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August 22, 2014

Delivered by RESS and Courier

Ontario Energy Board
2300 Yonge Street
26th Floor, Box 2319
Toronto, ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

**Re: EB-2014-0002
Horizon Utilities Corporation – Five Year Custom Distribution Rate
Application**

We are counsel to Horizon Utilities Corporation (“Horizon Utilities”) in the above captioned matter. Enclosed please find Horizon Utilities’ Notice of Motion with respect to the City of Hamilton’s refusal to provide complete responses to Horizon Utilities’ interrogatories.

Should you require further information, please do not hesitate to contact me.

**Yours very truly,
BORDEN LADNER GERVAIS LLP**

original signed by Mark Rodger

J. Mark Rodger
Incorporated Partner*

*Mark Rodger Professional Corporation

JMR
Encl.

copy to: John G. Basilio, Horizon Utilities Corporation
 Indy J. Butany-DeSouza, Horizon Utilities Corporation
 Intervenors
 Maureen Helt, OEB
 Christie Clark, OEB

TOR01: 5686053: v1

IN THE MATTER OF the *Ontario Energy Board Act 1998*, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by Horizon Utilities Corporation for an order approving just and reasonable rates and other charges for electricity distribution to be effective January 1, 2015 and for each following year through to December 31, 2019.

NOTICE OF MOTION

Horizon Utilities Corporation (“Horizon Utilities”) will make a motion to the Ontario Energy Board (“the Board”) at its offices at 2300 Yonge Street, Toronto, on a date and at a time to be fixed by the Board.

PROPOSED METHOD OF HEARING AND TIMING

Horizon Utilities has no preference as to the method of hearing this motion. However, Horizon Utilities does not want the City of Hamilton’s (the “City’s”) refusal to respond to interrogatories, or this resulting motion, to delay the commencement of the Settlement Conference scheduled for Wednesday, August 27, 2014. Accordingly, Horizon Utilities requests that the Board schedule any further steps in this motion for dates following the conclusion of the Settlement Conference.

THE MOTION IS FOR:

1. An order requiring the City to provide full and adequate responses to the following interrogatories directed to the City by Horizon Utilities:
 - (a) CoH-Horizon-3
 - (b) CoH-Horizon-4
 - (c) CoH-Horizon-5(b)
 - (d) CoH-Horizon-8
 - (e) CoH-Horizon-9

2. Such further and other relief as Horizon Utilities may request and the Board may grant.

THE GROUNDS FOR THE MOTION ARE:

1. The Board issued Procedural Order No. 1 on June 9, 2014. In that Order the Board approved intervenors, made findings on issues of confidentiality, and made provisions for interrogatories, interrogatory responses, a Technical Conference, an Issues Day, a Settlement Conference and filing any Proposed Settlement Agreement.
2. The City notified the Board that it intended to file evidence. In Procedural Order No. 2, issued July 31, 2014, the Board ordered that any intervenor wishing to file intervenor evidence was to file its evidence with the Board by August 8, 2014; that Horizon Utilities, intervenors and Board staff shall request any relevant information and documentation from any intervenor that has filed evidence by written interrogatories filed with the Board and served on all parties on or before August 15, 2014; and that intervenors who have been served with interrogatories shall file with the Board complete written responses to all interrogatories and serve them on Horizon, all other intervenors and Board staff on or before August 19, 2014.
3. The City's evidence in this proceeding is in the form of a report by WattsWorth Analysis, dated August 8, 2014.
4. Horizon Utilities and two intervenors (Energy Probe and VECC) delivered interrogatories to the City. Horizon Utilities, in particular, delivered 9 interrogatories to the City.
5. On August 19, 2014, the City delivered responses to Horizon Utilities' interrogatories.¹ Those responses are not complete. The City has refused to respond to all or part of 5 of the 9 interrogatories directed by Horizon Utilities to the City. The City's consultant has refused to provide answers to questions 3, 4, 7, 8 and 9, in whole or in part, "on the advice of counsel".
6. The City does not assert that the questions are not relevant (with the exception of Question CoH-Horizon-5(b), in respect of which counsel to the City states that Horizon

¹ See Appendix A.

Utilities has not indicated why previous drafts of the WattsWorth report would be relevant) or that answers are not available or cannot be provided with reasonable effort. Instead, counsel to the City states:

As the enclosed responses indicate, WattsWorth has been advised to decline to respond to a number of the interrogatories. In particular, it has been advised to decline to respond to Horizon's interrogatories number 3, 4, 7 8 and 9. In each of those interrogatories, Horizon asks WattsWorth to provide information that Horizon presumably believes is relevant. It is our position that information of that nature should be provided by Horizon by way of reply evidence. For WattsWorth to supply the information requested would mean that the evidence was that of WattsWorth, and not Horizon, which would preclude us from cross-examining on it. It is inappropriate for Horizon to try to limit in that way our right to cross-examine on evidence Horizon believes to be relevant, and therefore our right to fully represent our client.

If, as noted above, Horizon believes that the information they have asked for is relevant, it can provide it by way of reply evidence, which would then be subject to cross-examination.”

7. The Board’s *Rules of Practice and Procedure* provide for interrogatories as follows (in part):

26. Interrogatories

26.01 In any proceeding, the Board may establish an interrogatory procedure to:

- (a) clarify evidence filed by a party;
- (b) simplify the issues;
- (c) permit a full and satisfactory understanding of the matters to be considered; or
- (d) expedite the proceeding.

26.02 Interrogatories shall:

- ...(d) contain specific requests for clarification of a party's evidence, documents or other information in the possession of the party and relevant to the proceeding; ...

27. Responses to Interrogatories

27.01 Subject to **Rule 27.02**, where interrogatories have been directed and served on a party, that party shall:

- (a) provide a full and adequate response to each interrogatory;...

27.02 A party who is unable or unwilling to provide a full and adequate response to an interrogatory shall file and serve a response:

- (a) where the party contends that the interrogatory seeks information that is not relevant, setting out specific reasons in support of that contention;
- (b) where the party contends that the information necessary to provide an answer is not available or cannot be provided with reasonable effort, setting out the reasons for the unavailability of such information, as well as any alternative available information in support of the response; or
- (c) otherwise explaining why such a response cannot be given.

27.03 Where a party is not satisfied with the response provided, the party may bring a motion seeking direction from the Board.

8. It is common practice for the Board to allow interrogatories that request modified versions of evidence filed by parties. It is also the norm for parties to provide such requested information. The Board's discovery process, which will often involve hundreds of interrogatories, can contribute to shorter hearings in the event that all issues cannot be settled through the ADR process. For its part, Horizon Utilities has provided written responses to over 800 interrogatory questions and over 200 Technical Conference questions in this proceeding, within the timeline established by the Board. The discovery process is frustrated, and the proceeding is unnecessarily lengthened and made more costly, where a party that offers evidence refuses to answer relevant questions relating to it.
9. The questions that are the subject of this motion are relevant, and there is no basis for the City to refuse to respond to reasonable requests related to its own report, having presented that report prepared by individuals that the City holds out as experts. The City is in effect suggesting that Horizon Utilities ought to create its own evidence as a substitute for the City's non-responses, so that the City can cross-examine Horizon Utilities on the City's evidence. Horizon Utilities offers comments on the City's specific refusals in the following paragraphs.
 - **CoH-Horizon-3**
10. WattsWorth created a chart (Figure 16 in its report) presenting the ratio of SL Revenue Contribution:SL Load Contribution for Horizon Utilities and 8 other distributors that it considers comparable. Horizon Utilities asked that the information be expressed in graphical form. WattsWorth refuses to provide the requested information "on the advice of counsel".
11. This question is relevant; it is based on the WattsWorth report; and it can readily be prepared by WattsWorth. There is no basis for refusing to answer this question, and it is not reasonable to suggest that it is incumbent on Horizon Utilities to create a graph based

on the City's evidence so that the City can cross-examine Horizon Utilities on a graphical representation of the City's chart.

- **CoH-Horizon-4**

12. WattsWorth created a chart (Figure 17 in its report) presenting the SL Revenue per Number of Devices for Horizon Utilities and 8 other distributors that it considers comparable (the same group as set out in Figure 16). Horizon Utilities asked that the City provide a modified version of this figure with an additional line showing the SL Revenue per Number of Connections for the 9 distributors. WattsWorth refuses to provide the requested information "on the advice of counsel".
13. Again, the question is relevant; it is based on the WattsWorth report; and there is no suggestion that the information is not available to WattsWorth – if WattsWorth was able to collect information from these 9 distributors (the footnote in the WattsWorth report related to Figure 17 refers the reader to Footnote 13 for the source of the information in Figure 17, but it appears that Footnote 14 provides the sources of WattsWorth's information about the 9 distributors), then WattsWorth should be able to provide the requested information. It is not Horizon Utilities' responsibility to recreate WattsWorth's research and create its own answers to the questions properly directed to the City.

- **CoH-Horizon-5(b)**

14. Horizon Utilities has asked for the production of previous drafts of the WattsWorth report. WattsWorth refuses to provide the requested information "on the advice of counsel". As noted above, counsel to the City states that Horizon Utilities has not indicated why previous drafts of the WattsWorth report would be relevant.
15. Horizon Utilities would like to know whether, and the extent to which, City Staff were involved in and influenced the preparation of the report. This is relevant because the authors of the report are being presented as experts with certain duties that prevail over any obligation owed to the City.

- **CoH-Horizon-7**

16. Figures 11 and 12 in the WattsWorth report provide a comparison of the Residential Class distribution charges to the Street Light distribution charges showing that Horizon Utilities' proposed 2015 rates have a higher distribution rate increase for the Street Light class than the residential class; and that the distribution charge component of the total bill is higher for the street light class than the residential class. Horizon Utilities asked if the City of Hamilton is of the view that the Residential Class distribution rates should be increased so that the distribution rates for the City of Hamilton may be decreased. The response states that the City will provide a position on this in argument. Horizon Utilities will also be prepared to deal with this matter in argument if necessary.

- **CoH-Horizon-8**

17. Figure 1 in the WattsWorth report is a graph illustrating the trend in "distribution-based rate increases that [the City] has experienced since 2005 as well as a projection of those same charges it can expect to incur based on [Horizon Utilities'] Custom IR." (See p.2 of the WattsWorth report). The Horizon Utilities' interrogatory simply seeks confirmation that the 2005-2008 billing amounts are based on revenue to cost ratios of 15.6% for 2007 and prior and 43% for 2008, both of which are well below the Board's floor of 70% for the Street Lighting class. WattsWorth refuses to respond to the question "on the advice of counsel"
18. WattsWorth assembled the data on Street Lighting rates for the purpose of preparing its report. It is relevant and entirely appropriate for Horizon Utilities to request confirmation of the relationship of the revenue-to-cost ratios underlying the rates to the Board-approved range of revenue-to-cost ratios for the Street Lighting customer class. As with other interrogatories discussed in this letter, it is not appropriate that Horizon Utilities be required to create its own evidence in order to answer a question properly directed to the City.

- **CoH-Horizon-9**

19. WattsWorth asserts that “If the 2015 Revenue to Cost ratio was maintained for 2019, the total revenue that Horizon will require to collect from the streetlight class will go from approximately \$3.2M to \$2.9M, a 10% difference.” (See page 7 of the WattsWorth report.) The proposed 2015 Revenue to Cost Ratio for the Street Lighting class is 83.83%. The proposed 2019 Revenue to Cost Ratio for the class is 83.34%. WattsWorth has provided no support for its assertion or calculation in its report. The Horizon Utilities interrogatory seeks the calculation that supports this assertion. Specifically, Horizon Utilities requested “the calculation that shows how maintaining the Revenue to Cost ratio of 83.83% for the 2015 Test Year for each of the subsequent years (2016-2019) has a 10% impact on the Revenue Requirement to be recovered from the Street Lighting class in 2019.” WattsWorth refuses to respond to the question “on the advice of counsel”.
20. This is a question that arises directly from the City’s evidence. The City has provided a figure but no evidence/calculations to support it. It is entirely appropriate to ask where the figure came from. It is not Horizon Utilities’ responsibility to manufacture a calculation that supports the City’s evidence, nor is it reasonable for the City’s consultant to refuse to answer this question.

CONCLUSION

21. For all of these reasons, Horizon Utilities respectfully requests that the Board direct the City and its consultant to provide complete responses to Horizon Utilities’ Questions 3, 4, 5(b), 8 and 9, and that the Board schedule any further steps in this motion for dates following the conclusion of the Settlement Conference.

**THE FOLLOWING DOCUMENTARY MATERIAL AND EVIDENCE WILL BE
RELIED UPON AT THE HEARING OF THE MOTION:**

1. The Record in EB-2014-0002.
2. Such further and other material as counsel may advise and the Board may permit.

August 22, 2014

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AND TO: Intervenors

TOR01: 5685241: v5

APPENDIX A

City of Hamilton's Responses to Horizon Utilities' Interrogatories

August 19, 2014

Robert B. Warren
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File 01626.00019

Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2701
2300 Yonge Street
Toronto ON M4P 1E4

Dear Ms Walli:

Re: EB-2014-0002/Responses to Interrogatories Directed to the City of Hamilton from Horizon Utilities Corporation

We are counsel to the City of Hamilton in this matter. On behalf of our client we enclose herewith its Responses to interrogatories directed to it from Horizon Utilities Corporation (Horizon).

Horizon's interrogatories were directed to the evidence of WattsWorth Analysis Inc. (WattsWorth), filed on behalf of our client. As the enclosed responses indicate, WattsWorth has been advised to decline to respond to a number of the interrogatories. In particular, it has been advised to decline to respond to Horizon's interrogatories number 3, 4, 7 8 and 9. In each of those interrogatories, Horizon asks WattsWorth to provide information that Horizon presumably believes is relevant. It is our position that information of that nature should be provided by Horizon by way of reply evidence. For WattsWorth to supply the information requested would mean that the evidence was that of WattsWorth, and not Horizon, which would preclude us from cross-examining on it. It is inappropriate for Horizon to try to limit in that way our right to cross-examine on evidence Horizon believes to be relevant, and therefore our right to fully represent our client.

If, as noted above, Horizon believes that the information they have asked for is relevant, it can provide it by way of reply evidence, which would then be subject to cross-examination.

Finally, with respect to Horizon interrogatory number 5 b), in which WattsWorth is asked to provide "previous drafts of the report", we have advised WattsWorth to decline to provide any previous drafts. Horizon has not indicated why previous drafts would be relevant. In the absence of its doing so, it is our position that WattsWorth is not required to provide any draft.

Yours truly,

WeirFoulds LLP



Robert B. Warren

RBW/dh

cc: City of Hamilton
cc: Borden Ladner Gervais
Attention: J. Mark Rodger
cc: All parties
6718617.1

HORIZON UTILITIES CORPORATION

2015 RATES REBASING CASE

EB-2014-0002

RESPONSES TO

HORIZON UTILITIES CORPORATION

INTERROGATORIES

TO

WATTSWORTH ANALYSIS FOR CITY OF HAMILTON

CoH-Horizon-1

Preamble:

Section 2 of the WattsWorth evidence cites a Report of the Board “Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario’s Electricity Distributors” (EB-2010-0379 which was released 21 November 2013 and updated 4 December 2013. Figure 3 excerpts Table 2: Two Factor Input Price Index from that report. The evidence comments on this Table stating that “It essentially prescribes a benchmark price index that indicates the effects of inflationary increases (non-labour as well as labour) that are reasonable for LDCs from 2003 through 2012, as per the OEB.”

Question:

a) Please confirm that the Board’s intended use of the Two Factor Input Price Index is stated at page 11 of that report under the heading “2014 Inflation Factor Value” which states:

Consistent with the policy determinations set out in this Report, and the most recent Statistics Canada data available for GDP-IPI (FDD), the Board has calculated the value of the inflation factor for incentive rate setting under Price Cap IR and the Annual Index for rates effective in 2014 to be 1.7%. A detailed calculation is provided in Appendix C.

Reference:http://www.ontarioenergyboard.ca/oeb/_Documents/EB-2010-0379/EB-2010-0379_Report_of_the_Board_20131121.pdf

b) Please confirm that that current Horizon Utilities Custom IR application does not rely on “the value of the inflation factor for incentive rate setting under Price Cap IR and the Annual Index”. Please explain if you do not confirm this statement.

Response:

- a) WattsWorth (“WW”) cannot comment on the Board’s intended use of the Two Factor Input Price Index.
- b) WattsWorth cannot comment on Horizon’s Custom IR’s reliance on “the value of the inflation factor for incentive rate setting under Price Cap IR and the Annual Index”.

CoH-Horizon-2

Preamble:

The WattsWorth evidence states at the end of section 2 that:

2. An adjustment (increase) applied to the streetlight rate class in order to move its Revenue to Cost ratio closer to unity, despite the OEB’s comments that the Revenue to Cost ratio range does not need to be narrowed. (emphasis added)

Table 5 in the Horizon Utilities evidence (Exhibit 7, Tab 1, Schedule 2, page 4) shows that in the absence of rate rebalancing, all classes would have received the same percentage rate increase and the revenue-to-cost ratio for the SL class would decline from the 75.01 ratio that was approved for 2011 to 74.41 in this application. The revenue-to-cost ratio for the SL class is increased to 83.83 as a result of the rate rebalancing that is required to bring the revenue-to-cost ratios for the LU(1), LU(2) and USL classes within the relevant Board-approved ranges. For rate rebalancing all classes with revenue-to-cost ratios less than 100% received identical percentage adjustments to the proposed rate increases.

Question:

- a) Please explain the alternate approach that WattsWorth would recommend for rate rebalancing.
- b) Please comment on the extent to which the proposed alternate approach will ensure that the following guiding principles are respected:
 - The revenue-to-cost ranges for all classes are within the Board-approved ranges;
 - The rates are sufficient to enable Horizon Utilities to recover its revenue requirement in full;
 - No class has a rate rebalancing rate adjustment that moves the revenue-to-cost ratio for the class further way from 100%; and
 - Treats all classes equitably in terms of the rate rebalancing rate adjustment.
- c) If WattsWorth does not agree with the guiding principles set out in part (b) above, please explain that alternate guidance principles that WattsWorth would recommend using when rate rebalancing to bring revenue-to-cost ratios within the Board approved ranges.

Response:

- a) WW was not asked for, and did not provide, any recommendation on rate rebalancing.
- b) Please see response to a) above.
- c) Please see response to a) above.

CoH-Horizon-3

Preamble:

Figure 16 in the WattsWorth evidence presents the SL Revenue Contribution: SL Load Contribution for Horizon Utilities and 8 other distributors that it considers comparable.

Question:

Please provide a graph showing the SL Revenue Contribution: SL Load Contribution ratios on the vertical axis with the nine distributors on the horizontal axis in ascending order of their SL Revenue Contribution: SL Load Contribution ratios.

Response:

On the advice of counsel, WW declines to provide the graph requested.

CoH-Horizon-4

Preamble:

Figure 17 in the WattsWorth evidence presents the SL Revenue per Number of Devices for Horizon Utilities and 8 other distributors that it considers comparable.

Question:

Please provide a modified version of this figure with an additional line showing the SL Revenue per Number of Connections for the nine distributors.

Response:

On the advice of counsel, WW declines to provide a modified version of the figure.

CoH-Horizon-5

a) Please provide a copy of the retainer, terms of reference, and any instructions provided to WattsWorth Analysis Inc.

b) Please provide the previous drafts of the report.

Response:

a) WW was retained to do the following:

1. To review the pre-filed evidence of Horizon, as it pertains to the rates for street lighting to be charged to Hamilton;
2. To provide advice with respect to a preliminary meeting between Hamilton and Horizon;
3. To explain the reasons for increases in the rates for street lighting Horizon proposes to charge to Hamilton, if the application is granted;
4. To compare the rates to be charged to Hamilton by Horizon for street lighting to the rates charged to other similarly-situated electricity distribution utilities for street lighting;
5. To assess the reasonableness of Horizon's proposed rates for street lighting, to be charged to Hamilton, in light of the recommendations with respect to cost allocation for unmetered scattered loads in the report of the Ontario Energy Board in EB-2012-0383;
6. To provide us with a written report on your analysis and conclusions for items 1 to 4 above.

b) On the advice of counsel, WW declines to provide a draft of the report.

CoH-Horizon-6

Preamble:

Figure 14 compares the Revenue Requirement contribution per rate class as a percentage between 2011 and 2015.

Question:

- a) Please identify the percentage of 2011 revenue requirement that the SL class contributed.
- b) Please identify the percentage of 2015 revenue requirement that it is proposed that the SL class contribute.
- c) Please compute the difference between 2015 and 2011.

Response:

- a) 2.9%
- b) 2.9%
- c) 0%

CoH-Horizon-7

Preamble:

Figure 11 and 12 provide a comparison of the Residential Class distribution charges to the Street Light distribution charges showing that:

- The proposed 2015 rates have a higher distribution rate increase for the Street Light class than the residential class; and
- The distribution charge component of the total bill is higher for the street light class than the residential class.

Question:

Is the City of Hamilton of the view that the residential class distribution rates should be increased so that the distribution rates for the City of Hamilton may be decreased?

Response:

The question seeks a position that will be provided by Hamilton in argument.

CoH-Horizon-8

Preamble:

Figure 1 provides the actual annual billing for the City of Hamilton for the years 2005 – 2013, and the proposed annual billing amounts for the years 2014 – 2019. The comment on this figure in the WattsWorth report states:

According to Figure 1, Hamilton's distribution-based billing amount from the streetlight class that is projected for 2019, based on HUC's Custom IR, is approximately 15 times higher than it was in 2005 – an increase of > 1400%.

Page 28 of the Ontario Energy Board's Decision with Reasons from EB-2007-0697 dated October 3, 2008 provides the following table:

Revenue to Cost Ratios

Rate Class	Cost Allocation Study Col 1	Application Col 2	Target Range Col 3
Residential	123.6	112.4	85 – 115
GS < 50 kW	92.0	92.5	80 – 120
GS > 50 kW	72.1	86.3	80 – 180
Large Use > 5 MW	49.8	92.1	85 – 115
Street Light	15.6	23.8	70 – 120
Sentinel	34.8	91.5	70 – 120
USL	34.2	88.1	80 – 120
Back-up/Standby	51.0	65.8	n/a

And states that:

The Board concludes that the Streetlighting class should be moved closer to the Board target range. This is consistent with other recent Board decisions on this issue. The revenue to cost ratio will be 43% for Streetlighting in 2008. The Board notes that Horizon did not object to this approach. The Board further directs Horizon to move the ratio to 70% as part of its 2009 IRM application.

Reference: http://www.ontarioenergyboard.ca/oeb/_Documents/EB-2007-0697/dec_reasons_HorizonUtilities_20081003%20%283%29.pdf

Question:

Please confirm that the billing amounts in Figure 1 for 2005 - 2008 are based on revenue to cost ratios: 15.6% for 2007 and prior, and 43% for 2008, all of which are well below the Board's existing floor for the Street Lighting class of 70%.

Response:

On the advice of counsel, WW declines to respond to this question.

CoH-Horizon-9

Preamble:

The WattsWorth Report states:

If the 2015 Revenue to Cost ratio was maintained for 2019, the total revenue that Horizon will require to collect from the streetlight class will go from approximately \$3.2M to \$2.9M, a 10% difference.

Table 7-6 of Horizon Utilities' prefiled evidence provided the proposed Revenue to Cost Ratios for each rate class for the years 2015 – 2019

Table 7-6: Chapter 2 Filing Requirement Appendix 2P (D) – Proposed Revenue-to-Cost Ratios - 2015

Class	Proposed Revenue-to-Cost Ratios					Policy Range
	2015	2016	2017	2018	2019	
	%	%	%	%	%	%
Residential	103.23	104.03	103.77	104.96	103.86	85 - 115
GS < 50 kW	99.49	98.99	99.12	100.95	98.71	80 - 120
GS > 50 kW	94.14	93.34	94.23	90.11	94.34	80 - 120
Large Use (1)	115.00	112.17	111.03	109.45	108.05	85 - 115
Large Use (2)	115.00	85.00	85.00	91.39	96.86	85 - 115
Street Lighting	83.83	82.74	83.56	83.48	83.34	70 - 120
Senior Lighting	94.29	96.55	95.19	94.80	93.98	80 - 120
Unmetered Scattered Load (USL)	120.00	119.90	119.30	120.00	120.00	80 - 120
Standby	54.44	53.43	52.64	52.29	51.92	Undefined

Question:

Please provide the calculation that shows how maintaining the Revenue to Cost ratio of 83.83% for the 2015 Test Year for each of the subsequent years (2016-2019) has a 10% impact on the Revenue Requirement to be recovered from the Street Lighting class in 2019.

Response:

On the advice of counsel, WW declines to respond to this question.