Ontario Energy Board P.O. Box 2319 27th Floor 2300 Yonge Street Toronto ON M4P 1E4 Telephone: 416-481-1967 Facsimile: 416-440-7656 Toll free: 1-888-632-6273 Commission de l'énergie de l'Ontario C.P. 2319 27e étage 2300, rue Yonge Toronto ON M4P 1E4 Téléphone: 416-481-1967 Télécopieur: 416-440-7656 Numéro sans frais: 1-888-632-6273



**BY EMAIL** 

November 8, 2013

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

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Algoma Power Inc. ("API")

2014 IRM Distribution Rate Application

Board Staff Submission Board File No. EB-2013-0110

In accordance with Procedural Order No.1, please find attached the Board Staff Submission in the above proceeding. This document is being forwarded to API. There are no registered intervenors to this proceeding.

API's Reply Submission, if it intends to file one, is due by November 18, 2013.

Yours truly,

Original Signed By

Marc Abramovitz Advisor, Applications & Regulatory Audit

Encl.



## **ONTARIO ENERGY BOARD**

### **STAFF SUBMISSION**

## 2014 ELECTRICITY DISTRIBUTION RATES

Algoma Power Inc.

EB-2013-0110

**November 8, 2013** 

#### Board Staff Submission Algoma Power Inc. 2014 IRM4 Rate Application EB-2013-0110

#### Introduction

Algoma Power Inc. ("API") filed an application (the "Application") with the Ontario Energy Board (the "Board") on August 16, 2013, seeking approval for changes to the rates that API charges for electricity distribution, to be effective January 1, 2014. The Application is based on the 2014 4<sup>th</sup> Generation Incentive Regulation Mechanism ("IRM4") and also includes the impact of the rural and Remote Rate Protection funding, pursuant to Ontario Regulation 442/01.

The purpose of this document is to provide the Board with the submissions of Board staff based on its review of the evidence submitted by API.

Board staff has no concerns with the Retail Transmission Service Rates proposed by API. Pursuant to Guideline G-2008-0001, updated on June 28, 2012, Board staff notes that the Board will update the applicable data at the time of this Decision based on the then-current Uniform Transmission Rates.

API completed the Deferral and Variance Account continuity schedule included in the 2014 IRM Rate Generator Model at Tab 5 for its Group 1 Deferral and Variance Accounts. API's total Group 1 Deferral and Variance Account balances amount to a credit of \$105,489. This amount includes interest calculated to December 31, 2012. Based on the threshold test calculation, the Group 1 Deferral and Variance Account balances equate to \$0.0006 per kWh and does not meet the preset threshold of \$0.001 kWh. Therefore, API is not requesting disposition of its Group 1 Deferral Accounts in this Application.

Board staff has reviewed API's Group 1 Deferral and Variance account balances and notes that the principal balances as of December 31, 2012 largely reconcile with the balances reported as part of the *Reporting and Record-keeping Requirements*. The only discrepancies noted are to account 1588 and 1589 due to true-ups completed in 2013.

Board staff has confirmed that the preset threshold of \$0.001 per kWh has not been met and takes no issue with API's position to not seek disposition of its Group 1 Deferral Accounts.

Board staff makes detailed submissions on the following:

- Shared Tax-Savings Rate Riders; and
- Stretch Factor Re-assignment.

#### **Shared Tax-Savings Rate Riders**

#### **Background**

API completed the 2014 IRM Tax Sharing Model but noted that the Board's default approach in the model calculates a corporate tax rate that incorporates the Ontario Small Business Deduction ("OSBD"). API notes that it is a wholly owned subsidiary of FortisOntario which is wholly owned by Fortis Inc. Fortis Inc. is publicly traded on the Toronto Stock Exchange and is considered a public corporation under the *Income Tax Act*. In order to be eligible for the OSBD, a corporation must be a Canadian-controlled Private Corporation. Consequently, the tax rate used by API is 26.5% rather than the 23.74% calculated in the model. This computes a total shared savings of \$42,128.

API notes that the Street Lighting class is allocated to receive at total credit of \$30. However, the model does not generate a rate rider to the fourth decimal place. API has deemed the amount insignificant and no accommodation is proposed in the Application.

#### Submission

Board staff is in agreement with API that its corporate tax rate should be 26.5% rather than the 23.74% calculated by the model.

Board staff takes issue with the amount of revenue requirement allocated to the Street Lighting class. Board staff notes that on sheet 3 of the Shared Tax Savings Workform, API inserted the kWh rate for the Street Lighting class into column O as opposed to column N. The result leads to an understated revenue requirement for the Street Lighting class by approximately \$123,000. When corrected, the model computes a rate rider of \$(0.0004) to the Street Lighting class.

API may wish to comment on this transposition error in its reply submission.

#### **Stretch Factor Re-assignment**

#### **Background**

API filed its Application on the basis of the Filing Requirements for 4th Generation IRM, modified to accommodate the requirements of the RRRP as contemplated in O.Reg. 442/01. Electricity Distribution rates for API's R-1 and R-2 rate classes are adjusted in line with the provincial average of rate adjustments for the Residential and General Service < 50kW rate classes approved by the Board in the most recent rate orders for other Ontario electricity distributors. API's Seasonal and Street Lighting rates are adjusted in accordance with the price cap adjustment index established by the Board for 4<sup>th</sup> Generation IRM applicants. API has used a RRRP adjustment factor of 2.20% as a placeholder for the R-1 and R-2 rate classes, and acknowledges that this factor will be updated for the Draft Rate Order. The approved adjustment from the 2013 IRM decision was 3.75%.

For the purposes of adjusting its 2014 base rates, API used a stretch factor of 0.4% as a placeholder, which represents the factor assigned to the middle tranche in the 2013 IRM process.

On October 28, 2013 API submitted supplementary evidence to the Application following its responses to Board staff interrogatories, supporting its request for an assignment to the middle tranche of the pending stretch factor assignments for 2014 rates. API noted that the Board, in its draft *Report of the Board on Empirical Research to Support Incentive Rate-setting for Ontario's Electricity Distributors* (the "Report", EB-2010-0379) dated September 6, 2013, stated the following:

During this consultation, some distributors wrote to the Board claiming extenuating circumstances that they believe should make them eligible for specific treatment in relation to stretch factor assignments. The Board believes that these requests should be addressed on a case-by-case basis. Consistent with practice to date, distributors that apply to the Board for exclusions and/or exceptions and satisfy the Board that their reasons are compelling may be assigned the middle stretch factor (i.e., 0.30%).

API states that PEG's econometric model does not accurately assess and compare the efficiency of API within the general operating environment of distributors in Ontario.

API notes that in the Board's decision in the matter of EB-2007-0744, an application by Great Lakes Power Limited ("GLPL", the predecessor to API), the Board wrote:

GLPL presents a unique challenge for the Board. In reviewing the record for this case and examining the history of this applicant before the Board it has become clear that conventional ratemaking practice cannot address the issues presented by this applicant.

Conventional ratemaking cannot result in a rate that will cover the Company's costs, provide for a reasonable return on investment, while being reasonable from a ratepayer's point of view.

This circumstance arises directly out of the characteristics of the Applicant's service area. The Applicant's service area is more than twice the area of the greater Toronto area. It has less than 12,000 customers and has the lowest customer/kilometer ratio in Ontario with only 6.7 customers per kilometer on average. 99.9% of its service area is rugged and sparsely populated wilderness. Its service area is characterized by long runs of distribution wire between customers.

This is a high cost, low revenue service area.

API states that the Board's recognition of API as a high cost, low revenue service area in this and other Board decisions is unique and further evidence of API being an outlier in the community of Ontario distributors.

As well, API states that it has been recognized by Regulation, O. Reg. 442/01 Remote and Rural Rate Protection, as a distributor with higher and increasing costs related to serving a diverse customer base, a lower customer density, and a large and more varied geographic territory as compared with all other distributors in Ontario, with the exception of Hydro One. API submits that this is further evidence that API is an outlier in PEG's sample of Ontario distributors. Also, API notes that transportation, community governance, and forestry costs are increasing and higher than average than other distributors in the PEG sample group.

API is requesting that the Board assign the middle stretch factor for use in API's 2014 IRM rate application.

#### **Submission**

With the exception of the stretch factor, Board staff notes that the parameters API used in its Application are consistent with the Filing Requirements under section 3.2.1 and also notes that the parameters are placeholders that are to be updated by the Board when the supplemental report on the RRFE is released.

Attached as Appendix A to this submission is Board staff's calculation of the average increase in distribution rates as of October 31, 2013. Board staff has calculated the result to be 3.76%. Board staff submits that in its reply submission, API should include an updated rate design model that incorporates the updated number, pending the Panel's approval of the adjustment.

Subject to the revision for the above, Board staff submits that API has calculated the rate adjustments for its R-1, R-2, Seasonal and Street Lighting rate classes in accordance with the methodology approved in the EB-2012-0104 proceeding for API's 2013 IRM adjustment.

With respect to API's supplemental evidence on the stretch factor, Board staff notes that much of what was provided by API in its supplemental evidence was articulated in API's 2012 IRM rate application (EB-2011-0152). Board staff notes that this prior request was denied by the Board.

Board staff observes that a supplemental filing of new evidence should, in the normal course, be followed by a further discovery process. There are some matters that likely require further explanation and testing, such as why the RRRP funding is not sufficient to address the low density, low revenue profile of API, and the fact that API has not quantified the impact of being placed in the lowest ranked/highest stretch factor grouping.

Board staff submits that API has not provided a compelling case in support of its request. That is not to say that the request is not reasonable or appropriate. But, based on the information submitted, and with no opportunity for further testing, Board staff is of the view that the information is not sufficient for the Board to make an assessment as to whether further assistance to API (beyond the RRRP funding), in the form of an exception to the stretch factor assignment policy, should be granted.

Board staff observes that API has used the RRRP funding as a reason to support its uniqueness as a low density/high cost utility and has not explained why, the fact that approximately 50% of its revenue requirement is guaranteed, is not sufficient. While the intent of the RRRP funding is to mitigate rate impacts for customers of API, the mechanism put in place to implement this mitigation results in guaranteeing API that portion of the approved revenue requirement (as adjusted by the IRM process annually), which is recovered province wide. All things being equal, this reduces API's business risk.

While Board staff appreciates the reasons put forth by API, the company did not directly address the reasons identified in the 2012 IRM decision, which formed the basis of the finding to deny API's request for a re-assignment.

In that proceeding, Board staff submitted the following:

Board staff questions API's assertion that the reference in the EB-2007-0744 Decision to Algoma's service area as "high cost" and "low revenue" supports the conclusion that a stretch factor based on a comparison of operating costs per customer is not suitable for API. The circumstances giving rise to that characterization of API's service area pertained to the unreasonable rates that would result for the majority of API's customers if traditional rate-making principles were applied. The Board took notice of the size of the service territory, the large asset base and low customer density as the basis for which RRRP was the non-traditional but appropriate rate-making response in the circumstances. It is not apparent to Board staff that there is a linkage, as claimed by API, between the circumstances which prompted the introduction of RRRP to mitigate what otherwise could be viewed as unreasonable rates and a separate fact-based determination of a particular utility's productivity ranking.

Board staff submits that, in the absence of incremental reasons to the contrary, it's position in this proceeding remains as it was in the EB-2012-0152 proceeding because, simply, the same reasons continue to apply.

The Board's decision in that matter was to not award a change in stretch factor for the following reasons:

The fact that a utility has its rates set pursuant to RRRP does not mitigate the

need to be efficient, which is one of the objectives of IRM.

To award a stretch factor that is different would have the effect of providing
incremental relief to the utility for those qualities that are already appropriately
dealt with via the RRRP mechanism. No incremental arguments were provided
that would justify a different stretch factor. In any event, an IRM application is not
an appropriate venue in which a change in stretch factors should be considered.

Unless API addresses (and quantifies) why the relief afforded to it by the RRRP funding is not sufficient, and why API cannot achieve efficiencies for the costs that are in its control (while placed in the highest tranche), Board staff is not in a position to support the request. Board staff submits that API's request should be denied for the reasons noted above and that it may be considered more appropriately and fully in API's next cost of service application, scheduled for 2015 rates.

Alternatively, the Board could extend the current proceeding to allow API to address the gaps in the evidence identified by Board staff in this submission and then allow for a further round of discovery and final submissions from both API and Board staff. Board staff notes, however, that for this scenario there is no guarantee that the decision on this Application will be issued in time to implement January 1 rates.

All of which is respectfully submitted

# Appendix A RRRP Adjustment Calculation

• • • • • • • • • • • • • • • • • • • •										
Addistant Distanton	D1-441-1	2445	40.00	22.00	40.72	44.05	44.74	0.24	0.540/	
Atikokan Hydro Inc. Atikokan Hydro Inc.	Residential GS < 50	34.15 74.43	10.80 18.80	33.99 74.07	10.72 18.80	44.95 93.23	44.71 92.87	0.24	0.54% 0.39%	0.46%
Attrocarriyaro iric.	03 \ 30	74.43	10.00	74.07	10.00	33.23	32.07	0.30	0.5570	0.4070
Bluewater Power Distribution Corporation	Residential	15.48	16.88	13.80	15.04	32.36	28.84	3.52	12.21%	
Bluewater Power Distribution Corporation	GS < 50	26.60	37.20	23.71	33.20	63.80	56.91	6.89	12.11%	12.16%
·										
Brant County Power Inc.	Residential	11.10	16.72	11.07	16.64	27.82	27.71	0.11	0.40%	
Brant County Power Inc.	GS < 50	17.17	35.60	17.12	35.60	52.77	52.72	0.05	0.09%	0.25%
Burlington Hydro Inc.	Residential	12.29	13.36	12.23	13.28	25.65	25.51	0.14	0.55%	
Burlington Hydro Inc.	GS < 50	25.53	27.40	25.41	27.20	52.93	52.61	0.32	0.61%	0.58%
	B	40.00	40.04	40.04	42.00	22.42	22.00	0.40	0.570/	
Cambridge and North Dumfries Hydro Inc.	Residential GS < 50	10.09	13.04	10.04	12.96	23.13	23.00	0.13	0.57%	0.630/
Cambridge and North Dumfries Hydro Inc.	G3 < 50	11.92	25.40	11.86	25.20	37.32	37.06	0.26	0.70%	0.63%
Canadian Niagara Power Inc. (Average)	Residential	17.79	17.15	17.30	13.97	34.94	31.28	3.66	11.70%	
Canadian Niagara Power Inc. (Average)	GS < 50	25.00	45.93	24.28	39.80	70.93	64.08	6.85	10.68%	11.19%
editadian Magara Fower Inc. (Average)	G5 1 50	23.00	43.33	24.20	33.00	70.55	04.00	0.03	10.0070	11.15/0
Centre Wellington Hydro Ltd.	Residential	15.22	11.20	13.88	10.24	26.42	24.12	2.30	9.54%	
Centre Wellington Hydro Ltd.	GS < 50	17.36	36.20	15.31	32.00	53.56	47.31	6.25	13.21%	11.37%
· ·										
Chapleau Public Utilities Corporation	Residential	23.48	10.88	20.15	10.80	34.36	30.95	3.41	11.02%	
Chapleau Public Utilities Corporation	GS < 50	34.35	35.00	31.79	34.80	69.35	66.59	2.76	4.14%	7.58%
-										
Clinton Power Corporation	Residential	15.25	14.24	12.30	10.88	29.49	23.18	6.31	27.22%	
Clinton Power Corporation	GS < 50	20.95	27.20	24.17	26.20	48.15	50.37	-2.22	-4.41%	11.41%
2011112	B	0.00	40.50	0.00	12.50	22.50	22.50	0.00	0.000/	
COLLUS Power Corporation	Residential GS < 50	9.00	13.60	9.00 17.98	13.60 22.60	22.60	22.60	0.00 5.36	0.00% 13.21%	C C00/
COLLUS Power Corporation	G3 < 50	19.74	26.20	17.98	22.60	45.94	40.58	5.30	13.21%	6.60%
Cooperative Hydro Embrun Inc.	Residential	13.70	10.24	13.63	10.16	23.94	23.79	0.15	0.63%	
Cooperative Hydro Embrun Inc.	GS < 50	20.34	33.60	20.24	33.40		53.64	0.30	0.56%	0.59%
								0.00	0.007	
E.L.K. Energy Inc.	Residential	12.72	7.20	11.13	6.32	19.92	17.45	2.47	14.15%	
E.L.K. Energy Inc.	GS < 50	14.97	15.20	11.06	3.40	30.17	14.46	15.71	108.64%	61.40%
Enersource Hydro Mississauga Inc.	Residential	12.83	10.32	11.87	9.52	23.15	21.39	1.76	8.23%	
Enersource Hydro Mississauga Inc.	GS < 50	39.49	23.00	39.93	23.20	62.49	63.13	-0.64	-1.01%	3.61%
ENWIN Utilities Ltd.	Residential	10.82	16.16	10.77	16.08	26.98	26.85	0.13	0.48%	0.530/
ENWIN Utilities Ltd.	GS < 50	25.51	32.80	25.39	32.60	58.31	57.99	0.32	0.55%	0.52%
Erie Thames Powerlines Corporation	Residential	15.25	14.24	15.21	14.24	29.49	29.45	0.04	0.14%	
Erie Thames Powerlines Corporation	GS < 50	21.01	27.20	20.95	27.20	48.21	48.15	0.04	0.14%	0.13%
Life Thames Fowerlines Corporation	03 < 30	21.01	27.20	20.53	27.20	46.21	40.13	0.00	0.12/0	0.13/6
Espanola Regional Hydro Distribution Corporation	Residential	13.66	13.20	13.59	13.12	26.86	26.71	0.15	0.56%	
Espanola Regional Hydro Distribution Corporation	GS < 50	24.48	40.20	24.36	40.00	64.68	64.36	0.32	0.50%	0.53%
7, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,										
Essex Powerlines Corporation	Residential	12.74	12.00	12.68	11.92	24.74	24.60	0.14	0.57%	
Essex Powerlines Corporation	GS < 50	33.35	22.80	33.19	22.60	56.15	55.79	0.36	0.65%	0.61%
Festival Hydro Inc.	Residential	14.99	13.36	14.92	13.28	28.35	28.20	0.15	0.53%	
Festival Hydro Inc.	GS < 50	29.08	29.40	28.88	29.20	58.48	58.08	0.40	0.69%	0.61%
Fort Frances Power Corporation	Residential	12.05	7.04	11.99	7.04	19.09	19.03	0.06	0.32%	
Fort Frances Power Corporation	GS < 50	29.03	13.20	28.89	13.20	42.23	42.09	0.14	0.33%	0.32%
Greater Sudbury Hydro Inc.	Residential	15.79	9.68	16.14	9.92	25.47	26.06	-0.59	-2.26%	
Greater Sudbury Hydro Inc.	GS < 50	21.09	36.40	21.55	37.20	57.49	58.75	-1.26	-2.14%	-2.20%
	B . I I	45.07	0.00	45.44	0.00	24.52	24.22	0.04	0.000/	
Grimsby Power Inc.	Residential	15.27	9.36	15.11	9.28	24.63	24.39	0.24	0.98%	4 240/
Grimsby Power Inc.	GS < 50	25.89	25.40	25.56	25.00	51.29	50.56	0.73	1.44%	1.21%
Guelph Hydro Electric Systems Inc.	Residential	14.10	13.76	13.95	13.60	27.86	27.55	0.31	1.13%	
Guelph Hydro Electric Systems Inc.	GS < 50	15.16	25.40	15.00	25.20		40.20	0.31	0.90%	1.01%
oderpri riyuro Electric Systems IIIc.	03 < 30	13.10	23.40	13.00	23.20	-0.30	40.20	0.30	0.30/6	1.01%
Haldimand County Hydro Inc.	Residential	18.17	21.20	16.16	23.12	39.37	39.28	0.09	0.23%	
Haldimand County Hydro Inc.	GS < 50	29.04	41.00	28.90	40.80	70.04	69.70	0.34	0.49%	0.36%
	1			-5.50	.5.50		22.70			2.23/0
Halton Hills Hydro Inc.	Residential	12.31	9.28	12.25	9.20	21.59	21.45	0.14	0.65%	
Halton Hills Hydro Inc.	GS < 50	26.63	16.60	26.50	16.60		43.10		0.30%	0.48%

Class

***										
Hearst Power Distribution Company Limited	Residential	9.19	12.80	9.15	12.72	21.99	21.87	0.12	0.55%	0.440/
Hearst Power Distribution Company Limited	GS < 50	19.76	13.40	19.67	13.40	33.16	33.07	0.09	0.27%	0.41%
Havinan Hilitiaa Caynayatian	Decidential	14.69	11.00	14.52	11 44	26.20	25.07	0.32	1.23%	
Horizon Utilities Corporation	Residential GS < 50	32.70	11.60 17.00	14.53 32.35	11.44 16.80	26.29 49.70	25.97 49.15	0.32	1.12%	1.18%
Horizon Utilities Corporation	03 < 30	32.70	17.00	32.33	10.60	49.70	49.15	0.55	1.1270	1.10%
Hydro 2000 Inc.	Residential	13.62	10.96	12.87	10.32	24.58	23.19	1.39	5.99%	
Hydro 2000 Inc.	GS < 50	25.26	22.00	28.85	25.00	47.26	53.85	-6.59	-12.24%	-3.12%
Trydro 2000 Inc.	03 < 30	23.20	22.00	20.03	23.00	47.20	33.83	-0.33	-12.24/0	-3.12/0
Hydro Hawkesbury Inc.	Residential	5.99	6.48	5.95	6.40	12.47	12.35	0.12	0.97%	
Hydro Hawkesbury Inc.	GS < 50	13.84	11.00	13.75	11.00	24.84	24.75	0.09	0.36%	0.67%
Trydro Hawkesbury Inc.	03 1 30	15.04	11.00	13.73	11.00	24.04	24.73	0.03	0.5070	0.0770
Hydro One Brampton Networks Inc.	Residential	9.96	11.60	9.83	11.44	21.56	21.27	0.29	1.36%	
Hydro One Brampton Networks Inc.	GS < 50	17.98	31.60	17.75	31.20	49.58	48.95	0.63	1.29%	1.33%
,					0 - 1 - 0					
Hydro Ottawa Limited	Residential	9.42	18.24	9.32	18.08	27.66	27.40	0.26	0.95%	
Hydro Ottawa Limited	GS < 50	16.28	40.80	16.11	40.40	57.08	56.51	0.57	1.01%	0.98%
Innisfil Hydro Distribution Systems Limited	Residential	19.91	14.24	19.22	15.04	34.15	34.26	-0.11	-0.32%	
Innisfil Hydro Distribution Systems Limited	GS < 50	32.83	16.00	28.85	17.20	48.83	46.05	2.78	6.04%	2.86%
Kenora Hydro Electric Corporation Ltd.	Residential	19.03	11.12	18.94	11.04	30.15	29.98	0.17	0.57%	
Kenora Hydro Electric Corporation Ltd.	GS < 50	37.36	11.60	37.18	11.60	48.96	48.78	0.18	0.37%	0.47%
Kingston Hydro Corporation	Residential	12.23	12.00	12.17	11.92	24.23	24.09	0.14	0.58%	
Kingston Hydro Corporation	GS < 50	25.17	20.80	25.05	20.80	45.97	45.85	0.12	0.26%	0.42%
Kitchener-Wilmot Hydro Inc.	Residential	9.76	13.84	9.69	13.76	23.60	23.45	0.15	0.64%	
Kitchener-Wilmot Hydro Inc.	GS < 50	25.71	24.80	25.54	24.60	50.51	50.14	0.37	0.74%	0.69%
Lakefront Utilities Inc.	Residential	9.97	11.52	9.92	11.44	21.49	21.36	0.13	0.61%	
Lakefront Utilities Inc.	GS < 50	22.81	16.40	22.70	16.40	39.21	39.10	0.11	0.28%	0.44%
Lakeland Power Distribution Ltd.	Residential	19.66	11.52	15.35	11.04	31.18	26.39	4.79	18.15%	
Lakeland Power Distribution Ltd.	GS < 50	42.59	17.40	36.65	16.80	59.99	53.45	6.54	12.24%	15.19%
London Hydro Inc.	Residential	13.12	12.40	12.72	11.44	25.52	24.16	1.36	5.63%	
London Hydro Inc.	GS < 50	30.70	19.80	29.58	18.40	50.50	47.98	2.52	5.25%	5.44%
Entegrus Powerlines Inc. (Average)	Residential	14.41	9.46	14.31	9.38	23.87	23.69	0.18	0.74%	
Entegrus Powerlines Inc. (Average)	GS < 50	25.30	16.60	25.13	16.50	41.90	41.63	0.27	0.65%	0.69%
								_		
Midland Power Utility Corporation	Residential	15.23	16.00	11.78	15.68	31.23	27.46	3.77	13.73%	
Midland Power Utility Corporation	GS < 50	21.42	31.60	14.86	31.00	53.02	45.86	7.16	15.61%	14.67%
Milton Hydro Distribution inc.	Residential	15.00	11.20	14.93	11.12	26.20	26.05	0.15	0.58%	0.570/
Milton Hydro Distribution inc.	GS < 50	15.97	34.00	15.89	33.80	49.97	49.69	0.28	0.56%	0.57%
Nicesa Barina de Franço (Accesso)	De el de estel	45.04	42.72	45.76	12.64	20.56	20.40	0.46	0.500/	
Niagara Peninsula Energy (Average)	Residential	15.84	12.72	15.76	12.64	28.56	28.40	0.16	0.56%	0.500/
Niagara Peninsula Energy (Average)	GS < 50	37.27	27.20	37.09	27.00	64.47	64.09	0.38	0.59%	0.58%
Niagara-on-the-Lake Hydro Inc.	Posidontial	10 21	10.22	18.22	10.24	20.62	20 40	0.17	0.60%	
Niagara-on-the-Lake Hydro Inc.  Niagara-on-the-Lake Hydro Inc.	Residential GS < 50	18.31 45.97	10.32 27.60	45.75	27.40	28.63 73.57	28.46 73.15	0.17	0.57%	0.59%
magara-on-the-take Hydro IIIc.	03 < 30	43.37	27.00	43.73	27.40	13.31	/3.13	0.42	0.3770	0.35%
Norfolk Power Distribution Inc.	Residential	20.87	17.44	20.77	17.36	38.31	38.13	0.18	0.47%	
Norfolk Power Distribution Inc.	GS < 50	49.98	31.20	49.74	31.00	81.18	80.74	0.18	0.54%	0.51%
Noticin Tower Distribution inc.	05 1 50	43.30	31.20	43.74	31.00	01.10	00.74	0.44	0.5470	0.5170
North Bay Hydro Distribution Limited	Residential	14.44	10.32	14.34	10.24	24.76	24.58	0.18	0.73%	
North Bay Hydro Distribution Limited	GS < 50	21.39	33.00	21.25	32.80	54.39	54.05	0.34	0.63%	0.68%
	55 150	_1.55	33.00		32.00	34.33	54.05	3.34	3.0370	0.0070
Northern Ontario Wires Inc.	Residential	20.35	12.32	17.83	10.80	32.67	28.63	4.04	14.11%	
Northern Ontario Wires Inc.	GS < 50	26.79	30.00	23.90	26.80	56.79	50.70	6.09	12.01%	13.06%
			,,,,,				22.70	,,,,,,		
Oakville Hydro Electricity Distribution Inc.	Residential	13.11	11.44	13.05	11.36	24.55	24.41	0.14	0.57%	
Oakville Hydro Electricity Distribution Inc.	GS < 50	32.24	28.40	32.09	28.20	60.64	60.29	0.35	0.58%	0.58%
•										
Orangeville Hydro Limited	Residential	16.26	11.20	16.26	11.20	27.46	27.46	0.00	0.00%	
Orangeville Hydro Limited	GS < 50	33.27	20.20	33.11	20.20	53.47	53.31	0.16	0.30%	0.15%
	1									
				12 61	13.04	26.69	26.65	0.04	0.15%	
Orillia Power Distribution Corporation	Residential	13.65	13.04	13.61	13.04					
Orillia Power Distribution Corporation Orillia Power Distribution Corporation	Residential GS < 50	13.65 35.79	13.04 31.60	35.69	31.60	67.39	67.29	0.10	0.15%	0.15%
·							67.29	0.10	0.15%	0.15%
·							67.29 17.61	0.10	0.15% 0.97%	0.15%
Orillia Power Distribution Corporation	GS < 50	35.79	31.60	35.69	31.60	67.39				0.15%
Orillia Power Distribution Corporation Oshawa PUC Networks Inc.	GS < 50 Residential	35.79 8.34	31.60 9.44	35.69 8.25	31.60 9.36	67.39 17.78	17.61	0.17	0.97%	

Class

Ottawa River Power Corporation	GS < 50	22.72	20.80	22.61	20.80	43.52	43.41	0.11	0.25%	-0.01%
Parry Sound Power Corporation	Residential	21.90	14.00	21.67	13.84	35.90	35.51	0.39	1.10%	
Parry Sound Power Corporation	GS < 50	32.73	26.80	32.38	26.60	59.53	58.98	0.55	0.93%	1.02%
any seana rewer corporation	65 130	52.75	20.00	52.50	20.00	55.55	50.50	0.55	0.5570	1.02/0
Peterborough Distribution Incorporated	Residential	12.28	9.60	11.91	9.28	21.88	21.19	0.69	3.26%	
Peterborough Distribution Incorporated	GS < 50	29.90	17.00	29.90	18.00	46.90	47.90	-1.00	-2.09%	0.58%
PowerStream Inc. (Average)	Residential	12.34	10.88	13.67	10.88	23.22	24.55	-1.33	-5.40%	
PowerStream Inc. (Average)	GS < 50	25.39	27.00	22.38	28.00	52.39	50.38	2.02	4.00%	-0.70%
PUC Distribution Inc.	Residential	9.66	13.36	8.81	12.16	23.02	20.97	2.05	9.78%	
PUC Distribution Inc.	GS < 50	16.45	39.40	15.00	36.00	55.85	51.00	4.85	9.51%	9.64%
, oo bisansadan me	65 130	20.15	331.10	15.00	30.00	55.65	51.00		3.3270	3.0.70
Renfrew Hydro Inc.	Residential	13.68	11.36	13.91	11.52	25.04	25.43	-0.39	-1.53%	
Renfrew Hydro Inc.	GS < 50	30.60	27.00	30.39	26.80	57.60	57.19	0.41	0.72%	-0.41%
Rideau St. Lawrence Distribution Inc.	Residential	12.82	11.68	12.76	11.60	24.50	24.36	0.14	0.57%	
Rideau St. Lawrence Distribution Inc.	GS < 50	29.67	18.00	29.53	18.00	47.67	47.53	0.14	0.29%	0.43%
Signs Lookout Hydro Inc	Residential	26.28	9.04	24.26	8.32	35.32	32.58	2.74	8.41%	
Sioux Lookout Hydro Inc. Sioux Lookout Hydro Inc.	GS < 50	40.99	15.60	43.11	16.40	56.59	32.58 59.51	-2.92	-4.91%	1.75%
5.0a. 250kout Hydro IIIc.	55 \ 50	40.55	15.00	45.11	10.40	50.55	33.31	2.52	7.51/0	1.73/0
St. Thomas Energy Inc.	Residential	11.37	12.64	11.46	12.72	24.01	24.18	-0.17	-0.70%	
St. Thomas Energy Inc.	GS < 50	17.23	29.80	17.15	29.60	47.03	46.75	0.28	0.60%	-0.05%
Thunder Bay Hydro Electricity Distribution Inc.	Residential	12.63	9.76	9.85	9.92	22.39	19.77	2.62	13.25%	
Thunder Bay Hydro Electricity Distribution Inc.	GS < 50	25.96	26.80	17.84	26.00	52.76	43.84	8.92	20.35%	16.80%
Tille and a complication to a	De el de estel	40.00	40.00	0.04	42.52	20.00	22.42	F 4F	22.260/	
Tillsonburg Hydro Inc. Tillsonburg Hydro Inc.	Residential GS < 50	10.00 25.00	18.88 35.00	9.91 25.07	13.52 30.40	28.88	23.43 55.47	5.45 4.53	23.26% 8.17%	15.71%
Thisofibulg Hydro Inc.	03 < 30	23.00	33.00	23.07	30.40	00.00	33.47	4.33	0.1770	13.71/0
Toronto Hydro-Electric System Limited	Residential	18.43	12.17	18.25	12.16	30.60	30.41	0.19	0.62%	
Toronto Hydro-Electric System Limited	GS < 50	24.53	45.36	24.30	44.94	69.89	69.24	0.65	0.94%	0.78%
Veridian Connections (Average)	Residential	10.67	14.12	10.62	14.04	24.79	24.66	0.13	0.53%	
Veridian Connections (Average)	GS < 50	11.94	34.00	11.88	33.80	45.94	45.68	0.26	0.57%	0.55%
	5 .1	44.00	44.00		44.40	22.40	22.27	0.40	0.500/	
Wasaga Distribution Inc.	Residential	11.20	11.20	11.15 13.05	11.12	22.40	22.27 39.45	0.13	0.58%	0.63%
Wasaga Distribution Inc.	GS < 50	13.11	26.60	13.05	26.40	39.71	39.45	0.26	0.66%	0.62%
Waterloo North Hydro Inc.	Residential	14.79	14.96	14.72	14.88	29.75	29.60	0.15	0.51%	
Waterloo North Hydro Inc.	GS < 50	31.11	27.80	30.96	27.60	58.91	58.56	0.35	0.60%	0.55%
,										
Welland Hydro-Electric System Corp.	Residential	15.66	10.64	14.37	11.52	26.30	25.89	0.41	1.58%	
Welland Hydro-Electric System Corp.	GS < 50	27.83	16.40	24.80	17.40	44.23	42.20	2.03	4.81%	3.20%
Wellington North Power Inc.	Residential	18.05	14.48	18.00	14.40	32.53	32.40	0.13	0.40%	0.200/
Wellington North Power Inc.	GS < 50	38.32	32.80	38.21	32.80	71.12	71.01	0.11	0.15%	0.28%
West Coast Huron Energy Inc.	Residential	17.51	18.16	14.20	14.72	35.67	28.92	6.75	23.34%	
West Coast Huron Energy Inc.	GS < 50	31.11	21.40	33.72	23.20	52.51	56.92	-4.41	-7.75%	7.80%
							22.32			
Westario Power Inc.	Residential	12.33	12.32	11.34	11.36	24.65	22.70	1.95	8.59%	
Westario Power Inc.	GS < 50	23.66	21.40	20.77	18.40	45.06	39.17	5.89	15.04%	11.81%
Whitby Hydro Electric Corporation	Residential	17.43	11.52	17.29	11.36	28.95	28.65	0.30	1.05%	
Whitby Hydro Electric Corporation	GS < 50	20.13	39.40	19.91	39.00	59.53	58.91	0.62	1.05%	1.05%
Woodstock Hydro Services Inc.	Residential	12.84	17.60	12.83	17.60	30.44	30.43	0.01	0.03%	
Woodstock Hydro Services Inc.  Woodstock Hydro Services Inc.	GS < 50	24.92	28.60	24.80	28.40	53.52	53.20	0.01	0.60%	0.32%
O G G G G G G G G G G G G G G G G G G	03 \ 30	24.52	20.00	24.00	20.40	JJ.J2	33.20	J.JZ	0.0070	0.52/0

Class

Average Percent Change	3.76%