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January 19<sup>th</sup> 2018

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

Dear Ms. Walli:

**Re: OEB File: EB-2017-0082**  
**2018 Price Cap IR Distribution Rate Application - Wellington North Power Inc.**  
**Applicant Responses to OEB Staff Interrogatories**

On January 11<sup>th</sup> 2018, Wellington North Power Inc. (WNP) received four (4) questions from OEB Staff regarding the LDC's 2018 IRM Rate Application (OEB case number EB-2017-0082.) Please find enclosed the Applicant's responses to the questions raised.

An electronic copy of this letter containing responses to the questions raised has been filed on the Board's web portal together with an updated 2018 IRM Rate Generator model and revised a revised 2018 Capital Module – ACM model.

Should the OEB have questions regarding this matter please do not hesitate to contact me.

Regards,

*Richard Bucknall*

Richard Bucknall  
Chief Administrative Officer  
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c.c. *Christiane Wong - Information Administrator.*

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**Wellington North Power Inc. (Wellington North Power)**

**2018 IRM Application**

**EB-2017-0082**

**LDC's Responses to OEB Staff's Application Analysis**

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**Question #1**

**Ref: A portion of Sheet 3 “Continuity Schedule” is reproduced below.**

		2016					
Account Descriptions	Account Number	OEB-Approved Disposition during 2016	Principal Adjustments <sup>1</sup> during 2016	Closing Principal Balance as of Dec-31, 2016	Opening Interest Amounts as of Jan 1, 2016	Interest Jan 1 to Dec 31, 2016	OEB-Approved Disposition during 2016
<b>Group 1 Accounts</b>							
LV Variance Account	1550	80,053		203,301	2,050	2,135	2,022
Smart Metering Entry Charge Variance Account	1551	2,062		(607)	147	104	257
RSVA - Wholesale Market Service Charge <sup>2</sup>	1580	(90,419)		(348,708)	(3,328)	(3,045)	(2,703)
Variance WMS - Sub-account OEB Class A <sup>3</sup>	1580			0	0		
Variance WMS - Sub-account OEB Class B <sup>3</sup>	1580			23,824	90	272	
RSVA - Retail Transmission Network Charge	1584	(52,737)		34,549	(1,701)	(117)	(1,070)
RSVA - Retail Transmission Connection Charge	158F	(38,000)		55,547	(1,350)	236	(1,663)
RSVA - Power <sup>4</sup>	1588	70,576	(58,474)	399,901	1,390	4,920	(701)
RSVA - Global Adjustment <sup>5</sup>	1589	147,421	58,474	(452,123)	(877)	(819)	5,907
Disposition and Recovery/Refund of Regulatory Balances (2009) <sup>6</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2010) <sup>7</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2011) <sup>8</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2012) <sup>9</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2013) <sup>10</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2014) <sup>11</sup>	1590			43,193	(13,005)	337	
Disposition and Recovery/Refund of Regulatory Balances (2015) <sup>12</sup>	1590			0	0		
Disposition and Recovery/Refund of Regulatory Balances (2018) <sup>13</sup>	1590			91,822	0	1,065	
<i>Not to be disposed of until a year after rate order has expired and that balance has been audited</i>							
RSVA - Global Adjustment	1589	147,421	58,474	(452,123)	(877)	(819)	5,907
<b>Total Group 1 Balance excluding Account 1589 - Global Adjustment</b>		<b>(251,323)</b>	<b>(58,474)</b>	<b>404,060</b>	<b>(16,504)</b>	<b>5,207</b>	<b>(4,667)</b>
<b>Total Group 1 Balance</b>		<b>(103,901)</b>	<b>0</b>	<b>41,937</b>	<b>(17,271)</b>	<b>4,488</b>	<b>1,350</b>
LRAM Variance Account (only input amounts if applying for disposition of this account)	1588	0		0	0		
<b>Total including Account 1588</b>		<b>(103,901)</b>	<b>0</b>	<b>41,937</b>	<b>(17,271)</b>	<b>4,488</b>	<b>1,350</b>

The table from Wellington North Power’ 2016 cost of service Decision (EB-2015-0110), 2016\_EDDVAR\_Continuity\_Schedule\_v\_2.6) which identified the principal and interest amounts approved for disposition, is reproduced below.

		2015				Projected Interest on Dec-31-14	
Account Descriptions	Account Number	Principal Disposition during 2015 - Instructed by Board	Interest Disposition during 2015 - Instructed by Board	Closing Principal Balances as of Dec 31 14 Adjusted for Dispositions during 2015	Closing Interest Balances as of Dec 31 15 Adjusted for Dispositions during 2015	Projected Interest from Jan 1, 2015 to December 31, 2015 on Dec-31-14 balance adjusted for disposition during 2014 <sup>2</sup>	Projected Interest from January 1, 2016 to April 30, 2016 on Dec-31-14 balance adjusted for disposition during 2015 <sup>3</sup>
<b>Group 1 Accounts</b>							
1 LV Variance Account	1550	\$0	\$0	\$80,052	\$775	\$955	\$294
2 Smart Metering Entry Charge Variance Account	1551	\$0	\$0	\$2,062	\$125	\$24	\$8
3 RSVA - Wholesale Market Service Charge	1580	\$0	\$0	-\$90,419	-\$1,449	-\$555	-\$295
4 RSVA - Retail Transmission Network Charge	1584	\$0	\$0	-\$52,737	-\$1,047	-\$626	-\$193
5 RSVA - Retail Transmission Connection Charge	1588	\$0	\$0	\$38,100	\$888	\$461	\$110
6 RSVA - Power (excluding Global Adjustment)	1588	\$0	\$0	\$70,577	-\$1,893	\$913	\$281
7 RSVA - Global Adjustment	1589	\$0	\$0	\$147,422	\$3,608	\$1,750	\$541
8 Disposition and Recovery/Refund of Regulatory Balances (2009)	1590	\$0	\$0	-\$0	\$1	-\$0	-\$0
9 Disposition and Recovery/Refund of Regulatory Balances (2010)	1590	\$0	\$0	\$0	\$0	\$0	\$0
10 Disposition and Recovery/Refund of Regulatory Balances (2011)	1590	\$0	\$0	\$14,900	-\$11,421	\$16	\$0
11 Disposition and Recovery/Refund of Regulatory Balances (2012)	1590	\$0	\$0	\$0	\$0	\$0	\$0
12 Disposition and Recovery/Refund of Regulatory Balances (2013)	1590	\$0	\$0	\$45,572	-\$10,374	\$542	\$167
13 Disposition and Recovery/Refund of Regulatory Balances (2014)	1590	\$0	\$0	\$0	\$0	\$0	\$0
14 Disposition and Recovery/Refund of Regulatory Balances (2014)	1590	\$0	\$0	\$0	\$0	\$0	\$0

a) OEB staff notes that column BJ “OEB-Approved Disposition during 2016” and column BN “Interest Disposition during 2017 – instructed by OEB” does not reconcile with the disposition amount approved by the OEB in the 2016 cost of service Decision & Rate Order dated March 31, 2016.

Please provide an explanation for the above discrepancies. If corrections are needed OEB staff will make adjustments.

**Wellington North Power Inc. Response:**

- a) The disposition of the 1595 account balances as per WNP's 2016 Cost of Service rate application (EB-2015-0110) have been included to the Continuity Schedule together with the December 31, 2014 opening balances and the account activity until disposition.

The Applicant has and filed an updated version of the Rate Generator model on the OEB's web portal.

**Question #2**

**Ref: IRM Model – Tab 11 RTSR - UTRs & Sub-Tx**

On Tab 11, Wellington North Power entered Hydro One Sub-Transmission Rates for February – December 2016 as follows:

Network Service Rate	3.4121
Line Connection Service Rate	0.7879
Transformation Connection Service Rate	1.8018
Both Line and Transformation Connection Service Rate	2.5897

As per the Rate Order issued on January 14, 2016 (EB-2015-0079), the Hydro One Sub-Transmission Rates that were approved by the OEB were:

Network Service Rate	3.3396
Line Connection Service Rate	0.7791
Transformation Connection Service Rate	1.7713
Both Line and Transformation Connection Service Rate	2.5504

**Please confirm whether or not these amounts should be corrected and OEB staff will make adjustments . Otherwise, please provide explanation for the discrepancies noted above.**

Hydro One Sub-Transmission Rates	Unit	2016		2017	2018
		January - 2016	February - December 2016		
Rate Description		Rate		Rate	Rate
Network Service Rate	kW	\$ 3.4121	\$ 3.4121	\$ 3.1942	\$ 3.1942
Line Connection Service Rate	kW	\$ 0.7879	\$ 0.7879	\$ 0.7710	\$ 0.7710
Transformation Connection Service Rate	kW	\$ 1.8018	\$ 1.8018	\$ 1.7493	\$ 1.7493
Both Line and Transformation Connection Service Rate	kW	\$ 2.5897	\$ 2.5897	\$ 2.5203	\$ 2.5203

**Wellington North Power Inc. Response:**

Wellington North Power confirms the correct Hydro One Sub-Transmission Rates for February – December 2016 are:

Rate Description	Rate
Network Service Rate	3.3396
Line Connection Service Rate	0.7791
Transformation Connection Service Rate	1.7713
Both Line and Transformation Connection Service Rate	2.5504

Hydro One Sub-Transmission Rates	Unit	2016	
Rate Description		January - 2016	February - December 2016
		Rate	
Network Service Rate	kW	\$ 3.4121	\$ 3.3396
Line Connection Service Rate	kW	\$ 0.7879	\$ 0.7791
Transformation Connection Service Rate	kW	\$ 1.8018	\$ 1.7713
Both Line and Transformation Connection Service Rate	kW	\$ 2.5897	\$ 2.5504

The Applicant has corrected the February to December 2016 rates in worksheet “11. RTSR – UTRs & Sub Tx” of the Rate Generator model and filed an updated version on the OEB’s web portal.

**Question #3**

**Ref: Manager Summary, ACM model, page 85 of 104**

Wellington North Power states that it uses the 2016 Board-Approved Distribution Revenues and 2015 Actual Distribution Revenue inputs derived from earlier worksheets to calculate the threshold test.

OEB staff notes that the 2016 values match the load forecast in the 2016 cost of service settlement agreement<sup>1</sup> and should not be loss adjusted. However, OEB staff believes that the amounts entered in “2015 Actual Distribution Revenue” are loss adjusted as they are higher than the 2015 Yearbook data.

Please confirm that the 2015 amounts entered are not loss adjusted and staff will make adjustments. Otherwise, please provide an explanation.

**Wellington North Power Inc. Response:**

Wellington North Power inc. has updated the ACM model (worksheet “7. Growth Factor – DEN\_Calc”) to show “2015 Actual Distribution Revenue” to represent not loss adjusted values. The updated amounts are:

	<b>As filed:</b> (IRM Application: September 25,2017)			<b>Updated:</b> (January 19, 2018)		
	<b>2015 Actual Distribution Revenues</b>			<b>2015 Actual Distribution Revenues</b>		
	Billed Customers or Connections	Billed kWh	Billed kW	Billed Customers or Connections	Billed kWh	Billed kW
<b>Residential</b>	3,220	25,871,120		3,218	24,960,131	
<b>General Service &lt;50kW</b>	474	11,819,833		467	12,033,954	
<b>General Service 50 to 999kW</b>	38	14,482,546	44,648	35	20,081,441	53,923
<b>General Service 1,000 to 4,999 kW</b>	5	51,108,488	109,361	5	47,530,354	96,203
<b>Unmetered Scattered Load</b>	1	4,164		1	5,184	
<b>Sentinel Lighting</b>	29	24,275	68	29	24,838	68
<b>Street Lighting</b>	905	723,044	1,988	905	720,792	1,984
<b>Total</b>	<b>4,672</b>	<b>104,033,470</b>	<b>156,065</b>	<b>4,660</b>	<b>105,356,694</b>	<b>152,178</b>

As a consequence of updating the 2015 Actual Distribution Revenue values, the growth factor has increased to 3.19% (from 1.55% as per initial application) and alters the Price Cap IR value

<sup>1</sup> EB-2015-0110

and capital expenditure amount (CapEx) for 2018. These changes are summarized in the table below taken from worksheet "9. Threshold Test" of the ACM model:

	<b>As filed:</b> (IRM Application: Sept 25, 2017)	<b>Updated:</b> (January 19, 2018)
Price Cap Index	1.60%	1.60%
2016 Board-Approved Distribution Revenue	\$2,547,582	\$2,547,582
2015 Actual Distribution Revenue	\$2,508,772	\$2,468,932
Growth Factor	1.55%	3.19%
Dead Band	10%	10%
Average Gross Fixed Assets	\$9,335,086	\$9,335,086
Average Accumulated Depreciation	\$1,069,246	\$1,069,246
Average Net Fixed Assets	\$8,265,840	\$8,265,840
Working Capital Allowance	\$1,186,382	\$1,186,382
Rate Base	\$9,452,222	\$9,452,222
Depreciation	\$413,418	\$413,418
Threshold Value: Price Cap IR Year 2018	185%	226%
Threshold CapEx: Price Cap IR Year 2018	\$764,067	\$934,029

The implications of the revised "materiality threshold" for the Price Cap IR 2018 year adjusts the "maximum allowed incremental capital amount" as noted below:

	<b>As filed:</b> (IRM Application: Sept 25, 2017)	<b>Updated:</b> (January 19, 2018)
Price Cap IR	Price Cap IR Yr: 2018	Price Cap IR Yr: 2018
Distribution System Plan CapEx	\$2,196,470	\$2,196,470
Materiality Threshold	\$764,067	\$934,029
Project: Demolition of "old" Municipal Substation (MS3) and building & energization of "new" Municipal Substation (MS3)	\$1,700,000	\$1,700,000
Total Cost of ACM Project	\$1,700,000	\$1,700,000
Maximum Allowed Incremental Capital	\$1,432,403	\$1,262,441



The revised “maximum allowed incremental capital” value alters the “incremental revenue requirement” for the ACM project, reducing it from \$114,612 (as per initial application) to \$103,280 per year as summarized in the table below:

	<b>As filed:</b> (IRM Application: Sept 25, 2017)	<b>Updated:</b> (January 19, 2018)
Current Revenue Requirement	\$2,546,787	\$2,546,787
Return on Rate Base:		
Incremental Capital	\$1,432,403	\$1,262,441
Depreciation Expense	\$40,400	\$40,400
Incremental Capital to include in Rate Base	\$1,392,003	\$1,222,041
Return on Rate Base – Interest	\$32,255	\$28,317
Return on Rate Base –Equity	\$51,170	\$44,922
Return on Rate Base - Total	\$83,426	\$73,239
Amortization Expense – Incremental	\$40,400	\$40,400
Grossed Up PILs – Incremental	(\$9,214)	(\$10,360)
Incremental Revenue Requirement:		
Return on Rate Base – Total	\$83,426	\$73,239
Amortization Expense – Incremental	\$40,400	\$40,400
Incremental Grossed Up PILs – Total	(\$9,214)	(\$10,360)
<b>Incremental Revenue Requirement</b>	<b>\$114,612</b>	<b>\$103,280</b>

A revised “incremental revenue requirement” amount alters the ACM Rate Riders for each Rate Class as summarized below:

	<b>As filed:</b>			<b>Updated:</b>		
	(IRM Application: September 25,2017)			(January 19, 2018)		
	Total Revenue	Rate Rider		Total Revenue	Rate Rider	
Service Charge		Distribution Volumetric	Service Charge		Distribution Volumetric	
<b>Residential</b>	\$60,895	\$1.56	\$54,874	\$1.41		
<b>General Service &lt;50kW</b>	\$20,809	\$1.88	\$18,752	\$1.69	\$0.007 per kWh	
<b>General Service 50 to 999kW</b>	\$10,798	\$12.42	\$9,730	\$11.19	\$0.1067 per kW	
<b>General Service 1,000 to 4,999 kW</b>	\$20,957	\$101.48	\$18,885	\$91.45	\$0.1237 per kW	
<b>Unmetered Scattered Load</b>	\$17	\$1.28	\$16	\$1.15	\$0.006 per kWh	
<b>Sentinel Lighting</b>	\$196	\$0.33	\$176	\$0.30	\$1.1074 per kW	
<b>Street Lighting</b>	\$939	\$0.07	\$846	\$0.06	\$0.0716 per kW	
<b>Total</b>	<b>\$114,612</b>		<b>\$103,280</b>			

The Applicant has updated the IRM Rate Generator model (worksheets “18. Additional Rates”, “19. Final Tariff Schedule” and “20. Bill Impacts” to reflect the updated Rate Riders as a result of the revised Incremental Revenue Requirement.

The Applicant has filed an updated IRM Rate Generator model and ACM model on the OEB’s web portal.

**Question #4**

**Ref: Accounts 1588 and 1589**

1. Ref: Response to GA Question 1 a) i.

Please explain what does Wellington North Power mean when it says “removal of RPP Tier 1 & 2 values”?

2. Ref: Response to GA Question 2

The updated DVA Continuity Schedule shows the following Principal adjustments:

	2015	2016
Account 1588	646,890	(58,474)
Account 1589	(646,890)	58,474

Based on OEB staff’s review of Wellington North Power’s responses, it appears that the adjustments are made up of:

**2015 adjustment of \$646,890:**

Unbilled GA revenues recorded in 2014 in 1588 disposed of in 2016 rates: \$425,150

Difference in unbilled re. 2014: \$221,740

- a) Since 2014 balances have already been disposed on a final basis, please provide justification for making changes to already disposed amounts retroactively.
- b) It appears to OEB staff that \$221,740 was never recorded in 1588, so why is Wellington North Power reversing this amount in 1588 on the continuity schedule?
- c) Please comment on the retroactivity aspect of this disposition proposal.

**2016 adjustment of \$58,474:**

- d) It appears that this adjustment is related to the difference in unbilled GA at the end of 2015 and the actual related to that amount. Please confirm that this was unbilled recorded in Wellington North Power’s 1588 for 2015 and should have been in 1589.
- e) Why has Wellington North Power not included 2b. adjustment on its GA workform for the difference in unbilled at the end of 2015 and actual related to that amount?
- f) It appears that the signs for credit amount \$58,474 in 1588, and debit in 1589 on the continuity schedule in 2016 are reversed. From the description provided in the evidence, it appears that the unbilled GA entry at the end of 2015 was

credited to 1588 instead of 1589, in which case should this not be a debit on the continuity schedule?

- g) Also, if it was the unbilled entry in 1588 related to 2015, why is it in 2016 on both, the continuity schedule and the GA analysis workform?
- h) Please complete the following Tables for each account 1588 and 1589:

**Account 1588**

	<b>Year-end Unbilled Entry \$</b>	<b>Unbilled to Actual Revenue Difference \$</b>	<b>Account booked in</b>	<b>Account should have been</b>	<b>Disposed already? (Y/N)</b>
2014					
2015					
2016					

**Account 1589**

	<b>Year-end Unbilled Entry \$</b>	<b>Unbilled to Actual Revenue Difference \$</b>	<b>Account booked in</b>	<b>Account should have been</b>	<b>Disposed already? (Y/N)</b>
2014					
2015					
2016					

- 3. Ref: Response to GA Question 5:
  - a) OEB staff notes that since the settlement submission is made by day 4 after the month-end the submission is based on estimates. Please explain if Wellington North Power trues up charge type 142 (now 1142) with the IESO, when the actual billings for RPP and non-RPP are completed and actual kWh and split between RPP and non-RPP is available.
  - b) Does Wellington North Power make an entry into its GL to true up the proportions for GA costs between RPP and non-RPP regarding charge type 148?
  - c) The OEB issued a letter on the true-up requirements on May 23, 2017. Please comment if Wellington North Power is complying with those requirements.

**Wellington North Power Inc. Response:**

1. In WNP's GA Analysis Workforms submitted with its application, the kWh entered included the Regulated Price Plan (RPP) Tier 1 and Tier 2 usage. Since RPP prices have the GA included in the kWh price, this usage for RPP customers had to be removed from the non-RPP data.

2a) The \$221,740 labeled as "*Difference in unbilled re. 2014:*" is actually the incremental difference in GA income which occurred during 2015. This explains why the number is used in the 2015 GA Analysis Workform to reconcile the GL GA dollar amounts which occurred during 2015.

WNP agrees and confirms that the December 31, 2015 GA income of \$425,150 was disposed of in the Applicant's 2016's Cost of Service rate application (EB-2015-0110) and therefore should not be reallocated in the current EDDVAR.

2b) All unbilled Global Adjustment income was allocated to 1588 until June 2017. The \$221,740 increase in GA income during 2015 has not been disposed of and this amount needs to be in both the Continuity Schedule and the GA workform.

2c) As stated in 2a) WNP agrees that the December 31, 2015 GA income of \$425,150 was disposed of in the Applicant's 2016's Cost of Service rate application (EB-2015-0110) and should not be reallocated in the current EDDVAR Continuity Schedule.

2d) The \$58,474 represents the change in GA Income from Dec 31, 2015 to Dec 31, 2016. It is true that it was recorded in 1588 instead of 1589, but this was for 2016, not 2015 as indicated in the question. This change in GA income is also addressed in 2f).

2e) When populating the GA Analysis Workform, the amounts entered in column H were the kWh used to calculate the unbilled entry. Following the teleconference on January 12<sup>th</sup> 2018 between OEB staff and WNP, the applicant now understands this isn't what OEB Staff expected; however, when reconciling calculations for the expected GA and the General

Ledger GA, the actual usage was not used in formulating either of the comparison numbers. Therefore no adjustment for the actual kWh usage was made.

2f) The \$58,474 represents the change in GA Income from Dec 31, 2015 to Dec 31, 2016. Since the total GA Income which should have been allocated to 1589 decreased during that time period, the amount is correctly allocated as a DR to 1589. This amount partially offsets the increase in GA income which was recorded in 2015.

2g) As described above, there are two different incremental amounts which change GA income. It is included in both the Continuity Schedule and the GA analysis workform, because both of these use the GL account values and these amounts were not entered in the accounting records until 2017.

2h) The following table shows the GA unbilled entries that are allocated to 1588 until 2017 and confirms that the December 31, 2014 balance was disposed of in account 1588 in the Applicant's 2016's Cost of Service rate application (EB-2015-0110). The Actual GA Revenue was correctly allocated to 1589, so in essence 1589 has been operating on a cash basis but the GA unbilled has been affecting the 1588 balances. Since there has been no unbilled activity in the 1589 account, it is not appropriate to record any value to this particular account. The column labelled "Unbilled to Actual GA Revenue Difference \$" illustrates that the year-end difference between the Unbilled GA and the Actual GA is minimal.

Account 1588	Year-end Unbilled Entry \$	GA Portion of Year-end Unbilled Entry \$	Unbilled to Actual GA Revenue Difference \$	Account Unbilled GA booked in	Account should have been (For GA)	Disposed already? (Y/N)
2014	\$ 905,479	\$ 425,150	\$ 941	1588	1589	Y
2015	\$ 936,663	\$ 646,890	-\$ 3,154	1588	1589	N
2016	\$ 1,091,415	\$ 588,416	-\$ 632	1588	1589	N
Account 1589	Year-end Unbilled Entry \$	Unbilled to Actual Revenue Difference \$	Account booked in	Account should have been	Disposed already? (Y/N)	
2014	\$ -					
2015	\$ -					
2016	\$ -					

3a) The GA charge is reconciled between the First Estimate and actual GA rate monthly. Because of the size of the customer base, as per IESO compliance requirements WNP is required to reconcile the exact GA annually (not quarterly).

The values calculated for that reconciliation have been included in the Continuity Schedule under the principal adjustments for the year. This results in a variance between the "RRR" and "2016 Balance" which consists of:

- \$3 - \$4 due to rounding and,
- \$7277.49 WNP owed to the IESO on December 31, 2016 because of the annual reconciliation.

The Non-RPP values are very accurate at month-end since WNP uses settlement meter readings which reconcile to the IESO bill. If any variance exists, it is accounted for monthly in the 1589 values. As noted above, the values calculated for the annual reconciliation have been included in the Continuity Schedule under the principal adjustments for the year.

3b) In WNP's opinion, the applicant does not need to true-up the proportions for GA Costs because no GL Entry is made until the actual IESO invoice is received. Billing for the previous month can begin as soon as the IESO invoice is received. The invoice is posted to the month of consumption after billing for that month has taken place.

3c) With the adjustments to the Continuity Schedule to reflect the annual reconciliation, as noted above, WNP confirms it is conforming to the true-up requirements of the May 23, 2017 letter from the OEB.