

Wasaga Distribution Incorporated (“Wasaga”)

EB-2014-0118

Response to Application Analysis

1. A portion of Sheet 5 – 2014 Continuity Schedule is reproduced below.

Account Descriptions	Account Number	2014			
		Principal Disposition during 2014 - instructed by Board	Interest Disposition during 2014 - instructed by Board	Closing Principal Balances as of Dec 31-13 Adjusted for Dispositions during 2014	Closing Interest Balances as of Dec 31-13 Adjusted for Dispositions during 2014
Group 1 Accounts					
LV Variance Account	1550	36,049	746	64,445	480
Smart Metering Entity Charge Variance	1551	0	0	5,380	165
RSVA - Wholesale Market Service Charge	1580	(154,557)	(7,124)	(80,379)	(719)
RSVA - Retail Transmission Network Charge	1584	(184,599)	(7,068)	44,077	824
RSVA - Retail Transmission Connection Charge	1586	(106,263)	(7,312)	(96,117)	(42)
RSVA - Power (excluding Global Adjustment)	1588	(724,667)	(14,205)	(42,071)	(31,189)
RSVA - Global Adjustment	1589	360,163	22,016	428,197	3,824
Recovery of Regulatory Asset Balances	1590			0	0
Disposition and Recovery/Refund of Regulatory Balances (2008) ^a	1595			0	0
Disposition and Recovery/Refund of Regulatory Balances (2009) ^a	1595	0	0	354,435	68,301
Disposition and Recovery/Refund of Regulatory Balances (2010) ^a	1595			0	0
Disposition and Recovery/Refund of Regulatory Balances (2011) ^a	1595			0	0
Disposition and Recovery/Refund of Regulatory Balances (2012) ^a	1595			0	0
RSVA - Global Adjustment	1589	360,163	22,016	428,197	3,824
Total Group 1 Balance excluding Account 1589 - Global Adjustment		(1,134,036)	(34,962)	249,771	37,819
Total Group 1 Balance		(773,873)	(12,946)	677,968	41,643
LRAM Variance Account	1568			0	0
Total including Account 1568		(773,873)	(12,946)	677,968	41,643

The table from Wasaga’s 2013 IRM Decision (EB-2031-0175, page 5) which identified the principal and interest amounts approved for disposition, is reproduced below.

Group 1 Deferral and Variance Account Balances

Account Name	Account Number	Principal Balance A	Interest Balance B	Total Claim C = A + B
LV Variance Account	1550	\$36,050	\$746	\$36,796
RSVA - Wholesale Market Service Charge	1580	-\$154,557	-\$7,124	-\$161,681
RSVA - Retail Transmission Network Charge	1584	-\$184,599	-\$7,067	-\$191,666
RSVA - Retail Transmission Connection Charge	1586	-\$105,263	-\$7,312	-\$112,575
RSVA - Power	1588	-\$724,666	-\$44,295	-\$768,961
RSVA - Global Adjustment	1589	\$360,163	\$22,017	\$382,180
Total Group 1 Excluding				-\$1,198,087

Global Adjustment – Account 1589				
Total Group 1				-\$815,907

- a) Board staff notes that the “Interest Disposition during 2014 – Instructed by Board” in the Rate Generator Model (Account 1588 - Cell AZ29) does not reconcile with the “Interest Balance” in the 2013 IRM Decision.

If the input into the Rate Generator Model is an error, please make any necessary updates to the Model.

Wasaga Distribution Inc. (WDI) Response:

WDI agrees with Board Staff that an entry error was made in entering the Interest Disposition in Cell AZ29. WDI would also like to note that there was also an entry error in Cell AY28 and this has been corrected as well. WDI has resubmitted the Excel spreadsheet with these errors corrected.

2. A portion of Sheet 5 – 2014 Continuity Schedule is reproduced below.

		2.1.7 RRR
Account Descriptions	Account Number	As of Dec 31-13
Group 1 Accounts		
LV Variance Account	1550	101,721
Smart Metering Entity Charge Variance	1551	5,545
RSVA - Wholesale Market Service Charge	1580	(242,779)
RSVA - Retail Transmission Network Charge	1584	(146,766)
RSVA - Retail Transmission Connection Charge	1586	(209,734)
RSVA - Power (excluding Global Adjustment)	1588	(812,132)
RSVA - Global Adjustment	1589	814,201
Recovery of Regulatory Asset Balances	1590	0
Disposition and Recovery/Refund of Regulatory Balances (2008) [†]	1595	0
Disposition and Recovery/Refund of Regulatory Balances (2009) [†]	1595	422,737
Disposition and Recovery/Refund of Regulatory Balances (2010) [†]	1595	
Disposition and Recovery/Refund of Regulatory Balances (2011) [†]	1595	
Disposition and Recovery/Refund of Regulatory Balances (2012) [†]	1595	
RSVA - Global Adjustment	1589	814,201
Total Group 1 Balance excluding Account 1589 - Global Adjustment		(881,408)
Total Group 1 Balance		(67,207)
LRAM Variance Account	1568	0
Total including Account 1568		(67,207)

- a) Account 1595 – Disposition and Recovery/Refund of Regulatory Balances
 Board staff notes that there is a discrepancy in the amount shown in Sheet 5 of the Rate Generator Model for Account 1595 (Cell BF 33), which is 422,737 and the equivalent amount shown in the RRR report 2.1.7 which is a credit of \$1,230,374.30. Please reconcile the RRR balance and the evidence filed in this case.

Wasaga Distribution Inc. (WDI) Response:

WDI's RRR report 2.1.7 for Account 1595 contains many subaccounts for different disposition years. As reported on our 2.1.1 December 31, 2013 filing Account 1595 is made up of the following subaccounts as listed in Table 1 below:

**Table 1
 Reconciliation of 1595 Sub Accounts**

Account 1595 - Disposition and Recovery/Refund of Regulatory Balances		
Account Description	Balance	RRR 2.1.7 Filing
Disposition and Recovery/Refund of Regulatory Balances (2009)¹	422,736.61	
Disposition and Recovery/Refund of Regulatory Balances (2010)	-197,813.10	
Disposition and Recovery/Refund of Regulatory Balances (2011)	-1,455,297.61	
TOTAL	-1,230,374.10	-1,230,374.30
¹ This is the only 1595 Account being requested for Disposition.		

WDI has shown that the amount reported and Account 1595 (2009) reconcile to the above table and no further adjustments to the Rate Model are necessary.

3. Ref: Manager’s Summary, page 10

Wasaga has requested a three-year disposition period for its Group 1 Account balances in order mitigate the rate impacts for customers. Board staff notes that the default disposition period for disposition of Group 1 Deferral and Variance Account balances is one year.

- a) Please illustrate the bill impacts on Wasaga’s ratepayers using a one-year and two-year disposition period for the Group 1 Account balances.

WDI Response:

WDI has illustrated the Bill Impacts for the rate payers for one-year, two-year and three-year disposition periods due to the adjustments made as a result of these interrogatories in Table 2 below.

**Table 2
 Rate Impact for 1-3 Year Disposition Periods**

		WDI Bill Impact Summary			1 YEAR DISPOSITION		
Customer Class	kWh	kW	Distribution Charges			Total Bill	
			\$	%		\$	%
Residential	800		13.71	98.36		12.19	11.65
GS < 50 kW	2,000		32.43	187.29		29.02	12.09
GS 50 - 4,999 kW		290	1,830.07	42.92		1,646.64	28.98
Unmetered Scattered Load	548		9.29	355.29		6.29	9.95
Street Lights		398	866.47	35.82		657.52	17.01
		WDI Bill Impact Summary			2 YEAR DISPOSITION		
Customer Class	kWh	kW	Distribution Charges			Total Bill	
			\$	%		\$	%
Residential	800		18.91	135.67		17.47	16.71
GS < 50 kW	2,000		45.83	264.68		42.65	17.77
GS 50 - 4,999 kW		290	823.45	19.31		622.91	10.96
Unmetered Scattered Load	548		7.14	349.92		6.17	9.77
Street Lights		398	-492.94	-20.38		-724.99	-18.75

		WDI Bill Impact Summary			3 YEAR DISPOSITION		
Customer Class	kWh	kW	Distribution Charges			Total Bill	
			\$	%		\$	%
Residential	800		16.43	117.88		14.95	14.30
GS < 50 kW	2,000		39.83	230.03		36.55	15.23
GS 50 - 4,999 kW		290	487.92	11.44		281.68	4.96
Unmetered Scattered Load	548		7.08	347.23		6.12	9.69
Street Lights		398	-946.15	-39.12		-1,185.90	-30.68

WDI would still like to request a 3 year disposition period.

Note: The WMP charge has not been separated out of the Bill Impact Summary for the GS 50 – 4,999 kW class.

4. A portion of Sheet 14 – RTSR RRR Data is reproduced below.

Rate Class	Rate Description	Unit	Non-Loss	Non-Loss
			Adjusted Metered kWh	Adjusted Metered kW
RESIDENTIAL	Retail Transmission Rate - Network Service Rate	\$/kWh	86,146,203	-
RESIDENTIAL	Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	86,146,203	-
GENERAL SERVICE LESS THAN 50 KW	Retail Transmission Rate - Network Service Rate	\$/kWh	16,655,687	-
GENERAL SERVICE LESS THAN 50 KW	Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	16,655,687	-
GENERAL SERVICE 50 TO 4,999 KW	Retail Transmission Rate - Network Service Rate	\$/kW	17,751,183	58,733
GENERAL SERVICE 50 TO 4,999 KW	Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	17,751,183	58,733
UNMETERED SCATTERED LOAD	Retail Transmission Rate - Network Service Rate	\$/kWh	264,753	-
UNMETERED SCATTERED LOAD	Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kWh	264,753	-
STREET LIGHTING	Retail Transmission Rate - Network Service Rate	\$/kW	1,796,174	5,310
STREET LIGHTING	Retail Transmission Rate - Line and Transformation Connection Service Rate	\$/kW	1,796,174	5,310

Staff notes that the data entered above does not reconcile to the RRR 2.1.5 data as filed by Wasaga, with the exception of Street Lighting rate class. Staff believes the following data should be applicable:

RRR 2.1.5		
Rate Class	Metered kWh	Metered kW
Residential	89,679,729	
GS <50 kW	18,699,809	
GS 50 to 4,999 kW	16,468,269	89,674
Unmetered Scattered Load	309,857	

- a) Please confirm if Wasaga agrees and staff will make the necessary corrections to the model. If not, please provide an explanation for the figures entered.

WDI Response:

WDI agrees to the amounts in the Table above and has made the necessary corrections to the model. WDI has made all the corrections to the Revised Rate Generator Model in order to submit its response regarding Question 8 in this document.

**5. Sheet 15 – RTSR – UTRs & Sub-Tx (as filed)
 Hydro One Sub-Transmission Rate Rider 9A**

Hydro One Sub-Transmission Rate Rider 9A	Unit	Effective January 1, 2013	Effective January 1, 2014	Effective January 1, 2015
Rate Description		Rate	Rate	Rate
RSVA Transmission network - 4714 - which affects 1584	kW	\$ -	\$ 0.1465	\$ 0.1465
RSVA Transmission connection - 4716 - which affects 1586	kW	\$ -	\$ 0.0667	\$ 0.0667
RSVA LV - 4750 - which affects 1550	kW	\$ -	\$ 0.0475	\$ 0.0475
RARA 1 - 2252 - which affects 1590	kW	\$ -	\$ 0.0419	\$ 0.0419
RARA 1 - 2252 - which affects 1590 (2008)	kW	\$ -	-\$ 0.0270	-\$ 0.0270
RARA 1 - 2252 - which affects 1590 (2009)	kW	\$ -	-\$ 0.0006	-\$ 0.0006
Hydro One Sub-Transmission Rate Rider 9A	kW	<u>\$ -</u>	<u>\$ 0.2750</u>	<u>\$ 0.2750</u>

Hydro One Sub-Transmission Rate Rider 9A is effective until December 31, 2014 (Hydro One Networks tariff, p.10, EB-2013-0141). Therefore set to zero in the “Effective January 1, 2015” column.

Hydro One Sub-Transmission Rate Rider 9A	Unit	Effective January 1, 2013	Effective January 1, 2014	Effective January 1, 2015
Rate Description		Rate	Rate	Rate
RSVA Transmission network - 4714 - which affects 1584	kW	\$ -	\$ 0.1465	
RSVA Transmission connection - 4716 - which affects 1586	kW	\$ -	\$ 0.0667	
RSVA LV - 4750 - which affects 1550	kW	\$ -	\$ 0.0475	
RARA 1 - 2252 - which affects 1590	kW	\$ -	\$ 0.0419	
RARA 1 - 2252 - which affects 1590 (2008)	kW	\$ -	-\$ 0.0270	
RARA 1 - 2252 - which affects 1590 (2009)	kW	\$ -	-\$ 0.0006	
Hydro One Sub-Transmission Rate Rider 9A	kW	\$ -	\$ 0.2750	\$ -

a) If Wasaga is in agreement, Board staff will make the relevant correction.

WDI Response:

Wasaga is in agreement and would like to note that WDI was unable to make the corrections to this error in the original Rate Generator Model as this area of the sheet is cell protected.

6. A portion of Sheet 15 – RTSR – UTRs & Sub-Tx is reproduced below.

Hydro One Sub-Transmission Rates	Unit	Effective January 1, 2013	Effective January 1, 2014	Effective January 1, 2015
Rate Description		Rate	Rate	Rate
Network Service Rate	kW	\$ 3.18	\$ 3.23	\$ 3.23
Line Connection Service Rate	kW	\$ 0.70	\$ 0.65	\$ 0.65
Transformation Connection Service Rate	kW	\$ 1.63	\$ 1.62	\$ 1.62
Both Line and Transformation Connection Service Rate	kW	\$ 2.33	\$ 2.27	\$ 2.27

A portion of Sheet 16 – RTSR Historical Wholesale is reproduced below.

Hydro One	Network			Line Connection			Transformation Connection			Total Line
Month	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Units Billed	Rate	Amount	Amount
January	23,690	\$1.50	\$ 35,535	23,690	\$1.50	\$ 35,535	22,224	\$2.65	\$ 58,894	\$ 94,429
February	22,694	\$1.50	\$ 34,041	22,694	\$1.50	\$ 34,041	20,265	\$2.65	\$ 53,702	\$ 87,743
March	20,221	\$1.50	\$ 30,332	20,221	\$1.50	\$ 30,332	16,011	\$2.65	\$ 42,429	\$ 72,761
April	17,416	\$1.50	\$ 26,124	17,416	\$1.50	\$ 26,124	17,229	\$2.65	\$ 45,657	\$ 71,781
May	24,697	\$1.50	\$ 37,046	24,697	\$1.50	\$ 37,046	22,817	\$2.65	\$ 60,465	\$ 97,511
June	27,399	\$1.50	\$ 41,099	27,399	\$1.50	\$ 41,099	26,571	\$2.65	\$ 70,413	\$ 111,512
July	33,121	\$1.50	\$ 49,682	33,121	\$1.50	\$ 49,682	30,090	\$2.65	\$ 79,739	\$ 129,420
August	28,120	\$1.50	\$ 42,180	28,120	\$1.50	\$ 42,180	25,669	\$2.65	\$ 68,023	\$ 110,203
September	19,015	\$1.50	\$ 28,523	19,015	\$1.50	\$ 28,523	19,015	\$2.65	\$ 50,390	\$ 78,912
October	20,682	\$1.50	\$ 31,023	20,682	\$1.50	\$ 31,023	19,119	\$2.65	\$ 50,665	\$ 81,688
November	22,881	\$1.50	\$ 34,322	22,881	\$1.50	\$ 34,322	21,798	\$2.65	\$ 57,765	\$ 92,086
December	23,821	\$1.63	\$ 36,730	23,821	\$1.63	\$ 36,730	23,605	\$3.18	\$ 66,589	\$ 103,319
Total	283,757	\$ 1.50	\$ 426,634	283,757	\$ 1.50	\$ 426,634	264,413	\$ 2.67	\$ 704,730	\$ 1,131,365

Wasaga has input a Network Service Rate of \$1.50, Line Connection Service Rate of \$1.50 and Transformation Connection Service Rate of \$2.65.

Board staff notes that Sheet 15 indicates a Network Service Rate of \$3.18, Line Connection Service Rate of \$0.70 and Transformation Connection Service Rate of \$1.63.

- a) If the Network, Line Connection and Transformation Connection Service Rates in Sheet 16 are in error, Board staff will make the relevant corrections.

WDI Response:

WDI thanks Board Staff for discovering this error. Not only did WDI use the wrong rates but has used the incorrect billing usage. Both of these errors have been corrected on the resubmitted Rate Generator Model.

7. A portion of Sheet 25 – Other Charges & LF is reproduced below.

LOSS FACTORS	
If the distributor is not capable of prorating changed loss factors jointly with distribution rates, the revised loss factors will be implemented upon the first subsequent billing for each billing cycle.	
Total Loss Factor – Secondary Metered Customer < 5,000 kW	1.0810
Distribution Loss Factor - Primary Metered Customer < 5,000 kW	1.0702

- a) Board staff notes that the description for “Distribution Total Factor – Primary Metered Customer < 5,000 kW - 1.0702” should be “Total Loss Factor – Primary Metered Customer < 5,000 kW – 1.0702”. If Wasaga is in agreement, Board staff will make the relevant correction.

WDI Response:

WDI agrees to the correction and has made the change on the Revised Rate Generator Model that will be submitted with these interrogatories.

8. Class A Consumers/Market Participants

Chapter 3 of the Filing Requirements notes that “distributors must establish separate rate riders to recover the balances in the RSVAs from Market Participants (“MPs”) who must not be allocated the RSVAs account balances related to charges for which the MPs settle directly with the IESO (e.g. wholesale energy, wholesale market services).”

Chapter 3 of the Filing Requirements also note that “distributors who serve Class A customers per O.Reg 429/04 (i.e. customers greater than 5 MW) must propose an appropriate allocation for the recovery of the global adjustment variance balance based on their settlement process with the IESO.

- a) Please confirm whether or not Wasaga serves any consumers that are Wholesale Market Participants (“WMPs”).
- i. If yes:
 - i. Have these consumers been WMPs throughout the entire time over which variances accumulated in the RSVA accounts proposed for disposition?
 - ii. Please confirm that RSVA account balances have not been allocated to WMP customers as they settle these charges directly with the IESO.
- b) Please confirm whether or not Wasaga serves any class A consumers that settle energy charges directly with Wasaga. If yes, please explain how balances in account 1589 (Global Adjustment) have been allocated to these consumers.

WDI Response (a&b):

WDI does not serve any Class A consumers who settle energy charges directly.

At the time of filing the 2015 IRM, WDI was unaware of the methods of calculating rate riders for WMPs. WDI chose to use a simplified method in calculating a WMP rate rider as WDI has one WMP. WDI’s calculation was similar to Bluewater Power Distribution’s 2014 IRM application as the calculation was specific to one customer group (General Service 50 – 4,999 kW), however, WDI did not calculate a separate rate class for the WMP.

Based on this IR, WDI has researched both the Bluewater Power Distribution’s method and the Enwin Utilities Ltd. method and has chosen the methodology provided by Enwin. WDI believes the Enwin methodology reflects the correct allocation of rate riders per customer class as this methodology provides for the calculation of the rate rider when grouped by the nature of the deferral and variance accounts.

Table 3 below shows the Rate Rider for Deferral and Variance accounts and the Global Adjustment Rate Rider as it was originally submitted in our 2015 IRM. The table also shows the new proposed Rate Rider for Deferral and Variance Accounts as well as the Global Adjustment Rate Rider with the WMP as a separate rate rider for the variance account balances that apply to that customer.

Table 3
Summary of Submitted and Newly Proposed Rate Riders

	IRM Submitted		EnWin's Methodology			
	Account Numbers Included	Rate Class	For MP	Not for MP	Rate Rider Deferral Variance C = A + B	Not For MP
	1550, 1551, 1580, 1584, 1586, 1588, 1595	1589	1550, 1551, 1584, 1586, 1595	1580, 1588		1589
		Rate Rider Deferral Variance	A	B		Rate Rider GA
RESIDENTIAL	0.0009	0.0053	0.0012	- 0.0003	0.0009	0.0061
GENERAL SERVICE LESS THAN 50 KW	0.0008	0.0053	0.0012	- 0.0003	0.0008	0.0061
GENERAL SERVICE 50 TO 4,999 KW - Non WMP	0.2326	2.0814	0.4625	- 0.1292	0.3333	2.2634
GENERAL SERVICE 50 TO 5,999 KW - WMP	0.0811		0.4625		0.4625	
UNMETERED SCATTERED LOAD	0.0002	-	0.0012	- 0.0003	0.0008	-
STREET LIGHTING	0.4033	1.8738	0.4164	- 0.1227	0.2937	2.1533

Table 4 details the calculation of the Rate Rider for the Deferral/Variance Account for all customer classes. The RSVA accounts included in this are: LV-1550, SME-1551, Network-1554, Connection-1586 and Disposition and Recovery/Refund of Regulatory Balances-1595.

Table 4
Detail Calculation All Customers (Accounts 1550, 1551, 1584, 1586, 1595)

Rate Rider for Deferral/Variance Account Disposition (All)						
Rate Class		Metered kWh (include WMP)	Metered kW (include WMP)	1595 Recovery Share Proportion	1551 (% of Accounts)	% kWh
RESIDENTIAL	\$/kWh	85,253,972	0	67.86%	93.9%	67.86%
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	17,532,074	0	13.95%	6.1%	13.95%
GENERAL SERVICE 50 TO 4,999 KW - Non WMP & WMP	\$/kW	20,862,622	52,968	16.61%	0.0%	16.61%
UNMETERED SCATTERED LOAD	\$/kWh	297,067	0	0.24%	0.0%	0.24%
STREET LIGHTING	\$/kW	1,691,769	4,771	1.35%	0.0%	1.35%
Total		125,637,504	57,739	100.0%	100.0%	100.0%

Rate Rider for Deferral/Variance Account Disposition (All)							3 year
Rate Class	1550	1584 (based on % kWh)	1586 (based on % kWh)	1595 (based on share proportion)	1551 (based on % of Accounts)	Total \$	Rate Rider inc WMP
RESIDENTIAL	44,913	31,054	-67,221	291,571	5,305	305,623	0.0012
GENERAL SERVICE LESS THAN 50 KW	9,236	6,386	-13,824	59,960	345	62,104	0.0012
GENERAL SERVICE 50 TO 4,999 KW - Non WMP & WMP	10,991	7,599	-16,450	71,351	0	73,491	0.4625
UNMETERED SCATTERED LOAD	156	108	-234	1,016	0	1,046	0.0012
STREET LIGHTING	891	616	-1,334	5,786	0	5,959	0.4164
Total	66,188	45,764	-99,063	429,684	5,651	448,224	

Table 5 details the calculation of the Rate Rider for Deferral/Variance Accounts for all non-WMP customer classes. The RSVA accounts included in this are WMS-1580 and Energy-1588.

Table 5
Detail Calculation Excluding WMP (Accounts 1580 and 1588)

Rate Rider for Deferral/Variance Account Disposition excluding WMP (125,637,504-3,605,486)								3 year	
Rate Class		Metered kWh (exclude WMP)	Metered kW (exclude WMP)	% kWh	1580 (based on % kWh)	GA (based on % kWh)	Total \$	Rate Rider excl WMP	
RESIDENTIAL	\$/kWh	85,253,972	0	69.9%	-57,757	-30,736	-88,493	-0.0003	
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	17,532,074	0	14.4%	-11,878	-6,321	-18,198	-0.0003	
GENERAL SERVICE 50 TO 4,999 KW - Non WMP	\$/kW	17,257,136	46,212	14.1%	-11,691	-6,222	-17,913	-0.1292	
UNMETERED SCATTERED LOAD	\$/kWh	297,067	0	0.2%	-201	-107	-308	-0.0003	
STREET LIGHTING	\$/kW	1,691,769	4,771	1.4%	-1,146	-610	-1,756	-0.1227	
Total		122,032,018	50,983	100.0%	-82,674	-43,995	-126,669.04		

Table 6 details the calculation of the Rate Rider for Global Adjustment (Account 1589), of which the WMP is excluded.

Table 6
Detail Calculation Global Adjustment, Excluded WMP

Rate Rider for Global Adjustment Sub-Account Disposition applicable only for Non-RPP Customers (excluding WMP)						3 year	
Rate Class		Metered non-RPP kWh (exclude WMP)	RPP kW (exclude WMP)	% kWh	1589(GA) (based on % kWh)	Rider Non RPP, excl WMP	
RESIDENTIAL	\$/kWh	4,603,714	0	19.0%	83,870	0.0061	
GENERAL SERVICE LESS THAN 50 KW	\$/kWh	1,227,245	0	5.1%	22,358	0.0061	
GENERAL SERVICE 50 TO 4,999 KW - Non WMP	\$/kW	16,652,120	44,676	68.9%	303,366	2.2634	
UNMETERED SCATTERED LOAD	\$/kWh	0	0	0.0%	0	0.0000	
STREET LIGHTING	\$/kW	1,691,769	4,771	7.0%	30,820	2.1533	
Total		24,174,848	49,447	100.0%	440,414		

The Revised IRM Rate Generator Model included with this submission does not provide for input of the above note Riders in Table 3. Therefore, WDI requests Board Staff to override the rate rider values in Sheet 8 of WDI's 2015 IRM Rate Generator model. In addition, WDI would respectfully request future IRM models provided by the Board be amended to allow for this rate rider to be calculated with the models provided.

All of which is respectfully submitted.