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January 11, 2016

Ms. Kirsten Walli
Ontario Energy Board
PO Box 2319
27th Floor, 2300 Yonge Street
Toronto, Ontario M4P 1E4

Re: 2016 COS Rates Application, Clarification Question Responses
Board File No.: EB-2015-0061

Dear Ms. Walli,

Entegrus Powerlines Inc. has prepared responses to Clarification Questions received from VECC and Energy Probe. Responses to all questions received are included in the attached file.

If you have any further questions, please do not hesitate to contact me at (519) 352-6300 Ext 243 or via email at andrya.eagen@entegrus.com.

Regards,

[Original Signed By]

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2016 Cost of Service Application

Clarification Question Responses

EB-2015-0061

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Exhibit 7: Cost Allocation

CQ7-A Street Light Profile

Exhibit 2: Rate Base

QUESTION: ENERGY PROBE – CQ 1

Reference: IR 2-EnergyProbe-3 and IR 2-EnergyProbe-9

Is all of the fully allocated depreciation expense of \$407,582 (updated) included in OM&A or is part of it capitalized? If the latter, please show the amount capitalized and the amount included in OM&A for 2016.

Response

The \$407,582 represents only the portion of vehicle depreciation that is allocated to capital or recoverable jobs based on nature of the work performed when using the vehicles. No portion of the amount is included in OM&A.

QUESTION: ENERGY PROBE – CQ 2

Reference: IR 2-EnergyProbe-6, IR 9-EnergyProbe-44 and IR 9-EnergyProbe-46

- a) If directed by the Board, would EPI be able to calculate and collect separate rate riders for the stranded meters in the former Chatham-Kent Hydro and Middlesex Power Distribution?
- b) What would be the rate rider if it was calculated separately for each rate zone based on the costs shown by rate zone in Table 64 in 9-Energy Probe-64?

Response

- a) Yes.
- b) Please see Table 1: Stranded Meter Rate Riders by Rate Zone below.

TABLE 1: STRANDED METER RATE RIDERS BY RATE ZONE

Line No.	Description	Billing Unit	Rate Rider
1	CK		
2	Residential	Customer	\$0.18
3	General Service <50	kWh	\$0.0012
4	General Service >50	kW	\$0.0528
5	SMP		
6	Residential	Customer	\$0.23
7	General Service <50	kWh	\$0.0026
8	General Service >50	kW	\$0.1007
9	Dutton		
10	Residential	Customer	\$1.49
11	General Service <50	kWh	\$0.0005
12	Newbury		
13	Residential	Customer	\$1.57
14	General Service <50	kWh	\$0.0014
15	General Service >50	kW	\$0.0214

QUESTION: ENERGY PROBE – CQ 3**Reference: IR 2-EnergyProbe-10**

Is the net book value of \$372,626 shown in Table 8 the year end net book value or the average net book value for 2016? If the former, please provide the corresponding year end net book value at the end of 2015.

Response

The net book value of \$372,626 shown in Table 8 is the year-end net book value for 2016. Please see Table 2 below for the corresponding year-end net book value at the end of 2015.

TABLE 2: NON-REGULATED WATER ASSETS

Asset Class	Net Book Value - 2015 Bridge Year
Computer Equipment - Hardware	\$63,521
Computer Software	\$313,610
Office Equipment	\$69,043
Tools	\$7,725
Transportation Equipment	\$14,997
Total	\$468,896

QUESTION: ENERGY PROBE – CQ 4

Reference: IR 2-EnergyProbe-12

The response indicates that the pole rentals are billed annually and collected in mid-June of the following year. When does EPI actually invoice the customers for pole rentals?

Response

EPI invoices its pole rental customers annually in April of the following year.

QUESTION: ENERGY PROBE – CQ 5

Reference: IR 2-EnergyProbe-17

Please explain why the HST benefit days shown in Table 18 are not dollar weighted similar to the HST lead times shown in Tables 20 through 22.

Response

The HST benefit days are effectively dollar weighted. The HST benefit days calculation uses the components of the retail revenue lag (service lag, billing lag, collections lag, and payment processing lag), each of which are dollar weighted.

Exhibit 3: Operating Revenue

QUESTION: ENERGY PROBE – CQ 6

Reference: IR 3-EnergyProbe-21

The link provided in the response does not appear to correspond to the figures for the manufacturing variable used in the regression. Please reconcile.

Response

The source of the historical manufacturing variable data was acquired as follows:

- 1) As of January 8th, 2016 the data can be accessed via the following link:
<http://www5.statcan.gc.ca/cansim/search-recherche?searchTypeByValue=1&pattern=304-0015>
- 2) Click on “Add/Remove Data” across the top of the screen.
- 3) In section titled Step 1, select only “Ontario”.
- 4) In section titled Step 5, select “January 2006” to “December 2014”.
- 5) In section titled Step 7, select “Apply”.
- 6) Once data appears, EPI exported these amounts to Excel in order to incorporate into the Load Forecast.

Note that, EPI inadvertently included the aggregate of both the monthly “unadjusted” and “seasonally adjusted” amounts in incorporating this data into the Load Forecast calculation.

The inclusion of the aggregate, although inadvertent, resulted in the highest R^2 output, as opposed to using only one of the data sets. If only the “unadjusted” amount was used, the result is an R^2 reduction and an approximately 0.3% reduction in kWh purchases. If only the “seasonally adjusted” amount was used, the result is an R^2 reduction as well as approximately 0.5% reduction in kWh purchases.

QUESTION: ENERGY PROBE – CQ 7

Reference: IR 3-VECC-27 and Attachment IRR3-B, Appendix 2-H

- a) Are the revenues shown in account 4375 for water/sewer billing the net revenues or the gross revenues associated with this service?
- b) How and where are the depreciation expenses associated with the assets used to provide water/sewer billing of \$240,170 recovered by EPI?

Response

- a) Please see response to Clarification Question VECC – CQ 60.
- b) Depreciation expense associated with the assets used to provide water/sewer billing is recovered directly from the Chatham-Kent PUC and the Strathroy PUC. Recovered amounts are accounted for as a reduction to EPI's depreciation expense.

Reference: IR 3-VECC-16, Part c

- ## Response

- TABLE 3: CDM KWH IMPACTS FOR 2006 TO 2014

[illegible]

QUESTION: VECC – CQ 59

Reference: IR 3-VECC-23, Part g

- a) For the demand billed classes, please also provide the kW values for the LRAMVA Baselines and indicate how they were determined.

Response

- a) EPI has calculated the kW baselines similar to how the kW values were calculated in the load forecast. EPI utilized the five year average relationship between kW and kWh for each rate class and multiplied that by the kWh baselines previously established in Table 3-25. Please see updated Table 3-25 below.

CQ UPDATED TABLE 3-25: ADJUSTED LRAMVA BASELINE

Line No.	Description	Residential	General Service < 50 kW	General Service > 50 kW	Large Use (CK)	Large Use (SMP)	Unmetered Scattered Load	Sentinel Lighting	Street Lighting	Embedded Distributor	Total
1	kWh										
2	2014 Program Persistence	1,639,073	1,193,099	4,084,534	3,630,728	108,315	-	-	19,568	-	10,675,318
3	2015 Program Persistence	253,763	1,056,289	874,770	23,731,898	-	-	-	-	-	25,916,720
4	2016 Program Persistence	907,918	2,567,012	2,125,879	-	-	-	-	-	-	5,600,809
5	Total LRAMVA Baseline	2,800,754	4,816,400	7,085,183	27,362,627	108,315	-	-	19,568	-	42,192,848
6	Exclude Large Use (CK) (Due to Contract Agreement)				(27,362,627)						(27,362,627)
7	Adjusted LRAMVA Baseline	2,800,754	4,816,400	7,085,183	-	108,315	-	-	19,568	-	14,830,221
8	kW										
9	Percentage kW to kWh (From Load Forecast)			0.266%	0.328%	0.200%	0.000%	0.280%	0.300%	0.254%	
10	2014 Program Persistence			10,865	11,909	217	-	-	59	-	23,049
11	2015 Program Persistence			2,327	77,841	-	-	-	-	-	80,168
12	2016 Program Persistence			5,655	-	-	-	-	-	-	5,655
13	Total LRAMVA Baseline			18,847	89,749	217	-	-	59	-	108,871
14	Exclude Large Use (CK) (Due to Contract Agreement)				(89,749)						(89,749)
15	Adjusted LRAMVA Baseline			18,847	-	217	-	-	59	-	19,122

QUESTION: VECC – CQ 60**Reference: IR 3-VECC-27, Part a**

VECC 27 a) indicates that revenues for Water/Sewer Billing in 2010 and 2011 were recorded using a different basis for accounting. It is also noted that no revenues from these activities are reported for 2012-2014. Please explain the basis for accounting for these revenues in: a) the 2010-2011 period, b) the 2012-2014 period and c) the 2015 – 2016 period.

Response

- a) The water/sewer billing revenues in 2010 and 2011 represent billing and collecting services provided to customers of the Strathroy Public Utilities Commission (“PUC”) by Middlesex Power Distribution Corporation (“MPDC”). These revenues were recorded on a gross basis. As noted in Exhibit 1, Section 1.2.1, page 8, MPDC amalgamated with Chatham-Kent Hydro in early 2012. Beginning in 2012, the billing and collecting services for customers of the Strathroy PUC were transferred to EPI’s unregulated affiliate, Entegrus Services Inc. (“ESI”). ESI had historically performed these services for the customers of the Chatham-Kent PUC.
- b) ESI provided the billing and collecting services to customers of the Chatham-Kent PUC and Strathroy PUC from 2012 to 2014. As noted in Exhibit 1, Section 1.2.1, page 8, the utility-related assets of ESI were transferred to EPI on December 31, 2014. Therefore, there were no water/sewer billing revenues recorded in EPI for the 2012 – 2014 time period.
- c) The water/sewer billing revenues in 2015 and 2016 represent billing and collecting services provided to customers of the Chatham-Kent PUC and the Strathroy PUC by EPI. These revenues have been accounted for on a net basis.

Exhibit 4: Operating Expenses

QUESTION: ENERGY PROBE – CQ 8**Reference: 4-EnergyProbe-33**

What is driving the increase of \$45,000 in OEB and intervenor expenses shown in Table 40? What was the basis or source for this increase?

Response

As described in Exhibit 4, Section 4.7, page 68, in the Application EPI estimated OEB and Intervenor Application costs to total \$70k. This was comprised of OEB costs of \$40k and Intervenor costs of \$30k. Subsequently, in preparing to respond to 4-Energy Probe-33, EPI reviewed cost claims for two other recent Cost of Service proceedings for 2016 distribution rates, specifically EB-2015-0018 and EB-2015-0073. EPI noted that the average Intervenor cost claim for those proceedings was \$25k. Accordingly, in responding to 4-Energy Probe-33, EPI increased Intervenor costs from \$10k to \$25k, resulting in an overall increase of \$45k (3 x \$15k).

QUESTION: ENERGY PROBE – CQ 9

Reference: 4-EnergyProbe-27, Part d

The response to part (d) is not clear.

- a) Is it standard practice by distributors to clear the net OM&A, depreciation and revenue from the deferral account upon clearance to OM&A?
- b) Please confirm that the treatment of the depreciation expense noted in the response has not affected the accumulated depreciation for the smart meters.
- c) Would it be correct to state that from a pure OM&A basis, OM&A would have been \$71,788 higher in 2010 and \$90,502 higher in 2011 (as examples) had these costs been accounted for in the years they were incurred?
- d) With respect to the clerical error noted in the response to the \$107,662, is this still the amount of the increase in Table 4-6 as a cost driver in 2012, and if not, what is the revised figure?

Response

- a) EPI cannot comment on the standard practices of other distributors. Due to the non-recurring nature of the clearance, EPI presented it on a grouped basis.
- b) Confirmed.
- c) Yes.
- d) Yes.

Exhibit 5: Cost of Capital and Capital Structure

QUESTION: ENERGY PROBE – CQ 10

Reference: 5-SEC-25

- a) Are all of the debt instruments held by EPI with affiliates variable rate debt with no fixed term?
- b) Why has EPI not considered using 5 or 10 year term debt?

Response

- a) Yes.
- b) Fixed term debt should be compatible with the life of the underlying assets which for electricity distributors can extend beyond 30 years.

QUESTION: VECC – CQ 61

Reference: IR 4-VECC-40, Part b

The response to VECC #40 b) suggests that for the CDM programs impacting on demand billed customers the IESO definition of “peak” includes all 12 months of the year. However, the IESO’s Final Report: Evaluation of Business Incentive Programs states (page D-14) that “the IESO has judged that summer peak demand savings should be used for reporting”. This report can be found at <http://cms.powerauthority.on.ca/sites/default/files/conservation/2014-Evaluation-Business-Initiatives.pdf>

Also, in EB-2015-0083, Kingston Hydro in response to Technical Conference Undertaking JT2.7 as to the definition of peak period stated:

From the definitions in the Master CDM Agreement executed between all Ontario LDCs and the IESO:

“Peak Demand Savings” means electricity peak demand savings determined pursuant to the OPA EM&V Protocols.

From ERII Schedule F, EM&V Protocols Section 3:

Demand Savings (kW) are the maximum reduction in electricity demand between the Base Case and the Energy Efficient Case occurring in the same hour between 11 a.m. to 5 p.m. on business days, May through October.

Please provide the IESO documentation supporting EPI’s contention that the peak period applicable to CDM programs impacting demand billed customers extends over the each of the 12 months of the year.

Response

The IESO reports peak demand savings from CDM programs for the purposes of tracking progress towards peak demand reduction targets and not for lost revenue calculation purposes. The IESO reporting of peak demand savings for a specific time period of less than 12 months does not mean that these demand savings are exclusive to this time period. The measures undertaken as part of Entegrus' CDM programs are mostly for equipment that operates year round during regular business hours and the demand savings achieved by the measures during peak periods are expected to be maintained for each of the 12 months of the year. For example, according to the IESO 2014 Evaluation of Business Initiatives (Available at: <http://www.powerauthority.on.ca/sites/default/files/conservation/2014-Evaluation-Business-Initiatives.pdf>), 67% of the Retrofit program savings come from lighting projects. Lighting projects are expected to produce savings during regular operating hours and thus reduce electricity demand during the peak demand period of the businesses where the measures were installed. A small portion of projects produce demand reductions during limited months of the year or outside of regular operating hours.

For Entegrus' Retrofit program, the IESO has reported 5,046,300 kWh of net incremental energy savings and 838 kW of net incremental peak demand savings in 2014. Dividing the kWh value by the kW value provides an average of 6,020 hours in the year or 16 hours per day for 365 days on average. This is far greater than the roughly 1,095 hours included in the peak demand savings definition referenced. Some equipment upgraded runs 24 hours a day 365 days per year and other equipment runs 8 hours per day 5 days per week, but on average the equipment is running 2/3 of the time.

Exhibit 7: Cost Allocation

QUESTION: ENERGY PROBE – CQ 11

Reference: 7-EnergyProbe-40

- a) Please explain why EPI has increased the proposed ratio for the residential class from 99.0% to 99.9% in Scenario EP-40A and Scenario EP-40D updated Table 7-14.
- b) The response to part (a) indicates that revenue neutrality is not maintained. Is there too much or too little revenue based on the proposed ratios?
- c) Please explain why in the response to part (d) the updated Table 7-14 continues to show a proposed ratio of 62.9% for the large use class when the question asked for that ratio to be increased to 85%.

Response

- a) EPI increased the proposed Residential ratio from 99.0% to 99.9% in 2016 to reflect the offset of the proposed three year rate mitigation for the Large Use rate class. The Residential class is then reduced in 2017 to 99.50% and returns to 99.0% in 2018.
- b) Based on the hypothetical scenario proposed in 7-EnergyProbe-40, part a), EPI would be overearning by \$156k.
- c) EPI inadvertently included the wrong update for Scenario EP-40D, Updated Table 7-14. Please see the correct table below. The remaining tables included in this response accurately reflect the requested change to the Large Use ratio of 85%.

SCENARIO EP-40D, UPDATED TABLE 7-14: REVENUE TO COST RATIOS

Line No.	Rate Class	Previously Approved Ratios (Note 1)	Status Quo Ratios (Per CA Model)	Proposed Ratios	Policy Range
1	Residential	94.7%	99.0%	99.0%	85% to 115%
2	General Service < 50 kW	106.6%	114.4%	108.7%	80% to 120%
3	General Service > 50 - 4,999 kW	113.4%	99.1%	99.1%	80% to 120%
4	Large Use (Note 2)	n/a	44.8%	85.0%	85% to 115%
5	Unmetered Scattered Load	90.2%	142.2%	108.7%	80% to 120%
6	Sentinel Lighting	79.0%	86.3%	99.0%	80% to 120%
7	Street Lighting	79.0%	135.5%	108.7%	80% to 120%
8	Embedded Distributor (Note 3)	n/a	185.5%	100.0%	n/a

Note 1: These Revenue to Cost ratios relate to the former CKH, as approved in EB-2009-0261 and EB-2010-0074.
Note 2: The Large Use rate class is currently applicable only to SMP, which was last rebased under the 2006 EDR (MPDC application EB-2005-0351). At such time, current cost allocation and Revenue to Cost Ratio practices had not yet been established. Accordingly, there is no current Revenue to Cost Ratio for this rate class.
Note 3: Currently, a separate rate class does not exist for Embedded Distributor. Accordingly, there is no current Revenue to Cost ratio for this rate class.

QUESTION: VECC – CQ 62

Reference: IR 7-VECC-48, Part a

- a) Given that the load data for 2014 was not weather normalized, what would be the cost allocation results if the load profiles based on 2004 data were used for the weather sensitive customer classes?

Response

- a) In order to produce this hypothetical scenario, EPI utilized the 2004 weather normalized data developed by Hydro One Networks Inc. (“HONI”) for EPI’s predecessor utilities Chatham-Kent Hydro Inc. (“CKH”) and Middlesex Power Distribution Corporation. (“MPDC”). (HONI 2004 weather normalized data was not available for the former Dutton Hydro or the former Newbury Power.) To approximate a contemporary EPI profile using the HONI data, EPI combined profiles for CKH and MPDC for the Residential, General Service < 50 kW and General Service > 50 kW rate classes. Once the hourly data was combined, EPI applied the profile to the 2016 Load Forecast values by rate class. The resulting load profile is presented in Table 4 below. EPI then updated the cost allocation with the profile from Table 4, the cost allocation results are presented in Table 5 below.

TABLE 4: HYPOTHETICAL SCENARIO VECC-CQ 62, LOAD PROFILE

Month	Residential	GS<50	GS>50	Large Use	Street	Sentinel	USL	Embedded	Total
Co-incident Peak									
January	58,883	16,742	58,641	9,829	-	-	147		144,242
February	54,480	18,832	61,430	7,023	-	-	147		141,911
March	53,029	13,884	55,833	13,760	1,196	73	147		137,923
April	30,589	8,080	77,282	7,877	1,595	98	147		125,667
May	30,653	15,690	70,084	12,889	-	-	147		129,463
June	66,647	12,663	80,827	5,842	-	-	147		166,127
July	71,160	23,961	62,488	10,400	-	-	147		168,156
August	64,433	16,860	71,293	8,289	-	-	147		161,022
September	38,735	8,283	87,327	9,341	-	-	147		143,833
October	44,901	14,549	49,443	11,233	1,196	73	147		121,542
November	33,514	12,049	77,649	8,815	-	-	147		132,173
December	47,593	12,115	69,696	7,912	-	-	147		137,462
1CP	71,160	23,961	62,488	10,400	-	-	147	-	168,156
4CP	261,123	70,226	273,249	34,360	-	-	588	-	639,547
12CP	594,617	173,707	821,992	113,210	3,987	245	1,764	-	1,709,522
Non Co-incident Peak									
January	60,482	18,201	66,283	14,087	1,595	98	147		144,242
February	56,656	20,773	66,144	10,327	1,595	98	147		141,911
March	55,532	18,773	62,250	14,516	1,595	98	147		137,923
April	32,281	10,336	83,629	8,348	1,595	98	147		125,667
May	41,809	19,246	70,457	13,161	1,595	98	147		129,463
June	67,140	13,986	85,463	13,087	1,595	98	147		166,127
July	75,447	27,960	68,115	10,741	1,595	98	147		168,156
August	71,235	22,268	73,104	10,586	1,595	98	147		161,022
September	51,491	10,900	89,726	13,338	1,595	98	147		143,833
October	52,234	19,768	59,502	13,622	1,595	98	147		121,542
November	39,847	13,632	83,258	9,335	1,595	98	147		132,173
December	52,629	15,437	78,400	8,876	1,595	98	147		137,462
1NCP	75,447	27,960	89,726	14,516	1,595	98	147		209,489
4NCP	274,303	90,769	342,076	55,563	6,379	392	588		770,070
12NCP	656,782	211,281	886,331	140,023	19,138	1,175	1,764		1,916,495

TABLE 5: HYPOTHETICAL SCENARIO VECC-CQ62, COST ALLOCATION

Rate Class	Revenue Requirement from CA Model	Revenue Rqmt Allocated at Existing Rate Design	Allocated Other Revenue from CA Model	Total Revenue	RTC from CA Model	Proposed RTC	Proposed Revenue	Other Revenue	Base Revenue	Dec 18/15 Proposed Base Revenue	Change
Year 1, Rates Effective May 2016											
Residential	\$11,291,826	\$10,566,531	\$760,512	\$11,327,043	100.31%	101.23%	\$11,430,482	\$760,512	\$10,669,970	\$10,669,004	-\$965
GS<50	\$2,393,691	\$2,509,142	\$140,747	\$2,649,889	110.70%	105.61%	\$2,527,910	\$140,747	\$2,387,163	\$2,385,379	-\$1,783
GS>50	\$4,758,088	\$4,408,165	\$246,108	\$4,654,273	97.82%	97.82%	\$4,654,273	\$246,108	\$4,408,165	\$4,408,165	\$0
Large Use CK	\$276,978	\$176,258	\$10,680	\$186,938	67.49%	85.00%	\$235,431	\$10,680	\$224,751	\$222,653	-\$2,098
Large Use SMP	\$191,214	\$13,637	\$7,373	\$21,010	10.99%	30.90%	\$59,093	\$7,373	\$51,720	\$51,237	-\$483
USL	\$33,554	\$45,489	\$2,244	\$47,733	142.26%	105.61%	\$35,435	\$2,244	\$33,191	\$34,357	\$1,166
Sentinel	\$60,020	\$48,116	\$3,718	\$51,834	86.36%	86.36%	\$51,834	\$3,718	\$48,116	\$48,116	\$0
Street Lighting	\$194,616	\$243,462	\$17,122	\$260,584	133.90%	105.61%	\$205,528	\$17,122	\$188,406	\$192,569	\$4,163
Embedded Distribution	\$797	\$1,463	\$15	\$1,479	185.50%	100.00%	\$797	\$15	\$782	\$782	\$0
Year 2, Rates Effective May 2017											
Residential	\$11,291,826	\$10,566,531	\$760,512	\$11,327,043	100.31%	100.77%	\$11,378,763	\$760,512	\$10,618,250	\$10,617,767	-\$483
GS<50	\$2,393,691	\$2,509,142	\$140,747	\$2,649,889	110.70%	105.61%	\$2,527,910	\$140,747	\$2,387,163	\$2,385,379	-\$1,783
GS>50	\$4,758,088	\$4,408,165	\$246,108	\$4,654,273	97.82%	97.82%	\$4,654,273	\$246,108	\$4,408,165	\$4,408,165	\$0
Large Use CK	\$276,978	\$176,258	\$10,680	\$186,938	67.49%	85.00%	\$235,431	\$10,680	\$224,751	\$222,653	-\$2,098
Large Use SMP	\$191,214	\$13,637	\$7,373	\$21,010	10.99%	57.95%	\$110,812	\$7,373	\$103,439	\$102,474	-\$965
USL	\$33,554	\$45,489	\$2,244	\$47,733	142.26%	105.61%	\$35,435	\$2,244	\$33,191	\$34,357	\$1,166
Sentinel	\$60,020	\$48,116	\$3,718	\$51,834	86.36%	86.36%	\$51,834	\$3,718	\$48,116	\$48,116	\$0
Street Lighting	\$194,616	\$243,462	\$17,122	\$260,584	133.90%	105.61%	\$205,528	\$17,122	\$188,406	\$192,569	\$4,163
Embedded Distribution	\$797	\$1,463	\$15	\$1,479	185.50%	100.00%	\$797	\$15	\$782	\$782	\$0
Year 3, Rates Effective May 2018											
Residential	\$11,291,826	\$10,566,531	\$760,512	\$11,327,043	100.31%	100.31%	\$11,327,043	\$760,512	\$10,566,531	\$10,566,531	\$0
GS<50	\$2,393,691	\$2,509,142	\$140,747	\$2,649,889	110.70%	105.61%	\$2,527,910	\$140,747	\$2,387,163	\$2,385,379	-\$1,783
GS>50	\$4,758,088	\$4,408,165	\$246,108	\$4,654,273	97.82%	97.82%	\$4,654,273	\$246,108	\$4,408,165	\$4,408,165	\$0
Large Use CK	\$276,978	\$176,258	\$10,680	\$186,938	67.49%	85.00%	\$235,431	\$10,680	\$224,751	\$222,653	-\$2,098
Large Use SMP	\$191,214	\$13,637	\$7,373	\$21,010	10.99%	85.00%	\$162,532	\$7,373	\$155,159	\$153,711	-\$1,448
USL	\$33,554	\$45,489	\$2,244	\$47,733	142.26%	105.61%	\$35,435	\$2,244	\$33,191	\$34,357	\$1,166
Sentinel	\$60,020	\$48,116	\$3,718	\$51,834	86.36%	86.36%	\$51,834	\$3,718	\$48,116	\$48,116	\$0
Street Lighting	\$194,616	\$243,462	\$17,122	\$260,584	133.90%	105.61%	\$205,528	\$17,122	\$188,406	\$192,569	\$4,163
Embedded Distribution	\$797	\$1,463	\$15	\$1,479	185.50%	100.00%	\$797	\$15	\$782	\$782	\$0

QUESTION: VECC – CQ 63

Reference: IR 7-VECC-48, Part e

- a) The response to VECC 48 e) suggests that Sentinel and Street Lights are interval metered. Please confirm whether this is the case. If not, please indicate how the NCP values for these classes were established. If yes, why are there no meter capital and meter reading costs attributed to these classes?
- b) If the billed kWh by day and by hour are estimated based on connected load and hours requiring lighting, why wouldn't the billed amount equal the connected load (i.e., connected kW) and be equivalent to the NCP?

Response

- a) EPI Sentinel and Street Lights are not metered. The load profile utilized by EPI distributes the annual load based on daylight hours and seasonality.
- b) EPI confirms the billed amount equals the connected load but is not evenly divided to determine the NCP. Please see Attachment CQ7-A for the Street Light profile utilized.

QUESTION: VECC – CQ 64

Reference: IR 7-VECC-45, Part a

- a) Can EPI confirm that all USL connections have another metered account associated with them and that in no instances is a separate bill issued strictly for the USL connection? If not, how many are there?

Response

- a) Confirmed.

ATTACHMENT CQ7-A

Street Light Load Profile

3/5

4/5

Sum of Allocate: Hour																												
Month	Day	12:00:00 AM	1:00:00 AM	2:00:00 AM	3:00:00 AM	4:00:00 AM	5:00:00 AM	6:00:00 AM	7:00:00 AM	8:00:00 AM	9:00:00 AM	10:00:00 AM	11:00:00 AM	12:00:00 PM	1:00:00 PM	2:00:00 PM	3:00:00 PM	4:00:00 PM	5:00:00 PM	6:00:00 PM	7:00:00 PM	8:00:00 PM	9:00:00 PM	10:00:00 PM	11:00:00 PM	Grand Total		
10	29	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	30	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	1,282	1,595	1,595	1,595	1,595	1,595	18,028		
	31	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	1,595	1,595	15,550		
10 Total		49,365	49,365	49,365	49,365	49,365	47,770	32,619	13,101	-	-	-	-	-	-	-	-	-	4,489	19,063	26,498	32,220	44,580	49,365	49,365	565,896		
11	1	1,595	1,595	1,595	1,595	1,595	1,595	1,595	883	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	13,955		
	2	1,595	1,595	1,595	1,595	1,595	1,595	883	-	-	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	12,446		
	3	1,595	1,595	1,595	1,595	1,595	1,595	1,509	-	-	-	-	-	-	-	-	-	-	-	-	-	-	797	1,595	1,595	13,470		
	4	1,595	1,595	1,595	1,595	1,595	1,595	1,595	399	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	1,595	14,752		
	5	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	17,144		
	6	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	19,537		
	7	1,595	1,595	1,595	1,595	1,595	1,595	1,595	313	-	-	-	-	-	-	-	-	-	399	1,595	1,595	1,595	1,595	1,595	1,595	21,444		
	8	1,570	1,570	1,570	1,570	1,570	1,570	1,570	865	-	-	-	-	-	-	-	-	-	472	1,570	1,570	1,570	1,570	1,570	1,570	21,746		
	9	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	10	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	11	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	1,282	1,595	1,595	1,595	1,595	18,028		
	12	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	1,595	15,550		
	13	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	13,955		
	14	1,595	1,595	1,595	1,595	1,595	1,595	1,595	883	-	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	12,446		
	15	1,595	1,595	1,595	1,595	1,595	1,595	1,509	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	797	1,595	1,595	13,470	
	16	1,595	1,595	1,595	1,595	1,595	1,595	1,595	399	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	1,595	14,752	
	17	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	17,144		
	18	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	1,595	19,537	
	19	1,570	1,570	1,570	1,570	1,570	1,570	1,570	1,570	313	-	-	-	-	-	-	-	-	392	1,570	1,570	1,570	1,570	1,570	1,570	21,114		
	20	1,570	1,570	1,570	1,570	1,570	1,570	1,570	1,570	865	-	-	-	-	-	-	-	-	472	1,570	1,570	1,570	1,570	1,570	1,570	21,746		
	21	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	22	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	23	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	1,282	1,595	1,595	1,595	1,595	1,595	18,028	
	24	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	1,595	1,595	15,550	
	25	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	1,595	13,955	
	26	1,595	1,595	1,595	1,595	1,595	1,595	883	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	12,446	
	27	1,595	1,595	1,595	1,595	1,595	1,595	1,509	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	797	1,595	1,595	13,470	
	28	1,595	1,595	1,595	1,595	1,595	1,595	1,595	399	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	1,595	14,752	
	29	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	1,595	17,144	
	30	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	19,537	
	11 Total		47,770	47,770	47,770	47,770	47,770	45,378	26,639	9,531	-	-	-	-	-	-	-	-	-	2,986	12,684	18,837	25,044	40,593	47,770	47,770	516,082	
12	1	1,570	1,570	1,570	1,570	1,570	1,570	1,570	313	-	-	-	-	-	-	-	-	-	392	1,570	1,570	1,570	1,570	1,570	1,570	21,114		
	2	1,570	1,570	1,570	1,570	1,570	1,570	1,570	865	-	-	-	-	-	-	-	-	-	472	1,570	1,570	1,570	1,570	1,570	1,570	21,746		
	3	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	4	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	1,282	1,595	1,595	1,595	1,595	18,028		
	5	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	1,595	15,550		
	6	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	13,955		
	7	1,595	1,595	1,595	1,595	1,595	1,595	883	-	-	-	-	-	-	-	-	-	-	-	-	-	-	399	1,595	1,595	12,446		
	8	1,595	1,595	1,595	1,595	1,595	1,595	1,509	-	-	-	-	-	-	-	-	-	-	-	-	-	-	797	1,595	1,595	13,470		
	9	1,595	1,595	1,595	1,595	1,595	1,595	1,595	399	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	14,752		
	10	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	-	-	-	-	-	-	-	-	-	-	-	-	-	1,196	1,595	1,595	17,144		
	11	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	-	-	1,595	1,595	19,537		
	12	1,570	1,570	1,570	1,570	1,570	1,570	1,570	313	-	-	-	-	-	-	-	-	-	392	1,570	1,570	1,570	1,570	1,570	1,570	21,114		
	13	1,570	1,570	1,570	1,570	1,570	1,570	1,570	865	-	-	-	-	-	-	-	-	-	472	1,570	1,570	1,570	1,570	1,570	1,570	21,746		
	14	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,595	1,196	-	-	-	-	-	-	-	-	313	1,595	1,595	1,595	1,595	1,595	1,595	22,242		
	15	1,595	1,595	1,595	1,595	1,595	1,595	1,595	797	-	-	-	-	-	-	-	-	-	-	-	1,282	1,595	1,595	1,595	1,595	18,028		
	16	1,595	1,595	1,595	1,595	1,595																						