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August 19, 2014

Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street
Suite 2700
Toronto, ON M4P 1E4

Dear Ms Walli:

**Re: Draft Rate Order,
EB-2012-0459 Enbridge Gas Distribution Customized IR Application
Reply Submission**

On July 17, 2014, the Board issued its EB-2012-0459 Decision and Order (the "Decision") in respect of the Customized Incentive Regulation application by Enbridge Gas Distribution Inc. ("Enbridge"). In the Decision, the Board gave directions regarding the Draft Rate Order and Draft Accounting Order (collectively, the "DRO") arising out of the Decision. Among other things, the Decision provided for submissions by parties on the DRO to be filed by August 14, 2014 and a reply by Enbridge to be filed on August 19, 2014.

In the context of its directions regarding the DRO, the Board indicated that Enbridge should file a DRO that would "comprehensively reflect the Board's findings in this decision and allow the decision to be implemented as soon as possible". The Board also indicated that the material filed by Enbridge should allow the Board and parties to verify that "the Board's findings are properly addressed" and the Board stated its expectation that the Final Rate Order and Accounting Order would be available for an October 1, 2014 implementation timeframe.[1]

Two points emerge very clearly from these directions given by the Board in the Decision: first, the intent of the Board's directions is to ensure that the DRO reflects the findings made by the Board in the decision and, second, the Board's expectation is that the Decision will be implemented as soon as possible and, specifically, within an October 1, 2014 implementation timeframe.

[1] Decision, page 84.

Enbridge has received submissions or comments with respect to the DRO from the following:

(1) Board Staff;
(2) Association of Power Producers of Ontario ("APPrO");
(3) Building Owners and Managers Association Toronto ("BOMA");
(4) Canadian Manufacturers & Exporters ("CME");
(5) Consumers Council of Canada ("CCC");
(6) Energy Probe Research Foundation ("Energy Probe");
(7) Federation of Rental-housing Providers of Ontario ("FRPO");
(8) School Energy Coalition ("SEC"); and
(9) Vulnerable Energy Consumers Coalition ("VECC").

In reply to submissions and comments from Board Staff and intervenors, Enbridge will address three main issues. These issues relate to the determination of the cost of debt during each year of the term of the Customized IR plan; the determination of Rider E amounts and the manner and timing of clearance of Rider E; and the annual amounts to be refunded in order to give effect to the Board's findings regarding Site Restoration Costs ("SRC"). Enbridge will address each of these issues under the headings that follow.

A. Cost of Debt

Board Staff and certain parties[2] have made submissions about the determination of the cost of debt during each year of the IR term. They submit that the forecast weighted average cost of debt should be determined each year by taking into consideration not only forecast cost rates for forecast debt issuances, but also by taking into account the actual cost rates and the influence of actual levels and timing of debt issuances that have occurred in years prior to the rate application year.

Enbridge submits that the position put forward by these parties is not a realistic reflection of how the Decision can appropriately be implemented. Enbridge must fix the forecast levels and timing of debt issuances at this time in order to match the fixing of forecast rate base levels for five years in accordance with the Decision. Any attempt to mix actual levels of debt and timing of debt issuances (which correlate to actual rate base) with a capital structure that is matched to a forecast level of rate base would result in an unmatched weighted average cost of capital. While, under the Customized IR plan as approved in the Decision, Enbridge will be carrying out an annual, prospective update of Return on Equity ("ROE"), Enbridge will not be determining a forecast ROE that is influenced by actual returns during the previous years of the IR term. The same proposition holds true for the weighted average cost of debt.

[2] Energy Probe submission page 4, SEC submission page 5, BOMA submission page 2, CME submission page 2, APPrO submission page 4, Board Staff submission page 7, CCC submission page 1.

The impact of variances in levels of actual compared to forecast rate base, and actual compared to forecast ROE, along with variances in most other revenues and costs[3] will be handled through the Earnings Sharing Mechanism approved by the Board and will not be trued up prospectively for ratemaking on an annual basis. The impact of variances in the levels of debt issued, and associated cost rates, should be treated no differently in order for the Decision to be applied consistently.

B. SRC Refund

In its evidence with respect to SRC, Enbridge proposed a refund to customers of $259.8 million and it proposed the annual amount that would be refunded each year from 2014 to 2018. Enbridge's evidence made clear that the annual amounts to be refunded had been determined with a view to reducing the potential impact of a jump in customer bills after the end of the refund period.

In the Decision, the Board required that the SRC refund be increased from $259.8 million to $379.8 million.[4] However, the Board did not require any change to Enbridge's proposal that the annual refund amounts be determined with a view to reducing potential bill impact at the end of the refund period, nor did the Board make any finding whatsoever in the Decision suggesting that such a change should be made. Accordingly, in the DRO materials prepared by Enbridge to give effect to the findings in the Decision, "the updated refund amount to be returned each year is based on the same refund profile as the originally filed amount".[5]

In its submission, Board Staff confirms these points and expresses its support for the SRC refund "pattern" put forward by Enbridge. Specifically, Board Staff states that,

> In the DRO, Enbridge presented updated SRC amounts in response to the Board's SRC findings. Board staff notes that the 5-year refund pattern is in direct proportion to the profile proposed in its original evidence, as explained in TCU-RO 1.1. Enbridge provided its rationale for the refund profile in its evidence at D1/T5/S1 paragraphs 34 through 37. In essence, the pattern is designed to mitigate rate shock issues at the end of the plan term. Board staff also notes that the Board in its Decision with Reasons did not raise any concerns with Enbridge's original proposed refund pattern.
>
> As such, Board staff has no concerns with Enbridge's proposal.[6]

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[3] The reference here to "most other revenues and costs" means revenues and costs that are not covered by a deferral or variance account.
[4] Decision, page 62.
[5] Response to Undertaking TCU-RO 1.1, page 1.
[6] Board Staff submission, page 6.

Some parties have proposed that the SRC refund profile should be changed to produce what they perceive to be smoother customer bills over the term of the Customized IR plan. SEC, for example, proposes adjustments that are based on an assumption that "the SRC refund is used in a back-loaded way to smooth the bill increases for customers".[7] SEC's "Comparison of Refund Patterns – Proposed vs. Smoothed" is attached to its submissions.

Underlying SEC's proposal for a change to the SRC refund profile is a notion that the approach proposed by Enbridge will result in a sharp bill decrease for 2014, followed by sharp bill increases in each of the next four years.[8] In fact, SEC's Comparison of Refund Patterns shows a percentage change in annual Allowed Revenues, not bill impacts. This is confirmed in SEC's submissions, which state that the refund pattern referred to by SEC is "directionally similar to the figures provided by Enbridge", but is "based on changes to revenue requirement, rather than rates".[9]

In order to gain some insight into bill impacts, one can look to Enbridge's response to Undertaking TCU-RO 1.8. This evidence reveals that, after the reduction in 2014 to typical customer estimated bill amounts, with SRC credits included, the majority of rate classes do not return to approximate 2013 bill impact levels until 2017.[10]

Energy Probe does not agree with SEC's smoothing conclusions, at least insofar as residential customers are concerned. Energy Probe provides analysis in support of its view that a residential customer will enjoy a reduction from current (2013) rates through rates in 2014, 2015 and 2016 and then, even in 2017, a residential customer will be paying only a small amount more than in 2013.[11] Further, Energy Probe points out that "changing the SRC refund profile would change a number of factors that determine the revenue requirement" and it expresses its concern about a "significant increase in 2019 following the current customized IR plan of deviating from the SRC refund profile".[12]

It appears that CCC and VECC support the submissions made by SEC with regard to the SRC refund. However, Energy Probe provides analysis to back up its conclusion that it is "better for residential customers"[13] not to change the SRC refund profile, while CCC and VECC offer no similar analysis, nor even any comment on Energy Probe's analysis.[14]

Enbridge submits that suggestions about changing the profile of the SRC refund should be rejected for a number of reasons. These reasons are set out under the sub-headings that follow.

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[7] SEC submissions, page 3
[8] SEC submissions, page 3.
[9] *Ibid.*
[10] Response to Undertaking TCU-RO 1.8, page 2.
[11] Energy Probe submissions, page 7.
[12] Energy Probe submissions, pages 7 to 8.
[13] Energy Probe submissions, page 7.
[14] Energy Probe's submissions were filed on August 14, 2014, in accordance with the timeline established by the Board. CCC's submissions and VECC's comments were filed on August 18, 2014.

(i) DRO Process

As made clear by the Board in the Decision, the intent of the DRO Process is to verify that the Board's findings are properly addressed. In the Decision, the Board made a finding that required an increase in the SRC refund amount. The Board did not make any finding about a change to the proposed profile for the SRC refund. Enbridge submits that proposals to change the SRC refund profile do not fall within the scope of the DRO process and should be rejected by the Board on that ground alone.

More generally, Enbridge submits that the process for review of a draft rate order is not intended to be an opportunity for a second hearing of issues that were before the Board when a final decision was rendered and neither is the process intended to be a forum for parties to introduce new proposals and ideas that were not addressed in the Board's decision. There can be little doubt that other parties would object if, during a draft order review process, an applicant were to attempt to modify or adjust the proposal that it asked the Board to approve. In this case, for example, it was not open to Enbridge to propose, during the DRO process, a different approach to the SRC refund profile after Enbridge had made a proposal to the Board in that regard and the Decision provided no basis whatsoever for changing that proposal. In short, the DRO review process should give effect to the applicant's evidence and proposals, except where the Board's final decision provides a basis to change or refine what the applicant has put forward.

(ii) The Decision

Enbridge's proposal for the pattern of the SRC refund was clearly and distinctly based on an effort to avoid a large impact at the end of the refund period and there is nothing in the Decision to suggest that the Board determined or directed that there should be any departure from Enbridge's approach. Enbridge submits that the Decision is effectively an implied approval of Enbridge's approach to the SRC refund pattern. Obviously, a Board decision does not explicitly approve every aspect of the application before the Board: often in matters before the Board, many of the details of an application do not receive explicit mention in a decision. To the extent that a Board decision does not give any basis for changing particular aspects of the applicant's proposals, it is the applicant's evidence to which one must look in order to find the aspects of the applicant's case that have been implicitly approved by the Board. As stated above, the updated refund amounts in the DRO materials are based on the same refund profile as proposed in Enbridge's evidence.

(iii) Allowed Revenues

As pointed out by Energy Probe, changing the SRC refund profile changes a number of factors that determine "revenue requirement". The response to Undertaking TCU-RO 1.1 indicates that,

> …the annual Rider D refund amounts, which represent bill impacts only, do also have an impact and a direct link within the derivation of the allowed revenues and sufficiency/deficiency amounts presented in Appendix A of the Draft Rate Order. If the annual refund/profile amounts were to be altered, it would directly impact the corresponding annual tax deductions, rate base calculations (requiring monthly inputs), and very likely planned debt issuances, all of which would impact forecast capital structures, allowed revenues and sufficiency and deficiency amounts.[15]

Enbridge submits that the Allowed Revenues that Enbridge asked the Board to approve in the Customized IR application can and should be changed only to the extent that any such change flows from the Decision. The DRO process cannot and should not result in a change to Allowed Revenues that was not contemplated by the Decision and that does not flow from the Decision.

(iv) Timing

The evidence given in the response to Undertaking TCU-RO 1.1 is that changing the proposed profile for the SRC refund would require updating or recalculation of the financial results in Appendix A of the Draft Rate Order, the Rate Handbook in Appendix B, the Rider amounts in Appendix C, the rate approximations in Appendix D and the planned debt issuances in Appendix H. This evidence goes on to state that performing an update of this magnitude would take significant time and effort and would require the involvement of external resources and that, if a revised refund profile were to be determined, the time required to perform the calculations and produce validated results is estimated to be a minimum of a few weeks.[16] SEC commented that stakeholders asked Enbridge to provide a table using the assumptions eventually forwarded in SEC's submission. Enbridge declined to provide a quickly thrown together scenario as it would not take into account all of the re-forecasting of required debt issuances through the term and would not properly re-determine Allowed Revenues, which as indicated above would take a much greater time than required within the Decision and would not permit rates to be implemented by October 1, 2014 as further process would likely have to be ordered by the Board in reviewing all of the newly calculated results and forecasts of debt issues, and rate schedule re-works.

Enbridge is mindful of the Board's directions that the DRO should "allow the decision to be implemented as soon as possible" and the Board's expectation that the Final Rate Order and Accounting Order will be available for an October 1, 2014 implementation timeframe. Enbridge submits that, particularly given the Board's expectations regarding implementation of the Decision, it is not appropriate to embark on changes to the SRC refund profile that will entail weeks of work in order to produce validated results, and as such, delay the implementation of new rates beyond October 1, 2014

[15] Response to Undertaking TCU-RO 1.1, pages 1 to 2.
[16] Response to Undertaking TCU-RO 1.1, page 2

C. Rider E

(i) Forecast or Actual Volumes Data for January 1 to September 30, 2014

The 2014 revenue sufficiency resulting from implementation of the Decision is $62.1 million. This revenue sufficiency represents the difference between revenues at base rates and revenues at 2014 final rates applied to the 2014 Board-approved volume forecast. Given that 2014 final rates are effective January 1, 2014 and will be implemented as of October 1, 2014, Enbridge determined the revenue sufficiency for the period from January 1 to September 30, 2014, again based on the 2014 Board-approved volume forecast. The revenue sufficiency for this period is $43.9 million.

Board Staff and Energy Probe agree with Enbridge's determination of the revenue sufficiency for the period from January 1 to September 30, 2014. Some parties, though, have put forward the notion of using actual volumes to determine the sufficiency for this period.

As stated by Board Staff, "the use of actual volumes, which are not weather normalized, would be counter to the forward test year approach where the revenue requirement and the load forecast is based on a weather normalized forecast."[17] Further, Board Staff correctly points out that "the approach of calculating adjustments on the basis of a test year forecast is consistent with previous Board decisions in both the natural gas and electricity sector."[18]

Similarly, Energy Probe notes that "the 2014 rates are based entirely on forecasted volumes" and that "[t]he difference between the approved rates and the interim rates in place over the first months of 2014 should be applied to volumes on the same basis as the new rates were derived".[19]

In the response to TCU-RO 1.5 the Company highlighted that: "…there is no appropriate basis to introduce any actuals into the draft rate order. The volumes could have been lower than the forecast, yet the Rider E would still be developed based on forecast information to align it with the Ontario Energy Board (the "Board") approved rate making principles for utilities (i.e., revenue requirement and rates developed based on a forward looking test year.)"[20]

SEC submits that actual volumes should be used to determine the level of sufficiency for the January 1 to September 30 period because Enbridge "failed to complete the process for getting new rates in a timely manner."[21] Enbridge disagrees. As the Board said in the Decision, Enbridge's application for a "Custom IR plan" was the first of its

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[17] Board Staff submission, page 4.
[18] *Ibid.*
[19] Energy Probe submissions, page 4.
[20] Response to Undertaking TCU-RO 1.5, page 2.
[21] SEC submissions, page 2.

kind since the Board issued the Renewed Regulatory Framework for Electricity report.[22] It was important that the evidence and process for consideration of Enbridge's application be sufficient to allow thorough examination of the issues in the first "Custom IR plan". This is not, by any stretch of the imagination, a reason to depart from established rate-making principles that are based on a prospective test year.

Enbridge submits that the revenue sufficiency of $43.9 million for the period January 1 to September 30, 2014, which was derived based on the 2014 Board-approved volume forecast, is the appropriate amount to be cleared to customers through Rider E. This approach is aligned with forward test year ratemaking principles for utilities.

(ii) Clearance of Rider E to Customers

In their submissions parties raise concerns about the manner of, and period for, Rider E clearance.[23] Specifically, a concern has been expressed that Enbridge's proposal for Rider E clearance could result in "winners and losers".[24] In its submissions, Energy Probe states that clearing the $43.9 million as "[a] one-time rebate to customers based on their actual consumption over the January 2014 through September 2014 period" is "the most appropriate approach." and that such an approach "would be more reflective of individual consumption over the relevant period than basing the rebate on one or three months of future consumption".[25]

Enbridge agrees with the concern that, if the Rider E amount of $43.9 million is cleared to customers in the manner originally proposed by Enbridge, the variance between actual volumes and forecast volumes could create "winners and losers". In light of the relatively large amount of the refund and the unpredictability of fall weather, Enbridge agrees that the one month prospective clearance proposed by Enbridge is not the most appropriate approach in these specific circumstances.

In order to address the concerns raised by parties, Enbridge submits that either one of two approaches can be taken to the clearance of Rider E. Consequently, Enbridge supports and is able to implement either of the two following solutions to the issue raised about Rider E clearance. However, Enbridge's preferred approach is (a) One-Time Disposition Based on Actual Volumes.

(a) One-Time Disposition Based on Actual Volumes

Under this approach, Enbridge would implement a one-time disposition of the $43.9 million Rider E amount, based on each customer's actual volumes for the January 1 to September 30, 2014 period. Enbridge would be able to implement this one-time disposition on January 2015 bills.

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[22] Decision, page 5.
[23] APPrO submissions, page 5; BOMA submissions, page 2; CCC submissions, page 1; and Energy Probe submissions, page 5.
[24] Energy Probe submissions, page 5.
[25] Energy Probe submissions, pages 5 to 6.

The January 1, 2015 disposition would coincide with the rate change implementation for the January 2015 QRAM. Consequently, the one-time disposition would be brought to the attention of customers in the rate change notice in the same month when the disposition is effective on customer bills. This one-time credit back to customers on their January 2015 bills would also offset the level of their January bills which are typically the highest of the winter season.

Should the Board decide to approve the one-time disposition based on actual volumes of individual customers, Enbridge asks the Board to approve a 2014 Rider E Deferral Account ("2014 REDA"). A description of the accounting treatment for a 2014 REDA is attached as Appendix A to these reply submissions. The Company would prepare the derivation of the Rider E unit rates (based on $43.9 million plus interest and based on actual January to September 2014 volumes) once September actual volumes become available and seek approval prior to its January 1, 2015 QRAM application.

As noted in some intervenor submissions, the one-time disposition based on actual volumes (which are static) does not create volumetric differences. As well the $43.9 million would be refunded to customers based on their individual consumption profiles. Another possible approach to the one-time disposition would be to make it part of the clearance of 2014 deferral and variance account balances. The added benefit of this approach is that the $43.9 million refund would offset debit balances in the 2014 UDCDA and 2014 DDCTDA (the combined balance of which is forecast to be approximately $30 million at year end). However, implementation of this approach would mean a delay in refunding the Rider E amount to customers until the spring or summer of 2015.

<u>(b) Prospective Disposition from October to December 2014</u>

Under this approach, the $43.9 million Rider E disposition would be implemented over three months, October to December of 2014, and a Rider E variance account would be established to capture any over-refund or under-refund to customers. As Energy Probe has observed, "the addition of the variance account ensures that neither Enbridge nor ratepayers win or lose. It also creates an approach that mirrors the disposition of deferral account balances."[26]

Disposition of Rider E over the three months from October to December, with a variance account, would completely align the approach to disposition for both Riders D and E. The Rider D amount for the January to September, 2014 period will also be credited to customers over the three months from October to December and there is a variance account to capture any over-refund or under-refund in respect of Rider D. Customers would receive a credit amount for Rider E and Rider D on their October, November and December, 2014 bills.
To facilitate implementation of this approach, Enbridge has attached at Appendix B the derivation of Rider E unit rates reflecting an October to December disposition period

[26] Energy Probe submissions, page 6.

and at Appendix C a description of the accounting treatment for a 2014 Rider E Variance Account ("2014 REVA"). The 2014 REVA amount would be cleared in conjunction with the Company's 2014 Deferral and Variance accounts in the spring or summer of 2015.

D. Conclusion

For all of the reasons set out above, Enbridge submits that no change should be made to the DRO in relation to: (1) the determination of the cost of debt during each year of the term of the Customized IR plan; (2) the pattern of the SRC refund; or (3) the determination of the January 1 to September 30 sufficiency to be cleared through Rider E. Enbridge agrees that the DRO should give effect to a one-time disposition of Rider E, by way of a credit on January 2015 bills, based on actual volumes of individual customers during the period from January 1 to September 30, 2014, with a 2014 REDA to record the Rider E amount to be returned to customers, as set out in the proposed accounting treatment at Appendix A to this reply submission.

All of which is respectfully submitted.

Yours truly,

(Original Signed)

Andrew Mandyam
Director, Regulatory Affairs and
Financial Performance

Attachments

ACCOUNTING TREATMENT FOR A RIDER E DEFERRAL ACCOUNT (“2014 REDA”)

For the 2014 Fiscal Year
January 1, 2014 to December 31, 2014)

The purpose of the Rider E Deferral Account (REDA) is to record the 2014 Board approved Rider E amount to be refunded to customers. For 2014, Rider E represents the revenue variance between interim rates, which were in place from January 1st to September 30th 2014, and the final Board approved 2014 rates, which were implemented on October 1st 2014, but effective January 1st 2014. The approved Rider E refund was calculated to be $43.9 million.

Simple interest is to be calculated on the opening monthly balance of this account using the Board approved EB-2006-0117 interest rate methodology. The balance of this account, together with carrying charges, will be disposed of in a manner designated by the Board in a future rate hearing.

Accounting Entries

1. To record the approved 2014 Rider E refund amount:

Debit:	Operating revenue	(Account 300. 000)
Credit:	2014 REDA	(Account 179. ---)

To record the approved 2014 Rider E amount, representing the January through September 2014 revenue variance between interim rates and final approved rates.

2. Interest accrual:

Debit:	Interest Expense	(Account 323. 000)
Credit:	Interest on 2014 REDA	(Account 179. ---)

To record simple interest on the opening monthly balance of the 2014 REDA using the Board approved EB-2006-0117 interest rate methodology.

Revenue Adjustment Rider (Rider E) Summary
Period: October 1st to December 31st, 2014

	Col. 1	Col. 2	Col. 3	Col. 4
Item No.	**Description**	**Sales Service** (cent/m^3)	**Western Transportation Service** (cent/m^3)	**Ontario Transportation Service** (cent/m^3)
Bundled Services				
1.	**Rate 1**	(2.5080)	(2.4836)	(2.5022)
2.	**Rate 6**	(1.3530)	(1.2914)	(1.3099)
3.	**Rate 9**	(1.2271)	(1.2608)	(1.2743)
4.	**Rate 100**	-	-	-
5.	**Rate 110**	(0.3328)	(0.3728)	(0.3910)
6.	**Rate 115**	(0.0665)	(0.1053)	(0.1247)
7.	**Rate 135**	(0.0742)	(0.0496)	(0.0596)
8.	**Rate 145**	(0.1066)	(0.2539)	(0.2707)
9.	**Rate 170**	(0.0833)	(0.1133)	(0.1285)
10.	**Rate 200**	(0.6410)	(0.6777)	(0.6955)

			Delivery Service (cent/m^3 per CD)
Unbundled Services			
11.	**Rate 125**	n/a	(3.0120)
12.	**Rate 300**	n/a	(21.0190)

Notes: Sales Service Rider includes Distribution, Gas Supply Load Balancing, Transportation and Commodity unit rates shown on Page 2.
Western Transportation includes Distribution, Gas Supply Load Balancing, Transportation. unit rates shown on Page 2.
Ontario Transportation includes Distribution and Gas Supply Load Balancing. unit rates shown on Page 2.

Derivation of Revenue Adjustment Rider (Rider E) Unit Rates
Period: October 1st to December 31st, 2014

Item No.	Description	Distribution Adjustment ($000) (1)	Delivery Volumes (1000 m^3)	Unit Rate (¢/m^3)	Gas Supply Load Balancing Adjustment ($000) (1)	Delivery Volumes (1000 m^3)	Unit Rate (¢/m^3)	Gas Supply Transportation Adjustment ($000) (1)	Transport-ation Volumes (1000 m^3)	Unit Rate (¢/m^3)	Gas Supply Commodity Adjustment ($000) (1)	Sales Volumes only (1000 m^3)	Unit Rate (¢/m^3)
	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13
Bundled Services		Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9
1.	**Rate 1**	(18,004)	1,083,679	(1.6614)	(9,112)	1,083,679	(0.8409)	189	1,016,414	0.0186	(239)	982,255	(0.0244)
2.	**Rate 6**	(7,048)	1,089,720	(0.6468)	(7,226)	1,089,720	(0.6631)	153	831,122	0.0184	(431)	699,767	(0.0616)
3.	**Rate 9**	(2)	158	(1.3143)	0.1	158	0.0400	0	134	0.0135	0	134	0.0337
4.	**Rate 100**	-	-	0.0000	-	-	0.0000	-	-	0.0000	-	-	0.0000
5.	**Rate 110**	(258)	153,852	(0.1675)	(344)	153,852	(0.2235)	7	38,409	0.0181	8	21,085	0.0401
6.	**Rate 115**	(108)	116,102	(0.0933)	(36)	116,102	(0.0314)	1	3,356	0.0195	0	211	0.0387
7.	**Rate 135**	(12)	20,235	(0.0601)	0.1	20,235	0.0005	1	8,732	0.0100	(0)	400	(0.0246)
8.	**Rate 145**	(73)	42,807	(0.1710)	(43)	42,807	(0.0997)	2	10,612	0.0168	9	5,872	0.1473
9.	**Rate 170**	(81)	117,216	(0.0692)	(69)	117,216	(0.0593)	2	14,662	0.0152	3	10,602	0.0299
10.	**Rate 200**	(55)	41,033	(0.1333)	(231)	41,033	(0.5622)	5	30,190	0.0178	11	30,190	0.0367
11.	**Total**	(25,641)	2,671,720		(17,061)	2,671,720		360	1,953,631		(639)	1,750,517	

Item No.	Description	Delivery Adjustment ($000) (1)	CD Volumes (1000 m^3)	Unit Rate (¢/m^3 per CD)
Unbundled Services				
12.	**Rate 125**	(897.8)	29,806	(3.0120)
13.	**Rate 300**	(9.8)	47	(21.0190)

Notes: (1) Distribution, Load Balancing, Transportation and Commodity Adjustment is the sum of January to September

2014 SALES, TRANSPORTATION AND DELIVERY VOLUME SUMMARY

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 12
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	TOTAL SALES VOLUME (10^3 m^3) - by Rate													
1.1	**Rate 1**	730,914	733,723	605,672	437,977	237,783	120,765	88,545	93,284	100,205	162,096	308,737	511,422	4,131,122
1.2	**Rate 6**	507,516	522,333	454,705	314,568	180,995	76,665	53,648	58,178	76,299	111,720	217,260	370,788	2,944,674
1.3	**Rate 9**	45	45	45	45	45	45	45	45	45	45	45	45	534
1.4	**TOTAL GS SYS + B/S**	1,238,474	1,256,100	1,060,422	752,589	418,823	197,475	142,238	151,506	176,549	273,860	526,041	882,254	7,076,330
1.5	**Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	-
1.6	**Rate 110**	9,934	9,936	9,949	8,012	7,032	6,709	6,089	6,780	6,554	6,781	7,201	7,104	92,081
1.7	**Rate 115**	102	78	100	151	77	22	50	49	59	73	65	73	900
1.8	**Rate 135**	0	0	0	133	133	133	133	133	133	133	133	133	1,200
1.9	**Rate 145**	3,523	3,002	3,099	2,147	1,403	839	700	668	757	1,128	2,022	2,722	22,012
1.10	**Rate 170**	5,742	5,240	4,637	2,890	2,327	1,766	1,424	1,365	1,290	2,629	3,595	4,378	37,283
1.11	**Rate 200**	21,095	21,262	17,446	11,863	7,514	4,049	3,386	3,283	3,324	5,154	9,475	15,561	123,412
1.13	**TOTAL LV SYS + B/S**	40,396	39,519	35,232	25,197	18,486	13,518	11,783	12,277	12,118	15,898	22,491	29,973	276,888
1.14	**TOTAL SYS + B/S**	1,278,870	1,295,619	1,095,654	777,786	437,309	210,993	154,021	163,783	188,666	289,758	548,533	912,227	7,353,218
1	**CUMULATIVE**	1,278,870	2,574,489	3,670,143	4,447,929	4,885,238	5,096,231	5,250,251	5,414,035	5,602,701	5,892,459	6,440,991	7,353,218	
	TOTAL DELIVERY VOLUME SUMMARIES (10^3 m^3) - by Rate													
2.1	**Total Rate 1**	824,191	826,440	681,421	491,289	266,729	133,928	98,741	103,888	110,973	179,245	340,263	564,171	4,621,279
2.2	**Total Rate 6**	762,218	796,632	700,690	484,238	294,279	129,722	93,296	99,299	120,078	184,008	344,689	561,022	4,570,174
2.3	**Total Rate 9**	52	53	52	53	53	53	53	53	52	53	53	53	630
2.4	**TOTAL GS VOL.**	1,586,462	1,623,124	1,382,164	975,580	561,061	263,703	192,090	203,239	231,104	363,306	685,004	1,125,246	9,192,083
2.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.6	**Total Rate 110**	62,795	59,141	62,786	54,311	49,215	44,952	42,326	43,161	45,098	48,760	50,866	54,226	617,636
2.7	**Total Rate 115**	47,078	44,131	42,899	36,835	37,497	36,986	36,113	36,853	36,496	39,188	37,647	39,267	470,990
2.8	**Total Rate 135**	182	153	177	1,064	5,082	6,225	7,288	8,220	7,874	8,230	8,238	3,767	56,500
2.9	**Total Rate 145**	23,033	20,516	20,934	15,573	11,316	7,849	7,107	7,150	7,724	10,201	13,931	18,675	164,010
2.10	**Total Rate 170**	65,246	57,133	48,447	39,971	30,624	26,837	25,597	25,909	25,924	30,756	40,331	46,129	462,904
2.11	**Total Rate 200**	25,688	25,712	21,809	15,416	10,724	6,871	6,052	5,756	5,826	8,374	12,973	19,686	164,887
2.12	**Total Rate 300 Int**	3,210	2,796	3,235	2,306	2,306	2,306	2,306	2,306	2,306	2,306	2,306	2,306	30,000
2.13	**TOTAL LV VOL.**	227,232	209,582	200,288	165,475	146,764	132,027	126,789	129,356	131,249	147,815	166,293	184,056	1,966,927
2.14	**TOTAL VOLUME**	1,813,694	1,832,707	1,582,451	1,141,056	707,825	395,730	318,879	332,595	362,353	511,120	851,298	1,309,302	11,159,010
2	**CUMULATIVE**	1,813,694	3,646,401	5,228,852	6,369,907	7,077,732	7,473,462	7,792,341	8,124,937	8,487,290	8,998,410	9,849,708	11,159,010	
	TOTAL TRANSPORTATION VOLUME SUMMARIES (10^3 m^3) - by Rate													
3.1	**Total Rate 1**	762,422	765,079	631,247	455,962	247,533	125,246	92,004	96,886	103,850	167,847	319,354	529,213	4,296,645
3.2	**Total Rate 6**	593,543	615,100	537,785	371,799	219,172	94,733	67,095	72,147	91,119	135,962	260,191	434,968	3,493,615
3.3	**Total Rate 9**	45	45	45	45	45	45	45	45	45	45	45	45	534
3.4	**TOTAL GS VOL.**	1,356,010	1,380,224	1,169,076	827,806	466,750	220,024	159,144	169,078	195,014	303,854	579,590	964,225	7,790,794
3.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.6	**Total Rate 110**	16,589	16,374	16,239	13,808	12,439	11,576	10,880	11,548	11,479	12,075	12,872	13,462	159,341
3.7	**Total Rate 115**	1,314	1,458	1,543	1,528	1,066	1,039	1,123	1,122	1,152	1,179	981	1,196	14,700
3.8	**Total Rate 135**	45	40	1	388	1,864	2,681	3,035	3,572	3,558	3,662	3,285	1,785	23,916
3.9	**Total Rate 145**	6,368	5,843	5,874	4,125	2,679	1,703	1,448	1,464	1,531	2,145	3,535	4,933	41,647
3.10	**Total Rate 170**	8,295	7,737	7,137	4,595	3,288	2,293	1,871	1,815	1,757	3,318	4,921	6,423	53,449
3.11	**Total Rate 180**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.12	**Total Rate 200**	21,095	21,262	17,446	11,863	7,514	4,049	3,386	3,283	3,324	5,154	9,475	15,561	123,412
3.13	**TOTAL LV VOL.**	53,706	52,713	48,239	36,308	28,850	23,341	21,742	22,803	22,801	27,532	35,069	43,361	416,465
3.14	**TOTAL VOLUME**	1,409,715	1,432,937	1,217,315	864,114	495,600	243,365	180,886	191,880	217,815	331,386	614,658	1,007,586	8,207,259
3	**CUMULATIVE**	1,409,715	2,842,653	4,059,968	4,924,081	5,419,682	5,663,047	5,843,933	6,035,813	6,253,628	6,585,014	7,199,673	8,207,259	

Total Revenue Variance

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 12
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2014 Decision Rates (EB-2013-0406)													
	TOTAL REVENUE SUMMARIES ($' 000) - by Rate													
1.1	**Total Rate 1**	216,931	217,598	186,484	145,664	96,874	67,928	59,997	61,134	62,889	78,252	114,033	163,164	1,470,947
1.2	**Total Rate 6**	136,408	140,621	124,471	90,350	58,175	31,693	25,531	26,461	30,758	40,544	67,113	103,746	875,871
1.3	**Total Rate 9**	15	15	15	15	15	15	15	15	15	15	15	15	178
1.4	**TOTAL GS REV.**	353,354	358,234	310,970	236,029	155,064	99,636	85,542	87,610	93,661	118,811	181,160	266,925	2,346,997
1.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
1.6	**Total Rate 110**	3,113	3,085	3,097	2,702	2,491	2,388	2,265	2,384	2,364	2,440	2,542	2,576	31,447
1.7	**Total Rate 115**	535	535	541	538	508	499	506	506	509	515	503	516	6,211
1.8	**Total Rate 135**	(102)	(104)	(104)	(65)	169	219	247	282	278	287	269	305	1,682
1.9	**Total Rate 145**	913	800	817	565	581	427	388	386	407	510	724	923	7,441
1.10	**Total Rate 170**	144	27	(108)	(474)	753	619	550	542	530	789	1,023	1,213	5,607
1.11	**Total Rate 200**	3,918	4,167	3,460	2,414	1,604	957	831	809	817	1,167	1,971	3,107	25,223
1.12	**Total Rate 300**	15	14	15	12	12	12	12	12	12	12	12	12	154
	TOTAL LV REV.	8,536	8,525	7,717	5,693	6,118	5,121	4,799	4,921	4,917	5,721	7,044	8,653	77,765
1.13	**Rate 125 CD**	807	807	807	807	807	807	807	807	807	807	807	807	9,680
1.14	**TOTAL REVENUE**	362,697	367,566	319,494	242,528	161,988	105,564	91,148	93,338	99,385	125,339	189,011	276,384	2,434,442
1	**CUMULATIVE**	362,697	730,263	1,049,756	1,292,285	1,454,273	1,559,837	1,650,985	1,744,323	1,843,708	1,969,047	2,158,058	2,434,442	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2013 October Rates (EB-2013-0295)													
	TOTAL REVENUE SUMMARIES ($'000) - by Rate													
2.1	**Total Rate 1**	223,186	223,870	191,677	149,442	98,963	68,996	60,788	61,965	63,777	79,672	116,680	167,487	1,506,505
2.2	**Total Rate 6**	139,554	143,897	127,360	92,387	59,436	32,267	25,941	26,894	31,284	41,347	68,592	106,098	895,057
2.3	**Total Rate 9**	15	15	15	15	15	15	15	15	15	15	15	15	181
2.4	**TOTAL GS REV.**	362,755	367,783	319,052	241,844	158,414	101,278	86,744	88,874	95,076	121,034	185,287	273,601	2,401,743
2.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
2.6	**Total Rate 110**	3,192	3,160	3,177	2,770	2,553	2,445	2,318	2,438	2,422	2,502	2,606	2,645	32,228
2.7	**Total Rate 115**	554	553	558	553	523	514	520	521	523	531	518	532	6,402
2.8	**Total Rate 135**	(102)	(104)	(104)	(65)	171	221	250	285	280	289	272	306	1,700
2.9	**Total Rate 145**	933	817	835	579	591	434	395	392	414	519	736	939	7,584
2.10	**Total Rate 170**	171	51	(88)	(457)	766	630	560	553	541	802	1,040	1,232	5,801
2.11	**Total Rate 200**	3,974	4,223	3,507	2,447	1,627	972	845	822	830	1,186	1,999	3,150	25,581
2.12	**Total Rate 300**	16	15	17	13	13	13	13	13	13	13	13	13	166
	TOTAL LV REV.	8,739	8,715	7,901	5,841	6,244	5,230	4,901	5,024	5,023	5,842	7,185	8,817	79,463
2.13	**Rate 125 CD**	906	906	906	906	906	906	906	906	906	906	906	906	10,877
2.14	**TOTAL REVENUE**	372,400	377,405	327,860	248,592	165,565	107,414	92,552	94,805	101,005	127,783	193,378	283,325	2,492,082
2	**CUMULATIVE**	372,400	749,805	1,077,665	1,326,256	1,491,821	1,599,235	1,691,787	1,786,592	1,887,597	2,015,380	2,208,758	2,492,082	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	VARIANCE- TOTAL REVENUE ($'000) - by Rate													
3.1	**Total Rate 1**	(6,255)	(6,272)	(5,194)	(3,779)	(2,090)	(1,068)	(791)	(831)	(887)	(1,420)	(2,648)	(4,324)	(35,558)
3.2	**Total Rate 6**	(3,146)	(3,276)	(2,889)	(2,036)	(1,261)	(574)	(411)	(433)	(526)	(803)	(1,479)	(2,352)	(19,185)
3.3	**Total Rate 9**	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(3)
3.4	**TOTAL GS REV.**	(9,401)	(9,548)	(8,083)	(5,815)	(3,351)	(1,642)	(1,202)	(1,264)	(1,414)	(2,223)	(4,127)	(6,676)	(54,746)
3.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
3.6	**Total Rate 110**	(79)	(75)	(79)	(69)	(62)	(57)	(54)	(55)	(57)	(62)	(64)	(69)	(781)
3.7	**Total Rate 115**	(19)	(18)	(17)	(15)	(15)	(15)	(15)	(15)	(15)	(16)	(15)	(16)	(191)
3.8	**Total Rate 135**	(0)	(0)	(0)	(0)	(2)	(2)	(2)	(3)	(2)	(3)	(3)	(1)	(18)
3.9	**Total Rate 145**	(20)	(18)	(18)	(14)	(10)	(7)	(6)	(6)	(7)	(9)	(12)	(16)	(143)
3.10	**Total Rate 170**	(27)	(24)	(20)	(17)	(13)	(11)	(11)	(11)	(11)	(13)	(17)	(19)	(194)
3.11	**Total Rate 200**	(55)	(55)	(47)	(33)	(23)	(15)	(13)	(13)	(13)	(18)	(28)	(43)	(358)
3.12	**Total Rate 300**	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(13)
	TOTAL LV REV.	(202)	(191)	(183)	(149)	(126)	(108)	(102)	(103)	(106)	(122)	(140)	(165)	(1,698)
3.13	**Rate 125 CD**	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(1,197)
3.14	**TOTAL REVENUE**	(9,704)	(9,839)	(8,366)	(6,063)	(3,577)	(1,850)	(1,404)	(1,467)	(1,620)	(2,444)	(4,367)	(6,940)	(57,640)
3	**CUMULATIVE**	(9,704)	(19,542)	(27,908)	(33,972)	(37,548)	(39,399)	(40,802)	(42,269)	(43,889)	(46,333)	(50,700)	(57,640)	

Total Distribution Revenue Variance

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 12
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2014 Decision Rates (EB-2013-0406)													
	TOTAL DISTRIBUTION REVENUE SUMMARIES ($'000) - by Rate													
1.1	**Total Rate 1**	86,281	86,465	78,255	67,434	54,403	46,390	44,193	44,488	45,022	49,358	59,022	72,027	733,338
1.2	**Total Rate 6**	42,164	43,364	39,659	31,691	24,095	17,142	15,297	15,402	16,472	19,464	26,385	34,808	325,943
1.3	**Total Rate 9**	7	7	7	7	7	7	7	7	7	7	7	7	88
1.4	**TOTAL GS REV.**	128,453	129,836	117,922	99,132	78,505	63,539	59,498	59,898	61,501	68,829	85,415	106,842	1,059,368
1.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
1.6	**Total Rate 110**	1,074	1,059	1,073	1,034	1,011	991	978	981	991	1,009	1,020	1,036	12,258
1.7	**Total Rate 115**	443	441	440	435	435	434	433	434	434	436	435	436	5,236
1.8	**Total Rate 135**	15	14	15	20	66	78	90	100	96	100	100	206	899
1.9	**Total Rate 145**	363	343	346	302	265	232	223	224	230	255	288	328	3,400
1.10	**Total Rate 170**	395	373	347	320	290	274	267	269	269	287	320	339	3,749
1.11	**Total Rate 200**	480	480	432	353	295	247	237	233	234	266	323	406	3,986
1.12	**Total Rate 300**	15	14	15	12	12	12	12	12	12	12	12	12	154
	TOTAL LV REV.	2,786	2,723	2,667	2,476	2,374	2,269	2,241	2,253	2,266	2,365	2,498	2,763	29,681
1.13	**Rate 125 CD**	807	807	807	807	807	807	807	807	807	807	807	807	9,680
1.14	**TOTAL REVENUE**	132,045	133,366	121,395	102,414	81,686	66,614	62,546	62,958	64,574	72,001	88,719	110,412	1,098,730
1	**CUMULATIVE**	132,045	265,411	386,806	489,221	570,906	637,521	700,067	763,024	827,598	899,599	988,318	1,098,730	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2013 October Rates (EB-2013-0295)													
	TOTAL DISTRIBUTION REVENUE SUMMARIES ($'000) - by Rate													
2.1	**Total Rate 1**	90,401	90,597	81,684	69,940	55,801	47,111	44,729	45,050	45,622	50,314	60,789	74,889	756,926
2.2	**Total Rate 6**	43,665	44,921	41,037	32,683	24,723	17,437	15,508	15,622	16,739	19,871	27,122	35,949	335,276
2.3	**Total Rate 9**	8	8	8	8	8	8	8	8	8	8	8	8	90
2.4	**TOTAL GS REV.**	134,074	135,525	122,728	102,630	80,532	64,556	60,244	60,679	62,369	70,192	87,918	110,845	1,092,292
2.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
2.6	**Total Rate 110**	1,109	1,092	1,107	1,064	1,039	1,016	1,002	1,005	1,016	1,036	1,048	1,066	12,601
2.7	**Total Rate 115**	458	454	453	446	446	445	444	445	445	448	446	448	5,380
2.8	**Total Rate 135**	15	14	15	20	68	80	92	103	99	103	103	207	918
2.9	**Total Rate 145**	377	355	359	311	272	237	228	228	235	261	296	339	3,500
2.10	**Total Rate 170**	411	386	358	330	297	280	273	275	275	294	330	350	3,858
2.11	**Total Rate 200**	491	492	442	360	300	250	240	236	237	269	328	414	4,058
2.12	**Total Rate 300**	16	15	17	13	13	13	13	13	13	13	13	13	166
	TOTAL LV REV.	2,877	2,808	2,750	2,544	2,434	2,322	2,292	2,305	2,319	2,425	2,565	2,838	30,481
2.13	**Rate 125 CD**	906	906	906	906	906	906	906	906	906	906	906	906	10,877
2.14	**TOTAL REVENUE**	137,857	139,239	126,385	106,081	83,872	67,784	63,442	63,891	65,595	73,524	91,389	114,590	1,133,649
2	**CUMULATIVE**	137,857	277,097	403,481	509,562	593,434	661,219	724,661	788,552	854,146	927,670	1,019,059	1,133,649	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	VARIANCE- TOTAL DISTRIBUTION REVENUE ($'000) - by Rate													
3.1	**Total Rate 1**	(4,120)	(4,132)	(3,429)	(2,506)	(1,399)	(721)	(535)	(562)	(600)	(956)	(1,766)	(2,862)	(23,588)
3.2	**Total Rate 6**	(1,501)	(1,557)	(1,378)	(992)	(628)	(295)	(210)	(219)	(268)	(407)	(737)	(1,141)	(9,333)
3.3	**Total Rate 9**	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(3)
3.4	**TOTAL GS REV.**	(5,621)	(5,689)	(4,807)	(3,498)	(2,027)	(1,017)	(746)	(781)	(868)	(1,363)	(2,503)	(4,003)	(32,923)
3.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
3.6	**Total Rate 110**	(35)	(33)	(35)	(30)	(27)	(25)	(24)	(24)	(25)	(27)	(28)	(30)	(343)
3.7	**Total Rate 115**	(14)	(13)	(13)	(11)	(11)	(11)	(11)	(11)	(11)	(12)	(11)	(12)	(144)
3.8	**Total Rate 135**	(0)	(0)	(0)	(0)	(2)	(2)	(2)	(3)	(3)	(3)	(3)	(1)	(19)
3.9	**Total Rate 145**	(14)	(12)	(13)	(9)	(7)	(5)	(4)	(4)	(5)	(6)	(8)	(11)	(99)
3.10	**Total Rate 170**	(15)	(13)	(11)	(9)	(7)	(6)	(6)	(6)	(6)	(7)	(9)	(11)	(109)
3.11	**Total Rate 200**	(11)	(11)	(10)	(7)	(5)	(3)	(3)	(3)	(3)	(4)	(6)	(9)	(73)
3.12	**Total Rate 300**	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(13)
	TOTAL LV REV.	(91)	(85)	(83)	(68)	(60)	(53)	(51)	(52)	(53)	(60)	(67)	(75)	(799)
3.13	**Rate 125 CD**	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(100)	(1,197)
3.14	**TOTAL REVENUE**	(5,812)	(5,874)	(4,989)	(3,666)	(2,187)	(1,170)	(897)	(933)	(1,021)	(1,523)	(2,670)	(4,178)	(34,919)
3	**CUMULATIVE**	(5,812)	(11,686)	(16,675)	(20,341)	(22,528)	(23,698)	(24,595)	(25,528)	(26,549)	(28,071)	(30,741)	(34,919)	

Total Transportation Revenue Variance

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 13
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	2014 Decision Rates (EB-2013-0406)													
	TOTAL TRANSPORTATION REVENUE SUMMARIES ($'000) - by Rate													
1.1	**Total Rate 1**	35,451	35,574	29,351	21,201	11,510	5,824	4,278	4,505	4,829	7,804	14,849	24,607	199,783
1.2	**Total Rate 6**	27,598	28,601	25,006	17,288	10,191	4,405	3,120	3,355	4,237	6,322	12,098	20,225	162,444
1.3	**Total Rate 9**	2	2	2	2	2	2	2	2	2	2	2	2	25
1.4	**TOTAL GS REV.**	63,051	64,177	54,359	38,491	21,703	10,231	7,400	7,862	9,068	14,128	26,949	44,834	362,252
1.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
1.6	**Total Rate 110**	771	761	755	642	578	538	506	537	534	562	599	626	7,409
1.7	**Total Rate 115**	61	68	72	71	50	48	52	52	54	55	46	56	684
1.8	**Total Rate 135**	2	2	0	18	87	125	141	166	165	170	153	83	1,112
1.9	**Total Rate 145**	296	272	273	192	125	79	67	68	71	100	164	229	1,937
1.10	**Total Rate 170**	386	360	332	214	153	107	87	84	82	154	229	299	2,485
1.11	**Total Rate 180**	-	-	-	-	-	-	-	-	-	-	-	-	-
1.11	**Total Rate 200**	981	989	811	552	349	188	157	153	155	240	441	724	5,739
1.13	**Total Rate 300**	-	-	-	-	-	-	-	-	-	-	-	-	-
1.14	**Total Rate 305**	-	-	-	-	-	-	-	-	-	-	-	-	-
1.15	**Total CDS**	-	-	-	-	-	-	-	-	-	-	-	-	-
1.12	**TOTAL LV REV.**	2,497	2,451	2,243	1,688	1,342	1,085	1,011	1,060	1,060	1,280	1,631	2,016	19,366
1.13	**TOTAL REVENUE**	65,548	66,628	56,602	40,179	23,044	11,316	8,411	8,922	10,128	15,409	28,580	46,850	381,618
1	**CUMULATIVE**	65,548	132,176	188,779	228,958	252,002	263,318	271,729	280,651	290,779	306,187	334,768	381,618	
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	2013 October Rates (EB-2013-0295)													
	TOTAL TRANSPORTATION REVENUE SUMMARIES ($'000) - by Rate													
2.1	**Total Rate 1**	35,407	35,530	29,315	21,175	11,495	5,816	4,273	4,499	4,823	7,795	14,831	24,577	199,536
2.2	**Total Rate 6**	27,564	28,565	24,975	17,266	10,178	4,399	3,116	3,350	4,232	6,314	12,083	20,200	162,243
2.3	**Total Rate 9**	2	2	2	2	2	2	2	2	2	2	2	2	25
2.4	**TOTAL GS REV.**	62,973	64,097	54,292	38,443	21,676	10,218	7,391	7,852	9,056	14,111	26,916	44,779	361,804
2.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
2.6	**Total Rate 110**	770	760	754	641	578	538	505	536	533	561	598	625	7,400
2.7	**Total Rate 115**	61	68	72	71	49	48	52	52	53	55	46	56	683
2.8	**Total Rate 135**	2	2	0	18	87	125	141	166	165	170	153	83	1,111
2.9	**Total Rate 145**	296	271	273	192	124	79	67	68	71	100	164	229	1,934
2.10	**Total Rate 170**	385	359	331	213	153	106	87	84	82	154	229	298	2,482
2.11	**Total Rate 180**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.11	**Total Rate 200**	980	987	810	551	349	188	157	152	154	239	440	723	5,732
2.13	**Total Rate 300**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.14	**Total Rate 305**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.15	**Total CDS**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.12	**TOTAL LV REV.**	2,494	2,448	2,240	1,686	1,340	1,084	1,010	1,059	1,059	1,279	1,629	2,014	19,342
2.13	**TOTAL REVENUE**	65,467	66,546	56,532	40,129	23,016	11,302	8,400	8,911	10,115	15,390	28,545	46,792	381,145
2	**CUMULATIVE**	65,467	132,013	188,545	228,674	251,690	262,992	271,392	280,303	290,419	305,808	334,353	381,145	
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	VARIANCE- TOTAL TRANSPORTATION REVENUE ($'000) - by Rate													
3.1	**Total Rate 1**	44	44	36	26	14	7	5	6	6	10	18	30	247
3.2	**Total Rate 6**	34	35	31	21	13	5	4	4	5	8	15	25	201
3.3	**Total Rate 9**	0	0	0	0	0	0	0	0	0	0	0	0	0
3.4	**TOTAL GS REV.**	78	79	67	48	27	13	9	10	11	17	33	56	449
3.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
3.6	**Total Rate 110**	1	1	1	1	1	1	1	1	1	1	1	1	9
3.7	**Total Rate 115**	0	0	0	0	0	0	0	0	0	0	0	0	1
3.8	**Total Rate 135**	0	0	0	0	0	0	0	0	0	0	0	0	1
3.9	**Total Rate 145**	0	0	0	0	0	0	0	0	0	0	0	0	2
3.10	**Total Rate 170**	0	0	0	0	0	0	0	0	0	0	0	0	3
3.11	**Total Rate 180**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.11	**Total Rate 200**	1	1	1	1	0	0	0	0	0	0	1	1	7
3.13	**Total Rate 300**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.14	**Total Rate 305**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.15	**Total CDS**	-	-	-	-	-	-	-	-	-	-	-	-	-
3.12	**TOTAL LV REV.**	3	3	3	2	2	1	1	1	1	2	2	2	24
3.13	**TOTAL REVENUE**	81	83	70	50	29	14	10	11	13	19	35	58	473
3	**CUMULATIVE**	81	164	234	284	312	326	337	348	360	379	415	473	

Total Load Balancing Revenue Variance

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 12
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2014 Decision Rates (EB-2013-0406)													
	TOTAL LOAD BALANCING REVENUE SUMMARIES ($'000) - by Rate													
1.1	**Total Rate 1**	5,330	5,345	4,407	3,177	1,725	866	639	672	718	1,159	2,200	3,648	29,885
1.2	**Total Rate 6**	4,116	4,302	3,784	2,615	1,589	700	504	536	648	994	1,861	3,029	24,678
1.3	**Total Rate 9**	0	0	0	0	0	0	0	0	0	0	0	0	0
1.4	**TOTAL GS REV.**	9,446	9,646	8,190	5,792	3,314	1,567	1,142	1,208	1,366	2,153	4,062	6,678	54,563
1.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
1.6	**Total Rate 110**	51	48	51	44	40	36	34	35	37	40	41	44	500
1.7	**Total Rate 115**	18	17	16	14	14	14	14	14	14	15	14	15	181
1.8	**Total Rate 135**	(119)	(119)	(119)	(119)	-	-	-	-	-	-	-	-	(476)
1.9	**Total Rate 145**	(184)	(188)	(187)	(195)	17	12	11	11	12	15	21	28	(627)
1.10	**Total Rate 170**	(1,341)	(1,347)	(1,355)	(1,362)	26	22	21	22	22	26	34	38	(5,195)
1.11	**Total Rate 200**	(126)	94	79	56	39	25	22	21	21	31	47	72	381
1.12	**TOTAL LV REV.**	(1,701)	(1,495)	(1,514)	(1,561)	136	110	102	102	105	126	157	197	(5,236)
1.13	**TOTAL REVENUE**	7,745	8,151	6,676	4,230	3,450	1,676	1,245	1,310	1,471	2,279	4,219	6,875	49,327
1	**CUMULATIVE**	7,745	15,895	22,572	26,802	30,252	31,928	33,173	34,483	35,954	38,233	42,452	49,327	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	2013 October Rates (EB-2013-0295)													
	TOTAL LOAD BALANCING REVENUE SUMMARIES ($'000) - by Rate													
2.1	**Total Rate 1**	7,453	7,473	6,162	4,443	2,412	1,211	893	939	1,003	1,621	3,077	5,102	41,789
2.2	**Total Rate 6**	5,698	5,956	5,238	3,620	2,200	970	697	742	898	1,376	2,577	4,194	34,166
2.3	**Total Rate 9**	-	-	-	-	-	-	-	-	-	-	-	-	-
2.4	**TOTAL GS REV.**	13,151	13,429	11,400	8,063	4,612	2,181	1,590	1,682	1,901	2,996	5,654	9,296	75,955
2.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
2.6	**Total Rate 110**	97	92	97	84	76	70	66	67	70	76	79	84	958
2.7	**Total Rate 115**	23	22	21	18	18	18	18	18	18	19	18	19	229
2.8	**Total Rate 135**	(119)	(119)	(119)	(119)	-	-	-	-	-	-	-	-	(476)
2.9	**Total Rate 145**	(176)	(180)	(180)	(190)	21	15	13	13	14	19	26	35	(570)
2.10	**Total Rate 170**	(1,328)	(1,336)	(1,345)	(1,354)	32	28	26	27	27	32	42	48	(5,102)
2.11	**Total Rate 200**	(79)	142	120	85	59	38	33	32	32	46	71	108	688
2.12	**TOTAL LV REV.**	(1,581)	(1,381)	(1,405)	(1,475)	206	168	156	157	161	192	236	294	(4,272)
2.13	**TOTAL REVENUE**	11,571	12,048	9,995	6,588	4,818	2,349	1,747	1,838	2,062	3,188	5,890	9,590	71,683
2	**CUMULATIVE**	11,571	23,619	33,614	40,201	45,020	47,369	49,115	50,954	53,016	56,204	62,094	71,683	
		JAN	**FEB**	**MAR**	**APR**	**MAY**	**JUN**	**JUL**	**AUG**	**SEP**	**OCT**	**NOV**	**DEC**	**TOTAL**
	VARIANCE- TOTAL LOAD BALANCING REVENUE ($'000) - by Rate													
3.1	**Total Rate 1**	(2,123)	(2,129)	(1,755)	(1,265)	(687)	(345)	(254)	(268)	(286)	(462)	(876)	(1,453)	(11,903)
3.2	**Total Rate 6**	(1,583)	(1,654)	(1,455)	(1,005)	(611)	(269)	(194)	(206)	(249)	(382)	(716)	(1,165)	(9,489)
3.3	**Total Rate 9**	0	0	0	0	0	0	0	0	0	0	0	0	0
3.4	**TOTAL GS REV.**	(3,705)	(3,783)	(3,210)	(2,271)	(1,298)	(614)	(448)	(474)	(535)	(844)	(1,592)	(2,618)	(21,392)
3.5	**Total Rate 100**	-	-	-	-	-	-	-	-	-	-	-	-	0.0
3.6	**Total Rate 110**	(47)	(44)	(47)	(40)	(36)	(33)	(31)	(32)	(33)	(36)	(38)	(40)	(458)
3.7	**Total Rate 115**	(5)	(5)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(48)
3.8	**Total Rate 135**	0	0	0	0	-	-	-	-	-	-	-	-	0
3.9	**Total Rate 145**	(8)	(7)	(7)	(5)	(4)	(3)	(3)	(3)	(3)	(4)	(5)	(7)	(58)
3.10	**Total Rate 170**	(13)	(11)	(10)	(8)	(6)	(5)	(5)	(5)	(5)	(6)	(8)	(9)	(93)
3.11	**Total Rate 200**	(48)	(48)	(41)	(29)	(20)	(13)	(11)	(11)	(11)	(16)	(24)	(37)	(307)
3.12	**TOTAL LV REV.**	(120)	(115)	(109)	(86)	(70)	(58)	(54)	(54)	(56)	(66)	(79)	(97)	(964)
3.13	**TOTAL REVENUE**	(3,826)	(3,898)	(3,319)	(2,357)	(1,368)	(672)	(502)	(528)	(591)	(909)	(1,671)	(2,715)	(22,356)
3	**CUMULATIVE**	(3,826)	(7,724)	(11,042)	(13,399)	(14,768)	(15,440)	(15,942)	(16,470)	(17,061)	(17,971)	(19,641)	(22,356)	

Total Commodity Revenue Variance

Item No.	Col. 1	Col. 2	Col. 3	Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	Col. 9	Col. 9	Col. 10	Col. 11	Col. 12	Col. 12
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	2014 Decision Rates (EB-2013-0406)													
	TOTAL COMMODITY REVENUE SUMMARIES ($'000) - by Rate													
1.1	Total Rate 1	89,869	90,215	74,470	53,851	29,237	14,849	10,887	11,470	12,321	19,930	37,961	62,882	507,941
1.2	Total Rate 6	62,530	64,355	56,023	38,757	22,300	9,446	6,610	7,168	9,401	13,765	26,768	45,684	362,807
1.3	Total Rate 9	5	5	5	5	5	5	5	5	5	5	5	5	65
1.4	TOTAL GS REV.	152,405	154,576	130,499	92,614	51,542	24,300	17,502	18,643	21,727	33,701	64,734	108,571	870,813
1.5	Total Rate 100	-	-	-	-	-	-	-	-	-	-	-	-	0.0
1.6	Total Rate 110	1,217	1,217	1,219	981	861	822	746	831	803	831	882	870	11,280
1.7	Total Rate 115	13	10	12	18	9	3	6	6	7	9	8	9	110
1.8	Total Rate 135	0	0	0	16	16	16	16	16	16	16	16	16	147
1.9	Total Rate 145	437	373	385	266	174	104	87	83	94	140	251	338	2,731
1.10	Total Rate 170	703	642	568	354	285	216	174	167	158	322	440	536	4,567
1.11	Total Rate 200	2,584	2,605	2,137	1,453	920	496	415	402	407	631	1,161	1,906	15,118
1.12	TOTAL LV REV.	4,954	4,846	4,321	3,090	2,267	1,657	1,445	1,505	1,486	1,949	2,758	3,676	33,954
1.13	TOTAL REVENUE	157,359	159,421	134,820	95,704	53,809	25,957	18,947	20,148	23,212	35,650	67,493	112,247	904,767
1	CUMULATIVE	157,359	316,780	451,600	547,304	601,113	627,070	646,017	666,165	689,377	725,027	792,520	904,767	
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	2013 October Rates (EB-2013-0295)													
	TOTAL COMMODITY REVENUE SUMMARIES ($'000) - by Rate													
2.1	Total Rate 1	89,925	90,270	74,516	53,885	29,255	14,858	10,894	11,477	12,328	19,943	37,984	62,921	508,255
2.2	Total Rate 6	62,627	64,456	56,110	38,818	22,335	9,460	6,620	7,179	9,415	13,786	26,810	45,755	363,372
2.3	Total Rate 9	5	5	5	5	5	5	5	5	5	5	5	5	65
2.4	TOTAL GS REV.	152,558	154,732	130,632	92,708	51,595	24,324	17,519	18,661	21,749	33,734	64,799	108,681	871,692
2.5	Total Rate 100	-	-	-	-	-	-	-	-	-	-	-	-	0.0
2.6	Total Rate 110	1,216	1,216	1,218	981	861	821	745	830	802	830	881	869	11,269
2.7	Total Rate 115	13	10	12	18	9	3	6	6	7	9	8	9	110
2.8	Total Rate 135	0	0	0	16	16	16	16	16	16	16	16	16	148
2.9	Total Rate 145	435	371	383	265	173	104	87	83	94	139	250	336	2,720
2.10	Total Rate 170	703	641	567	354	285	216	174	167	158	322	440	536	4,563
2.11	Total Rate 200	2,582	2,602	2,135	1,452	920	496	414	402	407	631	1,160	1,904	15,103
2.12	TOTAL LV REV.	4,948	4,840	4,315	3,086	2,264	1,655	1,443	1,503	1,484	1,947	2,755	3,671	33,912
2.13	TOTAL REVENUE	157,505	159,571	134,948	95,794	53,859	25,979	18,962	20,165	23,233	35,681	67,554	112,352	905,604
2	CUMULATIVE	157,505	317,077	452,024	547,818	601,677	627,656	646,618	666,783	690,016	725,697	793,252	905,604	
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
	VARIANCE- TOTAL COMMODITY REVENUE ($'000) - by Rate													
3.1	Total Rate 1	(56)	(56)	(46)	(33)	(18)	(9)	(7)	(7)	(8)	(12)	(23)	(39)	(314)
3.2	Total Rate 6	(97)	(100)	(87)	(60)	(35)	(15)	(10)	(11)	(15)	(21)	(42)	(71)	(565)
3.3	Total Rate 9	0	0	0	0	0	0	0	0	0	0	0	0	0
3.4	TOTAL GS REV.	(153)	(156)	(133)	(94)	(53)	(24)	(17)	(18)	(22)	(34)	(65)	(110)	(879)
3.5	Total Rate 100	-	-	-	-	-	-	-	-	-	-	-	-	0.0
3.6	Total Rate 110	1	1	1	1	1	1	1	1	1	1	1	1	11
3.7	Total Rate 115	0	0	0	0	0	0	0	0	0	0	0	0	0
3.8	Total Rate 135	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
3.9	Total Rate 145	2	2	2	1	1	0	0	0	0	1	1	1	12
3.10	Total Rate 170	1	1	1	0	0	0	0	0	0	0	0	1	4
3.11	Total Rate 200	3	3	2	1	1	0	0	0	0	1	1	2	15
3.12	TOTAL LV REV.	6	6	5	4	3	2	2	2	2	2	3	5	42
3.13	TOTAL REVENUE	(147)	(150)	(128)	(90)	(50)	(22)	(15)	(17)	(21)	(31)	(62)	(105)	(837)
3	CUMULATIVE	(147)	(297)	(425)	(514)	(564)	(586)	(602)	(618)	(639)	(670)	(732)	(837)	

ACCOUNTING TREATMENT FOR A RIDER E VARIANCE ACCOUNT (“2014 REVA”)

For the 2014 Fiscal Year
January 1, 2014 to December 31, 2014)

The purpose of the Rider E Variance Account (REVA) is to record the difference between the actual Rider E amount refunded to customers, and the approved 2014 Rider E amount to be refunded to customers. For 2014, Rider E was designed to refund the revenue variance between interim rates, which were in place from January 1st to September 30th 2014, and the final Board approved 2014 rates, which were implemented on October 1st 2014, but effective January 1st 2014. The approved Rider E refund was calculated to be $43.9 million, which was then converted into a volumetric based rider (utilizing forecast October through December 2014 volumes) to be applied to actual customer volumes between October and December 2014. Variances between actual volumes and forecast volumes between October and December 2014 will cause the actual Rider E refund to be either lower or higher than the approved $43.9 million. The Rider E Variance Account will ensure that the actual amount refunded to customers will be equivalent to the approved amount.

Simple interest is to be calculated on the opening monthly balance of this account using the Board approved EB-2006-0117 interest rate methodology. The balance of this account, together with carrying charges, will be disposed of in a manner designated by the Board in a future rate hearing.

Accounting Entries

1. To record the variance in the Rider E refund credited to ratepayers:

Debit/Credit:	Operating revenue	(Account 300. 000)
Credit/Debit:	2014 REVA	(Account 179. ---)

To record the variance between actual and approved Rider E amounts credited to ratepayers resulting from variances between actual and forecast volumes.

2. Interest accrual:

Debit/Credit:	Interest Expense	(Account 323. 000)
Credit/Debit:	Interest on 2014 REVA	(Account 179. ---)

To record simple interest on the opening monthly balance of the 2014 REVA using the Board approved EB-2006-0117 interest rate methodology.