



Grimsby Power Incorporated

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October 16, 2014

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario M4P 1E4
Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli,

**RE: OEB File No. EB-2014-0076 - 2015 IRM Electricity Rate Application
Grimsby Power Incorporated
Response to Board Staff Interrogatories**

In accordance with the Notice of Application and Hearing, please find attached Grimsby Power's responses to Board Staff Interrogatories in the above proceeding.

As a result of the Board Staff's interrogatories, Grimsby Power has re-submitted the 2015 IRM Rate Generator model to reflect the Board-approved corporate tax rate.

As a result of the issuance of 2013 verified results from the OPA, the amount of Account 1568 - LRAMVA being requested for disposition has been revised, using actual savings values for 2013.

This letter is sent by courier, e-mail and RESS. Should there be any questions, please do not hesitate to contact me.

Yours truly,

D. Kelly

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**Grimsby Power Inc.
2015 IRM Rate Application
Board Staff Interrogatories**

**1. Interrogatory #1:
Tab 11 – STS – Tax Change**

Summary - Sharing of Tax Change Forecast Amounts

For the 2012 year, enter any Tax Credits from the Cost of Service Tax Calculation (Positive #)	13,000
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1. Tax Related Amounts Forecast from Capital Tax Rate Changes	2012	2015
Taxable Capital (if you are not claiming capital tax, please enter your Board-Approved Rate Base)	\$ 16,641,297	\$ 16,641,297
Deduction from taxable capital up to \$15,000,000	\$ -	\$ -
Net Taxable Capital	\$ 16,641,297	\$ 16,641,297
Rate	0.00%	0.00%
Ontario Capital Tax (Deductible, not grossed-up)	\$ -	\$ -
2. Tax Related Amounts Forecast from Income Tax Rate Changes		
Regulatory Taxable Income	\$ 290,478	\$ 290,478
Corporate Tax Rate	15.50%	15.50%
Tax Impact	\$ 32,024	\$ 32,024
Grossed-up Tax Amount	\$ 37,898	\$ 37,898
Tax Related Amounts Forecast from Capital Tax Rate Changes	\$ -	\$ -
Tax Related Amounts Forecast from Income Tax Rate Changes	\$ 37,898	\$ 37,898
Total Tax Related Amounts	\$ 37,898	\$ 37,898
Incremental Tax Savings		-\$ 0
Sharing of Tax Savings (50%)		-\$ 0

Board Staff is unable to reconcile the following amounts to Grimsby Power's previous cost of service Revenue Requirement Work Form (EB-2011-0273):

- Tax Credits: \$13,000
- Corporate Tax Rate: 15.50%
- Tax Impact: \$32,024

Grimsby Power's previous Board approved Revenue Requirement Work Form, notes the following figures:

- Tax Credits: \$0
- Corporate Tax Rate: 11.54%
- Tax Impact: \$33,524

Board staff notes if Grimsby Power agrees to the above changes, the tax savings amount changes from \$0 to \$15,385 resulting in tax sharing amount of \$7,692(50%).

(A) Please confirm if Grimsby Power agrees with the above changes, and Board staff will make the necessary corrections to the workform.

Grimsby Power Inc.'s Response:

Grimsby Power does not agree with the above changes as it is not the way that the tax calculation was done in the Cost of Service application, (as referenced).

(B) If the answer to (A) is no, please provide an explanation for the figures entered.

Grimsby Power Inc.'s Response:

A tax rate of 15.50% was used in the initial stages of the Cost of Service application. During the settlement process however, Grimsby Power agreed to include in the tax calculation two potential tax credits that may be received in 2012:

- i) A \$10,000 apprentice tax credit as a result of hiring an apprentice line-man in mid-2011.
- ii) A \$3,000 co-op student tax credit for budgeted co-op student hiring in 2012.

These potential tax credits brought the net tax rate to 11.54% in the final Revenue Requirement work-form.

Reference: Grimsby_2012_Rev_Reqt_Work_Form_Revised_DRO, Tab '6. Taxes_PILs', cell O39.

The Tax Sharing model was corrected using the 11.54% Corporate Tax rate. The correction however has no impact on the Distribution Volumetric Rate Rider as presented below since the deduction for the tax credits is contained in the rate itself, rather than in the calculation of the Tax Impact.

Exhibit 1: 2015_IRM_Revenue_Generator_V11_, Tab '11. STS - Tax Change'



Ontario Energy Board

Incentive Regulation Model for 2015 Filers

Grimsby Power Inc. - Grimsby, Ontario

Summary - Sharing of Tax Change Forecast Amounts

For the 2012 year, enter any Tax Credits from the Cost of Service Tax Calculation (Positive #)

13,000

1. Tax Related Amounts Forecast from Capital Tax Rate Changes

	2012	2015
Taxable Capital (if you are not claiming capital tax, please enter your Board-Approved Rate Base)	\$ 16,641,297	\$ 16,641,297
Deduction from taxable capital up to \$15,000,000	\$ -	\$ -
Net Taxable Capital	\$ 16,641,297	\$ 16,641,297
Rate	0.00%	0.00%
Ontario Capital Tax (Deductible, not grossed-up)	\$ -	\$ -

2. Tax Related Amounts Forecast from Income Tax Rate Changes

Regulatory Taxable Income	\$ 290,478	\$ 290,478
Corporate Tax Rate	11.54%	15.50%
Tax Impact	\$ 32,024	\$ 32,024
Grossed-up Tax Amount	\$ 37,898	\$ 37,898
Tax Related Amounts Forecast from Capital Tax Rate Changes	\$ -	\$ -
Tax Related Amounts Forecast from Income Tax Rate Changes	\$ 37,898	\$ 37,898
Total Tax Related Amounts	\$ 37,898	\$ 37,898
Incremental Tax Savings		-\$ 0
Sharing of Tax Savings (50%)		-\$ 0

Exhibit 2: 2015_IRM_Rate_Generator_V11, Tab '12. STS – Tax Change Rate Rider '



Ontario Energy Board

Incentive Regulation Model for 2015 Filers

Grimsby Power Inc. - Grimsby, Ontario

This worksheet calculates a tax change volumetric rate rider. If the rate riders are material (round to 4 decimal places), then the outputs in columns M and O will appear on Sheet 27 - Final Tariff Schedule.

Rate Class	Total Revenue \$ by Rate Class	Total Revenue % by Rate Class	Allocation of Tax Savings by Rate Class	Billed kWh	Billed kW	Distribution Volumetric Rate kWh Rate Rider	Distribution Volumetric Rate kW Rate Rider
RESIDENTIAL	2,856,659	72.9%	\$0	94,590,900		0.0000	
GENERAL SERVICE LESS THAN 50 KW	443,314	11.3%	\$0	18,707,282		0.0000	
GENERAL SERVICE 50 TO 4,999 KW	522,739	13.3%	\$0	69,874,994	191,455		0.0000
STREET LIGHTING	72,642	1.9%	\$0	1,578,145	4,403		0.0000
UNMETERED SCATTERED LOAD	20,859	0.5%	\$0	355,293		0.0000	
microFIT		0.0%	\$0				
Total	3,916,211	100.0%	\$0	185,106,615	195,858		

(C) If the answer to (A) is yes, please confirm if Grimsby Power wishes to transfer the tax sharing amount in Account 1595 for disposition at a future date due to insignificant rate riders.

Grimsby Power Inc.'s Response:

Please refer to Response 1 (B).

**2. Interrogatory #2:
Tab 16 – RTSR**

IESO	Network			Line Connection			Transformation Connection			Total Line
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	19,727	\$3.63	\$ 71,610	20,320	\$0.75	\$ 15,240	20,320	\$1.77	\$ 35,997	\$ 51,237
February	19,542	\$3.63	\$ 70,937	19,542	\$0.75	\$ 14,656	19,542	\$1.77	\$ 34,589	\$ 49,246
March	18,077	\$3.63	\$ 65,620	18,077	\$0.75	\$ 13,558	18,077	\$1.77	\$ 31,996	\$ 45,554
April	16,775	\$3.63	\$ 60,894	16,851	\$0.75	\$ 12,638	16,851	\$1.77	\$ 29,826	\$ 42,464
May	19,055	\$3.63	\$ 69,171	19,184	\$0.75	\$ 14,388	19,184	\$1.77	\$ 33,956	\$ 48,344
June	22,938	\$3.63	\$ 83,265	25,109	\$0.75	\$ 18,832	25,109	\$1.77	\$ 44,444	\$ 63,276
July	23,946	\$3.63	\$ 86,924	23,946	\$0.75	\$ 17,960	23,946	\$1.77	\$ 42,385	\$ 60,344
August	19,884	\$3.63	\$ 72,179	20,307	\$0.75	\$ 15,230	20,307	\$1.77	\$ 35,944	\$ 51,174
September	24,475	\$3.63	\$ 88,843	25,739	\$0.75	\$ 19,304	25,739	\$1.77	\$ 45,558	\$ 64,862
October	15,495	\$3.63	\$ 56,246	16,285	\$0.75	\$ 12,213	16,285	\$1.77	\$ 28,824	\$ 41,037
November	17,487	\$3.63	\$ 63,476	17,918	\$0.75	\$ 13,439	17,918	\$1.77	\$ 31,715	\$ 45,154
December	16,955	\$3.63	\$ 61,546	19,081	\$0.75	\$ 14,311	19,081	\$1.77	\$ 33,773	\$ 48,084
Total	234,356	\$ 3.63	\$ 850,712	242,360	\$ 0.75	\$ 181,770	242,360	\$ 1.77	\$ 429,008	\$ 610,778

Board staff is unable to reconcile the rate entered in the column “Transformation Connection” to the UTR effective January 1, 2013 for the Transformation Connection Service Rate. Board staff notes the rate should be \$1.85.

(A) If Grimsby Power agrees, please confirm, and Board staff will make the necessary corrections to the model.

Grimsby Power Inc.’s Response:

There is no error in this regard, please refer to Response 2(B).

(B) If the answer to (A) is no, please provide an explanation for the rate of \$1.77 entered.

Grimsby Power Inc.’s Response:

Niagara West Transformation Corporation (“NWTC”) is GPI’s supplier with respect to transmission connection services and they were granted a rate separate from the UTR process.

In the OEB Decision for NWTC’s Rate Application (EB-2010-0345, August 25, 2011), the Board ordered that, “Niagara West Transformation Corporation is granted a monthly transmission transformation connection rate of \$1.77 per kW effective March 1, 2011...” “separate and apart from the UTR process” (p. 7). NWTC charged GPI the \$1.77 per kW rate throughout 2013 in compliance with this Decision, and the UTR rate was not applicable.

3. Interrogatory #3 Appendix 6 – LRAM calculations

Grimsby Power has requested the approval to dispose of the balance in Account 1568 – LRAMVA, which includes a balance of \$67,275 including carrying charges up to December 31, 2013

(A) Please confirm that Grimsby Power has not included any lost revenue attributable to 2013 CDM programs.

Grimsby Power Inc.'s Response:

Grimsby Power does not confirm that it has not included any lost revenue attributable to 2013 CDM programs.

Grimsby Power confirms that the Account 1568 – LRAMVA balance of \$67,275 includes lost revenues attributable to 2011, 2012 along with an estimate for 2013 CDM programs. Please refer to GPI's response in Interrogatory #3B for details.

Since submitting the 2015 IRM Rate Application, Grimsby Power has received OPA verified CDM savings values for 2013 (issued August 30, 2014).

As a result, Grimsby Power requests approval to dispose of the revised balance for the Account 1568 – LRAMVA balance to year-end 2013, of \$72,373, with the calculation as shown in Exhibit 3. Estimated savings for 2013 have been replaced with actual savings in this revised calculation:

Exhibit 3: Revised Request for Account 1568 - LRAMVA Disposition to Year-end 2013

	Per 2015 IRM Rate Application		Revised Request for LRAMVA Disposition	
2011 Principal - Actual	\$	34,042.29	\$	34,042.29
2012 Principal - Actual	\$	21,405.54	\$	21,405.54
2013 Principal	\$	10,554.50	\$	15,652.28
Cumulative Principal		Estimate 66,002.33	Actual	71,100.11
Carrying Charges - on 2011 balance in 2012	\$	458.05	\$	458.05
Carrying Charges - on 2012 balance in 2013	\$	815.10	\$	815.10
		<u>\$ 1,273.15</u>		<u>\$ 1,273.15</u>
Total:		<u><u>67,275.48</u></u>		<u><u>72,373.26</u></u>

In the Chapter 3 Filing Requirements (July 25, 2014, p. 10), it is stated that distributors must file specified statements in support of the application for lost revenues. They are as follows:

Confirmations:

- GPI confirms that the most recent input assumptions available have been used in the lost revenue calculations.
- GPI confirms that the most recent and appropriate final CDM evaluation report from the OPA has been used in support of the lost revenue calculations. These are the 2013 OPA Verified CDM Results issued August 30, 2014.
- GPI confirms that carrying charges are being requested on the lost revenue amount.

For details of the revised LRAMVA calculations in 2013 and for each rate class, please refer to Appendix 1.

The revised LRAMVA values have been updated in the 2014 Continuity Schedule (Worksheet #5) of the 2015 IRM Rate Generator model which accompanies these Responses. The difference between estimated and actual values is recorded in the 2013 Other Adjustments during Q4 2013 column.

This creates a Total Claim of \$73,418 in the model since it includes projected Interest from January 1, 2014 to December 31, 2014 on the the December 31, 2013 balance. The Variance between RRR vs. the 2013 balance of \$5,098 is due to the adjustment in 2013 from estimated to actual CDM savings.

(B) Please confirm that the LRAMVA balance is attributable to 2011 and 2012 CDM programs in 2011, 2012 and 2013

Grimsby Power Inc.'s Response:

Grimsby Power does not confirm that the LRAMVA balance is attributable to 2011 and 2012 CDM programs in 2011, 2012, and 2013.

Grimsby Power does confirm that the LRAMVA balance is attributable to 2011 and 2012 CDM programs completed in 2011, 2012 and 2013, as well as an estimate for 2013 projects as shown below in Exhibit 4.

The July 2012 OEB Accounting Procedures Handbook Frequently Asked Questions explains on page 7 that, "electricity distributors are expected to report the balance in the LRAM Variance Account 1568 as part of the reporting and record-keeping requirements ("RRR") on an annual basis. Accordingly, this account balance should be reported in the annual trial balance under the electricity RRR 2.1.7 which is due on or before April 30 of the year following the reporting period."

In compliance with these instructions, on April 30, 2014 Grimsby Power included an estimate for 2013 lost revenues in the RRR 2.1.7. So that values in RRR 2.1.7 match the corporate accounting records, the account 1568 in the 2013 audited financial statements included this estimate. The 2013 estimate was therefore also included in the LRAMVA claim as shown below (Exhibit 4):

**Exhibit 4: Account 1568 - LRAMVA Principal Balance
Attributable to 2011, 2012 and 2013**

	Year of Completion			
	2011	2012	2013	Total
Projects started in 2011:	\$ 22,399.83	\$ 11,642.46		\$ 34,042.29
Projects started in 2012:		\$ 10,424.50	\$ 10,981.04	\$ 21,405.54
Subtotal:				\$ 55,447.83
2013 Projects - Estimate per 2015 IRM Rate Application				\$ 10,554.50
Total LRAMVA Principal:				\$ 66,002.33

(C) Please confirm Grimsby Power's last Board approved forecast did not include any CDM amounts.

Grimsby Power Inc.'s Response:

Grimsby Power does not confirm that the last Board approved forecast did not include any CDM amounts.

According to the Ontario Energy Board *Guidelines for Electricity Distributor Conservation and Demand Management* (EB-2012-0003, April 26, 2012, p. 12 – “CDM Guidelines”),

“Distributors will generally be expected to include a CDM component in their load forecast in cost of service proceedings”.

Grimsby Power's last Board approved forecast included CDM savings of 776,000 kWh in 2011, and 1,552,000 kWh in 2012 (*EB-2011-0273, Responses to Board Staff Interrogatories, Nov 9, 2011, p. 18*).

The CDM Guidelines reference also defined the LRAMVA calculation as being the difference between the following:

i. The results of actual, verified impacts of authorized CDM activities undertaken by electricity distributors between 2011-2014 for both Board-Approved CDM programs and OPA-Contracted Province-Wide CDM programs in relation to activities undertaken by the distributor and/or delivered for the distributor by a third party under contract (in the distributor's franchise area);

and

ii. The level of CDM program activities included in the distributor's load forecast (i.e. the level embedded into rates).

In calculating LRAMVA balances, Grimsby Power deducted the CDM savings that were included in the Board-approved load forecast from the total CDM savings.

Appendix 1:

Lost Revenue Adjustment Mechanism
Revised Calculations

Using
2013 OPA Verified CDM Results

Grimsby Power Inc.
Appendix 1: Lost Revenue Adjustment Mechanism ("LRAM") Calculations
2011 - 2013 CDM Annual Savings and Attributed Lost Revenue

Residential Rate Class

Year of Lost Revenues:	2011		2012		2013		Cumulative 2011 - 2013	
Year of Accounting Recognition:	2012		2013		2014		2014	
	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)
Actual / Estimated:	Actual	Actual	Actual	Actual	Actual	Actual	Calculated	Calculated
Appliance Retirement	271,099.88	9.42	113,649.12	5.58	27,458.40	2.13	412,207.40	17.13
Appliance Exchange	3,932.91	0.22	26,089.09	4.78	11,821.83	3.42	41,843.83	8.42
HVAC Incentives	508,690.53	71.61	160,064.47	36.39	141,741.69	41.19	810,496.69	149.19
Conservation Instant Coupon Booklet	170,489.97	2.61	12,073.03	-	35,134.49	1.70	217,697.49	4.32
Bi-Annual Retailer Event	267,919.02	3.83	203,026.98	3.17	78,312.84	2.90	549,258.84	9.90
Retailer Co-op	-	-	-	-	-	-	-	-
Residential Demand Response	-	-	-	-	0.73	-	0.73	-
Residential New Construction	-	-	-	-	-	-	-	-
Home Assistance Program	-	-	-	-	-	-	-	-
Total:	1,222,132.31	87.70	514,902.69	49.92	294,469.98	51.34	2,031,504.98	188.95
Variable Distribution Rate:	0.0086		0.0116		0.0117			
Actual Dollar Savings:	10,510.34		5,972.87		3,445.30		19,928.51	
Forecast kWh / kW Savings per Cost of Service:	456,363.91		912,728.43		912,728.43			
Forecast Dollar Savings:	3,924.73		10,587.65		10,678.92		25,191.30	
LRAM Variance Account (Dollars):	6,585.61		(4,614.78)		(7,233.62)		- 5,262.79	

General Service Less Than 50 kW Rate Class

Year of Lost Revenues:	2011		2012		2013		Cumulative 2011 - 2013	
Year of Accounting Recognition:	2012		2013		2014		2014	
	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)
Actual / Estimated:	Actual	Actual	Actual	Actual	Actual	Actual	Calculated	Calculated
Efficiency: Equipment Replacement	135,967.02	-	1,901,686.98	129.00	1,765,542.47	120.09	3,803,196.47	249.09
Direct Install Lighting	298,290.69	24.69	371,905.31	33.31	378,332.68	52.64	1,048,528.68	110.64
Existing Building Commissioning Incentive	-	-	-	-	-	-	-	-
New Construction and Major Renovation Incentive	-	-	-	-	-	-	-	-
Energy Audit	-	-	151,057.53	10.35	-	-	151,057.53	10.35
Commercial Demand Response (part of the Residential program schedule)	-	-	-	-	-	-	-	-
Demand Response 3 (part of the Industrial program schedule)	2,931.68	-	1,094.32	-	1,020.18	-	5,046.18	-
Pre-2011 Electricity Retrofit Incentive Program	2,045,933.91	88.02	-	-	-	-	2,045,933.91	88.02
Pre-2011 High Performance New Construction	441,656.36	21.50	752.36	0.26	0.23	-	440,903.77	21.76
Total:	2,924,779.66	134.22	2,424,991.77	172.92	2,144,895.09	172.73	7,494,666.53	479.86
Variable Distribution Rate:	0.0100		0.0125		0.0127			
Actual Dollar Savings:	29,247.80		30,312.40		27,240.17		86,800.36	
Forecast kWh / kW Savings per Cost of Service:	90,255.56		180,510.19		180,510.19			
Forecast Dollar Savings:	902.56		2,256.38		2,292.48		5,451.41	
LRAM Variance Account (Dollars):	28,345.24		28,056.02		24,947.69		81,348.95	

General Service 50 - 4,999 kW Rate Class

Year of Lost Revenues:	2011		2012		2013		Cumulative 2011 - 2013	
Year of Accounting Recognition:	2012		2013		2014		2014	
	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)
Actual / Estimated:	Actual	Actual	Actual	Actual	Actual	Actual	Calculated	Calculated
Process & System Upgrades	-	-	-	-	-	-	-	-
Monitoring & Targeting	-	-	-	-	-	-	-	-
Energy Manager	-	-	-	-	-	-	-	-
Efficiency: Equipment Replacement Incentive (part of the C&I program schedule)	-	-	-	-	-	-	-	-
Demand Response 3	12,367.27	-	7,363.73	-	6,485.44	-	26,216.44	-
Total:	12,367.27	-	7,363.73	-	6,485.44	-	26,216.44	-
Variable Distribution Rate:		1.41		1.69		1.72		
Actual Dollar Savings:		0.00		-		-		-
Forecast kWh / kW Savings per Cost of Service:		628.58		1,202.00		1,202.00		
Forecast Dollar Savings:		888.55		2,035.71		2,061.79		4,986.05
LRAM Variance Account (Dollars):		(888.55)		(2,035.71)		(2,061.79)	-	4,986.05

Summary for All Rate Classes

Year of Lost Revenues:	2011		2012		2013		Cumulative 2011 - 2013		
Year of Accounting Recognition:	2012		2013		2014		2014		
	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Energy Savings (kWh)	Demand Savings (kW)	Total Dollar Savings
Actual / Estimated:	Actual	Actual	Actual	Actual	Actual	Actual	Calculated	Calculated	Calculated
Total kWh / kW Savings:	4,159,279.24	221.91	2,947,258.20	222.83	2,445,850.52	224.06	9,552,387.95	668.81	
Actual Dollar Savings:	39,758.13	-	36,285.27	-	30,685.47	-	106,728.87	-	106,728.87
Forecast Dollar Savings:	4,827.29	888.55	12,844.03	2,035.71	12,971.40	2,061.79	30,642.71	4,986.05	35,628.77
LRAM Variance Account (Dollars):	34,930.85	(888.55)	23,441.24	(2,035.71)	17,714.06	(2,061.79)	76,086.16	-	4,986.05

- 2013 actuals are net of adjustments

Carrying Charges Calculation

Year of Lost Revenues:	2011	2012	2013
Year of Accounting Recognition:	2012	2013	2014
Cumulative LRAM Variance Account (Dollars) - Principal:	34,042.29	55,447.83	71,100.10
Carrying Charge Rate:	1.47%	1.47%	1.47%
Annual Carrying Charges:	458.05	815.08	1,045.17
Cumulative Carrying Charges:	458.05	1,273.13	2,318.30
LRAMVA Account EOY Balance:	34,500.34	56,720.96	73,418.41