

# **SETTLEMENT PROPOSAL**

**Enbridge Gas Inc.**

**2020 Rates – Phase 1**

**November 28, 2019**

## TABLE OF CONTENTS

<b><u>ISSUE</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>Page</u></b>
	Preamble	3
	Overview	6
	The Issues	
1.	Is the proposed price cap rate adjustment for 2020 calculated properly?	8
2.	Are the proposed pass-through costs included in 2020 rates for each of the EGD and Union Rate Zones appropriate?	9
3.	Are the proposed capital pass-through cost adjustments proposed for the Union Rate Zones appropriate?	10
4.	Is the Parkway Delivery Obligation cost adjustment for the Union Rate Zones calculated properly?	10
5.	What is the timing for implementation of the proposed Phase 1 changes to 2020 rates?	11
6.	Is it appropriate to approve the Accounting Order for 2020 Deferral and Variance Accounts for Enbridge Gas and for the EGD and Union Rate Zones?	11
7.	Enbridge Gas's E-Bill Practices	12
	Appendix A – Draft Rate Order – EGD Rate Zones	15
	Appendix B – Draft Rate Order – Union Rate Zones	16
	Appendix C – Draft Accounting Order	17

## PREAMBLE

This Settlement Proposal is filed with the Ontario Energy Board (the “OEB” or the “Board”) in connection with the application of Enbridge Gas Inc. (“Enbridge Gas” or the “Company”), for an order or orders approving Enbridge Gas’s 2020 rates for the Rate Zones of the former Enbridge Gas Distribution (EGD) and Union Gas Limited (Union) on an interim basis. This Settlement Proposal addresses “Phase 1” of this proceeding – which is limited to the annual rate escalation, pass-through costs, capital pass-through adjustments, Parkway Delivery Obligation cost adjustments and continuation of Deferral and Variance Accounts.

On October 29, 2019, the OEB issued its Notice of Application in this proceeding. In Procedural Order No. 1, dated November 12, 2019, the Board established the process to address Phase 1 of the application, up to and including a Settlement Conference.

A Settlement Conference was held on November 21 and 22, 2019, and discussions continued after that time. Chris Haussmann acted as facilitator for the Settlement Conference. This Settlement Proposal arises from the Settlement Conference.

Enbridge Gas and the following intervenors, as well as Ontario Energy Board technical staff (OEB Staff), participated in the Settlement Conference:

- Canadian Manufacturers & Exporters (CME)
- Consumers Council of Canada (CCC)
- Energy Probe Research Foundation (Energy Probe)
- Federation of Rental-Housing Providers of Ontario (FRPO)
- London Property Management Association (LMPA)
- Ontario Association of Physical Plant Administrators (OAPPA)
- Ontario Greenhouse Vegetable Growers (OGVG)
- Pollution Probe
- Quite Manufacturers Association (QMA)
- School Energy Coalition (SEC)
- Six Nations Natural Gas Company Limited (SNNG)
- The Corporation of the City of Kitchener – Utilities Division (Kitchener)
- Vulnerable Energy Consumers Coalition (VECC)

All intervenors listed above participated in the Settlement Conference and subsequent discussions. In this Settlement Proposal, the above-listed intervenors and Enbridge Gas are referred to as “the parties”.

The following items from Enbridge Gas’s Application and pre-filed evidence were addressed by the parties during the Settlement Conference:

1. The proposed price cap rate adjustment for 2020 rates in the EGD and Union Rate Zones
2. The proposed pass-through costs included in 2020 rates in the EGD and Union Rate Zones
3. The proposed capital pass-through cost adjustments for 2020 rates in the Union Rate Zones
4. The proposed Parkway Delivery Obligation cost adjustment for 2020 in the Union Rate Zones
5. The timing for implementation of the proposed Phase 1 changes to 2020 rates
6. The Accounting Order for the Deferral and Variance Accounts for 2020 for Enbridge Gas and the EGD and Union Rate Zones

The parties have reached complete agreement on all these items.

In addition, the parties discussed Enbridge Gas's change in billing practices in 2019 to make e-bill the default billing method for new customers and to switch existing paper bill customers who had previously provided an email address to the Company. Enbridge Gas believes that its change in practice is appropriate, and does not believe that any Board approval was or is required. Other parties disagree. The parties have agreed that issues related to Enbridge Gas's e-bill practices should be included in Phase 2 of this proceeding as described further herein.

Collectively, the items discussed during the Settlement Conference are referred to as the "Settled Items" in this Settlement Proposal.

No other issues or proposals were addressed by the parties during the Settlement Conference or are addressed in this Settlement Proposal.

All intervenors listed above participated in the Settlement Conference and subsequent discussions. OEB Staff is not a party to the Settlement Proposal. Although it is not a party to the Settlement Proposal, once the Settlement Proposal is filed, OEB Staff will file a submission commenting on two aspects of the settlement: whether the settlement represents an acceptable outcome from a public interest perspective, and whether the accompanying explanation and rationale is adequate to support the settlement. Also, as noted in the Practice Direction on Settlement Conferences, OEB Staff who participated in the Settlement Conference are bound by the same confidentiality and privilege rules that apply to the parties to the proceeding.

This document is called a “Settlement Proposal” because it is a proposal by the parties to the Board to settle the issues in this proceeding. It is termed a proposal as between the parties and the Board. However, as between the parties, and subject only to the Board’s approval of this Settlement Proposal, this document is intended to be a legal agreement, creating mutual obligations, and is binding and enforceable in accordance with its terms. As set forth below, this Settlement Proposal is subject to a condition subsequent, that if it is not accepted by the Board in its entirety, then unless amended by the parties it is null and void and of no further effect. In entering into this agreement, the parties understand and agree that, pursuant to the *Ontario Energy Board Act, 1998*, the Board has exclusive jurisdiction with respect to the interpretation or enforcement of the terms hereof.

Enbridge Gas and all intervenors listed above have agreed to the settlement of the Settled Items as described on the following pages. Any reference to “parties” in this Settlement Proposal is intended to refer to Enbridge Gas and the intervenors listed above. The description of each Settled Item assumes that all parties participated in the negotiation of the item, unless specifically noted otherwise.

Best efforts have been made to identify all of the evidence that relates to each Settled Item. The supporting evidence for each settled issue is identified individually by reference to its exhibit number in an abbreviated format; for example, Exhibit B, Tab 1, Schedule 1 is referred to as B-1-1. The identification and listing of the evidence that relates to each settled issue is provided to assist the Board.

The Settlement Proposal describes the agreements reached on the Settled Items. The Settlement Proposal provides a direct link between each Settled Item and the supporting evidence in the record to date and/or the additional evidence attached to hereto. In this regard, the parties are of the view that the evidence provided is sufficient to support the Settlement Proposal in relation to the Settled Items and, moreover, that the quality and detail of the supporting evidence, together with the corresponding rationale, will allow the Board to make findings agreeing with the proposed resolution of the Settled Items.

None of the parties can withdraw from the Settlement Proposal except in accordance with Rule 30 of the *Ontario Energy Board Rules of Practice and Procedure*. Further, unless stated otherwise, a settlement of any particular issue in this proceeding is without prejudice to the positions parties might take with respect to the same issue in future proceedings, whether during the term of Enbridge Gas’s current deferred rebasing term, or thereafter.

The parties acknowledge that this Settlement Conference is confidential in accordance with the Practice Direction on Settlement Agreements. The parties understand that confidentiality in that context does not have the same meaning as confidentiality in the OEB’s *Practice Direction on Confidential Filings*, and the rules of that latter document do not apply. Instead, in this Settlement Conference, and in this Settlement Proposal, the parties have interpreted “confidential” to mean that the documents and other information

provided during the course of the Settlement Conference, the discussion of each issue, the offers and counter-offers, and the negotiations leading to the settlement – or not – of each issue during the Settlement Conference are strictly privileged and without prejudice. None of the foregoing is admissible as evidence in this proceeding, or otherwise, with one exception: the need to resolve a subsequent dispute over the interpretation of any provision of this Settlement Proposal. Further, the parties shall not disclose those documents or other information to persons who were not attendees at the Settlement Conference. However, the parties agree that “attendees” is deemed to include, in this context, persons who were not physically in attendance at the Settlement Conference but were; a) any persons or entities that the parties engaged to assist them with the Settlement Conference; or b) any persons or entities from whom they seek instructions with respect to the negotiations; in each case provided that any such persons or entities have agreed to be bound by the same confidentiality provisions.

It is fundamental to the agreement of the parties that none of the provisions of this Settlement Proposal are severable. If the Board does not accept the provisions of the Settlement Proposal in their entirety, there is no Settlement Proposal (unless the parties agree that any portion of the Settlement Proposal that the Board does accept may continue as a valid Settlement Proposal).

Where in this Agreement, the parties “accept” the evidence of Enbridge Gas, or the parties or any of them “agree” to a revised term or condition, including a revised budget or forecast, then unless the Settlement Proposal expressly states to the contrary, the words “for the purpose of settlement of the issues herein” shall be deemed to qualify that acceptance or agreement.

## **OVERVIEW**

On August 30, 2018, in the MAADs Decision (EB-2017-0306/0307), the Board approved a rate setting mechanism (Price Cap IR) for Enbridge Gas, which sets out a multi-year incentive rate-setting mechanism (“IRM”) for the calendar year term of 2019 to 2023 (the “deferred rebasing term”). The MAADs Decision confirmed that during the deferred rebasing term, distribution rates will be set separately for the Enbridge Gas Distribution (“EGD”) and Union Gas (“Union”) Rate Zones.

This 2020 rate application is the second annual rate adjustment application under the IRM approved in the MAADs Decision. Enbridge Gas’s Application is divided into two Phases. Phase 1 (which is the subject of this Settlement Proposal) addresses the IRM related elements of the application and Phase 2 will address Enbridge Gas’s Incremental Capital Module (ICM) requests and a cost allocation study related to the Union Rate Zones, as well as Enbridge Gas’s e-bill practices.

The Phase 1 prefiled evidence sets out and explains the proposed changes to Enbridge Gas's base rates for regulated transportation, storage and distribution for each of its three Rate Zones (EGD, Union North and Union South) effective January 1, 2020. As explained, adjustments to the base rates for each Rate Zone are determined in accordance with the IRM as follows:

- i. Annual rate escalation, as determined by a price cap index ("PCI"), where PCI growth is driven by an inflation factor using GDP IPI FDD, less a productivity factor of zero and a stretch factor of 0.30% (the "X factor").
- ii. Demand side management cost changes, lost revenue adjustment mechanism changes for the contract market and average use/normalized average consumption adjustments.

A summary of the impact of the proposed IRM adjustments for each Rate Zone is set out in Table 1 of Exhibit B, Tab 1, Schedule 1 of the prefiled evidence.

In accordance with the MAADs Decision and the 2019 Rates Decision and Order (EB-2018-0305), Enbridge Gas has also included updates to capital pass-through and Parkway Delivery Obligation ("PDO") costs in the Union rate zones in Phase 1.

Through the Settlement Conference process, all parties have agreed that it is appropriate for Enbridge Gas to proceed to implement its as-filed IRM rate adjustments (with one adjustment), as well as the proposed updates to the capital pass-through charges and the PDO. . The agreed adjustment is that Enbridge Gas will apply an inflation factor of 1.61%, rather than the as-filed 1.66%, in the calculation of the PCI. This updated inflation factor reflects the most recent data from Statistics Canada.

The parties have also agreed to the Accounting Order for Deferral and Variance Accounts for Enbridge Gas and the EGD and Union Rate Zones for 2020 on the basis of Enbridge's representation that there are no substantive changes in the Accounting Order from prior years.

All parties agree that it is appropriate for Enbridge Gas to implement the 2020 IRM rate adjustments and other items in this Settlement Proposal on an interim basis, to be effective January 1, 2020. The implementation will be effected in conjunction with the January 1, 2020 QRAM Applications.

Enbridge Gas changed its e-bill practices in 2019 to make e-bill the default billing method for new customers and to switch existing paper bill customers who, for any reason, had previously provided an email address to the Company to e-bill without prior specific consent on their part. Enbridge Gas believes that its change in practice is appropriate, and does not believe that any Board approval was or is required. Other parties disagree and the parties agree that issues related to Enbridge Gas's change in e-bill policies

Details of the settlement on the Settled Items are set out in the Issues section that follows.

**1. Is the proposed price cap rate adjustment for 2020 calculated properly?**

All parties agree that it is appropriate to apply a PCI of 1.31%, based on an inflation factor of 1.61% and the X factor of 0.30%. The inflation factor has been updated from the as-filed figure of 1.66%, to reflect the most up-to-date data from Statistics Canada.

Proposed Changes in Revenue by Rate Zone							
Effective January 1, 2020							
		EGD Rate Zone			Union Rate Zones		
Line No.	Particulars (\$000's)	Prefiled (PCI 1.36%)	Rate Order (PCI 1.31%)	Difference	Prefiled (PCI 1.36%)	Rate Order (PCI 1.31%)	Difference
	<u>Summary Change in Revenue:</u>						
1	2020 Proposed in EB-2019-0194	1,251,215	1,250,630	586	1,288,164	1,287,688	476
2	2019 Approved	1,233,954	1,233,954	-	1,270,666	1,270,666	-
3	Net Change (line 1 - line 2)	17,261	16,675	586	17,497	17,022	476
	<u>Detail Change in Revenue:</u>						
4	2020 Price Cap Index	15,926	15,339	586	12,856	12,383	473
5	2020 DSM Budget Change	1,335	1,335	-	1,081	1,081	-
6	2020 Capital Pass-through Change	-	-	-	3,237	3,237	-
7	2020 Parkway Delivery Obligation Change	-	-	-	323	320	3
8	Total Excluding Incremental Capital Module ("ICM") (lines 4 through 7)	17,261	16,675	586	17,497	17,022	476
9	2020 ICM Funding	Note (1)	Note (1)	Note (1)	Note (1)	Note (1)	Note (1)
10	Total (line 8 + line 9)	17,261	16,675	586	17,497	17,022	476
<u>Notes:</u>							
(1)	2020 ICM funding request will be implemented on a subsequent date as part of this application subject to the Board's approval.						



All parties agree that in future years Enbridge Gas will use an inflation factor that has only one decimal place, to be consistent with the approach used for electricity distributors regulated by the OEB.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
TC Tr. 20-21	Technical Conference Testimony
KT1.2	Technical Conference Exhibits (responses to written questions)
JT1.1- JT1.7	Technical Conference Undertakings

## **2. Are the proposed pass-through costs included in 2020 rates appropriate?**

The MAADs Decision approved the following costs as Y factors:

- Demand Side Management (“DSM”) costs as determined in EB-2015-0029/EB-2015-0049 and any subsequent proceeding;
- Lost Revenue Adjustment Mechanism (“LRAM”) for the contract market; and
- Average Use and Normalized Average Consumption.

The prefiled evidence sets out Enbridge Gas’s calculations of the pass-through amounts associated with these Y factors for each of the EGD and Union Rate Zones. All parties accept the evidence of Enbridge Gas that it has properly calculated the pass-through costs included in the application.

Parties have expressed concern about the predictive force of the Board-approved methodologies used for average use, normalized average consumption (NAC) and degree day forecasts for the EGD and Union Rate Zones. Parties acknowledge that these methodologies will continue to be in place during Enbridge Gas’s deferred rebasing term, but confirm that they will be reviewed at the time of rebasing. Enbridge Gas agrees that as part of its rebasing application, it will file a rigorous study (which may be an internal study or a third party study) examining the various available methodologies for average use, NAC and degree day forecasts, including those currently in use by Enbridge Gas, as well as detailing the rationale for any proposed alternative methodologies. The study will also detail other ratemaking options available to address average use and weather variations.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
TC Tr. 5-17, 22-27, 34-44, 55-59, 66-67	Technical Conference Testimony
KT1.1, 1.3 – 1.5 to KT1.7	Technical Conference Exhibits (responses to written questions)
JT1.1, 1.5	Technical Conference Undertakings

**3. Are the proposed capital pass-through cost adjustments proposed for 2020 rates appropriate?**

In the 2019 Rates Decision and Order (EB-2018-0305), the Board denied the proposed one-time adjustment to base rates for certain capital pass-through projects for the Union Rate Zones. In the prefiled evidence, Enbridge Gas has updated the capital pass-through projects to reflect the 2020 revenue requirement of each approved project consistent with the rate treatment in past years. In response to the 2019 Rates Decision, Enbridge Gas has also included the 2020 revenue requirement of the Sudbury Replacement Project as capital pass-through.

All parties accept the evidence of Enbridge Gas that it has properly calculated the capital pass-through adjustments for 2020 rates.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
TC Tr. 45-53, 67-68, 74-87, 89-91	Technical Conference Testimony
KT1.6 and 1.7	Technical Conference Exhibits (responses to written questions)
JT1.2, 1.3- JT1.7	Technical Conference Undertakings

**4. Is the Parkway Delivery Obligation cost adjustment for the Union Rate Zones calculated properly?**

As set out in the prefiled evidence, Enbridge Gas has updated the PDO and Parkway Delivery Commitment Incentive (“PDCI”) costs included in 2020 rates for the Union Rate Zones to reflect the 2020 Rate M12 Dawn-Parkway toll and compressor fuel, based on the October 2019 QRAM (EB-2019-0193).

All parties accept the evidence of Enbridge Gas that it has properly calculated the PDO rate adjustment.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
B-1-1 App. A	Annual PDO Reporting
TC Tr. 18, 45-53, 67-68, 74-87, 89-91	Technical Conference Testimony
KT1.6 and 1.7	Technical Conference Exhibits (responses to written questions)
JT1.1, 1.3 and 1.7	Technical Conference Undertakings

**5. What is the timing for implementation of the proposed Phase 1 changes to 2020 rates?**

Enbridge Gas has prepared draft Rate Orders for the EGD and Union Rate Zones reflecting the implementation of the IRM adjustments and the proposed updates to the capital pass-through and PDO costs. The draft Rate Orders are attached as Appendix “A” and “B”.

The draft Rate Orders also include the adjustment of the Retail Service Charges to reflect an inflation factor (1.61%) as required by the Board’s Report on Energy Retailer Service Charges (EB-2015-0304).

All parties agree that it is appropriate to implement the updated rates as of January 1, 2020, in conjunction with the January 1, 2020 QRAM Application for the EGD and Union Rate Zones. All parties agree that the updated rates should be implemented on an interim basis, so that the impacts resulting from Phase 2 of this Application, if any, can be determined and implemented at a later date if the Board so determines.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
D-1	Draft Rate Order – EGD Rate Zone
D-2	Draft Rate Order – Union Rate Zones
TC Tr. 18-19	Technical Conference Testimony

**6. Is it appropriate to approve the Accounting Order for the 2020 Deferral and Variance Accounts for Enbridge Gas and for the EGD and Union Rate Zones?**

At Exhibit D, Tab 3, Enbridge Gas filed a draft Accounting Order for the continuation of previously approved Deferral and Variance Accounts for 2020 for Enbridge Gas and for each of the EGD and Union Rate Zones. Enbridge Gas’s prefiled evidence explains that it proposes to continue its 2019 accounts, except for the Post-Retirement True-Up Variance Account (“PTUVA”) which is no longer required and which will not be continued in 2020.

Since the date when Enbridge Gas filed its Application and evidence in this proceeding, the 2019 Rate Order and associated Accounting Order were approved by the Board. The 2019 Accounting Order includes some minor wording changes to several accounts as compared to what had been included in Enbridge Gas’s prefiled evidence in this proceeding. The ‘draft’ version of the 2019 Gas Supply Plan Cost Consequences Deferral Account (which did not address Board Staff comments) was inadvertently included as part of the 2019 Final Accounting Order.

In the document attached as Appendix “C” to this Settlement Proposal, Enbridge Gas asserts that it has updated the draft Accounting Order for this proceeding to include the changes approved in the 2019 Accounting Order, as well as an updated version of the 2019 Gas Supply Plan Cost Consequences Deferral Account (which now addresses Board Staff comments), and has made no other substantive changes.

All parties accept the updated draft Accounting Order attached as Appendix “C” to this Settlement Proposal.

**Evidence:** The evidence in relation to this issue includes the following:

A-2-1	Application
B-1-1	Rate Setting Mechanism
D-3	Draft Accounting Order
TC Tr. 59-61	Technical Conference Testimony

## **7. Enbridge Gas’s E-Bill Practices**

Enbridge Gas changed its billing practices in 2019 to make e-bill the default method for new customers and to switch existing paper bill customers who had previously provided, for any reason, an email address to the Company to e-bill. Enbridge Gas believes that its change in practice is appropriate, and does not believe that any Board approval was or is required. Other parties disagree and want the Board to consider issues related to Enbridge Gas’s change in e-bill policies.

The parties have agreed that issues related to Enbridge Gas’s e-bill practices should be included in Phase 2 of this proceeding, rather than Phase 1. The parties propose that the OEB’s review of the e-bill issue may, if the Board so determines, include issues of whether OEB approval is required and, if so, whether such approval should be granted and under what terms. It will also address such other issues as intervenors may raise and that the Board deems appropriate, which could include whether Enbridge Gas was required to obtain positive consent from customers who were switched and whether positive consent is required for new customers.

Enbridge Gas agrees to file evidence with the OEB about its e-bill practices, including description of what changed in 2019, and the impacts of that change in terms of customer adoption and customer reaction. Enbridge Gas will endeavour to make the evidence as complete as possible, to reduce the need for a detailed discovery process. Enbridge Gas will file the evidence by January 15, 2020 (or earlier, if possible).

In order to support the agreement to move the issue related to Enbridge Gas’s e-bill practices to Phase 2 of this proceeding, the parties have agreed to a number of interim measures to be implemented and maintained until such time as the Board issues a

decision on Enbridge Gas's e-bill practices. This allows all parties to agree to the implementation of the Phase 1 IRM rate adjustments as of January 1, 2020.

The interim measures agreed are as follows:

1. Enbridge Gas will only convert existing customers to e-bill if those customers have expressly agreed to the switch. This will be implemented immediately.
2. For Enbridge Gas's new or moving customers who contact the Company by phone to request service, Enbridge Gas will provide those customers with the option to choose e-bill or paper bill service, and will not imply that either is required. This will be implemented as soon as possible, and no later than December 31, 2019.
3. For Enbridge Gas's new or moving customers who sign up for service online, Enbridge has asserted that it is not able to change its online form to include a choice of paper or e-bill. Therefore, in this interim period Enbridge Gas will send a confirming email to the new customer indicating that they have the option to choose paper bills rather than e-bills. Additionally, if any such new or moving customer incurs a late payment penalty (LPP), Enbridge Gas will contact that customer by phone to confirm that the customer is aware that their bill is being sent electronically and in that call will indicate that the customer can switch to paper bill service and will determine whether the LPP charge should be waived. This will be implemented as soon as possible, and no later than December 31, 2019.
4. Enbridge Gas will post a message on its website, and on its e-bills, informing customers that there is a dispute around the Company's e-bill service being heard by the OEB and indicating that if e-bill customers have questions about their account or LPP charges that are being applied, then they can contact the call centre. Appropriate contact information will be included in this communication. Appropriate scripts will be provided for call centre employees to describe the current situation, and the customer's option to convert back to paper billing. This will be implemented as soon as possible, and no later than December 31, 2019.
5. Enbridge Gas will refund 2019 LPP amounts paid by customers who have been switched to e-bill in 2019, and who have not previously had a history of repeated LPP charges. Enbridge Gas confirms that refunds of such amounts will not bar claims that parties may make during Phase 2 for additional LPP refunds.
6. Enbridge Gas will not charge extra amounts for paper bills without receiving OEB approval. This will be implemented immediately.
7. Enbridge Gas will ensure that no customer who was switched to e-bill in 2019 is reported to credit agencies based on late payments. This will be implemented immediately.

8. Enbridge Gas will inform all parties to the Settlement Proposal when it has completed implementing the actions described in items 2, 3 and 4.

The parties agree that the implementation of the items listed above on an interim basis should not be interpreted as agreement by any party, including Enbridge Gas, that any such item is appropriate or necessary on an ongoing basis. The agreement on all items is without prejudice to the positions that any party may take on such items during Phase 2 of this proceeding (or at other times).

**Evidence:** The evidence in relation to this issue includes the following:

TC Tr. 54-55, 68-73  
JT1.4 and 1.6

Technical Conference Testimony  
Technical Conference Undertakings

**APPENDIX A**

**DRAFT RATE ORDER – EGD RATE ZONE**

**FILED SEPARATELY**

**APPENDIX B**

**DRAFT RATE ORDER – UNION RATE ZONES**

**FILED SEPARATELY**



**APPENDIX C**

**DRAFT ACCOUNTING ORDER**

**FILED SEPARATELY**