

## Entegrus Powerlines Inc. EB-2013-0120

### Board Staff Interrogatories

#### Billing Determinants – CK, SMP, Dutton and Newbury

#### Interrogatory #1

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

A section of Sheet 6 “Billing Det. for Def-Var” from CK’s, SMP, Dutton and Newbury’s 2014 IRM Rate Generator Model is reproduced below.

#### CK

Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue <sup>1</sup>
RESIDENTIAL	\$/kWh	233,649,318		25,978,844	0	8,193,629
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	90,524,721		13,430,269	0	2,261,090
GENERAL SERVICE 50 TO 999 KW	\$/kW	246,167,990	677,184	208,832,622	574,478	2,598,852
GENERAL SERVICE INTERMEDIATE 1,000 TO 4,999 KW	\$/kW	114,499,112	278,788	115,406,006	280,996	1,181,845
INTERMEDIATE WITH SELF GENERATION	\$/kW	28,118,306	66,670	27,456,387	65,101	229,834
UNMETERED SCATTERED LOAD	\$/kWh	904,732			0	25,640
STANDBY POWER	\$/kW				0	
SENTINEL LIGHTING	\$/kW	361,472	1,016	131,064	368	29,826
STREET LIGHTING	\$/kW	6,615,542	19,516	6,615,542	19,516	229,522
microFIT						
<b>Total</b>		<b>720,841,193</b>	<b>1,043,174</b>	<b>397,850,734</b>	<b>940,459</b>	<b>14,750,238</b>

#### SMP

Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue <sup>1</sup>
RESIDENTIAL	\$/kWh	57,204,582		7,450,410	0	2,008,341
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	15,968,049		2,192,770	0	248,088
GENERAL SERVICE 50 TO 4,999 KW	\$/kW	96,514,821	238,896	89,112,042	220,572	318,915
LARGE USE	\$/kW	34,317,082	67,537	34,317,082	67,537	7,231
UNMETERED SCATTERED LOAD	\$/kWh	298,717		85,116	0	6,913
SENTINEL LIGHTING	\$/kW	42,906	120	40,532	113	225
STREET LIGHTING	\$/kW	1,463,048	4,316	1,463,048	4,316	5,768
microFIT						
<b>Total</b>		<b>205,809,205</b>	<b>310,869</b>	<b>134,661,000</b>	<b>292,539</b>	<b>2,595,481</b>

#### Dutton

Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue <sup>1</sup>
RESIDENTIAL	\$/kWh	4,465,406		545,421	0	137,292
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	3,185,486		799,929	0	46,613
SENTINEL LIGHTING	\$/kW	881	2		0	12
STREET LIGHTING	\$/kW	116,338	343	55,239	163	2,626
microFIT						
<b>Total</b>		<b>7,768,111</b>	<b>345</b>	<b>1,400,589</b>	<b>163</b>	<b>186,543</b>

#### Newbury

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Rate Class	Unit	Metered kWh	Metered kW	Billed kWh for Non-RPP Customers	Estimated kW for Non-RPP Customers	Distribution Revenue <sup>1</sup>
RESIDENTIAL	\$/kWh	1,346,561		148,919	0	40,588
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	477,970		32,366	0	13,587
GENERAL SERVICE 50 TO 4,999 KW	\$/kW	1,652,160	4,438	1,581,860	4,250	22,176
STREET LIGHTING	\$/kW	55,239	163	55,239	163	1,288
microFIT						
<b>Total</b>		<b>3,531,930</b>	<b>4,601</b>	<b>1,818,384</b>	<b>4,413</b>	<b>77,640</b>

- a) Board staff is unable to reconcile the billing determinants with the Board-approved load forecast or most recent actual load data. Please provide reconciliation to the load data used on sheet 6 "Billing Det. for Def-Var" for each of Entegrus's service territories as well as in aggregate.
- b) Board staff is unable to reconcile distribution revenue on sheet 6 with Chatham-Kent's Board-approved distribution revenue. Please reconcile the distribution revenue on a class by class basis and provide the supporting documentation (e.g. excerpt of relevant past decision and/or settlement agreements, RRWF and relevant RRR data). Please provide an explanation for any deviation.

## RTSR – Billing Determinants

### Interrogatory #3

### Ref: RTSR Model, Tab 4 – "RRR Data"

#### CK

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	233,649,318	-	1.0428		243,649,509	-
General Service Less Than 50 kW	kWh	90,524,721	-	1.0428		94,399,179	-
General Service 50 to 999 kW	kW	201,807,408	545,894		50.67%	201,807,408	545,894
General Service 50 to 999 kW - Interval Metered	kW	44,360,582	131,290		46.31%	44,360,582	131,290
General Service 1,000 to 4,999 kW	kW	114,499,112	278,788		56.29%	114,499,112	278,788
Intermediate With Self Generation	kW	28,118,306	66,670		57.81%	28,118,306	66,670
Unmetered Scattered Load	kWh	904,732	-	1.0428		943,455	-
Sentinel Lighting	kW	361,472	1,016		48.76%	361,472	1,016
Street Lighting	kW	6,615,542	19,516		46.46%	6,615,542	19,516

#### SMP

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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	57,204,582	-	1.0608		60,682,621	-
General Service Less Than 50 kW	kWh	15,968,049	-	1.0608		16,938,906	-
General Service 500 to 4,999 kW	kW	28,997,280	71,775		55.37%	28,997,280	71,775
General Service 50 to 4,999 kW – Interval Metered	kW	67,517,541	167,121		55.37%	67,517,541	167,121
Large Use	kW	34,317,082	67,537		69.64%	34,317,082	67,537
Unmetered Scattered Load	kWh	298,717	-	1.0608		316,879	-
Sentinel Lighting	kW	42,906	120		49.01%	42,906	120
Street Lighting	kW	1,463,048	4,316		46.46%	1,463,048	4,316

### Dutton

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	4,455,818		1.0662		4,750,793	-
General Service Less Than 50 kW	kWh	3,185,486		1.0662		3,396,365	-
Sentinel Lighting	kW	881	2		60.38%	881	2
Street Lighting	kW	116,338	343		46.49%	116,338	343

### Newbury

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	1,346,561	-	1.0580		1,424,662	-
General Service Less Than 50 kW	kWh	477,970	-	1.0580		505,692	-
General Service 50 to 4,999 kW	kW	1,652,160	4,438		51.02%	1,652,160	4,438
Street Lighting	kW	55,239	163		46.45%	55,239	163

- a) Please confirm that the data entered in columns “Non-Loss Adjusted Metered kWh” and “Non-Loss Adjusted Metered kW” are not adjusted by Entegrus’s Board approved loss factor for CK, SMP, Dutton and Newbury.
- b) Please confirm that billing determinants used for each service territory match Entegrus’s RRR report 2.1.5 for 2012.

### HONI Sub-transmission rates – CK, SMP, Dutton and Newbury

#### **Interrogatory #4**

**Ref: RTSR Model, Tab 6 – “HONI Sub-transmission rates”**

The HONI sub-transmission section of sheet 6 “Historic Wholesale” for CK, SMP, Dutton and Newbury is reproduced below:

CK

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Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	42,227	\$2.65	\$ 111,902	42,243	\$0.64	\$ 27,036	30,037	\$1.50	\$ 45,056	\$ 72,091
February	41,119	\$2.65	\$ 108,965	41,254	\$0.64	\$ 26,403	28,586	\$1.50	\$ 42,879	\$ 69,282
March	39,186	\$2.65	\$ 103,843	39,697	\$0.64	\$ 25,406	27,490	\$1.50	\$ 41,235	\$ 66,641
April	36,278	\$2.65	\$ 96,137	36,485	\$0.64	\$ 23,350	24,192	\$1.50	\$ 36,288	\$ 59,638
May	46,688	\$2.65	\$ 123,723	46,688	\$0.64	\$ 29,880	32,917	\$1.50	\$ 49,376	\$ 79,256
June	52,732	\$2.65	\$ 139,740	52,732	\$0.64	\$ 33,748	37,786	\$1.50	\$ 56,679	\$ 90,427
July	56,033	\$2.65	\$ 148,487	56,097	\$0.64	\$ 35,902	41,175	\$1.50	\$ 61,763	\$ 97,665
August	52,067	\$2.65	\$ 137,978	52,067	\$0.64	\$ 33,323	38,457	\$1.50	\$ 57,686	\$ 91,008
September	47,622	\$2.65	\$ 126,198	48,290	\$0.64	\$ 30,906	35,931	\$1.50	\$ 53,897	\$ 84,802
October	37,573	\$2.65	\$ 99,568	37,573	\$0.64	\$ 24,047	26,414	\$1.53	\$ 40,373	\$ 64,419
November	38,687	\$2.65	\$ 102,521	38,687	\$0.64	\$ 24,760	28,139	\$1.50	\$ 42,209	\$ 66,968
December	33,366	\$2.70	\$ 89,980	33,389	\$0.65	\$ 21,546	22,894	\$1.51	\$ 34,573	\$ 56,119
<b>Total</b>	523,578	\$ 2.65	\$ 1,389,042	525,202	\$ 0.64	\$ 336,306	374,018	\$ 1.50	\$ 562,011	\$ 898,317

## SMP

Hydro One	Network			Line Connection			Transformation Connection			Total Line
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	14,068	\$2.65	\$ 37,281	7,991	\$0.64	\$ 5,114	14,149	\$1.50	\$ 21,224	\$ 26,338
February	13,260	\$2.65	\$ 35,140	7,857	\$0.64	\$ 5,028	13,959	\$1.50	\$ 20,939	\$ 25,968
March	13,513	\$2.65	\$ 35,809	8,253	\$0.64	\$ 5,282	13,659	\$1.50	\$ 20,488	\$ 25,770
April	12,496	\$2.65	\$ 33,115	7,842	\$0.64	\$ 5,019	12,826	\$1.50	\$ 19,240	\$ 24,258
May	15,832	\$2.65	\$ 41,954	8,546	\$0.64	\$ 5,469	15,832	\$1.50	\$ 23,747	\$ 29,217
June	18,222	\$2.65	\$ 48,287	9,236	\$0.64	\$ 5,911	18,222	\$1.50	\$ 27,332	\$ 33,243
July	18,592	\$2.65	\$ 49,268	9,358	\$0.64	\$ 5,989	18,592	\$1.50	\$ 27,887	\$ 33,876
August	17,306	\$2.65	\$ 45,860	10,756	\$0.64	\$ 6,884	17,690	\$1.50	\$ 26,535	\$ 33,418
September	16,293	\$2.65	\$ 43,177	10,427	\$0.64	\$ 6,673	16,293	\$1.50	\$ 24,440	\$ 31,113
October	15,590	\$2.65	\$ 41,312	10,117	\$0.64	\$ 6,475	15,708	\$1.50	\$ 23,561	\$ 30,036
November	14,719	\$2.65	\$ 39,004	8,579	\$0.64	\$ 5,491	14,719	\$1.50	\$ 22,078	\$ 27,568
December	14,632	\$2.78	\$ 40,656	8,519	\$0.65	\$ 5,576	14,810	\$1.53	\$ 22,682	\$ 28,259
Total	184,523	\$ 2.66	\$ 490,865	107,481	\$ 0.64	\$ 68,912	186,459	\$ 1.50	\$ 280,155	\$ 349,066

## Dutton

Hydro One	Network			Line Connection			Transformation Connection			Total Line
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	1,414	\$2.65	\$ 3,747	1,414	\$0.64	\$ 905	1,414	\$1.50	\$ 2,121	\$ 3,026
February	1,287	\$2.65	\$ 3,411	1,358	\$0.64	\$ 869	1,358	\$1.50	\$ 2,037	\$ 2,906
March	1,122	\$2.65	\$ 2,973	1,206	\$0.64	\$ 772	1,206	\$1.50	\$ 1,809	\$ 2,581
April	1,060	\$2.65	\$ 2,809	1,098	\$0.64	\$ 703	1,098	\$1.50	\$ 1,647	\$ 2,350
May	1,943	\$2.65	\$ 5,149	1,943	\$0.64	\$ 1,244	1,943	\$1.50	\$ 2,915	\$ 4,158
June	1,643	\$2.65	\$ 4,354	1,643	\$0.64	\$ 1,052	1,643	\$1.50	\$ 2,465	\$ 3,516
July	1,886	\$2.65	\$ 4,998	1,886	\$0.64	\$ 1,207	1,886	\$1.50	\$ 2,829	\$ 4,036
August	1,788	\$2.65	\$ 4,738	1,788	\$0.64	\$ 1,144	1,788	\$1.50	\$ 2,682	\$ 3,826
September	1,435	\$2.65	\$ 3,803	1,435	\$0.64	\$ 918	1,435	\$1.50	\$ 2,153	\$ 3,071
October	1,231	\$2.65	\$ 3,262	1,292	\$0.64	\$ 827	1,292	\$1.50	\$ 1,938	\$ 2,765
November	1,526	\$2.65	\$ 4,044	1,526	\$0.64	\$ 977	1,526	\$1.50	\$ 2,289	\$ 3,266
December	1,464	\$2.78	\$ 4,068	1,482	\$0.80	\$ 1,186	1,482	\$1.53	\$ 2,270	\$ 3,455
Total	17,799	\$ 2.66	\$ 47,355	18,071	\$ 0.65	\$ 11,803	18,071	\$ 1.50	\$ 27,153	\$ 38,956

## Newbury

Hydro One	Network			Line Connection			Transformation Connection			Total Line
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	580	\$2.65	\$ 1,536		\$0.00		580	\$1.50	\$ 869	\$ 869
February	581	\$2.65	\$ 1,539		\$0.00		581	\$1.50	\$ 871	\$ 871
March	496	\$2.65	\$ 1,315		\$0.00		496	\$1.50	\$ 744	\$ 744
April	533	\$2.65	\$ 1,411		\$0.00		533	\$1.50	\$ 799	\$ 799
May	740	\$2.65	\$ 1,962		\$0.00		740	\$1.50	\$ 1,111	\$ 1,111
June	833	\$2.65	\$ 2,208		\$0.00		833	\$1.50	\$ 1,250	\$ 1,250
July	881	\$2.65	\$ 2,336		\$0.00		881	\$1.50	\$ 1,322	\$ 1,322
August	1,867	\$2.65	\$ 4,948		\$0.00		1,867	\$1.50	\$ 2,801	\$ 2,801
September	605	\$2.65	\$ 1,602		\$0.00		605	\$1.50	\$ 907	\$ 907
October	527	\$2.65	\$ 1,398		\$0.00		527	\$1.50	\$ 791	\$ 791
November	575	\$2.65	\$ 1,525		\$0.00		575	\$1.50	\$ 863	\$ 863
December	602	\$2.78	\$ 1,671		\$0.00		602	\$1.68	\$ 1,009	\$ 1,009
Total	8,820	\$ 2.66	\$ 23,452	-	\$ -	\$ -	8,820	\$ 1.51	\$ 13,337	\$ 13,337

- a) Please explain the variance in the HONI sub-transmission rate in December and update the RTSR models for each service territory if necessary.

**Tax Sharing Model – Billing Determinants – CK and SMP**

**Interrogatory #5**

**Ref: Tax Sharing Model, Tab 1 – “Billing Determinants”**

Rate Class	Billing Determinant	2011 RRR Statistics		
		No. Customers	kWh	kW
(A)	(B)	(C)	(D)	(E)
<b>Chatham-Kent</b>				
Residential	kWh	28,644	207,045,763	-
General Service <50 kW	kWh	3,038	90,210,202	-
General Service >50 kW	kW	421	189,939,582	494,092
General Service Intermediate	kW	28	139,888,648	382,377
Intermediate With Self Generation	kW	1	32,205,190	87,305
Large User	kW			
Unmetered Scattered Load	kWh	194	1,081,178	-
Standby Power	kW	-	-	-
Sentinel Lighting	kW	327	347,118	1,079
Street Lighting	kW	10,751	5,757,195	18,365
Total		43,404	666,474,876	983,218
Percent of Combined Revenue				
<b>Strathroy, Mt. Byrdges &amp; Parkhill</b>				
Residential	kWh	6,299	58,904,267	-
General Service <50 kW	kWh	662	17,998,806	-
General Service >50 kW	kW	91	91,846,588	235,476
General Service Intermediate	kW			
Intermediate With Self Generation	kW			
Large User	kW	1	29,034,336	56,098
Unmetered Scattered Load	kWh	51	311,683	-
Standby Power	kW			
Sentinel Lighting	kW	46	42,724	119
Street Lighting	kW	1,958	1,458,103	4,316
Total		9,108	199,596,507	296,009
Percent of Combined Revenue				

- a) Board staff notes that Entegrus used 2011 RRR billing determinants for the allocation of the tax sharing amount. Please explain why the use of 2011 data is appropriate.
- b) Please update the tax sharing model, including rate rider calculations using the 2012 RRR billing determinants.

**Proposed Rates - CK**

**Interrogatory #6**

**Ref: Rate Generator, sheet 11 “Proposed Rates” and Tax Sharing Model, sheet 3**

On sheet 11 of the Rate Generator Entegrus for the CK service territory shows a rate rider of \$-0.0751/kW for the Street Lighting customer class, as shown below. On sheet 3 of the Tax Sharing Model, Entegrus shows a rate rider of \$-0.0750/kW for the same rate class.

**STREET LIGHTING SERVICE CLASSIFICATION**

MONTHLY RATES AND CHARGES - Delivery Component

Service Charge (per connection)	\$	1.69
Distribution Volumetric Rate	\$/kW	1.25420
Low Voltage Service Rate	\$/kW	0.04270
Retail Transmission Rate - Network Service Rate	\$/kW	<b>1.95540</b>
Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	<b>1.34294</b>
Rate Rider for Tax Change - effective until April 30, 2015	\$/kW	<b>(0.07510)</b>

- a) Please explain the variance. If this amount was entered in error, please confirm and Board staff will update the model.

**Proposed rate rider – Account 1595**

**Interrogatory #7**

**Ref: Manager’s summary pp. 8-10 and Appendix K; Rate Generator – Newbury, sheet 7**

On pages 8 and 10 Entegrus proposes to dispose of a credit balance in Account 1595 of \$25,679 using a different allocation that the Rate Generator model provides as shown below.

**Proposed Newbury Residual Balance Allocation & Rate Rider Calculation**

Original Newbury Rate Rider Composition: EB-2010-0275				
Rate Class	Approved Non-RPP Claim	Non-RPP 1595 Share Proportion	Approved RPP Variance Claim	RPP 1595 Recovery Share Proportion
RESIDENTIAL	\$5,499	34.30%	\$10,238	40.61%
GENERAL SERVICE LESS THAN 50 KW	\$586	3.65%	\$3,458	13.71%
GENERAL SERVICE 50 TO 4,999 KW	\$9,948	62.05%	\$11,068	43.90%
STREET LIGHTING	\$0	0.00%	\$448	1.78%
Total	\$16,032	100.00%	\$25,212	100%

**Proposed Residual Balance Allocation and Rate Riders**

RPP Rate Rider Calculation					
Rate Class	RPP 1595 Share Proportion	Allocation of Residual Balance	RPP Unit	2012 Billed Amounts (RPP Only)	Rate Rider
RESIDENTIAL	40.61%	-\$602	kWh	1,346,561	(0.0004)
GENERAL SERVICE LESS THAN 50 KW	13.71%	-\$203	kWh	477,970	(0.0004)
GENERAL SERVICE 50 TO 4,999 KW	43.90%	-\$651	kW	4,438	(0.1466)
STREET LIGHTING	1.78%	-\$26	kW	163	(0.1616)
Total	100%	-\$1,482	Note 1		

Non-RPP Rate Rider Calculation					
Rate Class	Non-RPP 1595 Share Proportion	Allocation of Residual Balance	Non-RPP Unit	2012 Billed Amounts (non-RPP Only)	Rate Rider
RESIDENTIAL	34.30%	-\$8,299	kWh	148,919	(0.0557)
GENERAL SERVICE LESS THAN 50 KW	3.65%	-\$884	kWh	32,366	(0.0273)
GENERAL SERVICE 50 TO 4,999 KW	62.05%	-\$15,014	kW	4,438	(3.3827)
STREET LIGHTING	0.00%	\$0	kW	163	-
Total	100%	-\$24,197	Note 2		

Note 1: Residual balance from EB-2010-0275 RPP rate rider expiring April 30, 2012

Note 2: Residual balance from EB-2010-0275 non-RPP rate rider expiring April 30, 2012

- Please provide supporting materials for the allocation of the credit balance between RPP and Non-RPP shown in appendix K.
- Entegrus indicates that the residual credit balance attributed to non-RPP customers is primarily the result of volumetric increases in the GS>50 kW rate class. Please quantify how much of the overall over recovery was generated by the GS>50kW rate class.
- Based on cost causality, would Entegrus consider it appropriate to allocate the entire over recovery to the GS>50kW rate class? Please explain.

**LRAM**

Ref: Section 2.7: LRAM/LRAMVA, Pages 13-15 of 20; Exhibit 2, Page 18 of 20, LRAM/LRAMVA Summary Table; Attachment I, IndEco Chatham-Kent LRAMVA Third Party Report and Attachment J, IndEco SMP LRAMVA and Middlesex LRAM Third Party Report

Entegrus has requested approval for both LRAM and LRAMVA amounts.

Entegrus has separated its requests into three different pieces:

- i. Chatham-Kent LRAMVA in 2011 and 2012 from 2011 and 2012 CDM Program savings, total amount of \$84,881.20, which includes carrying charges of \$817.20;
  - ii. SMP LRAMVA in 2011 and 2012 from 2011 and 2012 CDM Program savings, total amount of \$13,519.20, which includes carrying charges of \$145.20; and,
  - iii. SMP LRAM in 2011 and 2012 from persisting 2006-2010 CDM Program Savings, total amount of \$37,535.37 which includes carrying charges of \$570.37.
- a) Please confirm that the amounts summarized above are correct.
  - b) Please provide LRAM and LRAMVA rate riders, separate from the Group 1 DVA rate rider, for each of the LRAM and/or LRAMVA requests in this application.
  - c) Entegrus notes that the SMP zone has not updated its load forecast since 2006. Please discuss when this zone will have an updated load forecast that includes a CDM component.
  - d) It appears that Entegrus, or IndEco, has had to perform some manual adjustments in order to separate savings totals in 2011 and 2012 to calculate the LRAMVA amounts for the separate CK and SMP zones. Please confirm if this is correct.
  - e) Please discuss what information was relied on to separate CK and SMP-related savings in order to calculate separate LRAMVA amounts.
  - f) Please discuss what OPA final savings results were used for calculating 2011 lost revenues as the 2011 OPA results are summarized in two places:
    - Table 5: Summarized Program Results, August 31, 2011 on page 244 of 410, and
    - Table 1: Entegrus – OPA Annual CDM Report 2012 – Final Verified Results on page 245 of 410
  - g) It appears that IndEco has conducted manual adjustments to separate CK-related savings for calculation of 2011 and 2012 LRAMVA amounts. Please discuss why the savings used in “Table B-3: Impact on CDM on load, by rate class for 2011” (pg. 254 of 410) don’t match with the 2011 savings in either of the OPA Final 2011 or 2012 Results Tables mentioned above.



- h) Similarly, please discuss why the savings used in “Table B-4: Impact on CDM on load, by rate class for 2012” (pg. 255 of 410) doesn’t match with the 2012 savings in the OPA Final 2012 Results table.