388	223,017		1,707,405	12,628,143
47	1840	Underground Conduit	11,202,705	161,164		11,363,869	9,772,378	53,944		9,826,322	1,537,547
47	1845	Underground Conductors and Devices	19,409,591	1,154,576		20,564,167	11,602,343	559,970		12,162,313	8,401,854
47	1850	Line Transformers	15,659,949	161,164		15,821,113	7,614,103	674,516		8,288,619	7,532,494
47	1855	Services	3,623,556	2,656,516		6,280,072	340,129	153,047		493,176	5,786,896
47	1860	Meters	4,478,779			4,478,779	2,933,376	177,633		3,111,009	1,367,770
47	1860	Smart Meters	5,913,667			5,913,667	1,214,530	394,885		1,609,415	4,304,252
N/A	1865	Other Installations on Customer's Premises	0			0	0			0	0
N/A	1905	Land	0			0	0			0	0
CEC	1906	Land Rights	0			0	0			0	0
47	1908	Buildings and Fixtures	0			0	0			0	0
13	1910	Leasehold Improvements	0			0	0			0	0
8	1915	Office Furniture and Equipment	0			0	0			0	0
10	1920	Computer Equipment - Hardware	13,578			13,578	9,905	2,161		12,066	1,512
10	1920	Computer Equipment - Hardware - Smart Meters	11,760			11,760	5,232	2,331		7,563	4,197
12	1925	Computer Software	38,397			38,397	38,371	29		38,400	(3)
12	1925	Computer Software Smart Meters	492,267			492,267	256,817	98,104		354,921	137,346
10	1930	Transportation Equipment	0			0	0			0	0
8	1935	Stores Equipment	0			0	0			0	0
8	1940	Tools, Shop and Garage Equipment	0			0	0			0	(0)
8	1945	Measurement and Testing Equipment	0			0	0			0	0
8	1950	Power Operated Equipment	0			0	0			0	0
8	1955	Communication Equipment	0			0	0			0	0
8	1960	Miscellaneous Equipment	0			0	0			0	0
47	1970	Load Management Controls - Customer Premise	27,832		(27,832)	0	7,546		7,418	128	(128)
47	1975	Load Management Controls - Utility Premises	0			0	0			0	0
47	1980	System Supervisory Equipment	3,887,894			3,887,894	2,576,427	129,848		2,706,275	1,181,619
47	1985	Sentinel Lighting Rentals	0			0	0			0	0
47	1990	Other Tangible Property	0			0	0			0	0
47	1995	Contributions and Grants	(6,887,259)	(973,429)		(7,860,688)	(1,388,648)	(154,944)		(1,543,592)	(6,317,096)
	2005	Property under Capital Lease	0			0	0			0	0
		Total before Work in Process	103,193,980	29,966,571	(27,832)	133,132,719	49,708,130	3,460,107	7,418	53,160,819	79,971,900
WIP		Work in Process	4,099,831	(4,099,831)		0	0			0	0
		Total after Work in Process	107,293,811	25,866,740	(27,832)	133,132,719	49,708,130	3,460,107	7,418	53,160,819	79,971,900
	1925	Transportation						0			
	1930	Stores Equipment									
								3,460,107			

2-Energy Probe-29s

Ref: 2-Staff-13

- a) What is the cost associated with the building, landscaping and parking that will be completed in the spring of 2013? Please confirm that this amount has not been closed to rate base at the end of 2012.
- b) How much of the forecasted cost of \$23 million was closed to rate base at the end of 2012?
- c) Please explain why the new facility is owned by PUC Distribution rather than PUC Services given that it owned two of the facilities being replaced?
- d) Did PUC Distribution consider renting space in the new facility from an affiliate rather than owning the facility and renting to its affiliates? If not, why not?

PUC Response

- a) The cost remaining on the construction contract to be completed in 2013, including costs associated with the building, landscaping and parking, are estimated to be approximately \$1,222,803. This amount has not been closed to rate base at the end of 2012.
- b) In the 2013 Cost of Service rate application all of the \$23 million was closed to rate base at the end of 2012. The total building costs in the bridge year were projected to be \$23 million including all building costs, landscaping, parking etc. The actual costs in 2012 were \$22,916,497. There are projected additional costs in 2013 is \$1,222,803 for landscaping and parking which are not included in the test year capital additions. The total projected actual cost is \$24,193,300.
- c) The new facility is owned by PUC Distribution rather than PUC Services due to the lower long term interest rate available to PUC Distribution and no other cost differences for the companies sharing the building.
- d) PUC Distribution did consider renting space in the new facility from an affiliate rather than owning the facility. Refer to c) above.

2.0-VECC – 43

Reference: Board Staff IR 2-Staff-13

- a) With respect to the new service center and admin building, please show the adjustment, if any, to 2013 rate base which are made for the removal of assets no longer used and useful (e.g. furniture, etc.).
- b) Please confirm that no previous assets, land values or assets related to the buildings being replaced are recorded in the 2013 rate base calculation.

PUC Response

- a) With respect to the new service centre and administration building, there were no adjustments to the 2013 rate base for the removal of assets that are no longer in use.
- b) PUC confirms there were no previous assets, land values, or assets related to the buildings replaced recorded in the 2013 rate base calculation.

2-SEC-43s

Ref: 2-Staff-13

Please provide a breakdown of the usable space in the three old buildings, compared to the new building, on the following basis:

- a) Offices and related space (e.g. meeting rooms, reception, lunchroom, etc.)
- b) Shops, workshops and related space (e.g. changing rooms, etc.)
- c) Stores
- d) Vehicles storage (inside)
- e) Other (please describe).

With respect to each category, please provide details on the usage before and after (e.g. number of offices and number of personnel using those offices; number of vehicles stored, etc.). Please include square footage per (distribution) employee data, and provide any comparative data used by the Applicant in establishing the reasonableness of the new building and its configuration.

PUC Response

PUC has provided a breakdown of the space in the three old buildings as follows:

	Primary Use of Area	Gross SF	Overall SF
<u>Queen St</u>			
	Offices & Related *	19,034	
	Meeting Rooms	1,095	
	Lunch Room	450	
	Stationary and Archives	560	
	Lockers	336	
	Other (elec/mech rm)	205	
	Vehicle Parking	2,120	
			23,800
<u>Murphy Centre</u>			
	General Office & Related *	1,208	
	Water Meter Area	1,042	
	Elect Meter Area	2,118	
	Stations, Plant & Mtce Dept	682	
	Line Dept	871	
	Water Dept	863	
	Stores	12,502	
	Meeting Room	750	
	Lunch Room	1,600	
	Stationary and Archives	-	
	Lockers	1,400	
	Service Garage	1,364	
	Other (elec/mech rm)	200	
	Vehicle Parking	23,200	
			47,800
<u>Trbovich Centre</u>			
	General Office & Related	6,794	
	Line Dept Work Shop	2,477	
	Water Dept Work Shop	2,113	
	Stations Work Shop	792	
	Lockers	768	
	Other (Indoor Loading Docks)	3,520	
	Vehicle Parking	26,456	
			42,920
* Note: "Office & Related" areas include administrative offices and workstation areas, wash rooms, corridors, entrance areas, elevator area, garbage storage, archives and stationary supplies storage, where applicable.			

PUC does not have available the breakdown of the usable space in the format above for the new building. The architects have not completed the square footage calculations by departments. The total square footage of the 3 old buildings was 114,520 and the new building is 110,382. The vehicle storage square footage in the old building was 51,776 compared to 33,712 in the new building.

42-SEC-44s

Ref: 2-SEC-16(b)

Please provide details as to how the proceeds of the sale of the buildings owned by PUC Services Inc. will be “transferred” to PUC Distribution, and how that transfer will affect operating costs, debt, rate base, depreciation, cost of capital, and revenue requirement.

PUC Response

The proceeds from the sale of the service centers by PUC Services will be transferred to PUC Distribution. The proceeds from the sale of PUC Services buildings will be used to pay down the loan between PUC Inc. and PUC Services. PUC Inc. will subscribe for common shares in PUC Distribution to transfer the proceeds received from PUC Services. There will be no change to operating costs, deemed debt or rate base, depreciation, deemed cost of capital or revenue requirement.

2-Energy Probe-30s

Ref: 2-Staff-14

- a) The response to part (b) appears to indicate that PUC Services Inc. does not use any equipment, systems, office furniture, etc. that is owned by PUC Distribution. Please confirm this is true. If this cannot be confirmed, please indicate how PUC Distribution is reimbursed by PUC Services for the use of non-building assets.

- b) The response to part (d) refers to depreciation costs and cost of capital charges. Does the revenue also include an allocation of operating and maintenance costs and property taxes? If not, please explain why not. If yes, please show the total costs associated with the new facility individually and show the allocation of those costs that are included in the revenue from PUC Services.

PUC Response

- a) PUC Distribution confirms that PUC Services Inc. does not use any equipment, systems, office furniture, etc. that is owned by PUC Distribution.
- b) The revenue does include an allocation of operating and maintenance costs and property taxes. The table below provides details of the costs associated with the new facility, as well as the costs allocated to PUC Distribution from PUC Services.

O&M Cost Category	Total Costs	Allocated to PUC Distribution
Property Tax	\$804,002	\$372,173
Utilities	\$213,192	\$98,687
Internal Labour, Benefits, OH's	\$148,923	\$68,936
General Building Misc	\$132,600	\$61,381
Janitorial, Waste Disposal	\$62,730	\$29,038
Internal Trucking	\$23,460	\$10,860
Internal Materials	\$15,300	\$7,082
Insurance	\$13,241	\$6,129
TOTAL O&M	\$1,413,447	\$654,285
<hr/>		
Capital Components	\$2,452,569	\$1,135,294

2-Energy Probe-31s

Ref: 2-Energy Probe-6 & 2-Staff-6

- a) Please provide, if now available, an updated version of Table 2-15 that reflects 2012 actual audited additions.
- b) Please provide an updated version of Table 2-16 that reflects both of the following:
- opening cost and accumulated depreciation from the revised Table 2-15 provided in the interrogatory response or from part (a) above, if available; and,
 - an adjustment to the 2013 opening balances to reflect the removal of the costs and accumulated depreciation associated with stranded meters.
- c) Please provide a revised Table 2.1 that reflects the above requested changes for 2012 and 2013 and is in the same format as Table 2.1 provided in response to 2-Staff-6.

PUC Response

- a) PUC has provided below an updated Table 2-15 that reflects 2012 actual audited additions.

Table 2-15 with 2012 actual additions

Appendix 2-B		Cost					Accumulated Depreciation				
CCA Class	OEB	Description	Opening Balance	Additions	Disposals	Closing Balance	Opening Balance	Additions 1/2 year rule	Disposals	Closing Balance	Net Book Value
N/A	1805	Land	89,159	8,433		97,592	0			0	97,592
CEC	1806	Land Rights	836,582			836,582	0			0	836,582
47	1808	Buildings and Fixtures	1,242,326	22,916,497		24,158,823	673,569	254,002		927,571	23,231,252
13	1810	Leasehold Improvements	0			0	0			0	0
47	1815	Transformer Station Equipment - Normally Prima	8,312,486	442,023		8,754,509	3,249,660	213,018		3,462,678	5,291,831
47	1820	Distribution Station Equipment - Normally Prima	9,490,317	1,158,545		10,648,862	6,253,859	174,703		6,428,562	4,220,300
47	1825	Storage Battery Equipment	19,241			19,241	4,241	1,786		6,027	13,214
47	1830	Poles, Towers and Fixtures	13,413,491	1,453,464		14,866,955	2,877,014	282,222		3,159,236	11,707,719
47	1835	Overhead Conductors and Devices	11,917,662	1,368,570		13,286,232	1,407,870	195,464		1,603,334	11,682,898
47	1840	Underground Conduit	11,202,705	332,905		11,535,610	9,755,948	54,632		9,810,580	1,725,030
47	1845	Underground Conductors and Devices	19,409,591	597,638		20,007,229	11,441,337	549,529		11,990,866	8,016,363
47	1850	Line Transformers	15,659,949	1,124,624		16,784,573	7,540,451	690,683		8,231,134	8,553,439
47	1855	Services	3,623,556	449,032		4,072,588	303,293	93,219		396,512	3,676,076
47	1860	Meters	4,478,779			4,478,779	2,925,195	178,573		3,103,768	1,375,011
47	1860	Smart Meters	5,913,667	215,408		6,129,075	1,214,530	402,066		1,616,596	4,512,479
N/A	1865	Other Installations on Customer's Premises	0			0	0			0	0
N/A	1905	Land	0			0	0			0	0
CEC	1906	Land Rights	0			0	0			0	0
47	1908	Buildings and Fixtures	0			0	0			0	0
13	1910	Leasehold Improvements	0			0	0			0	0
8	1915	Office Furniture and Equipment	0			0	0			0	0
10	1920	Computer Equipment - Hardware	13,578			13,578	8,841	2,786		11,627	1,951
10	1920	Computer Equipment - Hardware - Smart Meters	11,760			11,760	5,232	2,331		7,563	4,197
12	1925	Computer Software	38,397	24,216		62,613	38,368	2,451		40,819	21,794
12	1925	Computer Software Smart Meters	492,267			492,267	256,817	98,104		354,921	137,346
10	1930	Transportation Equipment	0			0	0			0	0
8	1935	Stores Equipment	0			0	0			0	0
8	1940	Tools, Shop and Garage Equipment	0			0	0			0	(0)
8	1945	Measurement and Testing Equipment	0			0	0			0	0
8	1950	Power Operated Equipment	0			0	0			0	0
8	1955	Communication Equipment	0			0	0			0	0
8	1960	Miscellaneous Equipment	0			0	0			0	0
47	1970	Load Management Controls - Customer Premise	27,832		(27,832)	0	7,418		7,418	0	0
47	1975	Load Management Controls - Utility Premises	0			0	0			0	0
47	1980	System Supervisory Equipment	3,887,894	305,143		4,193,037	2,572,803	137,836		2,710,639	1,482,398
47	1985	Sentinel Lighting Rentals	0			0	0			0	0
47	1990	Other Tangible Property	0			0	0			0	0
47	1995	Contributions and Grants	(6,887,259)	(785,327)		(7,672,586)	(1,281,741)	(142,964)		(1,424,705)	(6,247,881)
	2005	Property under Capital Lease	0			0	0			0	0
		Total before Work in Process	103,193,980	29,611,170	(27,832)	132,777,318	49,254,705	3,190,442	7,418	52,437,729	80,339,589
WIP		Work in Process	4,099,831	(4,099,831)		0	0			0	0
		Total after Work in Process	107,293,811	25,511,339	(27,832)	132,777,318	49,254,705	3,190,442	7,418	52,437,729	80,339,589
	1925	Transportation					0				
	1930	Stores Equipment									
							3,190,442				

b) PUC has provided below an updated version of Table 2-16 that reflects both of the following:

i) opening cost and accumulated depreciation from the revised Table 2-15 provided in the interrogatory response or from part (a) above, if available; and,

ii) an adjustment to the 2013 opening balances to reflect the removal of the costs and accumulated depreciation associated with stranded meters.

Table 2-16 2013 revised as per part b) above

Appendix 2-B			Cost				Accumulated Depreciation				
CCA Class	OEB	Description	Opening Balance	Additions	Disposals	Closing Balance	Opening Balance	Additions 1/2 year rule	Disposals	Closing Balance	Net Book Value
N/A	1805	Land	97,592			97,592	0			0	97,592
CEC	1806	Land Rights	836,582			836,582	0			0	836,582
47	1808	Buildings and Fixtures	24,158,823			24,158,823	927,571	483,166		1,410,737	22,748,086
13	1810	Leasehold Improvements	0			0	0			0	0
47	1815	Transformer Station Equipment - Normally Prime	8,754,509	46,618		8,801,127	3,462,678	218,543		3,681,221	5,119,906
47	1820	Distribution Station Equipment - Normally Prime	10,648,862	1,471,797		12,120,659	6,428,562	181,237		6,609,799	5,510,860
47	1825	Storage Battery Equipment	19,241			19,241	6,027	1,786		7,813	11,428
47	1830	Poles, Towers and Fixtures	14,866,955	1,240,039		16,106,994	3,159,236	307,607		3,466,843	12,640,151
47	1835	Overhead Conductors and Devices	13,286,232	1,867,384		15,153,616	1,603,334	239,919		1,843,253	13,310,363
47	1840	Underground Conduit	11,535,610	159,833		11,695,443	9,810,580	56,125		9,866,705	1,828,738
47	1845	Underground Conductors and Devices	20,007,229	1,358,580		21,365,809	11,990,866	587,905		12,578,771	8,787,038
47	1850	Line Transformers	16,784,573	159,833		16,944,406	8,231,134	682,652		8,913,786	8,030,620
47	1855	Services	4,072,588	2,049,861		6,122,449	396,512	179,642		576,154	5,546,295
47	1860	Meters	41,668			41,668	16,214	1,600		17,814	23,854
47	1860	Smart Meters	6,129,075	319,666		6,448,741	1,616,596	405,541		2,022,137	4,426,604
N/A	1865	Other Installations on Customer's Premises	0			0	0			0	0
N/A	1905	Land	0			0	0			0	0
CEC	1906	Land Rights	0			0	0			0	0
47	1908	Buildings and Fixtures	0			0	0			0	0
13	1910	Leasehold Improvements	0			0	0			0	0
8	1915	Office Furniture and Equipment	0			0	0			0	0
10	1920	Computer Equipment - Hardware	13,578			13,578	11,627	2,786		14,413	(835)
10	1920	Computer Equipment - Hardware - Smart Meters	11,760			11,760	7,563	2,331		9,894	1,866
12	1925	Computer Software	62,613			62,613	40,819	4,872		45,691	16,922
12	1925	Computer Software - Smart Meters	492,267			492,267	354,921	98,104		453,025	39,242
10	1930	Transportation Equipment	0			0	0			0	0
8	1935	Stores Equipment	0			0	0			0	0
8	1940	Tools, Shop and Garage Equipment	0			0	0			0	(0)
8	1945	Measurement and Testing Equipment	0			0	0			0	0
8	1950	Power Operated Equipment	0			0	0			0	0
8	1955	Communication Equipment	0			0	0			0	(0)
8	1960	Miscellaneous Equipment	0			0	0			0	0
47	1970	Load Management Controls - Customer Premises	0			0	0			0	0
47	1975	Load Management Controls - Utility Premises	0			0	0			0	0
47	1980	System Supervisory Equipment	4,193,037	266,389		4,459,426	2,710,639	136,867		2,847,506	1,611,920
47	1985	Sentinel Lighting Rentals	0			0	0			0	0
47	1990	Other Tangible Property	0			0	0			0	0
47	1995	Contributions and Grants	(7,672,586)	(965,395)		(8,637,981)	(1,424,705)	(169,551)		(1,594,256)	(7,043,725)
	2005	Property under Capital Lease	0			0	0			0	0
		Total before Work in Process	128,340,208	7,974,605		136,314,813	49,350,174	3,421,133	0	52,771,308	83,543,505
			0			0				0	0
WIP		Work in Process	0			0	0			0	0
		Total after Work in Process	128,340,208	7,974,605	0	136,314,813	49,350,174	3,421,133	0	52,771,308	83,543,505

c) PUC has provided below a revised Table 2.1 that reflects the above requested changes for 2012 and 2013.

	2008	2009	2010	2011	2012	2013
Opening Cost (A)	78,671,492	81,705,192	85,950,341	89,978,517	103,193,980	128,340,208
Closing Cost (B)	81,705,192	85,950,341	89,978,517	96,776,286	132,777,318	136,314,813
Average Cost $C=(A+B)/2$	80,188,342	83,827,767	87,964,429	93,377,402	117,985,649	132,327,511
Opening Acc. Dep. (D)	42,459,337	44,261,780	46,070,502	47,443,944	49,254,705	49,350,174
Closing Acc. Dep. (E)	44,261,780	46,070,502	47,443,944	47,778,126	52,437,729	52,771,308
Average Acc. Dep. $F=(D+E)/2$	43,360,559	45,166,141	46,757,223	47,611,035	50,846,217	51,060,741
NBV	36,827,784	38,661,626	41,207,206	45,766,367	67,139,432	81,266,770

2.0-VECC – 45

Reference: IR 2-VECC-10

- Please provide the list of all vehicles expected to be used by PUC Distribution in 2013 and provide the total cost of these vehicles to the utility.
- Please provide the same as a) used/incurred in 2008.

PUC Response

- The listing of vehicles expected to be used by PUC Distribution in 2013 are as follows:

Truck 1	Ford	F700	Line RBD
Truck 2	International	4900	50' Double Bucket
Truck 3	Freightliner	FL80	Line-RBD
Truck 4	Freightliner	FL80	42' Single Bucket
Truck 5	Freightliner	FL80	Line RBD
Truck 6	Ford	F150	1/2 Ton
Truck 7	Ford	F550	Dump Truck-Small 4X4
Truck 9	Freightliner	FM2	42' Single Bucket
Truck 10	Freightliner	FL80	Line RBD
Truck 11	International	4900	Line RBD
Truck 12	International	4900	Line RBD tandem Axle
Truck 13	GMC	Sierra	1/2 Ton
Truck 14	Freightliner	M2	46' Double Bucket

Truck 16	International	7400	68' Bucket Truck
Truck 19	Ford	F550	Line RBD Small 4x4
Truck 20	Ford	F550	SMALL RBD
Truck 21	Freightliner	FM2	42' Single Bucket
Truck 22	Ford	Ranger Ext Cab	1/2 Ton
Truck 23	Ford	Ranger Ext Cab	1/2 Ton
Truck 25	Ford	Ranger	1/2 Ton
Truck 26	Ford	F-250 (4 X 4)	3/4 Ton
Truck 29	Ford	F-550	1Ton Small Dump 4X4
Truck 50	Ford	Half Ton,Compact	1/2 ton Compact truck
Truck 51	Chevrolet	S10	1/2 Ton
Truck 53	Ford	F150	1/2 Ton
Truck 57	GMC	SIERRA	1/2 Ton
Van 58	Dodge	Grand Caravan	Mini Van
Van 59	Dodge	Grand Caravan	Mini Van
Van 60	Ford	Freestar	Mini Van
Truck 64	Ford	F450	One Ton Dump Truck
Van 81	Chevrolet	Uplander	Mini Van
Van 84	Ford	FreeStar	Mini Van
Van 85	GMC	Safari	Mini Van
Van 87	Chevrolet	Uplander	Mini Van
Van 89	Chevrolet	Uplander	Mini Van
Truck 90	Chevrolet	Silverado	1/2 Ton
Truck 92	Ford	Ranger	1/2 Ton
Truck 93	Ford	Ranger Ext Cab	1/2 Ton
Truck 94	Ford	Ranger ExteCab	1/2 Ton
Truck 96	Ford	F150	Full size 1/2 ton
Truck 99	Ford	F150	1/2 Ton
Truck 100	GMC	SIERRA	1/2 Ton
Truck 101	GMC	Sierra	1/2 Ton
Truck 108	Ford	Half Ton,Compact	
Van 109	DODGE	CARAVAN	Mini Van
Truck 110	GMC	SIERRA	1/2 Ton
Truck 111	GMC	SIERRA	1/2 Ton
Van 112	Dodge	Grand Caravan	
Truck 115	GMC	SIERRA 1/2 TON	1/2 Ton
Riding mower	KUBOTA	GF1800E	Riding Lawn Mower 118
Tractor 119	John Deere	425	Tractor 119 snow blower/lawn mower
Forklift 129	Toyoto	7FGU30	Forklift 129
Trailer 130	Felling	ONG	Trailer 130, Rear Lot RBD
RBD 131, R Lot	Tiiger-1 Thierman Ind	2500A	RBD 131, Rear Lot
Chipper 132	Vermeer	935BC	Trailer 132, Chipper, Brush
Trailer 135	Timberline	DPT30B	Trailer 135, Stringing, #2
Trailer 136	AB Chance	M5900AP	Trailer 136, Line Fencing
Trailer 137	UtilEquip	E01	Trailer 137, Reel
Trailer 139	Timberland	DPT-24	Trailer 139, Stringing,#1
Trailer 140	Timberline	DPT-24	Trailer 140, Stringing
Trailer 142	Brindle Products Inc.	PT10TC	Trailer 142, Pole, Single
Trailer 143	UtilEquip	42R	Trailer 143, Reel,Single

Trailer,		DPT 40B	Trailer 144,Stringing
Sander 156	Henderson Chief	FSP 8	Sander 156
SUV,160	Dodge	Journey	SUV
Trailer 117	CARG	COA6512SA	
Trailer 164	TSE	UP70BD	
Truck 196	GMC	SIERRA	
Truck 97	GMC	SIERRA	
Truck 198	GMC	SIERRA	
Genset 200	ONAN	15000	
Genset 201	ONAN	15000	
Truck 15	Ford	F-550 4X4	1 ton small dump truck
Underground Ser	FORD	F-550	Cube Van
Truck 18,	FREIGHTLINER	M2 106	40' SINGLE BUCKET
Van 54	Dodge	Grand Caravan	Mini Van
Van 55,	Dodge	Grand Caravan	Mini Van
Truck 62,	GMC	Siera	1/2 Ton
Van 63	GMC	SAVANA	Cargo 1500
Truck 66	Ford	F-250	
Truck 69	GMC	SIERRA	
Van 82	DODGE	CARAVAN	Mini Van
Van 83	DODGE	GRAND CARAVAN	Mini Van
Van 88 Mini	DODGE	GRAND CARAVAN	Mini Van
Truck 95	Ford	F350	
Lift Truck	Toyota Lift Truck	8BRU23	4,500 LBS Capacity
Trailer 141	Brindle Products Inc	PT35TG	Trailer 141,Pole Tandem
SUV 161	DODGE	JOURNY	SUV

Operating costs to the utility for use of vehicles in 2013 is estimated to be \$285,120.

- b) Operating costs to the utility for use of vehicles in 2008 was \$228,266. Vehicle records are not readily available for 2008 in order to provide a detailed listing.

2-Staff-62s

Ref: 2-Staff-9

Board Staff IR 2-Staff-9 asked PUC whether its external auditors have agreed with its proposed changes in accounting policies. The IR asked PUC to provide the plan for consultation with its auditors if PUC had not obtained the agreement with its external auditors.

In the response to the IR, PUC stated that “PUC is deferring implementation of IFRS for financial reporting; therefore, the external auditors have not confirmed agreement with the policies.”

PUC did not comment on its external auditors' viewpoint on the change PUC made in 2012 of its capitalization and depreciation expense policies under CGAAP.

- a) Please state whether PUC's external auditors have agreed with the changes in capitalization and depreciation expense policies PUC made in 2012 under CGAAP. Please provide a confirmation note from PUC's external auditors, if available.
- b) If PUC's external auditors did not agree with the changes:
 - i. Please provide the reasons for disagreement.
 - ii. Please provide the plan for consultation with PUC's external auditors to obtain agreement.
 - iii. If applicable, please quantify the impact of the difference between PUC's approach and that of the o external auditors on PUC's proposed revenue requirement.

PUC Response

- a) PUC's external auditors have agreed with the changes in capitalization and depreciation expense policies made in 2012 under CGAAP. The auditors confirmed through the auditor's report the financial statements were in accordance with CGAAP.
- b) Not applicable.

2-Staff-63s

Ref: 2-Staff-12

In response to the above referenced interrogatory, PUC noted that the replacement cost of a pole was estimated to be \$4,500. Please provide a further breakdown of the costs included to replace a pole.

PUC Response

The average cost to replace a pole is:

- Labour - \$2,755
- Trucking - \$595
- Materials - \$1,150
- Total - \$4,500

2-SEC-41s

Ref: 2-SEC-14

Please confirm that the listed documents are the only documents in the Applicant's possession that come within the description of the original question.

PUC Response

PUC confirms that the listed documents are the only documents in PUC's possession that come within the description of the original question.

2-SEC-42s

Ref: 2-SEC-15

Please provide the actual amounts spent in 2012 in each of the "annual allowances" categories referred to.

PUC Response

The actual amounts spent in 2012 for each of the categories referenced is not available. Actual spending by Distribution Plant accounts for 2012 were as follows:

1830 – Poles, Towers and Fixtures (Includes Replace Wood Poles program) \$1,453,464

1835 – Overhead Conductors and Devices (Includes Replace Restricted Wire program)
\$1,368,570

1840/1845 – Underground Conduit/Underground Conductors and Devices (Includes U/G Cable Remediation and U/G Station Cables programs) \$930,543

EXHIBIT 3 – OPERATING REVENUE**3-Energy Probe-32s**

Ref: Summary of PUC's Proposal on Load Forecast and CDM Savings as a result of the interrogatories & Exhibit 3, Tab 1, Schedule 2

Please provide a revised Table 3.1 from Exhibit 3, Tab 1, Schedule 2 that reflects the changes proposed as a result of the interrogatories.

PUC Response

PUC has provided below a revised Table 3.1 that reflects the changes proposed as a result of the interrogatories.

Summary of Revenue	2008 Board Approved	2008 Actual	2009 Actual	2010 Actual	2011 Actual	2012 Bridge Year	2013 Test Year at Current Rates	2013 Test Year at Proposed Rates
Distribution Revenue								
Residential	8,267,073	7,399,697	8,376,374	7,880,033	8,189,191	8,322,100	8,266,523	9,966,387
General Service < 50 kW	2,389,979	2,355,498	2,278,648	2,255,588	2,414,922	2,431,664	2,428,738	2,927,471
General Service > 50 kW	3,737,678	3,550,602	3,630,937	3,604,998	3,348,946	3,430,121	3,395,278	4,029,780
Unmetered Scattered Load	23,722	23,853	24,220	23,212	23,460	26,769	26,614	31,973
Sentinel Lighting	23,722	18,840	26,615	27,032	28,657	29,245	28,957	35,449
Street Lights	383,997	220,791	446,230	653,080	565,692	656,273	656,458	788,007
Total Distribution	14,826,171	13,569,281	14,783,024	14,443,943	14,570,868	14,896,172	14,802,568	17,779,067
% of Revenue	94%	90%	93%	93%	90%	95%	87%	89%
Other Revenue								
4082 - RS Revenue	58,520	59,797	64,933	54,762	41,034	53,500	43,000	43,000
4084 - Service Tx Requests	250	1,076	847	1,314	723	700	700	700
4210 - Rent from Electric Property	304,080	305,072	383,671	232,931	365,939	305,200	1,664,914	1,664,914
4225 - Late Payment Charge	195,000	217,310	237,964	223,894	198,379	195,000	196,000	196,000
4235 - Other Income & Expenses	172,900	280,440	253,369	263,048	217,074	184,350	195,190	195,190
4325 - Revenue from Merch. Jobbing	30,000	38,509	96,363	325,143	479,821	30,000	63,900	63,900
4330 - Costs & Exp. For Merch. Jobbing		(5)	5,118	434	1,780	2,000	(2,040)	(2,040)
4340 - Profit and Losses from Financial Inst.		3,298	(1,231)					
4355 - Gain on Disposition of Property					62,000			
4375 - Revenue from non-utility operations		263,954	65,516	106,861	412,945	1,570,161	105,336	105,336
4380 - Expense of non-utilities operations		(6,096)	(63,305)	(259,521)	(412,945)	(1,567,613)	(105,336)	(105,336)
4390 - Misc. non-operating income	114,000	37,893	17,343	52,905	86,353	15,000	40,000	40,000
4405 - Interest and Dividend Income	97,972	285,792	62,738	54,850	89,357	65,000	66,300	66,300
Total Revenue Offsets	972,722	1,487,040	1,123,326	1,056,621	1,542,460	853,298	2,267,964	2,267,964
% of Total Revenue	6%	10%	7%	7%	10%	5%	13%	11%
Grand Total	15,798,893	15,056,321	15,906,350	15,500,564	16,113,328	15,749,470	17,070,532	20,047,031

3-Energy Probe-33s

Ref: 3-VECC-22 & Exhibit 3, Tab 1, Schedule 2

- a) The response to part (b) indicates that the SSS admin charge is recorded in account 4080 - Distribution Revenue. This account is not included in Table 3-25. Please explain where in Tale 3.1 this revenue is included in the overall revenue forecast.
- b) Please show the actual SSS admin charge revenue for each of 2009 through 2012 and the forecast for 2013.
- c) Please explain the following increases in actual 2012 revenues as compared to that forecast:
 - i) account 4210 - actual revenue of \$352,249 vs. \$305,200 forecast;
 - ii) account 4225 - actual revenue of \$213,138 vs. \$195,000 forecast;
 - iii) account 4235 - actual revenue of \$243,593 vs. \$184,350 forecast;
 - iv) account 4325 - actual revenue of \$352,067 vs. \$30,000 forecast; and
 - v) account 4390 - actual revenue of \$122,094 vs. \$15,000 forecast.
- d) For each account noted in part (c) above, please explain why the 2013 forecast should not be maintained at the 2012 actual level (for account 4210 this question refers to the pole rental revenue as shown in 3-Energy Probe-14).
- e) What was the gain on disposition of \$37,423 shown for 2012 related to? What was the gain of \$62,000 in 2011 related to?
- f) Account 4390 shows an actual 2012 amount of \$122,094 and the response to 3-Energy Probe-13 part (f) indicates that \$82,100 of this amount was related to the sale of scrap. What was the remainder of the revenue (approximately \$40,000) related to and what is the forecast for 2013 for this source of revenue?

PUC Response

- a) In Table 3.1 the SSS admin revenue is included in the distribution revenue allocated to the appropriate rate classes.
- b) Actual SSS admin charge revenue is as follows:

	Actual	Actual	Actual	Actual	Forecast
	2009	2010	2011	2012	2013
SSS Admin Charge Revenue	\$106,815	\$115,761	\$123,526	\$118,749	\$120,000

- c) PUC has provided below explanations for the following increases in actual 2012 revenues as compared to the forecast:

i) *Account 4210 - actual revenue of \$352,249 vs. \$305,200 forecast* – increase in pole rental fees in 2012 over forecast.

ii) *Account 4225 - actual revenue of \$213,138 vs. \$195,000 forecast* – Residential late payment charges in 2012 were \$7,000 under forecast and General Service late payment charges in 2012 were \$24,000 over forecast – 2013 forecast is at 2011 actual level.

iii) *Account 4235 - actual revenue of \$243,593 vs. \$184,350 forecast* – Collection charges in 2012 were \$20,000 over forecast, Service call revenue was \$26,000 over forecast in 2012 and Microfit monthly charges were \$3,000 over budget in 2012.

iv) *Account 4325 - actual revenue of \$352,067 vs. \$30,000 forecast* – sale of stores material, traffic accident repairs charged to customers, etc. was \$320,000 over 2012 forecast.

v) *Account 4390 - actual revenue of \$122,094 vs. \$15,000 forecast* – sale of scrap material was \$67,000 over 2012 forecast and apprentice tax credits were \$40,000 over forecast.

- d) The revenues in part c) varies from year to year therefore it cannot be assumed that the 2012 levels will continue 2013. The average of the accounts excluding the solar project for 2008 to 2011 was \$940,000 compared to the 2013 forecast of \$842,730.

- e) The gain on disposition of \$37,423 in 2012 and \$62,000 in 2011 related to the sale of land.

- f) The remainder of the revenue in account 4390 (approximately \$40,000) related to apprenticeship tax credits. The total apprenticeship tax credits forecast in the 2013 test year are \$60,000 and are offset in labour costs.

3.0 – VECC –48

Reference: 3-VECC-22 a)

- a) For each of the following accounts please explain the variance between the forecast and actual values for 2012 and indicate why the higher actual value cannot be assumed to continue through 2013:
- Account 4225 (Late Payment Charge)
 - Account 4235 (Other Income and Expenses)
 - Account 4325 (Revenue from Merch. Jobbing)
 - Account 4390 (Misc. Non-operating Income)

PUC Response

Refer to response to 3-Energy Probe-33s.

3.0 – VECC – 49

Reference: 3-EP-13 d) & e)

- a) Based on the response to part (d), does the 2013 budget for Account 4235 need to be revised upwards?
- b) With respect to the response to part (e), please provide a similar breakdown for 2012 actuals and the 2013 forecast.

PUC Response

- a) Based on the average of 2011 and 2012, collection charge revenue can be increased by \$7,500 and Service call revenue by \$26,000.
- b) There is no revenue in account 4325 for large solar projects in 2012 actual or 2013 forecast.

3.0-VECC – 46

Reference: Interrogatory Responses – Summary of PUC Proposal

Exhibit 3, Tab 2, Schedule 1, pages 12-13

- a) Please confirm that PUC is no longer proposing to incorporate the net to gross adjustment factor in its determination of the 2013 manual CDM adjustment.
- b) Please explain why the billed CDM adjustment (6,654,894 kWh) was multiplied by a loss factor of 1.0489 in order to obtain the impact on purchases as opposed to the 1.0445 factor used in the Application (page 13) to adjust the regression model's purchased energy prediction to billed energy.

PUC Response

- a) PUC confirms it is using the net amount to determine the 2013 manual CDM adjustment.
- b) Upon further review of the CDM adjustment, PUC proposes the net CDM savings of 6,654,894 kWh should be used as the manual CDM adjustment and the loss factor not applied.

3.0 – VECC – 47

Reference: 3-VECC-21 c)

- a) Please confirm that the 31,593,974 kWh adjustments for losses converts the model predicted purchases to billed energy. If not, explain why not.
- b) If part (a) is confirmed, please explain why it is necessary to increase the proposed net CDM savings adjustment of 6,654,894 kWh for losses (i.e. shouldn't the billed energy prior to CDM adjustment simply be reduced by the assumed impact of CDM on billed energy?).

PUC Response

- a) PUC confirms the 31,593,974 kWh adjustments for losses converts the models predicted purchases to billed energy.
- b) Upon further review, PUC agrees the proposed CDM adjustment of 6,654,894 should not be adjusted for losses.

3-Staff-64s**Ref: 3-Staff-24, 3-Staff-23**

PUC has proposed an approach for the CDM adjustment for the 2013 load forecast amount based on an assumed savings of 30% of its four-year (2011 to 2014) CDM target.

An alternative approach is to take into account the 2011 results and their persistence, as measured and reported by the OPA for PUC, and then to assume an equal increment for each of 2012, 2013, and 2014 so as to achieve PUC's CDM target of 47,380,000 kWh. Board staff views this approach as being preferable as there are actual results on what the utility has achieved to date, which can then take into account what more will be needed to achieve the cumulative four-year target. In using the measured and reported results from the 2011 programs, including the persistence into 2013, Board staff views that an improved estimate of the CDM impact of 2011-2013 programs on the LRAMVA threshold for 2013 (and 2014) would result, along with the corresponding adjustment to the 2013 test year load forecast.

Based on the final 2011 OPA results provided in response to 3-Staff-23, Board staff has prepared the following table, which is also provided in working Microsoft Excel format:

Load Forecast CDM Adjustment Work Form (2013)**PUC Distribution Inc.****EB-2012-0162**

4 Year (2011-2014) kWh Target:					
47,380,000					
	2011	2012	2013	2014	Total
%					
2011 CDM Programs	4.55%	4.55%	4.55%	4.29%	17.95%
2012 CDM Programs		13.68%	13.68%	13.68%	41.03%
2013 CDM Programs			13.68%	13.68%	27.35%
2014 CDM Programs				13.68%	13.68%
Total in Year	4.55%	18.23%	31.90%	45.31%	100.00%
kWh					
2011 CDM Programs	2,157,479	2,157,479	2,157,479	2,031,020	8,503,457
2012 CDM Programs		6,479,424	6,479,424	6,479,424	19,438,272
2013 CDM Programs			6,479,424	6,479,424	12,958,848
2014 CDM Programs				6,479,424	6,479,424
Total in Year	2,157,479	8,636,903	15,116,327	21,469,292	47,380,000

Check 47,380,000

	Net-to-Gross Conversion "Gross"	"Net"	Difference	"Net-to-Gross" Conversion Factor (<i>'g'</i>)
2006 to 2011 OPA CDM programs: Persistence to 2013	92963819	55770492	37193327	66.69%

	2011	2012	2013	2014	Total for 2013
Amount used for CDM threshold for LRAMVA	2,157,479	6,479,424	6,479,424		15,116,327
Manual Adjustment for 2013 Load Forecast	3,596,301	10,800,550	5,400,275		19,797,126
<i>Manual adjustment uses "gross" versus "net" (i.e. numbers multiplied by (1 + g))</i>			<i>Only 50% of 2013 CDM impact is used based on a half year rule</i>		

The methodology for this is as follows: For the top table

- The 2011-2014 CDM target is input into cell B6;
- Measured results for 2011 CDM programs for each of the years 2011 and persistence into 2012, 2013 and 2014 are input into cells C15 to F15;
- Based on these inputs, the residual kWh to achieve the 4 year CDM target is allocated so that there is an equal incremental increase in each of the years 2012, 2013 and 2014.

The second table is to calculate the conversion from “net” to “gross” results. While the LRAMVA is based on the “net” OPA-reported results, the load forecast is impacted also by CDM savings of “free riders” and “free drivers”. While Board staff has input values from the response to 3-Staff-23 into each of cells D26 and E26, in the absence of other information, these should be populated with the measured “gross” and “net” CDM savings respectively, for the persistence of all CDM programs from 2006 to 2011 on 2013, as reported in the final OPA reports.

For the last table, two numbers are calculated:

- The “Amount used for CDM threshold for LRAMVA” is the sum of the persistence of 2011 and 2012 CDM programs and the annualized impact of 2013 CDM programs on 2013; and
- “Manual Adjustment for 2013 Load Forecast” represents the amount to be reflected in the 2013 load forecast. This amount uses the “gross” impact, which is calculated by multiplying each year’s CDM program impact or persistence by $(1 + g)$ from the second table. In addition, the impact of the 2013 CDM programs on 2013 “actual” consumption is divided by 2 to reflect a “half year” rule. Since the 2013 CDM programs are not in effect at midnight on January 1, 2013, the “annualized” results reported in the OPA report will overstate the “actual” impact. In the absence of information on the timing and uptake of CDM programs in their initial year, a “half-year” rule may proxy the impact.

a) Please verify the inputs and results of the model.

- b) Please derive the class-specific CDM kWh and kW savings that would correspond with the “net” CDM savings above.
- c) Please provide PUC’s comments on the methodology above to develop the CDM savings that will underlie the 2013 CDM amount for the LRAMVA and the corresponding CDM adjustment for the 2013 test year load forecast. What refinements to this approach should be considered?

PUC Response

- a) The results in the model above are based on the example provided in the original interrogatory for Thunder Bay Hydro Electricity Distribution Inc.

PUC has revised the model with the appropriate numbers and included it below:

Load Forecast CDM Adjustment Work Form (2013)					
PUC Distribution Inc.		EB-2012-0162			
4 Year (2011-2014) kWh Target:					
30,830,000					
	2011	2012	2013	2014	Total
%					
2011 CDM Programs	8.90%	8.90%	8.90%	8.54%	35.24%
2012 CDM Programs		10.79%	10.79%	10.79%	32.38%
2013 CDM Programs			10.79%	10.79%	21.59%
2014 CDM Programs				10.79%	10.79%
Total in Year	8.90%	19.69%	30.49%	40.92%	100.00%
kWh					
2011 CDM Programs	2,744,164	2,744,164	2,744,164	2,632,822	10,865,314
2012 CDM Programs		3,327,448	3,327,448	3,327,448	9,982,343
2013 CDM Programs			3,327,448	3,327,448	6,654,895
2014 CDM Programs				3,327,448	3,327,448
Total in Year	2,744,164	6,071,612	9,399,059	12,615,165	30,830,000
				Check	30,830,000
Net-to-Gross Conversion					
	"Gross"	"Net"	Difference	"Net-to-Gross" Conversion Factor ('g')	
2006 to 2011 OPA CDM programs:					
Persistence to 2013	92,963,819	55,770,492	37,193,327	66.69%	
	2011	2012	2013	2014	Total for 2013
Amount used for CDM threshold for LRAMVA	2,744,164	3,327,448	3,327,448		9,399,059
Manual Adjustment for 2013 Load Forecast	4,574,246	5,546,522	2,773,261		12,894,029
Manual adjustment uses "gross" versus "net" (i.e. numbers multiplied by (1 + g))			Only 50% of 2013 CDM impact is used based on a half year rule		

- b) PUC has provided below the class-specific CDM kWh and kW savings that would correspond with the “net” CDM savings above.

	Residential	GS<50	GS>50	Street Lighting	Sentinels	USL	Total
kWh	4,550,758	1,365,379	3,362,279	3,394	105,593	11,657	9,399,059
kW where applicable			8,396	10	295		8,700

- c) PUC is in agreement with the LRAMVA calculation and has no further comments. PUC believes the CDM adjustment for the 2013 test year load forecast should be based on the net results. Furthermore, the CDM adjustment should be reduced by the 2011 actual CDM savings as the 2011 purchased energy used in the regression analysis is the actual data and already reflects the impact of the CDM programs implemented in 2011 essentially “double counting”. PUC also has concerns with the inconsistent treatment of the LRAMVA being on a full year and the CDM adjustment being based on the ½ year rule.

3-Staff-65s

Ref: 3-Staff-25

In its response to part b) of 3-Staff-25, PUC states:

Assuming the “half-year” rule is used to account for 2013 CDM programs not being in place for a full year, the adjustment for 2012 and 2013 CDM programs on 2013 demand would be estimated as 3,327,448 kWh X 1.5 (reflecting full year impact of 2012 CDM and half-year impact of 2013 CDM on 2013) X 1.6750 = 8,360,213 kWh. However, **PUC is concerned with using the “half-year” rule since it is PUC’s understanding that there should be consistent treatment on how the load forecast is adjusted and how the LRAMVA threshold is determined. [Emphasis added]**

- a) What is PUC’s understanding of the consistent treatment for the load forecast adjustment and LRAMVA?
- b) In the above example, the 2013 CDM program savings in 2013 are estimated to be 3,327,448 kWh, but this is assuming that the 2013 CDM programs were in effect the full year, from January 1 to December 31. In reality, the programs will be implemented and there will be uptake by customers at various points in the year. Thus the impact actually

realized in 2013, the initial year of 2013 programs, will be different from and much less, all else being equal, than the annualized savings. Please provide, with explanation, PUC's perspective on whether the 2013 annualized savings of 2013 CDM programs will overstate the actual savings.

PUC Response

a) It is PUC's understanding that there should be consistent treatment on how the load forecast is adjusted and how the LRAMVA threshold is determined. Since a full year amount is used in the LRAMVA threshold calculation for 2013 then a full year for 2013 should be used in the manual CDM adjustment.

b) PUC agrees that uptake of the programs by customers will be at various points in the year. Although, it is unknown when in the year the programs will be implemented and accessed by customers or the actual results. Therefore, in PUC's view, it cannot be determined at this time if the annualized savings will overstate the actual savings.

3-SEC-45s

Ref: 3-VECC-22

Please provide details of the reductions in FTEs, if any, from 2012 Bridge Year Forecast to 2013 Test Year resulting from the reductions in Accounts 4375 and 4380.

PUC Response

There were no reductions in FTEs from the 2012 Bridge Year Forecast to 2013 Test year resulting from the reductions in Accounts 4375 and 4380.

EXHIBIT 4 – OPERATING COSTS

4-Energy Probe-35s

Ref: 4-Energy Probe-17 & Exhibit 6, Tab 1, Schedule 1

- a) The response to part (b) of the interrogatory indicates that property taxes are included in account 5675. Please provide the total property taxes paid in each of 2008 through 2012 and the forecast for 2013 that incorporates the \$296,000 increase for the new building.
- b) The response to part (f) states that the \$50,000 shown in Table 6-1 of Exhibit 6, Tab 1, Schedule 1 is account 6150 - taxes other than income. Please indicate what taxes are included in this account and please provide the actual amounts recorded in this account for each of 2008 through 2012.
- c) Please explain the "Smart Meter Regulatory Entry" cost driver shown in the table provided in response to part (e) of the interrogatory. In particular, is the increase in 2012 of \$661,391 which is reversed in 2013, the costs incurred prior to 2012 and recovered in 2012? If yes, please show the derivation of the \$661,391 by year in which the costs were actually incurred.
- d) Please reconcile the "smart meter regulatory entry" of \$661,391 shown in part (e) of the response with the figure of \$142,790 shown in the response to part (c) of the response. Is the \$142,790 just one of the components included in the \$661,391?
- e) Please explain why PUC reduced line clearing costs by \$253,000 in 2012 only to increase them by \$326,000 in 2013.

PUC Response

- a) PUC has provided below the total property taxes paid in each of 2008 through 2012 and the forecast for 2013 that incorporates the \$296,000 increase for the new building.

	Actual	Actual	Actual	Actual	Forecast	Forecast	var	v.
	2008	2009	2010	2011	2012	2013	2012 2013	
Direct	\$74,860	\$37,152	\$36,378	\$38,156	\$41,449	\$40,000	\$1,449	
Allocated	\$52,967	\$51,446	\$49,619	\$47,513	\$75,821	\$372,173	(\$296,352)	
Total Property Tax	\$127,828	\$88,598	\$85,997	\$85,669	\$117,270	\$412,173	(\$294,903)	

b) The reference to account 6150 in the response to Energy Probe – IR 4-EP-17, part (f) is incorrect as it should reference account 6105 – *taxes other than income taxes*. The amounts recorded in account 6105, shown in the table below, are Payments in Lieu of Property Tax, paid to the Ontario Electricity Financial Corporation, as prescribed by subsection 92 (1) of the Electricity Act, 1998 and Ontario Regulation 423/11.

	Actual	Actual	Actual	Actual	Actual
	2008	2009	2010	2011	2012
Account 6105					
Taxes -Other than income	\$38,044	\$55,628	\$49,934	\$50,362	\$50,000

c) The smart meter regulatory entry cost driver shown in the table relates to the approved disposition to account 1556 – *OM&A Smart Meter Variance account* as per Board Decision EB-2012-0084 dated July 19, 2012. PUC has provided below a table of costs in the year they were actually incurred.

2009	2010	2011	2012	Total
62,086	112,400	339,482	147,423	661,391

d) The \$142,790 is the community relations components of the \$661,391 "smart meter regulatory entry".

e) PUC tenders for contracted line clearing services to clear areas of its service territory on an annual rotating basis. The annual cost of this service varies depending on the area being cleared and the number of contractors bidding for the service. In 2012 favourable bids were received

for the area contracted due to the entry of a new contractor serving the area. The 2013 forecast is based on 2011 actual.

4-Energy Probe-36s

Ref: 4-Energy Probe-17 & 4-Energy Probe-18

Please reconcile the number of FTEs shown for 2012 of 84 in the response to 4-Energy Probe-18 part (c) and the figure of 86.81 shown in the response to 4-Energy Probe-17 part (g).

PUC Response

The FTEs on 4-Energy Probe-17 (g) should be 84, the Customers/FTEs should be 397.63 and the OM&A cost per FTEE should be 121,527.82.

4.0-VECC – 50

Reference: IR 4-Staff-29

The interrogatory requested completion of Appendix 2-K. The revised Excel file Chapter2Appendicies_20130404 shows; (1) no part-time employees, (2) no accrued pension and post-retirement benefits and (3) no amounts for overtime. Please confirm this information is correct or, if it is not, please complete Appendix 2-K.

PUC Response

PUC Distribution has no employees, the labour included in Appendix 2-K is the labour portion of the charges from PUC Services. There are no part-time employees, accrued post-retirement benefits are included in PUC Services and overtime is included in total salary and wages.

4-SEC-47s

Ref: 4-Staff-29

Please advise why the Applicant has not broken down Appendix 2-K into the four employee categories required under the Filing Requirements.

PUC Response

Executive staff and non-union staff (less than 3 FTE) are included with Management staff.

4-SEC-48s**Ref: 4-SEC-26**

Please explain how the Applicant is able to provide the 2-K for Distribution for all years, without being able to provide the 2-K for Services for all years. Please explain in detail the process used to get the numbers for each year for Appendix 2-K for the Applicant.

PUC Response

Schedule 2-K for Distribution for all years was prepared using “Distribution only” data (i.e. separate and apart from PUC Services information) and was prepared during the several months leading up to the filing of the 2013 application. Preparation of schedule 2-K for PUC Services could be provided, however, it would require comprehensive, in-depth analysis of multiple sources of data.

4.0-VECC – 51**Reference: IR 4-SEC-26 (f)**

- a) Please provide the total number of employees in PUC Services in 2008 and the total number allocated to the distribution company. Show the same for 2013.
- b) Please provide the total operating cost of PUC Services in 2008 and the total amount charged to distribution. Please provide the same for 2013.

PUC Response

a) PUC has provided below the total number of employees in PUC Services and allocated to PUC Distribution in 2008 and the 2013 test year.

	2008	2013
PUC Distribution	66	87
PUC Services	152	182

b) Total operating cost of PUC Services and the amounts charged to PUC Distribution are as follows:

	Actual 2008	Estimated 2013
Total Operating Costs of PUC Services	\$8,489,212	\$12,108,552
Total Amount Charged to PUC Distribution	\$2,210,588	\$2,611,358

4-Energy Probe-37s**Ref: 4-SEC-24**

The response lists the increase in property taxes for the new building as one of the drivers of the increase in OM&A per customer. How were the property taxes associated with the 3 buildings being replaced, and owned by affiliates, charged to PUC distribution in the past? For each of 2008 through 2012, please provide the property taxes paid by PUC Distribution as part of the costs paid to affiliates for the use of these facilities.

PUC Response

The property taxes associated with the 3 buildings that were replaced and owned by affiliates were charged to PUC Distribution through the administrative account 5675 of the shared services methodology described in *Exhibit 4, Tab 2, Schedule 4*.

Please refer to 4-Energy Probe-35s part (a) for the property taxes paid by PUC distribution as part of the costs paid to affiliates for 2008 to 2012.

4-SEC-52s**Ref: 4-SEC-19**

Please advise how much, if any, of the 20% increase in Operations for 2012 is related to the new building, and provide details of that component.

PUC Response

None of the increase in Operations for 2012 is related to the new building.

4.0-VECC – 52**Reference: IR-VECC-27**

a) Please explain the “Asset charge” shown in the table of Meter Reading Expenses.

PUC Response

Please refer to IRRS for 4-Staff-69s part (e) below.

4.0-VECC – 53**Reference: IR 4-SEC-23 / 4-EP-16**

a) Please explain the “cost of capital/asset” charge in the table provided in response c).

b) Please explain what activities the employees are engaged in in respect the Community relations-sundry. Please provide the FTEs and description of the positions.

PUC Response

a) Please refer to IRRS for 4-Staff-69s part (e) below.

b) The activities in this account include the customer call centre, front counter staff dealing with customers and dealing with customers in the field on items such as high bill complaints, insurance claims, etc.

Duties include dealing with customer inquiries at front counter, by telephone or e-mail. Includes items such as billing inquiries, rereads, high bill complaints, cut-ins/cut-outs, underground plant locates, government assistance programs, accounts receivable balances, deposit requirements and policies, smart meter inquiries, energy retailer inquiries, electricity deregulation, on line account access inquiries, maintaining data base of customer calls, etc.

Position	FTE
Sr Customer Service Clerk	.56
Customer Service Clerks	2.8
Customer Service Support Clerk	.56
Mailroom Services	.92
Field Services Reps	.25
Customer Service Supervisor	.56
Customer Service and Billing Supervisor	.28

4-Staff-66s

Ref: Appendix 2-M

- a) Please complete columns labeled (B) and (C) in the above referenced appendix. b) Please confirm that “consultant costs for regulatory matters” is a one-time cost by selecting the appropriate value in column (D).
- b) Please provide an explanation as to why OEB Section 30 Costs (Applicant- originated), intervenor costs and operating expenses associated with other resources allocated to regulatory matters have not been entered for the 2013 test year. If applicable, update Appendix 2-M.

PUC Response

- a) PUC has completed columns (B) and (C) in the revised appendix below and confirmed “consultant costs for regulatory matters” is a one-time cost by selecting the appropriate value in column (D).
- b) The OEB Section 30 costs (Applicant originated) are included with the OEB Section 30 costs (OEB-initiated).

Regulatory Cost Category	USoA Account	USoA Account Balance in the test year	Ongoing or One-time Cost? ²	Last Rebasing Year (2008 Board Approved)	Most Current Actuals Year 2011	2012 Bridge Year	Annual % Change	2013 Test Year	Annual % Change
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H) = [(G)-(F)]/(F)	(I)	(J) = [(I)-(G)]/(G)
1 OEB Annual Assessment	5655	\$ 271,041	On-Going	\$ 100,800	\$ 102,886	\$ 100,800	-2.03%	\$ 102,000	1.19%
2 OEB Section 30 Costs (Applicant-originated)									
3 OEB Section 30 Costs (OEB-initiated)	5655	\$ 271,041	On-Going	\$ 10,000	\$ 4,352		-100.00%	\$ 5,000	
4 Expert Witness costs for regulatory matters									
5 Legal costs for regulatory matters	5655	\$ 271,041	On-Going	\$ 18,002					
6 Consultants' costs for regulatory matters	5655	\$ 271,041	On-Time	\$ 18,002	\$ 31,003	\$ 125,000	303.19%	\$ 31,250	-75.00%
7 Operating expenses associated with staff resources allocated to regulatory matters	5655	\$ 271,041	On-Going	\$ 122,485	\$ 37,020	\$ 133,949	261.83%	\$ 132,791	-0.86%
8 Operating expenses associated with other resources allocated to regulatory matters ¹	5655	\$ 271,041	On-Going	\$ 9,067					
9 Other regulatory agency fees or assessments									
10 Any other costs for regulatory matters (please define)									
11 Intervenor costs									
12 Sub-total - Ongoing Costs ³		\$ -		\$ 260,354	\$ 144,258	\$ 234,749	62.73%	\$ 239,791	2.15%
13 Sub-total - One-time Costs ⁴		\$ -		\$ 18,002	\$ 31,003	\$ 125,000	303.19%	\$ 31,250	-75.00%
14 Total		\$ -		\$ 278,356	\$ 175,261	\$ 359,749	105.26%	\$ 271,041	-24.66%

4-Staff-67s

Ref: 4-VECC-31

On October 20, 2010, the Board issued a letter regarding LEAP Emergency Financial Assistance. The letter stated that “the LEAP amount should be calculated based on total distribution revenues” and further stated that “for greater clarity, Board-approved total distribution revenue means a distributor’s forecasted service revenue requirement as approved by the Board”.

Please recalculate the LEAP amount using the service revenue requirement.

PUC Response

The LEAP amount using the service revenue requirement, as revised in the interrogatory responses, is \$24,056.

4-Staff-68s

Ref: 4-Staff-28

- a) Please identify the source and the definition of the CPI annual increases for 2009 to 2012 used in the response. Please explain why this source of CPI is used by PUC.
- b) Please identify whether the 2012 CPI measure is an actual or forecast.
- c) Board staff understands that the 2013 CPI shown is a forecast. Please identify the source of this number, if different from that for the historical data.

PUC Response

- a) The source of the CPI annual increases was the Bank of Canada website. Consumer price index on the site is defined as measure that tracks movements over time in the level of consumer prices. The CPI compares the retail prices of a representative "shopping basket" of goods and services at two different points in time.
- b) The 2012 CPI measure was an actual at the time.
- c) The 2013 forecast was an average of the prior three years.

4-SEC-46s

Ref: 4-Staff-28

Please confirm that the inflation assumptions assume 0.0% productivity.

PUC Response

PUC confirms the inflation assumptions assumed 0.0% productivity.

4-Staff-69s

Ref: 4-Staff-43

In the table provided in the response to 4-Staff-43 a), please provide descriptions of the following items:

- | | |
|-----------------------------|-----------|
| a) Meter Reading Contractor | \$30,000; |
| b) Meter Reading Exp Phone | \$4,400; |
| c) Meter Reading Labour | \$16,683; |
| d) Meter Reading Truck | \$2,040; |
| e) Asset Charge | \$25,209. |

PUC Response

- a) PUC Distribution will maintain a reduced contract with its service provider to perform meter reading activities.
- b) PUC Distribution incurs telecommunications costs required to obtain meter reads.
- c) PUC Distribution utilizes internal labour to perform meter reading activities.
- d) PUC Distribution is allocated “trucking” costs from PUC Services for use of its vehicles while performing meter reading duties. These costs are to cover operating and maintenance of the vehicles.
- e) PUC Services allocates depreciation expense (Asset Charge) related to the assets it owns (i.e. vehicles, equipment, computers, office furniture, etc.) to PUC Distribution based on their usage of the assets. In addition, a “Cost of Capital” is allocated to PUC Distribution to allow PUC Services a return on invested capital based on the usage of the assets.

4-SEC-9s

Ref: 4-Staff-30

Please refer to the MEARIE 2012 Management Salary Survey dated August 31, 2012 (a copy of which is attached):

- a) Please confirm that the Applicant participated in the Survey.
- b) Please advise for how many of the employees of the Applicant (or employees of any affiliate that provide services to the Applicant) is their total compensation in each of the following categories relative to the Survey:
 - a. Under the 25th percentile
 - b. 25th to 50th percentile
 - c. 50th to 75th percentile
 - d. Above the 75th percentile.
- c) Please estimate the total forecast management compensation cost for the test year if all management employees had total compensation at the 50th percentile.

PUC Response

- a) PUC Services participated in the Survey.
- b) Six of the positions performing work on behalf of the LDC were over P50. Three of the six were less than \$1,500 over P50. Of the remaining three, two did not have a direct comparator on the MEARIE Positions Profile. Only a portion of the salaries of the six is an expense of the LDC.

- c) Management compensation would be approximately \$150,000 higher if all management employees were at P50.

4-SEC-50s

Ref: 4-SEC-33

Please provide a detailed calculation to demonstrate that the impact on the Applicant of the methodology employed to allocate the financial impacts of the new enterprise software, including but not limited to all tax impacts, is the same as the impact on the Applicant if the Applicant owned the new enterprise software itself.

PUC Response

PUC has provided a detailed calculation below to demonstrate the impact of the methodology employed to allocate the financial impacts of the new enterprise software is the same as the impact as if the applicant owned the new enterprise software itself.

<u>Assumptions:</u>		
Capital Cost	\$100.00	
Depreciation Rate	20%	(5 Years)
Cost of Capital	6.20%	

	46%	16%	38%
	PUC Distribution	PUC Services	Other(s)
<u>Owned by PUC Services</u>			
Capital Investment Opportunity Cost		\$6.20	
Allocation of Cost of Capital	\$2.85	(\$5.21)	\$2.36
Depreciation Expense		\$20.00	
Allocation of Depreciation (Asset Charge)	\$9.20	(\$16.80)	\$7.60
OM&A (Direct)		\$10.00	
Allocation of Admin Expenses	\$4.60	(\$8.40)	\$3.80
Impact to Earnings Before Tax	\$16.65	\$5.79	\$13.76

<u>Owned by PUC Distribution</u>			
Capital Investment Opportunity Cost	\$6.20		
Allocation of Cost of Capital	(\$3.35)	\$0.99	\$2.36
Depreciation Expense	\$20.00		
Allocation of Depreciation (Asset Charge)	(\$10.80)	\$3.20	\$7.60
OM&A (Direct)	\$10.00		
Allocation of Admin Expenses	(\$5.40)	\$1.60	\$3.80
Impact to Earnings Before Tax	\$16.65	\$5.79	\$13.76

4-SEC-51s**Ref: 4-SEC-27(e)**

Please provide a full breakdown of Management Fees by source for each year.

PUC Response

PUC has provided below a breakdown of Management Fees by source for each year.

	2011	2012 audited	2013
PUC Distribution	\$4,849,238.00	\$4,028,704.00	\$5,861,263.00
Public Utilities Commission	\$3,123,936.00	\$3,108,284.00	\$4,723,058.00
PUC Telecom	\$75,810.00		
PUC Inc.	\$56,791.00	\$43,230.00	\$157,416.00
Total	\$8,105,775.00	\$7,180,218.00	\$10,741,737.00

EXHIBIT 5 - COST OF CAPITAL AND RATE OF RETURN

5-Energy Probe-38s

Ref: 5-Energy Probe-21 & Exhibit 5, Tab 1, Schedule 1 & Exhibit 5, Tab 1, Schedule 3

- a) Are the Infrastructure Ontario rates provided in the response to part (c) of the interrogatory response based on serial or amortizer loans?
- b) The 2013 table in Exhibit 5, Tab 1, Schedule 3 shows Infrastructure Ontario debt of \$25 million while page 2 of Exhibit 5, Tab 1, Schedule 1 has two IO loans with amounts of \$5 million and \$21.18 million, respectively. Please reconcile these figures.
- c) What was the balance drawn on each of the IO loans as of the end of December 2012?
- d) If different from the amounts in part (c), what is the expected average principle balance for each of the two IO loans in 2013?

PUC Response

- a) The Infrastructure Ontario rates provided are based on amortizer loans.
- b) The balance at December 31, 2011 for the infrastructure loan #1 was \$5 million. The approved principal for the infrastructure loan #2 was \$21.18 million of which \$1,092,003 was drawn at the end of December 31, 2011. Table 5-8 in Exhibit 5, Tab 1, Schedule 3, PUC forecast in the application the total principal loan balance to be \$25 million in the 2013 test year.
- c) The balances drawn on each of the loans at the end of December 2012 are loan #1 - \$5,000,000 and loan #2 - \$17,470,930.
- d) PUC expects the principal balance at the end of 2013 to be \$5 million and \$21.18 million.

5-SEC-53s

Ref: 5-SEC-29

Please explain the reasons for not considering repayment of the promissory note in favour of more competitive borrowing rates from third parties.

PUC Response

The rate on the promissory note does not affect customer rates. There is greater flexibility in dealing with the parent company rather than a third party.

EXHIBIT 7 – COST ALLOCATION

7.0-VECC – 54

Reference: 7-Staff-47

a) Please confirm that the revised Cost Allocation Model filed with the first round IR responses included:

- The revised allocator for meter reading expenses,
- The revised load forecast, and
- Updated demand allocators based on the revised load forecast.

b) Were any other changes incorporated in the revised Cost Allocation Model? If yes, please indicate what they were.

PUC Response

a) PUC confirms the revised cost allocation model filed with the first round of IRs included the revised allocator for meter reading expense and the revised load forecast. The demand allocators were not revised based on the revised load forecast.

b) PUC also completed sheet I7.2 in the cost allocation model to include the weighted factor for meter reading by rate class (IR 9-Staff-50 and IR-VECC-38).

7-Energy Probe-39s

Ref: 7-Energy Probe-23

Instead of setting the revenue to cost ratios for the street lighting and sentinel classes to the same level, please keep the sentinel ratio at the proposed level of 80% and all other classes, excluding street lighting, at the ratios as shown in the response. Please calculate the revenue to cost ratio for the street lighting class that results in overall revenue neutrality for PUC.

PUC Response

The revenue to cost ratio for the street light class for revenue neutrality is 79.53% as shown below.

Cost Allocation Based Calculations									
Class	Revenue Requirement - 2013 Cost Allocation Model	2013 Base Revenue Allocated based on Proportion of Revenue at Existing Rates	Miscellaneous Revenue Allocated from 2013 Cost Allocation Model	Total Revenue	Revenue Cost Ratio	Proposed Revenue to Cost Ratio	Proposed Revenue	Miscellaneous Revenue	Proposed Base Revenue
Residential	12,276,417	10,023,199	1,419,154	11,442,353	93.2%	93.2%	11,441,621	1,419,154	10,022,467
GS < 50 kW	2,937,676	2,943,610	333,862	3,277,472	111.6%	111.6%	3,278,417	333,862	2,944,555
GS >50 kW	3,733,302	4,114,229	385,082	4,499,311	120.5%	120.0%	4,479,962	385,082	4,094,880
Sentinel Lights	51,434	35,095	5,374	40,469	78.7%	80.0%	41,147	5,374	35,773
Street Lighting	1,175,934	796,079	120,652	916,731	78.0%	79.53%	935,197	120,652	814,545
USL	37,654	32,241	3,840	36,081	95.8%	95.8%	36,073	3,840	32,233
TOTAL	20,212,417	17,944,453	2,267,964	20,212,417	100.0%		20,212,417	2,267,964	17,944,453

7-Energy Probe-40s

Ref: 7-Staff-47

Starting with the revenue to cost ratios shown in the cost allocation model provided in the response to this interrogatory, please reduce the ratio for the GS > 50 class to 120% and increase the ratio to the same level for the street light and sentinel classes so that PUC is held revenue neutral, without changing the ratios for the remaining classes. Please indicate the result ratio for the street light and sentinel class that achieves this result.

PUC Response

Based on the revenue to cost ratios in the interrogatory responses, the ratios for the street lights and sentinel lights would be 77.99% as shown below.

Cost Allocation Based Calculations									
Class	Revenue Requirement - 2013 Cost Allocation Model	2013 Base Revenue Allocated based on Proportion of Revenue at Existing Rates	Miscellaneous Revenue Allocated from 2013 Cost Allocation Model	Total Revenue	Revenue Cost Ratio	Proposed Revenue to Cost Ratio	Proposed Revenue	Miscellaneous Revenue	Proposed Base Revenue
Residential	12,288,647	9,928,754	1,439,936	11,368,690	92.5%	92.8%	11,406,322	1,439,936	9,966,386
GS < 50 kW	2,828,166	2,917,109	317,460	3,234,569	114.4%	114.7%	3,244,931	317,460	2,927,471
GS >50 kW	3,675,402	4,078,000	380,702	4,458,702	121.3%	120.0%	4,410,482	380,702	4,029,780
Sentinel Lights	51,029	34,780	5,374	40,154	78.7%	77.99%	39,797	5,374	34,423
Street Lighting	1,166,443	788,458	120,652	909,110	77.9%	77.99%	909,685	120,652	789,033
USL	37,344	31,965	3,840	35,805	95.9%	95.9%	35,813	3,840	31,973
						0.0%			
TOTAL	20,047,031	17,779,067	2,267,964	20,047,031	100.0%		20,047,031	2,267,964	17,779,067

7-Staff-70s

Ref: 7-Staff-45 (b)

In response to the above referenced interrogatory, please provide a copy of appendix 2- W for the sentinel and street lighting classes showing bill impacts of 17.44% and 19.70% respectively.

PUC Response

PUC has included below a copy of appendix 2-W for the sentinel and street lighting classes showing the bill impacts of 17.44% and 19.70% respectively when the proposed ratios for street lighting and sentinel lighting are increased to 90% as requested in IR-staff-45. Appendix 2-W is prior to any adjustments as a result of the interrogatory responses.

Appendix 2-W Bill Impacts

Customer Class: **Sentinel Lights**

Consumption 55 kWh ☒ May 1 - October 31 ☐ November 1 - April 30 (Select this radio button for applications filed after April 30, 2015)

0.1522 kW									
Charge Unit		Current Board-Approved			Proposed			Impact	
		Rate (\$)	Volume	Charge (\$)	Rate (\$)	Volume	Charge (\$)	\$ Change	% Change
Monthly Service Charge	Monthly	\$ 2.5700	1	\$ 2.57	\$ 3.6400	1	\$ 3.64	\$ 1.07	41.63%
Smart Meter Disposition Rider	Monthly		1	\$ -		1	\$ -	\$ -	
Stranded Meter Rate Rider	Monthly		1	\$ -		1	\$ -	\$ -	
			1	\$ -		1	\$ -	\$ -	
			1	\$ -		1	\$ -	\$ -	
			1	\$ -		1	\$ -	\$ -	
Distribution Volumetric Rate	per kW	\$ 23.9750	0.1522	\$ 3.65	\$ 33.9609	0.1522	\$ 5.17	\$ 1.52	41.65%
			55	\$ -		55	\$ -	\$ -	
LRAM & SSM Rate Rider			55	\$ -		55	\$ -	\$ -	
			55	\$ -		55	\$ -	\$ -	
			55	\$ -		55	\$ -	\$ -	
			55	\$ -		55	\$ -	\$ -	
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			55	\$ -		55	\$ -	\$ -	
			55	\$ -		55	\$ -		

Loss Factor (%)

4.5400%

4.8900%

Bill Impacts

Customer Class: **Street Lights #1**

Consumption 363541 kWh ☒ May 1 - October 31 ☐ November 1 - April 30 (Select this radio button for applications filed after

1825 kW

[illegible]

Loss Factor (%)

4.5400%

4.8900%

EXHIBIT 9 - DEFERRAL AND VARIANCE ACCOUNTS**9-Energy Probe-41s****Ref: 9-Staff-58 & 2-Energy Probe-6**

Please update the response to part (b) that shows the derivation of the amounts recorded in account 1576 to reflect the actual 2012 capital additions closed to rate base under the "previous" CGAAP accounting and under the "modified" CGAAP accounting. Please use 2012 actuals as requested in 2-Energy Probe-31s, or if they are not available, the preliminary 2012 actuals provided in 2-Energy Probe-6.

PUC Response

PP&E values Assuming "Previous" CGAAP Accounting Policies continu	
Opening Net PP&E	53,939,275
Additions	30,274,599
Depreciation	(4,145,373)
Closing net PP&E	80,068,501
PP&E Values Assuming Accounting Changes Under CGAAP in 2012	
Opening Net PP&E	53,939,275
Additions	29,611,170
Depreciation	(3,190,442)
Closing net PP&E	80,360,003
Difference in Closing net PP&E, "previous" CGAAP vs "changed" CGAA	(291,502)

9-Staff-71s**Ref: 9-Staff-58****Ref: Chapter 2 Appendices, Revenue Requirement Work Form (RRWF)**

In the response to 9-Staff-58, PUC is proposing to clear the credit balance of Account 1576 of \$335,332 by amortizing the balance over 4 years. The annual adjustment to depreciation expense is calculated to be (\$83,833).

In App.2-CH-Depr Exp 2013 CGAAP of the Chapter 2 Appendices, PUC has calculated the 2013 Depreciation Expense to be \$3,407,501. This amount of depreciation expense is input into cell M37 of Sheet 3 Data_Input_Sheet of the RRWF. However, this balance of depreciation expense has not been reduced by \$83,833 on cell F56 of App.2-CH- Depr Exp 2013 CGAAP of the Chapter 2 Appendices.

The net depreciation expense is the gross PP&E depreciation expense of \$3,407,501 less the amount calculated to be the annual amortization of Account 1576 – a credit amount of \$83,833. This net depreciation expense of \$3,323,668 is not flowing to cell E37 of Sheet 3 Data_Input_Sheet of the RRWF. Instead, the gross PP&E depreciation expense of \$3,407,501 appears in cell E37. The \$83,833 credit balance that should be used to reduce depreciation expense erroneously appears as an adjustment to the return on rate base in cell M67 of Sheet 3 Data_Input_Sheet of the RRWF.

- a) Please update App.2-CH-Depr Exp 2013 CGAAP of the Chapter 2 Appendices to show the annual amortization of Account 1576 in cell F56 of this schedule. Please calculate the net depreciation expense on this appendix and input the net amount on cell M37 of Sheet 3. Data_Input_Sheet of the RRWF.
- b) Please update cell M67 of Sheet 3 Data_Input_Sheet of the RRWF to show a zero adjustment to the return on rate base calculation. A zero adjustment to return on rate base is consistent with the Board's policy of clearing Account 1576.

PUC Response

a) PUC has provided below an updated App.2-CH-Depr Exp 2013 CGAAP of the Chapter 2 Appendices to show the annual amortization of Account 1576 in cell F56 of this schedule. PUC has input the net depreciation expense amount on cell M37 of Sheet 3 Data_Input_Sheet of the RRWF. A revised RRWF is submitted with the supplemental IR responses.

**Appendix 2-CH
Depreciation and Amortization Expense**

		Year 2013					
Account	Description	Additions	Years (new additions only)	Depreciation Rate on New Additions	2013 Depreciation Expense 1 (h)=2012 Full Year Depreciation + ((d*0.5)/(f))	2013 Depreciation Expense per Appendix 2-B Fixed Assets, Column K (l)	Variance 2 (m) = (h) - (l)
		(d)	(f)	(g) = 1 / (f)			
\$ 1,611	Computer Software (Formally known as Account 1925)			\$ -	\$ -		\$ -
\$ 1,612	Land Rights (Formally known as Account 1906)			\$ -	\$ -		\$ -
\$ 1,805	Land			\$ -	\$ -		\$ -
\$ 1,808	Buildings		\$ 50	\$ 0	\$ 484,837	\$ 484,837	\$ 0
\$ 1,810	Leasehold Improvements			\$ -	\$ -		\$ -
\$ 1,815	Transformer Station Equipment >50 kV	\$ 46,618	\$ 40	\$ 0	\$ 208,949	\$ 208,949	\$ 0
\$ 1,820	Distribution Station Equipment <50 kV	\$ 1,471,797	\$ 40	\$ 0	\$ 181,237	\$ 181,237	\$ 0
\$ 1,825	Storage Battery Equipment		\$ 15	\$ 0	\$ 1,786	\$ 1,786	\$ 0
\$ 1,830	Poles, Towers & Fixtures	\$ 1,240,039	\$ 45	\$ 0	\$ 307,607	\$ 307,607	\$ 0
\$ 1,835	Overhead Conductors & Devices	\$ 1,867,384	\$ 60	\$ 0	\$ 239,919	\$ 239,919	\$ 0
\$ 1,840	Underground Conduit	\$ 159,833	\$ 50	\$ 0	\$ 56,125	\$ 56,125	\$ 0
\$ 1,845	Underground Conductors & Devices	\$ 1,358,580	\$ 40	\$ 0	\$ 587,905	\$ 587,905	\$ 0
\$ 1,850	Line Transformers	\$ 159,833	\$ 40	\$ 0	\$ 682,652	\$ 682,652	\$ 0
\$ 1,855	Services (Overhead & Underground)	\$ 2,049,861	\$ 40	\$ 0	\$ 179,642	\$ 179,642	\$ 0
\$ 1,860	Meters	\$ -	\$ 25	\$ 0	\$ 1,600	\$ 1,600	\$ -
\$ 1,860	Meters (Smart Meters)	\$ 319,666	\$ 15	\$ 0	\$ 405,541	\$ 405,541	\$ 0
\$ 1,905	Land			\$ -	\$ -		\$ -
\$ 1,908	Buildings & Fixtures			\$ -	\$ -		\$ -
\$ 1,910	Leasehold Improvements			\$ -	\$ -		\$ -
\$ 1,915	Office Furniture & Equipment (10 years)			\$ -	\$ -		\$ -
\$ 1,915	Office Furniture & Equipment (5 years)			\$ -	\$ -		\$ -
\$ 1,920	Computer Equipment - Hardware			\$ -	\$ 1,951	\$ 1,951	\$ -
\$ 1,920	Computer Equip.-Hardware(Post Mar. 22/04)		\$ 5	\$ 0	\$ 2,331	\$ 2,331	\$ 0
\$ 1,925	Computer Software		\$ 5	\$ 0	\$ 98,104	\$ 98,104	\$ 0
\$ 1,925	Computer Software - Smart Meters		\$ 5	\$ 0	\$ -		\$ -
\$ 1,930	Transportation Equipment			\$ -	\$ -		\$ -
\$ 1,935	Stores Equipment			\$ -	\$ -		\$ -
\$ 1,940	Tools, Shop & Garage Equipment			\$ -	\$ -		\$ -
\$ 1,945	Measurement & Testing Equipment			\$ -	\$ -		\$ -
\$ 1,950	Power Operated Equipment			\$ -	\$ -		\$ -
\$ 1,955	Communications Equipment			\$ -	\$ -		\$ -
\$ 1,955	Communication Equipment (Smart Meters)			\$ -	\$ -		\$ -
\$ 1,960	Miscellaneous Equipment			\$ -	\$ -		\$ -
\$ 1,975	Load Management Controls Utility Premises		\$ 15	\$ 0	\$ -		\$ -
\$ 1,980	System Supervisor Equipment	\$ 266,389	\$ 20	\$ 0	\$ 136,867	\$ 136,867	\$ 0
\$ 1,985	Miscellaneous Fixed Assets			\$ -	\$ -		\$ -
\$ 1,995	Contributions & Grants	-\$ 965,395	\$ 40	\$ 0	-\$ 169,551	-\$ 169,551	\$ 0
etc.				\$ -	\$ -		\$ -
				\$ -	\$ -		\$ -
	Total	\$ 7,974,605			\$ 3,407,501	\$ 3,407,501	\$ 0
Depreciation expense adjustment resulting from amortization of Account 1575					-\$ 83,833		
Total Depreciation expense to be included in the test year revenue requirement					\$ 3,323,668		

b) PUC has updated cell M67 of Sheet 3 Data_Input_Sheet of the RRWF to show a zero adjustment to the return on rate base calculation. A revised RRWF is submitted with the supplemental interrogatory responses.

9-SEC-54s

Ref: 9-Staff-60

Please explain how stranded meters in GS>50KW with a book value of \$12,000 (2011) and \$26,000 (2012) produce a stranded meters charge to the class of \$386,378.

PUC Response

The stranded meter cost allocation by rate class in the application was based on the allocation of meter costs in PUC's 2007 cost allocation informational filing.