Ontario Energy Board P.O. Box 2319 27th. Floor 2300 Yonge Street Toronto ON M4P 1E4 Telephone: 416-481-1967 Facsimile: 416-440-7656 Toll free: 1-888-632-6273 Commission de l'énergie de l'Ontario C.P. 2319 27e étage 2300, rue Yonge Toronto ON M4P 1E4 Téléphone: 416-481-1967 Télécopieur: 416-440-7656 Numéro sans frais: 1-888-632-6273



BY EMAIL

November 16, 2015

Ontario Energy Board P.O. Box 2319 27th Floor 2300 Yonge Street Toronto ON M4P 1E4 Kirsten.Walli@ontarioenergyboard.ca

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli:

Re: Algoma Power Inc. (Algoma Power) 2016 Price Cap IR Distribution Rate Application OEB Staff Submission OEB File No. EB-2015-0051

In accordance with Decision and Procedural Order No.3, please find attached OEB staff's submission in the above proceeding. A Rural and Remote Rate Protection Adjustment factor is attached as Appendix A to this submission. The applicant has been copied on this filing.

Algoma Power's reply submission, if it intends to file one, is due by November 26, 2015.

Yours truly,

Stephen Vetsis Advisor, Electricity Rates and Prices

Encl.



ONTARIO ENERGY BOARD

STAFF SUBMISSION

2016 ELECTRICITY DISTRIBUTION RATES

Algoma Power Inc.

EB-2015-0051

November 16, 2015

OEB Staff Submission Algoma Power Inc. 2016 Price Cap IR Distribution Rate Application EB-2015-0051

Introduction

Algoma Power Inc. (Algoma Power) filed an application (the Application) with the Ontario Energy Board (OEB) on August 14, 2015, seeking approval for changes to the rates that Algoma Power charges for electricity distribution, to be effective January 1, 2016. The Application is based on the Price Cap IR option of the 2016 Incentive Regulation Mechanism (IRM).

The purpose of this document is to provide the OEB with the submissions of OEB staff based on its review of the evidence submitted by Algoma Power. With the exception of the specific issues identified below, OEB staff takes no issue with Algoma Power's proposals.

Rate Design for Residential Customers

In the Application, Algoma Power proposed to apply the first stage of the transition to fully fixed rates for residential customers in its Residential - R1 class. This proposal was made in response to the OEB's policy, *A New Residential Rate Design for Residential Electricity Customers* (EB-2012-0410) (the Policy), which was issued in April of 2015. The Policy requires that all distributors transition to a fully fixed rate design for residential customers over a four year transition period starting in 2016.

Under Ontario Regulation 445/07, each of Algoma Power's consumers who is "charged as a general service less than 50 kilowatt demand rate-class customer" and each of Algoma Power's consumers who is "charged for the distribution of electricity as having a demand of greater than 50 kilowatt rate-class customer" is required to be treated by the OEB as a residential customer for the purposes of fixing just and reasonable rates for a distributor under section 78 of the *Ontario Energy Board Act, 1998.* In other words, with the exception of those customers falling into the Seasonal, microFIT and Street Lighting rate classes, all of Algoma Power's customers fall within the Residential customer class. This reclassification was made effective as a result of the OEB's 2008 decision in EB-

2007-0744. The effect of this legislation is to permit virtually all of Algoma Power's customers to qualify for Rural and Remote Rate Protection (RRRP) funding.

In order to implement the Policy, Algoma Power has proposed to segregate its Residential – R1 class into two groups: (i) traditional residential customers and (ii) customers that qualify as residential under legislation. Algoma Power would only apply the transition to fully fixed rates for "traditional" residential customers.

In response to interrogatories, Algoma Power indicated that its billing system contains a unique identifier which allows it to directly identify whether a customer is a traditional residential customer or a general service customer. This identifier was then used to separate the sales data for each sub-group of customers in order to derive a unique set of base rates for each sub-group.

(i) RRRP Regulation

At issue in this proceeding is Algoma Power's proposal to maintain compliance with Ontario Regulation 445/07 and the EB-2007-0744 decision while also implementing the the Policy.

The Policy states that the OEB will not consider the new rate design for non-residential electricity customers until a future time. As summarized at page 2 of the Policy:

The OEB's general policy for rate design is to increase the amount of revenue collected through the fixed rate, and reduce the amount of revenue collected through the usage rate. We will implement this policy first with residential electricity customers. Next, we intend to review the rate design for low-volume general service customers (generally small businesses) and coordinate that rate design with changes in the larger general service categories, following the same policy reasons.

Algoma Power submits that in order for it to comply with the intent of the Policy, it must create a sub-class of traditional residential customers within its Residential - R1 customer class (while maintaining the complete overall class for the purposes of RRRP funding, IRM adjustments and revenue to cost ratio adjustments). In its response to VECC IR #1, Algoma Power provided as follows:

To accommodate what API has interpreted as the intent of the Board's Policy, API has segregated a subpopulation of the Residential R1 classification of customers. The Residential – R1 classification consists of three subpopulations of customer types commonly classified separately in the vast majority, if not all, of rate regulated distributors in Ontario; the three subpopulations are:

- 1. Residential
- 2. General Service less than 50 kW
- 3. Unmetered Scattered Load

In the API proposal, the subpopulation described as residential has been isolated from the remainder of the Residential – R1 classification and are made subject to the Board's Policy for the purpose of rate design. Therefore, API is not extending the Board's Policy to all of its residential classified customers. After further consideration, API should have stated that it is seeking Board approval on this proposal in the context of Ontario Regulation 445/07, instead of asking the Board to opine on it...if challenged by a Residential – R1 or Residential – R2 classified customer or group of customers, other than that group segregated in the residential subpopulation, the Board's Decision in this matter ought to prevail.

OEB staff supports Algoma Power's proposal. In the view of OEB staff, it is the intent of the Policy that the new rate design be applied only to generic residential customers (and not to other types of customers deemed "residential" by Ontario Regulation 445/07).

OEB staff notes that it was a stated objective of the OEB in preparing the Policy that there be a "uniform approach" to the application of the Policy among all distributors. OEB staff therefore submits that it would not be appropriate, at this time, to require Algoma Power to apply the new rate design to "General Service less than 50 kW" and "Unmetered Scattered Load" customers in Algoma Power's service territory deemed as residential under Ontario Regulation 445/07. In OEB staff's view, requiring Algoma Power to apply the Policy to customers who would otherwise be classified as "non-residential" by virtually all other Ontario distributors would not be a "uniform approach".

OEB staff submits that the OEB has the legal discretion to order Algoma Power to apply the Policy to only the traditional residential customers of the utility's Residential R1 class. It is well-established that regulatory policy can take the form of binding instruments and non-binding instruments. For example, codes, rules and orders in combined hearings dictate a binding general framework for application to specific circumstances. However, statements of OEB policy (like guidelines and, sometimes, reasons provided by OEB panels in hearings) serve to guide determinations made by OEB members in specific circumstances, and to shape applications submitted to the OEB. While OEB members are bound, as a matter of law, by the application of Ontario Regulation 445/07, the same is not true in respect of non-binding forms of regulatory policy, such as the Policy. In OEB staff's view, the Policy is intended to guide OEB members in the exercise of their decision-making discretion. It is subject to review and modification, as warranted, by OEB members in their application of it in their individual decisions. The legal principles underlying policy guidelines was discussed by the OEB at page 8 of its EB-2009-0139 Decision, issued April 9, 2010:

The legal principles that underlie the development and use of policy guidelines by administrative tribunals are well established and of long standing. Effective decision making by administrative tribunals often involves striking a balance between the benefits of certainty and consistency on the one hand, and flexibility and fact-specific solutions on the other. The use of policy guidelines to achieve an acceptable level of consistency in administrative decision making is particularly important for tribunals exercising discretion in the performance of adjudicative functions. Tribunals are permitted to issue guidelines, policy statements and handbooks setting out how the tribunal is likely to exercise its statutory discretion on a matter which is before it on a regular basis provided the guidelines are not applied as if they were law, and the regulator's discretion is not pre-empted.

More recently, the OEB re-affirmed that principle in the context of a decision on the policy and filing requirements relating to working capital, stating (at page 7 of its EB-2014-0155 Decision and Order, issued July 31, 2014):

The Board has considered all of the submissions and agrees with the parties on the principal point that it can establish guidelines, policies and other nonbinding instruments and that it can utilize those instruments to inform its decision-making. However, those instruments cannot be treated as binding.

In summary, OEB staff submits that the panel accept Algoma Power's proposal which would result in applying the intent of the Policy to Algoma Power's unique situation.

(ii) Tariff of Rates and Charges

Algoma Power's tariff of rates and charges (Tariff) states that a service is considered "Residential" if it meets one of the two following criteria:

i) is a dwelling occupied as a residence continuously for at least eight months of the year and, where the residential premises is located on a farm, includes other farm premises associated with the residential electricity meter, and

ii) consumers who are treated as residential-rate class customers under Ontario Regulation 445/07 (Reclassifying Certain Classes of Consumers as Residential-Rate Class Customers: Section 78 of the Ontario Energy Board Act, 1998) made under the Ontario Energy Board Act, 1998.

Algoma Power is proposing that the Tariff for its R1 class have two sets of base rates. One set which has no label and applies to R1 customers that meet criteria (i) above and another set, labeled General Service, which applies to R1 customers that meet criteria (ii) above. Algoma Power confirmed that only one set of base rates would apply to each customer depending on whether that customer meets criteria (i) or (ii). Algoma Power did not propose any additional wording on the Tariff to clarify which set of base rates applies for a particular customer.

Algoma Power noted that the customers in its billing system have a unique identifier which determines whether they are a generic residential customer or a general service customer and which would allow Algoma Power to apply different base rates to different groups of customers. OEB staff takes no issue with this approach but submits that the base rates in the Tariff must be clearly labeled to indicate that each set applies only to one sub-group of R1 customer. OEB staff does believes it would be unclear to an individual who has not participated in the proceeding that only one set of base rates applies to a customer in the R1 class.

Should the OEB approve Algoma Power's proposal to segregate the R1 class, OEB staff submits that the OEB should apply the following labels to the base rates approved in Algoma Power's final Tariff where (i) and (ii) represent the two criteria in the description for the Residential class.

Service Charge – Applicable only to customers that meet criteria (i) above Service Charge – Applicable only to customers that meet criteria (ii) above

A similar label should apply to the corresponding volumetric rates.

(iii) Proposal for Mitigation

The Policy requires that distributors transition to a fully fixed rate design over a four year period but states that exceptions to the four year transition period will be considered where a distributor's fixed charge would increase by greater than \$4 in a given rate year. Algoma Power stated that its fixed charge would have to increase by \$7.35 per rate year if it were to complete the transition to fully fixed rates in four years and, as a result, Algoma Power has requested an exception and submitted a proposal for mitigation.

Under Algoma Power's proposal, the fixed charge for residential customers in the R1 class would increase by \$4 in each rate year. Algoma Power stated that it chose this approach as it believed that \$4 was the maximum allowable increase under the Policy. Algoma Power stated that it believes rate stability is an important factor for its customers and, as such, it proposed to cap the annual increase to its fixed charge at \$4 per rate year. At this rate, Algoma Power would take 8 rate years to complete its transition. OEB staff notes that Algoma Power is one of few distributors that would require more than five years to transition to fully fixed rates with a change to the fixed charge that is less than \$4 per rate year.¹ OEB staff submits that Algoma Power's approach to mitigating the impact of the change in rate design is appropriate and adequately considers the needs of its customers.

¹ See OEB staff's presentation at Meeting #2 of the Rate Design Working Group.

http://www.ontarioenergyboard.ca/oeb/Industry/Regulatory+Proceedings/Policy+Initiatives+and+Consultations/R ate+Design+for+Distributors+%28EB-2012-0410%29/Rate+Design+Working+Group+%28RDWG%29

OEB staff also notes that it would be expected that Algoma would rebase during this transition period. Staff submits that while this \$4 per rate year shift could be adopted for the four remaining years of its Price Cap IR term, that Algoma may wish to re-evaluate whether a faster pace of change could be undertaken at its next rebasing, given the OEB's stated interest in "balancing considerations of customer impact with achieving the objectives of the policy and maintaining a similar timeline for all distributors"².

(iv) Rate Design for Seasonal Customers

Algoma did not propose to alter the rate design for customers in its Seasonal Class. Chapter 3 of the Filing Requirements states that "distributors with a seasonal residential class must propose identical rate design treatment for such a class." Algoma Power noted that, under O.Reg. 442/01, residential rate class customers are eligible to receive RRRP funding. Algoma Power stated that its Seasonal rate classification customers have purposely not been treated as residential customers in the past and that this principle has been consistently applied since its 2007 cost of service rate application.

OEB staff noted that the descriptions for both the Seasonal class and for standard residential customers within the Residential - R1 class on Algoma Power's state that a service must be used as a "dwelling." OEB staff asked Algoma Power why the Seasonal class would not be considered as a seasonal residential class. Algoma Power replied that consistent application of RRRP regulation has excluded seasonal customers from the residential classification and that OEB staff's reasoning about the status of seasonal customers as a form of residential user, if extended to this issue, would suggest seasonal customers ought to be eligible for RRRP funding.

OEB staff notes that Algoma Power has attempted to "accommodate what [it] has interpreted as the intent of the [OEB's] Policy" in its proposal to segregate the R1 class. For the purposes of implementing the rate design policy for the R1 class, Algoma Power has applied a definition of a residential customer that is different from RRRP regulation. OEB staff sees no reason why Algoma Power cannot apply the rate design policy to its Seasonal rate class and continue to ensure that the class does not receive RRRP funding. It is clear from the Filing Requirements that the OEB expects distributors to

² EB-2012-0410, Board Policy - A New Distribution Rate Design for Residential *Electricity Customers*, p 25.

apply a fully fixed rate design to seasonal residential class. OEB staff submits that Algoma Power should apply the fully fixed rate design to its Seasonal class.

In response to OEB staff interrogatory #3, Algoma Power estimated that it would take nine years for its Seasonal class to transition to a fully fixed rate design if the fixed charge were increased by \$3.72 per rate year. Algoma Power also noted that the total bill impact for a 50 kWh customer in the Seasonal class would be less than 10% if this approach was used.³ OEB staff submits that the OEB should adopt the approach Algoma Power outlined in its response above to transition its Seasonal class to a fully fixed rate design as it consistent with the approach proposed for the R1 class. Similarly, OEB staff submits that the length of the transition period be re-evaluated at Algoma Power's next rebasing, in order that the balancing of Policy's objectives and the utility's customer impacts can be considered once again

³ Consistent with the Filing Requirements, a 50kWh customer was used to calculate the bill impact for a low-volume customer as this amount was greater than the average consumption of a Seasonal customer at the 10th percentile.

SCHEDULE A

ALGOMA POWER INC.

RURAL AND REMOTE RATE PROTECTION ADJUSTMENT FACTOR

EB-2015-0051

NOVEMBER 16, 2015

Applicant Name	Class	MFC 2015	VC 2015	MFC 2014	VC 2014	TB 2015	TB 2014	\$ Chg	% Chg	Average % Chg
Atikokan Hydro Inc.	Residential	34.98	11.12	34.58	10.96	46.10	45.54	0.56	1.23%	1
Atikokan Hydro Inc.	GS < 50	76.23	19.20	75.38	19.00	95.43	94.38	1.05	1.11%	1
Bluewater Power Distribution Corporation	Residential	15.90	17.36	15.70	17.12	33.26	32.82	0.44	1.34%	1
Bluewater Power Distribution Corporation	GS < 50	27.32	38.20	26.97	37.80	65.52	64.77	0.75	1.16%	1.25%
Brant County Power Inc.	Residential	11.22	16.88	11.22	16.88	28.10	28.10	0.00	0.00%	4
Brant County Power Inc.	GS < 50	17.36	36.00	17.36	36.00	53.36	53.36	0.00	0.00%	
	00.000	17.000	50.00	17.00	50.00	55.50	55.50	0.00	0.007	0.0070
Brantford Power Inc.	Residential	11.98	9.12	11.83	11.36	21.10	23.19	-2.09	-9.01%	
Brantford Power Inc.	GS < 50	25.99	13.60	25.66	13.40	39.59	39.06	0.53	1.36%	-3.83%
										-
Burlington Hydro Inc.	Residential	12.03	13.12	11.88	12.96	25.15	24.84	0.31	1.25%	
Burlington Hydro Inc.	GS < 50	25.09	27.00	24.77	26.60	52.09	51.37	0.72	1.40%	1.32%
Cambridge and North Dumfries Hydro Inc.	Residential	11.14	14.40	11.00	14.24	25.54	25.24	0.30	1.19%	-
Cambridge and North Dumfries Hydro Inc.	GS < 50	13.17	28.20	13.00	27.80	41.37	40.80	0.57	1.40%	
,										
Canadian Niagara Power Inc. (Average)	Residential	19.21	16.45	18.50	16.80	35.66	35.30	0.36	1.01%	
Canadian Niagara Power Inc. (Average)	GS < 50	27.07	46.00	26.03	45.93	73.07	71.97	1.10	1.53%	1.27%
Courtee Midlington Under Ltd	Desidential	45.62	44.52	45.40	44.20	27.45	26.70	0.26	4.2.40	-
Centre Wellington Hydro Ltd. Centre Wellington Hydro Ltd.	Residential GS < 50	15.63 17.83	11.52 37.20	15.43 17.60	11.36 36.80	27.15 55.03	26.79 54.40	0.36	1.34%	1.25%
	03 < 50	17.05	57.20	17.00	50.60	55.05	54.40	0.05	1.10%	1.25%
Chapleau Public Utilities Corporation	Residential	24.04	11.20	23.77	11.04	35.24	34.81	0.43	1.24%	1
Chapleau Public Utilities Corporation	GS < 50	35.18	35.80	34.78	35.40	70.98	70.18	0.80	1.14%	
COLLUS Power Corporation	Residential	10.15	15.92	10.02	15.68	26.07	25.70	0.37	1.44%	
COLLUS Power Corporation	GS < 50	20.28	27.00	20.02	26.60	47.28	46.62	0.66	1.42%	1.43%
Conservative Under Freihaus Inc.	Desidential	44.77	44.04	1150	40.00	25.04	25.44	0.07	4 450	-
Cooperative Hydro Embrun Inc. Cooperative Hydro Embrun Inc.	Residential GS < 50	14.77 17.23	11.04 28.40	14.56 16.98	10.88 28.00	25.81 45.63	25.44 44.98	0.37	1.45%	1.45%
	03 < 30	17.23	28.40	10.56	28.00	43.03	44.50	0.05	1.437	1.4370
E.L.K. Energy Inc.	Residential	11.44	6.48	11.26	6.40	17.92	17.66	0.26	1.47%	
E.L.K. Energy Inc.	GS < 50	15.45	9.80	15.21	9.60	25.25	24.81	0.44	1.77%	1.62%
Enersource Hydro Mississauga Inc.	Residential	13.22	10.64	13.03	10.48	23.86	23.51	0.35	1.49%	
Enersource Hydro Mississauga Inc.	GS < 50	40.68	23.80	40.10	23.40	64.48	63.50	0.98	1.54%	1.52%
ENWIN Utilities Ltd.	Residential	11.05	16.48	10.94	16.32	27.53	27.26	0.27	0.99%	-
ENVIN Utilities Ltd.	GS < 50	26.05	33.60	25.79	33.20	59.65	58.99	0.27	1.12%	1.05%
	03 4 30	20.05	55.00	25.75	55.20	55.05	50.55	0.00	1.12/	1.05/0
Erie Thames Powerlines Corporation	Residential	15.64	14.56	15.44	14.40	30.20	29.84	0.36	1.21%	
Erie Thames Powerlines Corporation	GS < 50	21.55	28.00	21.27	27.60	49.55	48.87	0.68	1.39%	1.30%
Espanola Regional Hydro Distribution Corporation	Residential	14.07	13.60	13.87	13.44	27.67	27.31	0.36	1.32%	
Espanola Regional Hydro Distribution Corporation	GS < 50	25.22	41.40	24.86	40.80	66.62	65.66	0.96	1.46%	1.39%
Essex Powerlines Corporation	Residential	12.94	12.16	12.94	12.16	25.10	25.10	0.00	0.00%	-
Essex Powerlines Corporation	GS < 50	33.87	23.20	33.87	23.20	57.07	57.07	0.00	0.00%	
Festival Hydro Inc.	Residential	16.37	13.12	15.18	13.52	29.49	28.70	0.79	2.75%	
Festival Hydro Inc.	GS < 50	30.66	30.40	29.44	29.80	61.06	59.24	1.82	3.07%	2.91%
Greater Sudbury Hydro Inc.	Residential	16.19	9.92	16.01	9.84	26.11	25.85	0.26	1.01%	
Greater Sudbury Hydro Inc.	GS < 50	21.64	37.40	21.39	37.00	59.04	58.39	0.65	1.11%	1.06%
Fort Frances Power Corporation	Residential	18.88	11.04	18.64	10.88	29.92	29.52	0.40	1.36%	-
Fort Frances Power Corporation	GS < 50	43.68	11.04	43.12	10.88	63.48	62.72	0.40	1.21%	
	03 4 30	43.00	15.00	43.12	15.00	05.40	02.72	0.70	1.21/	1.20/0
Grimsby Power Inc.	Residential	15.69	9.68	15.47	9.52	25.37	24.99	0.38	1.52%	
Grimsby Power Inc.	GS < 50	26.67	26.20	26.29	25.80	52.87	52.09	0.78	1.50%	1.51%
Guelph Hydro Electric Systems Inc.	Residential	14.49	14.08	14.30	13.92	28.57	28.22	0.35	1.24%	
Guelph Hydro Electric Systems Inc.	GS < 50	15.57	26.20	15.37	25.80	41.77	41.17	0.60	1.46%	1.35%
Haldimand County Hydro Inc.	Residential	17.02	19.84	17.02	19.84	36.86	36.86	0.00	0.00%	4
Haldimand County Hydro Inc. Haldimand County Hydro Inc.	GS < 50	26.94	19.84 38.00	26.92	38.00	36.86 64.94	36.86	0.00	0.00%	0.02%
	00 \ 00	20.74	56.00	20.52	56.00	04.54	04.92	0.02	5.0570	0.02/8
Halton Hills Hydro Inc.	Residential	12.72	9.60	12.52	9.44	22.32	21.96	0.36	1.64%	1
Halton Hills Hydro Inc.	GS < 50	27.51	17.00	27.08	16.80	44.51	43.88	0.63	1.44%	
Horizon Utilities Corporation	Residential	15.72	12.40	14.92	11.76	28.12	26.68	1.44	5.40%	
					-		-			
Horizon Utilities Corporation	GS < 50	39.14	20.20	33.21	17.20	59.34	50.41	8.93	17.71%	11.56%
Horizon Utilities Corporation Horizon Utilities Corporation			20.20	33.21	17.20	59.34 28.12	50.41 26.68	8.93 1.44	17.71%	

Applicant Name	Class	MFC 2015	VC 2015	MFC 2014	VC 2014	TB 2015	TB 2014	\$ Chg	% Chg	Average % Chg
Horizon Utilities Corporation	GS < 50	39.14	20.20	33.21	17.20	59.34	50.41	8.93	17.71%	11.56%
Hydro 2000 Inc.	Residential	14.87	12.00	14.68	11.84	26.87	26.52	0.35	1.32%	-
Hydro 2000 Inc.	GS < 50	22.12	12.00	21.84	19.00	41.32	40.84	0.33	1.18%	1.25%
Hydro Hawkesbury Inc.	Residential	7.17	7.84	7.06	7.68	15.01	14.74	0.27	1.83%	
Hydro Hawkesbury Inc.	GS < 50	15.15	12.00	14.91	11.80	27.15	26.71	0.44	1.65%	1.74%
Hudro One Brampton Natworks Inc.	Residential	11.07	12.40	10.10	11.76	23.47	21.86	1.61	7.37%	
Hydro One Brampton Networks Inc. Hydro One Brampton Networks Inc.	Residential GS < 50	24.39	32.20	10.10	32.00	56.59	50.23	6.36	12.66%	10.01%
	00.00	2.1.55	52.20	10.25	52.00	50.55	50.25	0.50	12:0070	1010170
Hydro Ottawa Limited	Residential	9.67	18.72	9.55	18.48	28.39	28.03	0.36	1.28%	
Hydro Ottawa Limited	GS < 50	16.72	42.00	16.51	41.40	58.72	57.91	0.81	1.40%	1.34%
		20.45		22.42		05.04		0.40		-
Innisfil Hydro Distribution Systems Limited Innisfil Hydro Distribution Systems Limited	Residential GS < 50	20.45 33.72	14.56 16.40	20.19 33.29	14.40 16.20	35.01 50.12	34.59 49.49	0.42	1.21%	1.24%
innishi Hydro Distribution Systems Linnited	63 < 50	55.72	10.40	55.29	10.20	50.12	49.49	0.05	1.2770	1.24%
Kenora Hydro Electric Corporation Ltd.	Residential	19.43	11.36	19.24	11.28	30.79	30.52	0.27	0.88%	
Kenora Hydro Electric Corporation Ltd.	GS < 50	38.15	12.00	37.77	11.80	50.15	49.57	0.58	1.17%	1.03%
Kingston Hydro Corporation	Residential	12.56	12.32	12.40	12.16	24.88	24.56	0.32	1.30%	
Kingston Hydro Corporation	GS < 50	25.85	21.20	25.52	21.00	47.05	46.52	0.53	1.14%	1.22%
Kitchener-Wilmot Hydro Inc.	Residential	10.65	13.12	10.50	12.96	23.77	23.46	0.31	1.32%	
Kitchener-Wilmot Hydro Inc.	GS < 50	26.13	25.20	25.76	24.80	51.33	50.56	0.31	1.52%	1.42%
	00.00	20110	20120	25070	2 1100	51.55	50.50	0.77	102/0	1112/0
Lakefront Utilities Inc.	Residential	10.27	11.84	10.12	11.68	22.11	21.80	0.31	1.42%	
Lakefront Utilities Inc.	GS < 50	23.50	16.80	23.16	16.60	40.30	39.76	0.54	1.36%	1.39%
Lakeland Power Distribution Ltd.	Residential	20.23	11.84	19.94 43.19	11.68	32.07	31.62 60.79	0.45	1.42%	1 20%
Lakeland Power Distribution Ltd.	GS < 50	43.82	17.80	43.19	17.60	61.62	60.79	0.83	1.37%	1.39%
London Hydro Inc.	Residential	13.51	12.72	13.32	12.56	26.23	25.88	0.35	1.35%	
London Hydro Inc.	GS < 50	31.63	20.40	31.18	20.20	52.03	51.38	0.65	1.27%	1.31%
Entegrus Powerlines Inc. (Average)	Residential	14.84	9.74	14.63	9.60	24.58	24.23	0.35	1.45%	
Entegrus Powerlines Inc. (Average)	GS < 50	26.07	17.20	25.69	16.90	43.27	42.59	0.67	1.58%	1.52%
Midland Power Utility Corporation	Residential	15.60	16.40	15.42	16.24	32.00	31.66	0.34	1.07%	
Midland Power Utility Corporation	GS < 50	21.94	32.40	21.69	32.00	54.34	53.69	0.65	1.21%	1.14%
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Milton Hydro Distribution inc.	Residential	15.43	11.52	15.21	11.36	26.95	26.57	0.38	1.43%	
Milton Hydro Distribution inc.	GS < 50	16.42	34.80	16.19	34.40	51.22	50.59	0.63	1.25%	1.34%
		10.10		10.00	40.00			1.00		-
Niagara Peninsula Energy Inc. Niagara Peninsula Energy Inc.	Residential GS < 50	18.43 37.76	14.80 27.60	16.06 37.79	12.88 27.60	33.23 65.36	28.94 65.39	4.29	14.82% -0.05%	7.39%
Nagara Pennisula Litergy inc.	03 < 30	37.70	27.00	37.75	27.00	05.30	03.35	-0.03	-0.0376	1.33%
Niagara-on-the-Lake Hydro Inc.	Residential	18.17	10.24	17.94	10.08	28.41	28.02	0.39	1.39%	
Niagara-on-the-Lake Hydro Inc.	GS < 50	37.76	22.60	37.28	22.40	60.36	59.68	0.68	1.14%	1.27%
North Bay Hydro Distribution Limited	Residential	14.64	10.48	14.64	10.48	25.12	25.12	0.00	0.00%	
North Bay Hydro Distribution Limited	GS < 50	21.69	33.40	21.69	33.40	55.09	55.09	0.00	0.00%	0.00%
Northern Ontario Wires Inc.	Residential	21.03	12.80	20.70	12.56	33.83	33.26	0.57	1.71%	
Northern Ontario Wires Inc.	GS < 50	27.69	31.00	27.25	30.60	58.69	57.85	0.84	1.45%	1.58%
Oakville Hydro Electricity Distribution Inc.	Residential	14.59	12.72	14.42	12.56	27.31	26.98	0.33	1.22%	
Oakville Hydro Electricity Distribution Inc.	GS < 50	35.11	31.00	34.71	30.60	66.11	65.31	0.80	1.22%	1.22%
Orangeville Hydro Limited	Residential	15.45	10.64	15.25	10.48	26.09	25.73	0.36	1.40%	
Orangeville Hydro Limited	GS < 50	31.62	19.20	31.21	19.00	50.82	50.21	0.61	1.21%	1.31%
Orillia Power Distribution Corporation	Residential	14.02	13.36	13.84	13.20	27.38	27.04	0.34	1.26%	1
Orillia Power Distribution Corporation	GS < 50	36.76	32.40	36.29	32.00	69.16	68.29	0.87	1.27%	1.27%
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Oshawa PUC Networks Inc.	Residential	8.47	9.60	8.47	9.60	18.07	18.07	0.00	0.00%	
Oshawa PUC Networks Inc.	GS < 50	8.38	34.00	8.38	34.00	42.38	42.38	0.00	0.00%	0.00%
Ottowa Biyor Dowor Correction	Destrictments	10.00	42.00	10.00	12.00	22.00	22.00	0.00	0.000	
Ottawa River Power Corporation Ottawa River Power Corporation	Residential GS < 50	10.99 22.97	12.00 21.00	10.99 22.97	12.00 21.00	22.99 43.97	22.99 43.97	0.00	0.00%	
	03 \ 30	22.37	21.00	22.37	21.00	-3.37	+3.37	0.00	0.00%	0.00%
Parry Sound Power Corporation	Residential	22.50	14.32	22.21	14.16	36.82	36.37	0.45	1.24%	1

Applicant Name	Class	MFC 2015	VC 2015	MFC 2014	VC 2014	TB 2015	TB 2014	\$ Chg	% Chg	Average % Chg
[1
Peterborough Distribution Incorporated	Residential	12.57	9.84	12.43	9.76	22.41	22.19	0.22	0.99%	
Peterborough Distribution Incorporated	GS < 50	30.62	17.40	30.27	17.20	48.02	47.47	0.55	1.16%	1.08%
PowerStream Inc. (Average)	Residential	12.67	11.20	12.51	11.04	23.87	23.55	0.32	1.36%	-
PowerStream Inc. (Average)	GS < 50	26.08	27.80	25.75	27.40	53.88	53.15	0.73	1.37%	1.37%
		0.04	10.00	0.00	10.50	22.50		0.07		4
PUC Distribution Inc. PUC Distribution Inc.	Residential GS < 50	9.91 16.87	13.68 40.40	9.80 16.68	13.52 40.00	23.59 57.27	23.32 56.68	0.27	1.16%	1.10%
	00 100	10107	10110	10.00	10100	57127	50.00	0.00	110 174	1110/0
Renfrew Hydro Inc.	Residential	13.97	11.60	13.83	11.52	25.57	25.35	0.22	0.87%	
Renfrew Hydro Inc.	GS < 50	31.25	27.40	30.94	27.20	58.65	58.14	0.51	0.88%	0.87%
Rideau St. Lawrence Distribution Inc.	Residential	13.19	12.00	13.02	11.84	25.19	24.86	0.33	1.33%	-
Rideau St. Lawrence Distribution Inc.	GS < 50	30.52	18.40	30.13	18.20	48.92	48.33	0.59	1.22%	1.27%
Sioux Lookout Hydro Inc.	Residential	27.00	9.28	26.65	9.20	36.28	35.85	0.43	1.20%	
Sioux Lookout Hydro Inc.	GS < 50	42.10	16.00	41.56	15.80	58.10	57.36	0.74	1.29%	1.24%
St. Thomas Energy Inc.	Residential	14.21	13.44	11.53	12.80	27.65	24.33	3.32	13.65%	-
St. Thomas Energy Inc.	GS < 50	23.20	31.60	17.47	30.20	54.80	47.67	7.13	14.96%	14.30%
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Thunder Bay Hydro Electricity Distribution Inc.	Residential	12.98	10.08	12.81	9.92	23.06	22.73 53.52	0.33	1.45%	1.420/
Thunder Bay Hydro Electricity Distribution Inc.	GS < 50	26.66	27.60	26.32	27.20	54.26	53.52	0.74	1.38%	1.42%
Tillsonburg Hydro Inc.	Residential	10.25	19.36	10.13	19.12	29.61	29.25	0.36	1.23%	
Tillsonburg Hydro Inc.	GS < 50	25.60	35.80	25.31	35.40	61.40	60.71	0.69	1.14%	1.18%
Toronto Hydro-Electric System Limited	Residential	18.63	12.30	18.63	12.30	30.93	30.93	0.00	0.00%	-
Toronto Hydro-Electric System Limited	GS < 50	24.80	45.86	24.80	45.86	70.66	70.66	0.00	0.00%	0.00%
	D	10.01	10.00	10.77	10.70	25.02	25.40	0.00	1 200	-
Veridian Connections Inc. Veridian Connections Inc.	Residential GS < 50	12.94 16.34	12.88 32.80	12.77 16.13	12.72 32.40	25.82 49.14	25.49 48.53	0.33	1.29%	1.28%
	03 < 30	10.34	52.00	10.15	52.40	45.14	40.55	0.01	1.20/	1.2070
Wasaga Distribution Inc.	Residential	11.57	11.52	11.39	11.36	23.09	22.75	0.34	1.49%	
Wasaga Distribution Inc.	GS < 50	13.54	27.40	13.33	27.00	40.94	40.33	0.61	1.51%	1.50%
Waterloo North Hydro Inc.	Residential	15.20	15.36	15.00	15.20	30.56	30.20	0.36	1.19%	-
Waterloo North Hydro Inc.	GS < 50	31.96	28.60		28.20	60.56	59.75	0.81	1.36%	1.27%
Walland Ludza Electric System Corp.	Desidential	10.10	10.00	15.00	10.00	27.00	20 70	0.39	1.46%	-
Welland Hydro-Electric System Corp. Welland Hydro-Electric System Corp.	Residential GS < 50	16.13 28.67	10.96 16.80	15.90 28.26	10.80 16.60	27.09 45.47	26.70 44.86	0.39	1.46%	1.41%
	00 100	20107	10.00	20120	10.00	13117	1.100	0.01	1.50%	1.11/0
Wellington North Power Inc.	Residential	18.49	14.80	18.28	14.64	33.29	32.92	0.37	1.12%	
Wellington North Power Inc.	GS < 50	39.25	33.60	38.80	33.20	72.85	72.00	0.85	1.18%	1.15%
West Coast Huron Energy Inc.	Residential	17.88	18.48	17.70	18.32	36.36	36.02	0.34	0.94%	-
West Coast Huron Energy Inc.	GS < 50	31.76	21.80	31.45	21.60	53.56	53.05	0.51	0.96%	0.95%
Westario Power Inc.	Residential	12.66	12.64	12.50	13 49	25.30	24.00	0.22	1.28%	
Westario Power Inc.	GS < 50	24.30	21.80	23.99	12.48 21.60	46.10	24.98 45.59	0.32	1.28%	1.20%
Whitby Hydro Electric Corporation	Residential	17.90	11.84	17.67	11.68	29.74	29.35	0.39	1.33%	
Whitby Hydro Electric Corporation	GS < 50	20.68	40.60	20.41	40.00	61.28	60.41	0.87	1.44%	1.38%
Woodstock Hydro Services Inc.	Residential	12.98	17.76	12.98	17.76	30.74	30.74	0.00	0.00%	1
Woodstock Hydro Services Inc.	GS < 50	25.19	29.00		29.00	54.19	54.19	0.00	0.00%	

Average Percent Change 1.80%