

**Hydro Hawkesbury Inc.
EB-2019-0042**

Staff Question-1

**Ref: Tab 3 of IRM Rate Generator (cells BM 37 and BM 41)
IRM Rate Generator Model – Staff Revised (attachment)**

Pre-amble

An extract of the balance in 1595 (2019) of Tab 3 is re-produced below:

		2019		
Account Descriptions	Account Number	Principal Disposition during 2019 - instructed by OEB	Interest Disposition during 2019 - instructed by OEB	Closing Principal Balances as of Dec 31, 2018 Adjusted for Disposition during 2019
Group 1 Accounts				
LV Variance Account	1550	63,380	3,055	11,986
Smart Metering Entity Charge Variance Account	1551	(284)	(15)	(2,445)
RSVA - Wholesale Market Service Charge ⁵	1580	(128,172)	(6,036)	(18,010)
Variance WMS – Sub-account CBR Class A ⁵	1580			0
Variance WMS – Sub-account CBR Class B ⁵	1580	39,450	1,172	(2,028)
RSVA - Retail Transmission Network Charge	1584	(175,172)	(4,675)	(89,305)
RSVA - Retail Transmission Connection Charge	1586	(83,785)	(1,741)	(55,620)
RSVA - Power ⁴	1588	101,971	(2,392)	102,466
RSVA - Global Adjustment ⁴	1589	51,607	3,405	(1,495,233)
Disposition and Recovery/Refund of Regulatory Balances (2013) ³	1595		390	0
Disposition and Recovery/Refund of Regulatory Balances (2014) ³	1595		(303)	0
Disposition and Recovery/Refund of Regulatory Balances (2015) ³	1595		386	0
Disposition and Recovery/Refund of Regulatory Balances (2016) ³	1595			0
Disposition and Recovery/Refund of Regulatory Balances (2017) ³	1595			0
Disposition and Recovery/Refund of Regulatory Balances (2018) ³	1595			(140,158)
Disposition and Recovery/Refund of Regulatory Balances (2019) ³ <i>Not to be disposed of until a year after rate rider has expired and that balance has been audited</i>	1595	131,004	6,753	(131,004)
RSVA - Global Adjustment	1589	51,607	3,405	(1,495,233)
Total Group 1 Balance excluding Account 1589 - Global Adjustment		(51,607)	(3,405)	(324,119)
Total Group 1 Balance		(131,004)	(0)	(1,819,353)

In the updated IRM rate generator attached, the formula in Tab 3 cell BM 41 was corrected by OEB staff, as the original formula did not capture the total group 1 balance correctly. Given the formula change, it raises question on whether the amounts originally entered for disposition in 1595 (2019) are correct.

Questions

- a. Please confirm whether a debit balance of \$131,004 has been transferred into Account 1595 (2019). Based on the updated IRM rate generator attached, please review accuracy of:
- the amount entered in Account 1595 (2019) in Tab 3, cell BM 37
 - total group 1 balance of 0 in Tab 3, cell BM 41

HHI Response: Based on the decision dated December 13, 2018, a principal amount of \$131,004 as been approved (debit in account 1595). Yes BM 41 should be \$0.

Staff Question-2

Ref: Application, p. 13

Tab 3 of IRM Rate Generator (cells BV 23 and BV 25)

Pre-amble

In the application, Hydro Hawkesbury states that the Class B Account 1580 WMS CBR sub-account balance should have been \$37,755 and (\$150,546) in the control Account 1580 WMS. Based on the 2.1.7 RRR column of the DVA continuity schedule, it appears that these amounts were not included in RRR as of December 31, 2018.

		nces		2.1.7 RRR	
Account Descriptions	Account Number	Total Claim	Account Disposition: Yes/No?	As of Dec 31, 2018	Variance RRR vs. 2018 Balance (Principal + Interest)
Group 1 Accounts					
LV Variance Account	1550	11,921		78,000	(1)
Smart Metering Entity Charge Variance Account	1551	(2,525)		(2,751)	(0)
RSVA - Wholesale Market Service Charge ⁵	1580	(16,870)		(112,791)	37,754
Variance WMS – Sub-account CBR Class A ⁵	1580	0		0	0
Variance WMS – Sub-account CBR Class B ⁵	1580	(2,928)		0	(37,755)
RSVA - Retail Transmission Network Charge	1584	(92,063)		(269,264)	(0)
RSVA - Retail Transmission Connection Charge	1586	(57,560)		(141,437)	0

Questions

- a. Please explain why there is a 0 balance in its 2.1.7 RRR filing for Class B Account 1580 WMS CBR sub-account when Hydro Hawkesbury notes that there should have been a debit balance of \$37,755 in 2.1.7 RRR. Why would the 2.1.7 RRR balances for Account 1580 not reflect all transactions as of December 31, 2018?

HHI Response: When HHI reported its 2.1.7 balances for account 1580, a credit of \$112,791 was reported in RSVA – Wholesale Market Service Charge. A credit of \$150,546 should have been reported in RSVA – Wholesale Market Service Charge and a debit of \$37,755 should have been reported in Variance

WMS – Sub-account CBR Class B. Although the total for account 1580 was correct, amount was incorrectly classified in the sub-accounts.

- b. Please update the 2.1.7 RRR balances for the control Account 1580 WMS and the Class B Account 1580 WMS CBR sub-account as of December 31, 2018 as required. Please submit a revision request to the OEB's Performance Analytics & Reporting group and notify the case manager when the RRR amendment is complete.

HHI Response: HHI will request an update to modify the 2.1.7 as follow in Sub-Accounts

Sub-Account CBDR class B-Principal \$37,422.09

Sub-Account CBDR class B-Interest \$332.44

Staff Question-3

**Ref: Application, p. 16
Tab 6 of IRM Rate Generator (Table 3-b)
GA Analysis Workform**

Pre-amble

In the application, Hydro Hawkesbury states that it has 1 or 2 class A customers when providing settlement information to the IESO. In Tab 6 of the IRM rate generator, there is one transition customer in 2018.

In Tab 6, Hydro Hawkesbury entered 12,502,583 kWh for class A consumption in 2018. However, in the GA analysis workform, non-RPP class A consumption is 15,041,117 kWh based on the data extracted from RRR.

Questions

- a. Please clarify the circumstances in which Hydro Hawkesbury has one or two class A customers. Please confirm accuracy of the information in Table 3-a.

HHI Response: HHI confirms that it did have 2 Class A Customers for a total of 13,396,041 without losses (including in transition customer)

- b. Please explain why there is a discrepancy of 2,538,534 kWh (15,041,117 kWh minus 12,502,583 kWh) in class A consumption between its RRR filing and Tab 6 of the IRM rate generator. Please confirm the correct number and check whether the class A volumes submitted in RRR as of December 31, 2018 require updating.

HHI Response: HHI notes that it had inadvertently entered loss adjusted consumption in Tab 6 of the IRM Rate Generator. Furthermore, in investigating the issue, HHI found that in its RRR filing, it had included a full year for the transition customer when it should have been for 6 months only. Therefore, as explained at Question 9 of these IRs, HHI commits to filing a revision request upon approval of the rate application or as instructed by Board Staff. The revised consumption in the RRR will be in the amount of 13,396,041 kWh which reconciles with the addition of both Table 3a) and Table 3b) of Tab 6 of the revised IRM Rate Generator. Please see Question 10 for further details on the revised RRR consumption. Screenshots of Tab 6 is presented below.

3a

Enter the number of transition customer you had during the period the Account 1589 GA or Account 1580 CBR B balance accumulated

Clear All

Transition Customers - Non-loss Adjusted Billing Determinants by Customer

Customer	Rate Class		2018	
			January to June	July to December
Customer 1	GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION	kWh	1,645,077	1,512,038
		kW	4,005	3,720
		Class A/B	B	A

3b

Enter the number of rate classes in which there were customers who were Class A for the full year during the period the Account 1589 GA or Account 1580 CBR B balance accumulated. Enter the total Class A consumption in the rate class in the table

Clear All

Rate Classes with Class A Customers - Billing Determinants by Rate Class

Rate Class	Rate Class		2018	
Rate Class 1	GENERAL SERVICE 50 to 4,999 kW SERVICE CLASSIFICATION	kWh		11,884,003
		kW		29,064

Staff Question-4

Ref: Application, p. 14
1595 Analysis Workform
Tab 3 of IRM Rate Generator

Pre-amble

In the application, Hydro Hawkesbury is proposing not to dispose of its 1595 balances, as the total balance of all accounts in 1595 is \$473 and is too immaterial to dispose. Therefore, Hydro Hawkesbury has not populated the 1595 Analysis Workform.

In the DVA Continuity Schedule, Hydro Hawkesbury has not included the residual balances from Account 1595 sub-accounts 2013, 2014 and 2015 as part of the disposition of its group 1 DVA balances.

Question

- a. Please confirm that Hydro Hawkesbury is planning to write off the residual debit balances for Account 1595 vintage years 2013, 2014 and 2015 due to the immateriality of the residual balances.

HHI Response: HHI confirms that it is not seeking to dispose of its immaterial balances and plans on writing them off. Those balances are carrying charges only. Principal amounts were disposed.

Staff Question-5

Ref: Application, pp. 25-26

Hydro Hawkesbury 2018 Scorecard (accessible via OEB website)

Pre-amble

In 2018, Hydro Hawkesbury had under-earned by -13.10% based on an achieved ROE of -4.10% and a deemed ROE of 9.00%. Hydro Hawkesbury attributes the under-earnings to the following two reasons:

1. Refund of the cost of the substation in 2018 due to the over-collection of \$253K since its 2014 COS application (one-time event)
2. Over-statement of cost of power by \$9M due to the regression methodology established in its 2018 COS application, which Hydro Hawkesbury states will create a discrepancy between deemed and actual financial indicators

Questions

- a. Given that cost of power is overstated by \$9M compared to actual, please discuss whether Hydro Hawkesbury foresees any regulatory or financial viability issues during the IRM years until its next rebasing. Please discuss in the context of Hydro Hawkesbury's current financial position.

HHI Response: Having been the most efficient utility on Ontario for the past 10+ years, HHI can safely state that it does not foresee any fiscal nor financial issues as a result of the overstating of the Cost of Power. HHI also notes that its rates, and Cost of Power and resulting rates were calculated in accordance with the rules of load forecasting and rate design and subsequently approved by the Ontario Energy Board. That said, in its next Cost of Service application, HHI will explore methods of forecasting other than the regression analysis that has been the norm for all utilities so far.

- b. Please elaborate on the tools or systems that Hydro Hawkesbury has in place to ensure that its capital and operational spending are in line with revenues.

HHI Response: HHI populates and uses a model similar to the Chapter 2 Appendices to track its capital and operational expenses against its 2018 Board Approved expenses. These tools were put in place to provide the utility with a better tracking and reporting of its spending. It serves to facilitates the yearly reporting to the OEB as well as facilitates the preparation of Cost of Service applications. As a small utility, HHI does not have an internal regulatory team to assist in tracking and reporting therefore it relies on tools.

Staff Question-6

Ref: Tab 11 of IRM Rate Generator (UTRs)

Pre-amble

In the 2020 column under the "Uniform Transmission Rates (UTR)" section on Tab 11 of the IRM rate generator, the 2019 Uniform Transmission Rates approved for Network, Line and Transformation Connection Service costs (EB-2018-0326) were carried over in 2020. OEB staff notes that the 2020 UTR column should have reflected the latest uniform transmission rates approved in EB-2019-0164.

Question

- a. Please confirm whether Hydro Hawkesbury agrees with the updates on the 2020 UTRs in the staff revised version of the IRM rate generator attached.

HHI Response: HHI confirms that it agrees with the most recent UTRs as updated by the OEB

Staff Question-7

Ref: Application, pp. 13-14

Pre-ambble

At the above reference, Hydro Hawkesbury confirms that it is in compliance with the OEB's February 21, 2019 accounting guidance related to Accounts 1588 and 1589 and that no adjustments were required as a result of the implementation of this accounting guidance.

Questions

- a. As a result of confirming that it has implemented the OEB's February 21, 2019 accounting guidance, please confirm whether Hydro Hawkesbury is seeking final (as opposed to interim) disposition of its 2018 audited Group 1 DVA account balances as part of the current proceeding.

HHI Response: HHI is seeking final disposition of its 2018 audited Group 1 DVA account balances as part of the current proceeding.

- b. Please confirm whether Hydro Hawkesbury is also seeking final disposition related to its December 31, 2017 audited Group 1 DVA account balances, which were approved for disposition by the OEB on an interim basis as part of Hydro Hawkesbury's 2019 IRM application.

HHI Response: HHI is seeking final disposition of its December 31, 2017 audited Group 1 DVA account balances, which were approved for disposition by the OEB on an interim basis as part of Hydro Hawkesbury's 2019 IRM application.

- c. In regards to the implementation of the OEB's February 21, 2019 accounting guidance, please confirm that Hydro Hawkesbury has assessed this new accounting guidance against each RPP settlement it had completed in both 2017 and 2018, and that no adjustments were required as a result.

HHI Response: HHI has assessed this new accounting guidance against each RPP settlement it had completed in both 2017 and 2018, and no adjustments were required as a result.

- d. Hydro Hawkesbury indicates that it did not report any adjustments related to the implementation of the OEB's February 21, 2019 accounting guidance because it settles using actual numbers. In the context of the OEB's February 21, 2019 guidance, it prescribes that a utility settle its consumption for a particular month on the fourth day of the following month (i.e. December consumption is settled on January 4th) using best available data.

- i. Is Hydro Hawkesbury confirming that actual consumption quantities are available for RPP settlement purposes by the fourth day of the following month (i.e. actual December consumption is available by January 4th)?

HHI response: The actuals RPP consumption are available on the 4th day of the following month. EX: September 2019 actual RPP are available on November 1st, 2019). This being said HHI can perform the 1st true up (following actual invoices from H1 and IESO and the 2nd true up following the actuals RPP sales on November 4th 2019)

- ii. If the response above is no, then please explain how Hydro Hawkesbury is confirming that it has implemented the OEB's February 21, 2019 accounting guidance when it has not complied with the prescribed accounting for RPP settlements.
- iii.

HHI Response: As per our understanding we were using Actual power purchase and RPP data to perform our settlement. (EX: for March 4th 2019 settlement, we used the actual power purchase from January 2019 and the actual RPP sales from January 2019.

- e. In the response provided to question 2 of the *Appendix A – GA Methodology Description*, Hydro Hawkesbury indicates that it follows methodology b) with respect to recording CT 148 (i.e. CT 148 is booked into Account 1589, the portion of CT 1142 equalling RPP – HOEP for RPP consumption is booked into

account 1588, and the portion of CT 1142 equalling GA RPP is credited into Account 1589).

- i. In the context of the OEB's February 21, 2019 accounting guidance, please explain how Hydro Hawkesbury is confirming that it is in compliance with this guidance when the guidance prescribes the use of methodology a) from question 2 of the *Appendix A – GA Methodology Description*.

HHI'S response: As per the February guidance's, since August 31, 2019 HHI complies with the OEB'S accounting guidance's. The process we use is as follows:

Initial Settlement for CT 1142:

HHI estimates the power purchased as well and RPP and Non-RPP sales for the month that just ended. (EX: October 1st. Estimates September). So on the 4th day of the month, when we do your initial RPP settlement, all data used would be based on estimates. We use estimates for:

- **total wholesale volumes,**
- **proportions for consumption volume for RPP and non-RPP,**
- **RPP volumes at each price point,**
- **Power price**

HHI uses GA 2nd estimate (because this is the best information available at the time, and eventually it needs to be trued up to actual).

Based on the above information, the initial settlement would be performed around the 4th day of the month.

1st True-up after IESO & Hydro One invoice is received:

For the 1st true-up some elements for RPP settlement are actual (e.g. actual power price and actual GA price, total wholesale kWh paid for) but some are estimated (split between RPP and non-RPP, and consumption at each RPP price)

We get the invoices from the IESO & Hydro One around the 16th of the month. HHI now have actual power price, actual GA price, and actual total wholesale volumes. The 1st true-up would be done on or around the 4th day of the following month. This true up would be performed using the following actuals:

- Total actual wholesale volumes,
- Actual power price,
- Actual GA price.

Since actual proportions for RPP and non-RPP are not available yet, you would perform 1st true-up of CT 1142 using the following estimates:

Estimated total RPP volumes (based on Estimated proportion of RPP to non-RPP),

Estimated proportion of RPP at each price point.

This true up occurs when the actual power invoices are received mid-month. We true up this on the 4th day of the following month (EX: November 4th)

2nd True-up after retail volumes are available (when billings have been completed):

When all retail data becomes available, you would be able to true-up everything to actuals. 2nd true-up of CT 1142 would be based on actual RPP revenue and Actual power and GA price:

- Actual retail volume for RPP and non-RPP,
- Actual retail volumes at each RPP price, and RPP revenues at each price point,
- Actual consumption proportions for RPP and non-RPP,
- Actual energy price for RPP and non-RPP,
- Actual costs for energy and GA.

Since HHI bills monthly (1-30 day) we are in a position to true up this amount on the 4th day of the month.

In resume: End of September 2019

Initial settlement (estimate for September 2019) done on October 4th 2019

- **1st True up following October 15th invoice for the month of September will be done November 4th, 2019**
- **2nd true-up following the actual sales RPP and Non-RPP data for September is also done on November 4th.**
- **The process starts over again as we do our October initial Settlement on November 4th.**
- **Item 2 and 3 above will be performed on December 4th, 2019.**

Staff Question-8

Ref: GA Analysis Workform (cell C64)

Tab 3 of IRM Rate Generator Model (cell BD 29)

Pre-amble

Hydro Hawkesbury has completed and submitted the OEB's GA Analysis Workform in support of its disposition of Account 1589. In cell C64 of the GA Analysis Workform, Hydro Hawkesbury has presented a credit balance of \$104,114.

Questions

- a. The balance in cell C64 of the GA Analysis Workform must correspond with the "Transactions debit/(credit) during 2018" column for Account 1589 as per the DVA continuity schedule in the Rate Generator Model. Accordingly, please update the GA Analysis Workform as it currently does not match the balance in the DVA continuity schedule.
- b. If Hydro Hawkesbury believes that the current balance in cell C64 of the GA Analysis Workform is correct, please explain why.

HHI Response a) b) : The GA Analysis Workform that was filed in the original application was in fact correct. The IRM model has been updated to reflect the balances in the GA Analysis Workform. The revised IRM model is being filed along with these responses.

		Opening Principal Amounts as of Jan 1, 2018	Transactions Debit / (Credit) during 2018	OEB-Approved Disposition during 2018	Principal Adjustments 1 during 2018	Closing Principal Balance as of Dec 31, 2018	Opening Interest Amounts as of Jan 1, 2018	Interest Jan 1 to Dec 31, 2018	OEB-Approved Disposition during 2018	Interest Adjustment s1 during 2018	Closing Interest Amounts as of Dec 31, 2018	Principal Disposition during 2019 - instructed by OEB	Interest Disposition during 2019 - instructed by OEB	Closing Principal Balances as of Dec 31, 2018 Adjusted for Disposition during 2019	Closing Interest Balances as of Dec 31, 2018 Adjusted for Disposition during 2019
original															
RSVA - Power4	1588	-805,646.95	102,465.50	907,618.18	0.00	204,436.73	-17,173.67	4,906.85	17,144.30	0.00	4,877.48	-101,971.23	2,392.18	102,465.50	7,269.66
RSVA - Global Adjustment4	1589	352,029.07	-1,495,233.25	-300,422.23	0.00	-1,443,626.41	4,233.79	-17,130.08	-3,678.33	0.00	-16,574.62	-51,606.84	-3,405.38	-1,495,233.25	-19,980.00
		-453,617.88	-1,392,767.75	607,195.95	0.00	-1,239,189.68	-12,939.88	-12,223.23	13,465.97	0.00	-11,697.14	-153,578.07	-1,013.20	-1,392,767.75	-12,710.34
final															
RSVA - Power4	1588	-805,646.95	-1,288,653.47	907,618.18	0.00	-1,186,682.24	-17,173.67	-12,213.09	17,144.30	0.00	-12,242.46	-101,971.23	2,392.18	-1,288,653.47	-9,850.28
RSVA - Global Adjustment4	1589	352,029.07	-104,114.28	-300,422.23	0.00	-52,507.44	4,233.79	-10.14	-3,678.33	0.00	545.32	-51,606.84	-3,405.38	-104,114.28	-2,860.06
		-453,617.88	-1,392,767.75	607,195.95	0.00	-1,239,189.68	-12,939.88	-12,223.23	13,465.97	0.00	-11,697.14	-153,578.07	-1,013.20	-1,392,767.75	-12,710.34
ajustement															
RSVA - Power4	1588	0.00	-1,391,118.97	0.00	0.00	-1,391,118.97	0.00	-17,119.94	0.00	0.00	-17,119.94	0.00	0.00	-1,391,118.97	-17,119.94
RSVA - Global Adjustment4	1589	0.00	1,391,118.97	0.00	0.00	1,391,118.97	0.00	17,119.94	0.00	0.00	17,119.94	0.00	0.00	1,391,118.97	17,119.94
		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Carrying charges															
						Solde moyen									
original															
RSVA - Power4	1588					153,203.98		4,906.85							
RSVA - Global Adjustment4	1589					-696,009.79		-17,130.08							
						-542,805.81		-12,223.23							
final															
RSVA - Power4	1588					-542,355.51		-12,213.09							
RSVA - Global Adjustment4	1589					-450.30		-10.14							
						-542,805.81		-12,223.23							
ajustement															
RSVA - Power4	1588							-17,119.94							
RSVA - Global Adjustment4	1589							17,119.94							
								0.00							

Staff Question-9

Ref: GA Analysis Workforms (filed in 2019 and 2020 IRM proceedings)

Tab 20 of IRM rate generator, column I (current loss factor)

Pre-amble

In the 2018 GA Analysis workform submitted on record in this proceeding, cell K59 shows that the calculated loss factor was 1.0781 based on 2018 non-RPP class B volumes. In the 2017 GA Analysis workform submitted previously in the 2019 IRM proceeding, cell F57 shows that the calculated loss factor was 1.0567 based on 2017 non-RPP class B volumes.

The calculated loss factor of 1.0781 in the 2018 GA Analysis Workform based on 2018 non-RPP class B volumes also appears relatively high in comparison with the approved loss factor of 1.0509 (for secondary metered customers).

Questions

- a. Please explain why the calculated loss factor was 1.0781 in the 2018 GA Analysis Workform is significantly higher than the approved loss factor of 1.0509 for secondary metered customers.

Please provide the supporting analysis to explain how the calculated loss factor of 1.0781 (shown in the 2018 GA Analysis Workform) is reasonable compared to the applicant's approved loss factor.

HHI Response: HHI will request an update the 2.1.5 RRR under Demand and Revenue, Table 5.

Reported in 2018 RRR 2.1.5

Table 5 Class A Consumption	
Please report the aggregate consumption and demand for Class A customers	
Metered kWhs	Metered kWhs
15,041,117	35,472.95

Proposed Revision (revisions request will be filed upon confirmation from Board Staff)

Table 5 Class A Consumption	
Please report the aggregate consumption and demand for Class A customers	
Metered kWhs	Metered kW
13,396,040.58	31,470.95

ACTUAL GA ANALYSIS					
Note 2	Consumption Data Excluding for Loss Factor (Data to agree with RRR as applicable)				
	Year		2018		Non-RPP Class B Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)
	Total Metered excluding WMP	C = A+B	144,139,136	kWh	
	RPP	A	64,445,530	kWh	69,699,047.00
	Non RPP	B = D+E	79,693,606	kWh	64,652,489.00
	Non-RPP Class A	D	15,041,117	kWh	
	Non-RPP Class B*	E	64,652,489	kWh	1.0781
					LINE LOSS
MODIFIED GA ANALYSIS					
Note 2	Consumption Data Excluding for Loss Factor (Data to agree with RRR as applicable)				
	Year		2018		Non-RPP Class B Including Loss Adjusted Consumption, Adjusted for Unbilled (kWh)
	Total Metered excluding WMP	C = A+B	144,139,136	kWh	
	RPP	A	64,445,530	kWh	69,699,047.00
	Non RPP	B = D+E	79,693,606	kWh	66,297,565.42
	Non-RPP Class A	D	13,396,041	kWh	
	Non-RPP Class B*	E	66,297,565	kWh	1.0513
					LINE LOSS

Staff Question-10

Ref: All models filed with 2020 IRM application

- a. Based on Hydro Hawkesbury's response to the above questions, please re-file all applicable models, workforms and/or appendices to reflect the updates.
- b. Please summarize all updates to the application, model(s) and/or appendices submitted in this proceeding.

HHI Response: HHI confirms that it has filed all models that were revised as a result of the responses to these IRs with the exception of the GA Workform the reason being that some of the information that is pre-populated from the RRR is incorrect. HHI awaits further instructions from Board Staff as to when to file a revision request to update its RRR which will then flow into the GA Workform.