

**Niagara Peninsula Energy Inc.
 EB-2013-0154**

Board Staff Interrogatories

RTSR Model

Interrogatory #1

Ref: RTSR Model, Tab 4 – “RRR Data”

Rate Class	Unit	Non-Loss Adjusted Metered kWh	Non-Loss Adjusted Metered kW	Applicable Loss Factor	Load Factor	Loss Adjusted Billed kWh	Billed kW
Residential	kWh	418,525,032		1.0560		441,962,434	-
General Service Less Than 50 kW	kWh	126,162,886		1.0560		133,228,008	-
General Service 50 to 4,999 kW	kW	608,305,969	1,761,221		47.34%	608,305,969	1,761,221
Unmetered Scattered Load	kWh	2,471,840		1.0560		2,610,263	-
Sentinel Lighting	kW	267,435	721		50.84%	267,435	721
Street Lighting	kW	7,822,105	21,037		50.96%	7,822,105	21,037

Please confirm that the data entered in columns “Non-Loss Adjusted Metered kWh” and “Non-Loss Adjusted Metered kW” is not adjusted by NPEI’s Board approved loss factor.

Rate Generator Model

Interrogatory #2

Ref: Rate Generator Model – Peninsula West, Tab 5 – “2014 Continuity Schedule”

Ref: Rate Generator Model – Niagara Falls, Tab 5 – “2014 Continuity Schedule”

Board staff is unable to reconcile the data entered for the columns “Board-Approved Disposition during 2011” (both principal and interest) and “Board-Approved Disposition during 2012” (both principal and interest) to NPEI’s previous rate proceedings, EB-2010-0138 and EB-2011-0185 respectively.

- (A) Please provide evidence for the figures entered.
- (B) If changes are required, please confirm and re-file the Rate Generator models for the Peninsula West and Niagara Falls rate zones with the necessary corrections.

Interrogatory #3

Ref: Rate Generator Model – Peninsula West, Tab 6 “Billing Det. for Def-Var”

Ref: Rate Generator Model – Niagara Falls, Tab 6 “Billing Det. for Def-Var”

Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue ¹
RESIDENTIAL	\$/kWh	462,790,265		71,338,420	0	15,743,932
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	122,331,880		19,756,401	0	3,563,569
GENERAL SERVICE 50 TO 4,999 KW	\$/kW	628,090,148	1,818,411	539,407,131	1,561,661	9,467,683
UNMETERED SCATTERED LOAD	\$/kWh	2,335,428		1,123,722	0	137,071
SENTINEL LIGHTING	\$/kW	292,817	809	113,770	314	8,675
STREET LIGHTING	\$/kW	7,467,591	20,107	897,746	2,417	93,091
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Total		1,223,308,129	1,839,327	632,637,190	1,564,393	29,014,021

Board staff is unable to reconcile the data in the column “Distribution Revenue” to NPEI’s previous cost of service proceeding (EB-2010-0138).

- (A) Please provide evidence for the figures entered.
- (B) If changes are required, please confirm, and Board staff will make the necessary adjustments to the models.

Interrogatory #4

Ref: Rate Generator Model – Peninsula West, Tab 11 “Proposed Rates”

Ref: Rate Generator Model – Niagara Falls, Tab 11 “Proposed Rates”

Rate Rider for Deferral/Variance Account Disposition (2014) - effective until April 28, 2016
 Rate Rider for Global Adjustment Sub-Account Disposition (2014) - effective until April 28, 2016
 Applicable only for Non-RPP Customers

Board staff notes that NPEI has requested a two year disposition period to clear its Group 1 deferral and variance accounts. Board staff notes that for all rate classes, tab 11 of the model shows an effective until date of April 28, 2016. Board staff notes that, if approved as filed, this should read April 30, 2016.

Please confirm if NPEI agrees, and Board staff will make the necessary adjustments to the model and final tariff.