IN THE MATTER OF the *Ontario Energy Board Act, 1998*, Schedule B to the *Energy Competition Act, 1998*, S.O. 1998, c.15;

AND IN THE MATTER OF an Application by Toronto Hydro-Electric System Limited for an Order or Orders approving or fixing just and reasonable distribution rates and other charges, effective January 1, 2020 to December 31, 2024.

TORONTO HYDRO-ELECTRIC SYSTEM LIMITED

DRAFT RATE ORDER – REPLY SUBMISSION

OEB FILE NO. EB-2018-0165

FEBRUARY 12, 2020

1.0 OVERVIEW

1. The Ontario Energy Board (the "**OEB**"), in its Decision and Order issued December 19, 2019 (the "**Decision**"), invited OEB Staff ("**OEB Staff**") and intervenors in the proceeding to file comments on Toronto Hydro-Electric System Limited's ("**Toronto Hydro**") Draft Rate Order ("**DRO**") by February 3, 2020.[1]

2. OEB Staff filed its submissions on January 31, and School Energy Coalition ("**SEC**") and Vulnerable Energy Consumers of Canada ("**VECC**") filed their submissions on February 3. No other parties submitted comments on the DRO.

3. In this Reply, Toronto Hydro addresses OEB Staff and intervenors comments on the DRO. In a separate document filed the same day as this Reply, Toronto Hydro submits an updated DRO, as noted in the cover letters dated January 21 and January 28, 2020 and as directed by the OEB in a letter dated February 5, 2020.

4. OEB Staff and intervenors generally accepted Toronto Hydro's implementation of the Decision with the exception of specific comments with respect to:

   a) Renewable Enabling Improvement ("REI") investments;

   b) 2018 and 2019 impacts of the CCA rule change; and

   c) rate smoothing and the disposition of Group 2 DVAs.

5. This Reply responds to the parties' comments on the items identified above.

2.0 RENEWABLE ENABLING IMPROVEMENTS ("REI") INVESTMENTS

6. While OEB Staff accepted that the updates to the REI programs are in accordance with the Decision, OEB Staff commented on the increased REI-related revenue requirement. Specifically, OEB Staff assumes the incremental in-service additions ("**ISAs**") relative to the approved for the program are associated with spending in years prior to 2020. Toronto Hydro confirms that this is the case.

7. In its Decision, the OEB directed Toronto Hydro to update the 2019 forecast for the best-available information and to reconcile the opening balance for 2020 with the

[1] EB-2018-0165, Decision and Order (December 19, 2019) at page 203.

closing balance for the REI related revenue requirement. Therefore, the update to 2019 ISAs resulted in changes to the 2020-2024 ISA profile.

3.0 2018 AND 2019 IMPACTS OF THE CCA RULE CHANGE

8. Per OEB Staff's request,[2] Toronto Hydro confirms that it followed the OEB's order to record the entire 2018 and 2019 forecasted revenue requirement impact of the CCA rule changes within the new sub-account of Account 1592 – PILs and Tax Variances – CCA changes.

4.0 RATE SMOOTHING

9. OEB Staff raised two concerns with Toronto Hydro's rate smoothing proposal. The first concern was that the proposal made by Toronto Hydro is not appropriate or necessary, and the second was with respect to the application of carrying charges under the rate smoothing proposal. VECC supported OEB Staff's submission.[3]

10. SEC also made submissions on the issues raised by OEB Staff. SEC endorsed Toronto Hydro's rate smoothing proposal "*as it mitigates the significant distribution rate increase that will occur in 2021, primarily caused by the credit balances in the Group 2 deferral and variance accounts to be disposed of in 2020.*"[4] With respect to the issue of carrying charges, SEC advised that it came to a different understanding than OEB Staff in reading Toronto Hydro's proposal, and asked Toronto Hydro to clarify its approach in the Reply Submission.

11. Toronto Hydro addresses the parties' comments on rate smoothing in the paragraphs that follow.

4.1 Rate Smoothing Approach

12. Before addressing OEB Staff's specific comments, Toronto Hydro would like to clarify its methodology and rationale for the rate smoothing proposal in the DRO.

13. The usual approach is to begin clearance of the Group 2 DVAs in the first year of the rate cycle. This is what is reflected in the "Unsmoothed Scenario" in the DRO. Typically, rate smoothing modifies the end dates of those rate riders to mitigate the

[2] OEB Staff, DRO Submission (January 31, 2020) at page 3.
[3] VECC, DRO Submission (February 3, 2020).
[4] SEC, DRO Submission (February 3, 2020) at page 1.

bill impacts when those rate riders end. However, because there is a material reduction in Toronto Hydro's revenue requirement in 2020, starting the significant Group 2 DVA credits in 2020 leads to: (i) a considerably greater distribution rate decrease in 2020, and more importantly (ii) very high increases in 2021-2025 when the credits expire. These unintended consequences are troublesome for customers from a bill impact perspective.

14. With so many Group 2 DVA balances being cleared, Toronto Hydro evaluated countless scenarios in preparing the DRO. From that analysis, the utility concluded that the best scenario for customers is to stagger the start dates for the rate riders, as well as the end dates. This scenario, which is filed as the rate smoothing proposal in the DRO, produces a significant 17.4% distribution rate decrease for residential customers in 2020, and a smooth rate of annual increases in the years thereafter.

15. OEB Staff took issue with the staggered disposition of the Group 2 DVAs and challenged the necessity and appropriateness of the rate smoothing proposal. OEB Staff proposed a "simple and expeditious solution" to start all the Group 2 DVA clearances on March 1, 2020. Toronto Hydro notes that OEB Staff's proposal has the same effect as the unsmoothed scenario outlined in the DRO.

16. Toronto Hydro submits that the unsmoothed scenario is not desirable for customers as it results in distribution rate increases greater than 6% in certain years. By contrast, Toronto Hydro's rate smoothing proposal (i) provides most customers a rate decrease in 2020 while (ii) maintaining the year over year annual increases over the rate period at, below, or very close to inflation for all customer classes.

17. Toronto Hydro acknowledges OEB Staff's comment that the balances in the Group 1 accounts, the RTSRs, and commodity rates may change over the rate period. However, Toronto Hydro disagrees that this is a compelling justification to refrain from adopting rate smoothing at this time based on the facts at hand.

18. Customers argued strongly in favour of keeping price increases low. The OEB ordered the consideration of a smooth scenario in the Decision, and Toronto Hydro submitted a smooth scenario in the DRO along with the bill impacts for the unsmoothed scenario. OEB Staff challenged the smoothed scenario and proposed an option that has the same effect as the unsmoothed scenario. Although OEB Staff's option is the "simplest and most expeditious" approach, for all the reasons articulated above, Toronto Hydro submits that it is not in the best interest of customers. The OEB should reject OEB Staff's proposal.

4.2 Disposition of Group 2 DVAs

19. OEB Staff submitted that Toronto Hydro's rate smoothing proposal should have included the carrying charges for all Group 2 DVA balances until the proposed start date of disposition.[5] SEC saw the proposal differently and noted that it expects "*that Toronto Hydro would, in the normal course, calculate and add the calculated interest to the balances at the time of disposition.*"[6] Toronto Hydro confirms that its proposal is consistent with SEC's understanding.

20. Toronto Hydro calculated the carrying charges for Group 2 DVA balances that are proposed for disposition starting on March 1, 2020. It did not calculate the carrying charges for the outer years because it assumed the carrying charges would be applied in the normal course as part of the annual rate applications using actual OEB interest rates. Toronto Hydro made this assumption consistent with OEB's expectation that the scope of annual rate applications is to apply mechanistic adjustments, such as updating the inflation factor in the rate formula, to finalize the rates for the upcoming year.[7]

21. Toronto Hydro rejects OEB Staff's allegation that the rate smoothing proposal denied ratepayers the interest that is owed to them.[8] That was not Toronto Hydro's intention. As SEC inferred, Toronto Hydro's approach was premised on providing the OEB with the most up-to-date calculations of those carrying charges at the time that the rate riders are finalized on Tariff of Rates and Charges.

22. Nonetheless, to address OEB Staff's concerns Toronto Hydro is filing the estimated carrying charges as part of the updated DRO. Toronto Hydro notes that the net effect of this update is to increase the credits to customers, and that this would have been the result under Toronto Hydro's original proposal.

23. Toronto Hydro agrees with OEB Staff and SEC's comments that if the rate smoothing proposal is approved, the true-ups in Account 1595 should take place in the year that the the relevant account is proposed to be disposed, rather than in the 2021 rates application.

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[5] OEB Staff, DRO Submission (January 31, 2020) at page 6.
[6] SEC, DRO Submission (February 3, 2020) at page 1.
[7] Report of the Board, Renewed Regulatory Framework for Electricity Distributors: A Performance-Based Approach (October 18, 2012) *[RRF Report]* at page 22.
[8] OEB Staff, DRO Submission (January 31, 2020) at page 6.

24. Toronto Hydro thanks OEB Staff and SEC for their diligence in reviewing the proposed rate smoothing implementation and flagging the points of clarification above.

25. On the basis of the foregoing, Toronto Hydro requests that the OEB order the clearance of the DVA balances and Other Amounts, including forecasted carrying charges, as set out in the updated DRO. Consistent with OEB Staff's alternative proposal and SEC's submission, Toronto Hydro further requests that the OEB stipulate that:

    a) the Group 2 DVA balances will be subject to the true-ups in Account 1595,

    b) the true-ups will include "*any variance between the approved principal and interest amount and the actual amount,*"[9] and

    c) the true-up for any particular account will be disposed of in the year that the account is to be disposed.

4.3 Interim Tariffs

26. Toronto Hydro filed the 2020-2024 Tariffs of Rates and Charges in accordance with the OEB Filing Requirements, and proposed interim approval of the 2021-2024 Tariffs consistent with past practice in the 2015-2019 Custom IR application.

27. Toronto Hydro notes that a Tariff that receives interim approval provides customers with an approximate indication of what the distribution rates will be in those future years. Toronto Hydro agrees with OEB Staff that much of the Tariff will change as part of the annual rate update applications, but notes that the changes tend to be relatively small.[10]

4.4 Bill Impact Tables

28. OEB Staff requested summary bill impact tables showing the annual and the average sub-total A and total bill impacts with and without rate riders. The requested information is enclosed as Appendix A to this Reply.

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[9] OEB Staff, DRO Submission (January 31, 2020) at page 7.

[10] For example, as OEB Staff pointed out, inflation may differ from the placeholder estimate, but this does not typically have a dramatic effect on the rates. Similarly, the rate riders that will be updated for carrying charges will change, but those changes are not expected to be significant, especially given that the estimated carrying charges are now reflected in Tariffs enclosed as part of the updated DRO.

29. Toronto Hydro notes that the total bill impacts without rate riders are an abstraction because in reality the total bill would never be calculated without rate riders. The application of the rate riders also has an impact on other key elements of the total bill such as the Ontario Energy Rebate and the taxes. For these reasons, Toronto Hydro submits that the OEB should not rely on these numbers in deciding whether to accept Toronto Hydro's rate smoothing proposal.

30. The appropriate and relevant bill impacts are provided in the updated DRO (Table 14 series). This information shows that Toronto Hydro's rate smoothing proposal produces the most favourable result for customers, in particular a 17.4% decrease for residential customers in 2020, and a smooth rate of annual increases in the years thereafter. Toronto Hydro submits that the OEB should approve this proposal.

– All of which is respectfully submitted –

Table 1-1: Bill Scenarios - Residential

Residential (750 kWh)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	44.37	35.77	38.08	38.53	40.94	42.60	
		% change		**-19.4%**	**6.5%**	**1.2%**	**6.3%**	**4.1%**	**-0.8%**
	Total Bill (After Taxes & Rebate)	$/30 days	129.21	123.11	124.58	124.94	126.44	127.79	
		% change		**-4.7%**	**1.2%**	**0.3%**	**1.2%**	**1.1%**	**-0.2%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	44.37	36.65	37.70	39.07	40.33	41.99	
		% change		**-17.4%**	**2.9%**	**3.6%**	**3.2%**	**4.1%**	**-1.1%**
	Total Bill (After Taxes & Rebate)	$/30 days	129.21	123.60	124.46	125.38	125.95	127.30	
		% change		**-4.3%**	**0.7%**	**0.7%**	**0.5%**	**1.1%**	**-0.3%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	41.63	38.34	40.08	40.53	42.94	44.60	
		% change		**-7.9%**	**4.5%**	**1.1%**	**5.9%**	**3.9%**	**1.4%**
	Total Bill (After Taxes & Rebate)	$/30 days	126.82	124.33	125.75	126.11	128.07	129.42	
		% change		**-2.0%**	**1.1%**	**0.3%**	**1.6%**	**1.1%**	**0.4%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-2: Bill Scenarios - CSMUR

Competitive Sector Multi-Unit Residential (300 kWh)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	34.01	29.67	31.43	31.80	33.78	35.14	
		% change		**-12.8%**	**5.9%**	**1.2%**	**6.2%**	**4.0%**	**0.7%**
	Total Bill (After Taxes & Rebate)	$/30 days	65.27	62.07	63.38	63.68	64.83	65.94	
		% change		**-4.9%**	**2.1%**	**0.5%**	**1.8%**	**1.7%**	**0.2%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	34.01	30.01	31.07	32.04	33.57	34.93	
		% change		**-11.8%**	**3.5%**	**3.1%**	**4.8%**	**4.1%**	**0.5%**
	Total Bill (After Taxes & Rebate)	$/30 days	65.27	62.28	63.14	63.87	64.66	65.77	
		% change		**-4.6%**	**1.4%**	**1.2%**	**1.2%**	**1.7%**	**0.2%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	33.12	31.46	32.89	33.26	35.24	36.60	
		% change		**-5.0%**	**4.5%**	**1.1%**	**6.0%**	**3.9%**	**2.0%**
	Total Bill (After Taxes & Rebate)	$/30 days	64.22	62.95	64.11	64.41	66.02	67.12	
		% change		**-2.0%**	**1.8%**	**0.5%**	**2.5%**	**1.7%**	**0.9%**

Note: “Excluding Rate Riders Total Bill (After Taxes & Rebate)” Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-3: Bill Scenarios – GS <50 kW

GS <50 kW (2,000 kWh)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	108.33	101.05	105.14	106.37	113.00	117.56	
		% change		**-6.7%**	**4.0%**	**1.2%**	**6.2%**	**4.0%**	**1.6%**
	Total Bill (After Taxes & Rebate)	$/30 days	333.78	330.30	332.32	333.32	338.25	341.95	
		% change		**-1.0%**	**0.6%**	**0.3%**	**1.5%**	**1.1%**	**0.5%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	108.33	101.63	104.80	107.28	111.99	116.55	
		% change		**-6.2%**	**3.1%**	**2.4%**	**4.4%**	**4.1%**	**1.5%**
	Total Bill (After Taxes & Rebate)	$/30 days	333.78	330.05	332.63	334.06	337.43	341.13	
		% change		**-1.1%**	**0.8%**	**0.4%**	**1.0%**	**1.1%**	**0.4%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	102.04	105.40	110.18	111.41	118.04	122.60	
		% change		**3.3%**	**4.5%**	**1.1%**	**6.0%**	**3.9%**	**3.7%**
	Total Bill (After Taxes & Rebate)	$/30 days	328.98	332.08	335.96	336.96	342.34	346.04	
		% change		**0.9%**	**1.2%**	**0.3%**	**1.6%**	**1.1%**	**1.0%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-4: Bill Scenarios – GS 50-999 kW

GS 50-999 kW (200 kVA)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	1,779.43	1,519.25	1,601.75	1,620.81	1,723.18	1,793.54	
		% change		**-14.6%**	**5.4%**	**1.2%**	**6.3%**	**4.1%**	**0.2%**
	Total Bill (After Taxes & Rebate)	$/30 days	14,183.15	13,624.74	13,957.77	13,979.31	14,094.99	14,174.50	
		% change		**-3.9%**	**2.4%**	**0.2%**	**0.8%**	**0.6%**	**0.0%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	1,779.43	1,546.39	1,582.63	1,632.40	1,707.93	1,778.29	
		% change		**-13.1%**	**2.3%**	**3.1%**	**4.6%**	**4.1%**	**0.0%**
	Total Bill (After Taxes & Rebate)	$/30 days	14,183.15	13,786.30	13,827.25	13,992.41	14,077.76	14,157.26	
		% change		**-2.8%**	**0.3%**	**1.2%**	**0.6%**	**0.6%**	**0.0%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	1,672.54	1,627.58	1,701.31	1,720.37	1,822.74	1,893.10	
		% change		**-2.7%**	**4.5%**	**1.1%**	**6.0%**	**3.9%**	**2.5%**
	Total Bill (After Taxes & Rebate)	$/30 days	14,042.70	13,986.96	14,070.28	14,091.81	14,207.49	14,287.00	
		% change		**-0.4%**	**0.6%**	**0.2%**	**0.8%**	**0.6%**	**0.3%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-5: Bill Scenarios – GS 1,000-4,999 kW

GS 1,000-4,999 kW (2,000 kVA)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	14,472.09	13,267.01	13,856.35	14,019.99	14,898.63	15,502.46	
		% change		**-8.3%**	**4.4%**	**1.2%**	**6.3%**	**4.1%**	**1.4%**
	Total Bill (After Taxes & Rebate)	$/30 days	153,429.31	148,923.18	152,317.18	152,502.09	153,494.96	154,177.28	
		% change		**-2.9%**	**2.3%**	**0.1%**	**0.7%**	**0.4%**	**0.1%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	14,472.09	13,407.62	13,762.77	14,108.19	14,784.43	15,388.26	
		% change		**-7.4%**	**2.6%**	**2.5%**	**4.8%**	**4.1%**	**1.2%**
	Total Bill (After Taxes & Rebate)	$/30 days	153,429.31	150,570.96	150,972.28	152,601.76	153,365.91	154,048.24	
		% change		**-1.9%**	**0.3%**	**1.1%**	**0.5%**	**0.4%**	**0.1%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	13,736.92	13,969.80	14,602.55	14,766.19	15,644.83	16,248.66	
		% change		**1.7%**	**4.5%**	**1.1%**	**6.0%**	**3.9%**	**3.4%**
	Total Bill (After Taxes & Rebate)	$/30 days	152,375.28	152,445.38	153,160.39	153,345.30	154,338.16	155,020.49	
		% change		**0.0%**	**0.5%**	**0.1%**	**0.6%**	**0.4%**	**0.3%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-6: Bill Scenarios – Large Use

Large Use (9,700 kVA)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	75,465.01	68,742.43	71,663.94	72,514.12	77,082.60	80,223.15	
		% change		**-8.9%**	**4.2%**	**1.2%**	**6.3%**	**4.1%**	**1.2%**
	Total Bill (After Taxes & Rebate)	$/30 days	703,885.52	706,895.84	705,676.83	706,637.53	711,799.91	715,348.74	
		% change		**0.4%**	**-0.2%**	**0.1%**	**0.7%**	**0.5%**	**0.3%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	75,465.01	69,483.47	71,186.24	73,020.46	76,431.73	79,572.28	
		% change		**-7.9%**	**2.5%**	**2.6%**	**4.7%**	**4.1%**	**1.1%**
	Total Bill (After Taxes & Rebate)	$/30 days	703,885.52	705,268.08	707,192.21	707,209.70	711,064.43	714,613.25	
		% change		**0.2%**	**0.3%**	**0.0%**	**0.5%**	**0.5%**	**0.3%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	70,697.02	72,644.19	75,934.85	76,785.03	81,353.51	84,494.06	
		% change		**2.8%**	**4.5%**	**1.1%**	**5.9%**	**3.9%**	**3.6%**
	Total Bill (After Taxes & Rebate)	$/30 days	700,943.09	706,784.51	710,502.96	711,463.66	716,626.04	720,174.86	
		% change		**0.8%**	**0.5%**	**0.1%**	**0.7%**	**0.5%**	**0.5%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-7: Bill Scenarios – Street Lighting

Street Lighting (16,000 devices; 2,700 kVA)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	124,154.21	110,723.45	116,781.10	118,201.08	125,709.49	130,890.56	
		% change		**-10.8%**	**5.5%**	**1.2%**	**6.4%**	**4.1%**	**1.1%**
	Total Bill (After Taxes & Rebate)	$/30 days	290,843.31	272,656.01	282,378.44	283,983.01	292,467.52	298,322.13	
		% change		**-6.3%**	**3.6%**	**0.6%**	**3.0%**	**2.0%**	**0.5%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	124,154.21	112,836.09	115,408.69	119,084.25	124,563.88	129,744.95	
		% change		**-9.1%**	**2.3%**	**3.2%**	**4.6%**	**4.2%**	**0.9%**
	Total Bill (After Taxes & Rebate)	$/30 days	290,843.31	276,613.56	279,520.60	284,981.00	291,172.98	297,027.59	
		% change		**-4.9%**	**1.1%**	**2.0%**	**2.2%**	**2.0%**	**0.4%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	122,354.93	118,907.04	124,282.78	125,702.76	133,211.17	138,392.24	
		% change		**-2.8%**	**4.5%**	**1.1%**	**6.0%**	**3.9%**	**2.5%**
	Total Bill (After Taxes & Rebate)	$/30 days	288,562.94	284,780.75	290,855.33	292,459.91	300,944.42	306,799.02	
		% change		**-1.3%**	**2.1%**	**0.6%**	**2.9%**	**1.9%**	**1.2%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders

Table 1-8: Bill Scenarios – Unmetered Scattered Load

Unmetered Scattered Load (285 kWh)			2019	2020	2021	2022	2023	2024	2020-2024 Average Annual Increase
Unsmoothed Scenario	Distribution Subtotal A	$/30 days	34.80	25.75	28.02	28.35	30.14	31.37	
		% change		**-26.0%**	**8.8%**	**1.2%**	**6.3%**	**4.1%**	**-2.1%**
	Total Bill (After Taxes & Rebate)	$/30 days	60.09	53.00	54.65	54.92	56.37	57.37	
		% change		**-11.8%**	**3.1%**	**0.5%**	**2.6%**	**1.8%**	**-0.9%**
Smoothed Scenario	Distribution Subtotal A	$/30 days	34.80	26.65	27.32	28.55	29.89	31.12	
		% change		**-23.4%**	**2.5%**	**4.5%**	**4.7%**	**4.1%**	**-2.2%**
	Total Bill (After Taxes & Rebate)	$/30 days	60.09	53.63	54.17	55.08	56.17	57.17	
		% change		**-10.8%**	**1.0%**	**1.7%**	**2.0%**	**1.8%**	**-1.0%**
Excluding Rate Riders	Distribution Subtotal A	$/30 days	33.45	28.40	29.68	30.02	31.80	33.03	
		% change		**-15.1%**	**4.5%**	**1.1%**	**5.9%**	**3.9%**	**-0.3%**
	Total Bill (After Taxes & Rebate)	$/30 days	59.10	54.96	56.00	56.27	57.72	58.72	
		% change		**-7.0%**	**1.9%**	**0.5%**	**2.6%**	**1.7%**	**-0.1%**

Note: "Excluding Rate Riders Total Bill (After Taxes & Rebate)" Section excludes both Group 2 and 1 (including Smart Meter Charge) Rate Riders