

EXHIBIT 7 COST ALLOCATION

Table of Contents

7.1 Cost Allocation Study Requirements
7.1.1 Introduction
7.1.2 Load Profiles
7.1.3 Cost Allocation Inputs
7.1.4 Embedded Distributor
7.1.5 Unmetered Loads
7.1.6 microFIT class
7.1.7 New Customer Class
7.1.8 Eliminate a Customer Class
7.1.9 Standby Rates
7.1.10 Sheet I6.2 Customer Data Worksheet
7.2.1 Class Revenue Requirements
7.3 Revenue-to-Cost Ratio Overview
7.3.1 Cost Allocation Results and Analysis
Appendix 7-10EB Cost Allocation Model – Sheets I6, I8, O1
and O2 (first page only)
Appendix 7-20EB RRWF – Sheets 11 and 12 (Cost
Allocation)

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020 1 of 31

Exhibit 7: Cost Allocation

Tab 1 (of 3): Cost Allocation Study

OVERVIEW OF COST ALLOCATION

7.1 Cost Allocation Study Requirements

3 7.1.1 Introduction

- 4 The OEB outlined its cost allocation policies in its reports of November 28, 2007
- 5 Application of Cost Allocation for Electricity Distributors, and March 31, 2011 Review of
- 6 Electricity Distribution Cost Allocation Policy (EB-2010-0219). These are referred to
- 7 here as the "Cost Allocation Reports".

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- 9 In this Application, NPEI has used the 2020 version 3.7 of the Cost Allocation Model
- 10 released by the OEB on August 1, 2019 to conduct a 2021 Test Year Cost Allocation
- 11 study consistent with the OEB's cost allocation policies. The model has been loaded
- with 2021 Test Year Costs, customer numbers and demand values for NPEI. The 2021
- 13 demand values were determined based on the description provided under the Load
- 14 Profiles section of this Exhibit. The various weighting factors used in the 2021 study
- 15 have also been explained below.

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7.1.2 Load Profiles

- 19 In a letter dated June 12, 2015, the OEB requested "distributors to be mindful of material
- 20 changes to load profiles and propose updates, as appropriate, in cost of service rate
- 21 applications". NPEI proposes to use the same method as was used in the 2015 Cost of
- 22 Service application to determine the demand data for the 2021 cost allocation model.
- 23 This method involves applying a scaling factor to the 2004 weather normalized volumes
- 24 supporting the 2004 load profiles to determine an estimate of the 2021 weather
- 25 normalized load profiles. Then the same method applied by Hydro One to the 2004 load
- 26 profiles to determine the demand data for the original cost allocation study, is applied to
- the 2021 load profiles to determine the 2021 demand data. NPEI has provided an Excel

spreadsheet named "Load profile model 2004 Hydro One data for 2021" to show how the 2021 demand data is determined.

NPEI is the result of the amalgamation of the former Niagara Falls Hydro Inc. and the former Peninsula West Utilities Ltd. The former Peninsula West Utilities Ltd. filed a Cost Allocation Informational Filing on March 15, 2007 (EB-2005-0405) (EB-2007-0002). The former Niagara Falls Hydro Inc. prepared its load profiles for all rates classes and received RUN1 data from Hydro One for its hourly load shapes, however NFH did not file a Cost Allocation Informational Filing in 2007 as they were preparing the merger application and considered it to be more useful, prudent and practical to file a Cost of Service Study at the time of rebasing and harmonizing rates for the new merged company. NPEI filed a Cost Allocation Study with the 2011 Cost of Service rate application. The 2011 Cost Allocation Study was based on information from the amalgamated companies. NPEI also filed a Cost Allocation Study with the 2015 Cost of Service rate application.

NPEI attempted to update the actual hourly data by rate class for the 2018 year. NPEI had significant differences in the GS<50 kW and GS > 50 kW rate classes when compared to the actual kWh billed. This was due to many customers having conventional meters in both of these rate classes. NPEI replaced these conventional meters with either a MIST meter or smart meter throughout 2016, 2017, 2018, 2019 and have replaced 23 in 2020. As a result, NPEI will be prepared for the next cost of service application. NPEI will put in place a process to prepare a load profile for the 2020 year. This will provide more than one year of data to review the load profiles for the next cost of service application.

7.1.3 Cost Allocation Inputs

- 2 In the March 31, 2011 Cost Allocation Report, the OEB stated that "default weighting
- 3 factors should now be utilized only in exceptional circumstances". Distributors are
- 4 expected to develop their own weighting factors as part of their cost allocation study.
- 5 NPEI has developed its own weighting factors as outlined below.

Services (Account 1855)

To determine the weighting factor to be used for each customer class, the cost of installing a typical service for each customer class was determined. A weighting factor was determined by assigning the Residential customer class a factor of 1, as required, and determining the relative weights of the rest of the classes. The results are presented in Table 7.1.3-1 below:

Table 7.1.3-1-Weighting Factors-Services

	2021	2015
	Test	Board
	Year	Approved
Residential	1.0	1.0
GS<50 kW	2.5	2.5
GS>50 kW	9.0	9.0
Streetlight	0.0	0.0
Sentinel Light	0.0	0.0
Unmetered Scattered Load	0.0	0.0

GS < 50 kW – Factor set at 2.5. A work order for a new service for a small commercial customer usually has more parties including third parties involved, additional approvals, and additional time spent as these services are usually more complex than a residential customer.

GS > 50 kW - Factor set at 9.0. A work order for a new service for a large commercial customer is more complex, involves more resources, requires additional approvals and additional time spent.

Billing and Collecting

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Comparing a residential bill as a base of 1, NPEI reviewed the time spent in billing and customer service and collections on customers in each rate class. NPEI has found that with TOU billing now in place, there are no major differences in rate class billing costs between the residential rate class and the GS<50 kW rate class. There are additional steps in billing when billing GS>50 kW customers with respect to interval read analytics, global adjustment etc. In terms of collection costs, there are a lower number of customers in this class to collect on however, due to the higher dollar values associated with these customers these customers are first priority in monitoring outstanding balances. Also, with GS > 50 kW customers, there is usually more parties involved in the follow up process for collections, notices, and payment arrangements thereby taking more time to collect than a residential customer. In 2017, NPEI received its first Class A customers, where determination of eligibility, education, and on-going customer engagement with many customers in the GS > 50 kW rate class occurred. NPEI reviews on a quarterly basis the load for GS<50 kW customers and GS >50 kW customers to ensure they are in the appropriate rate class. This review as well as the actual transfer of a customer from one rate class to another does not occur with the residential rate class thereby increasing the factor for the GS <50 kW and GS >50 kW rate class when compared to the residential rate class.

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- NPEI has assigned the following factors;
- 23 Residential Service factor set at 1 per Cost Allocation Instruction

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GS< 50 kW – Factor set at 1.5 as there is more time spent when collections are involved on a per bill basis and these customers are reviewed quarterly for appropriateness of rate class based on their load. Billing costs are similar to residential customers for those GS<50 customers on smart meters.

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GS > 50 kW – Factor set at 2.0 as there is more time spent on both billing and collection on a per bill basis when issues arise. As well these customers are reviewed quarterly for appropriateness of rate class based on their load. The billing is more complex than the

6 of 31

1 TOU billing for a residential customer and customer engagement meetings are held for eligible Class A customers.

Streetlight, unmetered loads and sentinel lights – a factor of 0.8 has been assigned as these customers have limited collection activity.

Table 7.1.3-2-Weighting Factors-Billing and Collecting

	2021	2015
	Test	Board
	Year	Approved
Residential	1.0	1.0
GS<50 kW	1.5	1.5
GS>50 kW	2.0	2.0
Streetlight	0.8	0.8
Sentinel Light	0.8	0.8
Unmetered Scattered Load	0.8	0.8

Metering Capital-Sheet 1.7.3.3

NPEI followed a similar approach as in the COS 2015 whereby the various types of meters installed were identified and the number of meters installed at the end of 2019 were identified from NPEI's customer information system. The cost to install meters has increased due to the replacement of all 2G technology meters, and the replacement of conventional meters with either a MIST meter or a new smart meter.

Table 7.1.3-3 Metering Capital

			Weighted	Weighted		
	Weighting	Weighting	average Cost	average Cost		
	Factor	Factor	Per Meter	Per Meter	\$ Change	% Change
	2021	2015	2021	2015		
Residential	1.00	1.00	157.44	118.55	38.89	32.80%
GS < 50 kW	1.69	1.74	265.86	206.05	59.81	29.03%
GS > 50 kW	21.63	19.08	3,405.95	2,261.47	1,144.48	50.61%

Meter Reading-Sheet I-7.1.3.4

NPEI will have all of the conventional meters replaced with either a smart meter or a MIST meter by August 1, 2020. As at March 31, 2020, NPEI had two MIST meters, and 30 smart meters remaining to be changed from conventional meters to electronically read meters. The conversion of the 600 volt meters requires the assistance of an outside electrician. Meter reading costs for smart meters have been assigned a weighting factor of one. As shown in Table 7.1.3-4 below, the effort and cost for reading other types of meters are compared to the smart meter reading costs to determine an appropriate weight.

Table 7.1.3-4 – Meter Reading Weights

	Cost Relative	Cost Relative	/e Avera		Average			
	То	То	Monthly Monthly		Allocation	Allocation		
	Residential	Residential	ntial Meter Meter		Percentage	Percentage		
	Average	Average	Re	ading		Reading	Weighting	Weighting
	Cost	Cost		Costs Costs Fac		Factor	Factor	
	2021	2015	:	2021		2015	2021	2015
	Test Year	Board Approved	Te	st Year	Во	ard Approved	Test Year	Board Approved
Residential	1.00	1.00	\$	0.52	\$	0.32	38.13%	45.91%
GS < 50 kW	5.63	3.07	\$	2.92	\$	0.99	18.76%	13.17%
GS > 50 kW	72.50	48.05	\$	37.65	\$	15.41	43.11%	40.92%

8 of 31

1 On average the costs to read the meter for the GS < 50 kW and GS > 50 kW rate

2 classes have increased as a result of the switch from a conventional meter to a

3 MIST meter or the conversion from a conventional meter to a smart meter. The

costs related to meter reading NPEI's distribution stations and transformer station

are included in Account 5310 but for purposes of cost allocation, these expenses

have been excluded. The 2021 Test Year includes a total of \$869,478 for total

meter reading expenses however only \$848,898 is allocated to the rate classes on

8 Sheet I7.2 of the Cost Allocation model.

7.1.4 Embedded Distributor

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11 NPEI is not a host distributor for any embedded distributor.

7.1.5 Unmetered Loads

NPEI communicates with unmetered load customers, including streetlighting customers, to assist them in understanding the regulatory context in which distributors operate and how it affects unmetered load customers. This communication takes place on an on-going basis and is not driven by the rate

19 application process.

NPEI has used the "streetlight adjustment factor" to allocate costs to the Streetlighting rate class as outlined in the OEB's June 12, 2015 letter. The streetlight revenue to cost ratio range was tightened as well. Table 7.1.5-1 below outlines the changes from the 2015 Board Approved to the 2021 Test Year.

9 of 31

Table 7.1.5-1 – Unmetered connections

	2021	2015
	Test	Board
	Year	Approved
Streetlight	93	1,299
Sentinel	298	303
Unmetered Scattered Load ("USL")	325	422

7.1.6 microFIT class

NPEI is not proposing to include microFIT as a separate class in the cost allocation model in 2021. NPEI understands that the cost allocation model will produce a calculation of unit costs which the OEB may use to update the uniform microFIT rate at a future date.

7.1.7 New Customer Class

15 NPEI is not proposing to include a new customer class in this Application.

7.1.8 Eliminate a Customer Class

19 NPEI is not proposing to eliminate a customer class in this Application.

7.1.9 Standby Rates

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3	On April	2,	2015	the	OEB	issued	а	Board	Policy	of	Rate	Design	for	Electricity

- 4 Residential Customers in which the Board stated that it intends to remove the
- 5 standby charge when the new rate policy is implemented for commercial customers.
- 6 To date, a new rate policy for commercial customers has not been implemented.
- 7 Currently, NPEI does not have a standby rate and NPEI is not proposing a new
- 8 standby rate in this Application.

7.1.10 Sheet I6.2 Customer Data Worksheet

- 12 The Bad Debt Data entered is actually for the Historical Years 2016, 2017, and
- 13 2018. The cells identifying the historical year are locked and do not allow for input.
- 14 In summary, the 2016 Bad Debt total was \$218,352, 2017 Bad Debt total was
- 15 \$\$263,168 and 2018 Bad Debt total was \$ 308,528.

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020

Exhibit 7: Cost Allocation

Tab 2 (of 3): Class Revenue Requirements

12 of 31

CLASS REVENUE REQUIREMENTS

7.2.1 Class Revenue Requirements

The data used in the updated cost allocation study is consistent with NPEI's cost data that supports the proposed 2021 Test Year revenue requirement outlined in this Application. NPEI's assets were broken out into primary and secondary distribution functions using updated breakout percentages. The breakout of assets, capital contributions, depreciation, accumulated depreciation, customer data and load data by primary, line transformer and secondary categories were developed from the best data available to NPEI, its engineering records, and its customer and financial information systems.

A live Excel version of the updated cost allocation study has been included with the filed application material (EB-2020-0040_NPEI_Appl_2020_Cost_Allocation_Model_20200430). In addition, Appendix 7-1 outlines Input Sheets I-6 and I-8 and Output Sheets O-1 and O-2 (first page only).

Capital contributions, depreciation and accumulated depreciation by USoA are consistent with the information provided in the 2021 continuity statement shown in Exhibit 2. The rate class customer data used in the updated cost allocation study is consistent with the 2021 customer forecast outlined in Exhibit 3.

The following Table 7.2-1 provides the combined allocated OEB Approved cost by rate class from the former 2015 cost allocation study along with the NPEI results from the 2021 cost allocation study.

Table 7.2-1 – Allocated Costs

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	2015 Board Approved		2021 Proposed Cost Allocation	
	Allocation	%	Study	%
	Study			
Residential	20,747,538	69.2%	26,201,616	69.2%
GS < 50 kW	3,173,270	10.6%	4,058,338	10.7%
GS > 50 kW	5,536,411	18.5%	7,261,574	19.2%
Sentinel Lighting	88,456	0.3%	91,375	0.2%
USL	108,156	0.4%	91,894	0.2%
Street Lighting	316,689	1.1%	135,878	0.4%
Total	29,970,520	100.0%	37,840,675	100.0%

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020 14 of 31

Exhibit 7: Cost Allocation

Tab 3 (of 3): Revenue-to-Cost Ratios

15 of 31

REVENUE TO COST RATIOS

7.3 Revenue-to-Cost Ratio Overview

The results of a cost allocation study are typically presented in the form of revenue to cost ratios. The ratio is shown by rate classification and is the percentage of distribution revenue collected by rate classification compared to the costs allocated to the classification. The percentage identifies the rate classifications that are being subsidized and those that are over-contributing. A percentage of less than 100% means the rate classification is under-contributing and is being subsidized by other classes of customers. A percentage of greater than 100% indicates the rate classification is over-

11 contributing and is subsidizing other classes of customers.

In the March 31, 2011 Cost Allocation Board Report, the Board established what it considered to be the appropriate ranges of revenue to cost ratios which are summarized in Table 7.3-1 below. The Streetlight class is shown with the targets as established in the OEB's June 12, 2015 letter. In addition, Table 7.3-1 provides the approved revenue to cost ratios from NPEI's 2015 Cost of Service (EB-2014-0096) compared to the proposed ratios and the OEB Min and Max targets.

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020 16 of 31

Table 7.3-1 - Revenue-to-Cost Ratios

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	2015 Board				
	Approved	2021	2021		
	Cost	Cost	Proposed	OEB Ta	arget
	Allocation	Allocation	Ratios		
	Study	Study		Min	Max
Residential	91.65%	94.24%	94.24%	85%	115%
GS < 50 kW	120.00%	116.96%	116.96%	80%	120%
GS > 50 kW	120.00%	108.82%	110.71%	80%	120%
Sentinel Lighting	119.83%	126.04%	120.00%	80%	120%
Unmetered Scattered Load	91.65%	96.43%	96.43%	80%	120%
Street Lighting	91.65%	217.09%	120.00%	80%	120%

7.3.1 Cost Allocation Results and Analysis

- 2 The 2021 Cost Allocation study shows that the Residential, GS < 50 kW, GS > 50 kW,
- 3 and Unmetered Scattered Load rate classes fall within the OEB target range. The
- 4 Sentinel Lighting and Street Lighting rate classes resulted in revenue-to-cost ratios
- 5 above the OEB's Max target. NPEI is proposing to use the Max target revenue-to-cost
- 6 ratio for these two rate classes. As a note, the GS > 50 kW rate class is the balancing
- 7 class.

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Table 7.3-2 below shows the proposed class revenue for this Application. This class revenue will be used in Exhibit 8 to design the proposed distribution charges for this Application.

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Table 7.3-2 – Calculated Class Revenue

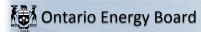
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		2021 Proposed		
	2021	Base Revenue	2021	
	Base Revenue	Allocated at	Proposed	
	at	Existing Rates	Base	Miscellaneous
	Existing Rates	Proportion	Revenue	Revenue
Residential	20,983,817	22,531,540	22,531,540	2,161,859
GS < 50 kW	4,114,496	4,417,972	4,417,972	328,862
GS > 50 kW	6,928,887	7,439,947	7,577,389	461,736
Sentinel Lighting	76,021	81,628	81,628	5,321
Unmetered Scattered Load	102,299	109,845	104,329	6,984
Street Lighting	268,595	288,406	156,479	6,575
	32,474,115	34,869,338	34,869,338	2,971,337

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Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020

Appendix 7-1
OEB Cost Allocation Model – Sheets I6, I8, O1 and O2 (first page only)



2020 Cost Allocation Model

EB-2020-XXXX

Sheet I6.1 Revenue Worksheet - Hydro One prepared

Total kWhs from Load Forecast	1,286,841,405
Total kWs from Load Forecast	1,788,455
Deficiency/sufficiency (RRWF 8. cell F51)	- 2,395,224

Miscellaneous Revenue (RRWF 5.	2.074.227
cell F48)	2,971,337

			1	2	3	7	8	9
	ID	Total	Residential	GS <50	GS>50-Regular	Street Light	Sentinel	Unmetered Scattered Load
Billing Data								
Forecast kWh	CEN	1,286,841,405	454,614,210	131,961,769	694,096,099	4,469,101	218,613	1,481,614
Forecast kW	CDEM	1,788,455			1,775,257	12,545	653	
Forecast kW, included in CDEM, of customers receiving line transformer allowance		773,798			773,798			
Optional - Forecast kWh, included in CEN, from customers that receive a line transformation allowance on a kWh basis. In most cases this will not be applicable and will be left blank.								
KWh excluding KWh from Wholesale Market Participants	CEN EWMP	1,286,841,405	454,614,210	131,961,769	694,096,099	4,469,101	218,613	1,481,614

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020

Existing Monthly Charge			\$33.67	\$40.15	\$109.12	\$1.26	\$18.03	\$20.73
Existing Distribution kWh Rate			\$0.0000	\$0.0146	·		·	\$0.0144
Existing Distribution kW Rate					\$3.5671	\$4.9783	\$22.4995	
Existing TOA Rate					\$0.60			
Additional Charges								
Distribution Revenue from Rates		\$32,938,394	\$20,983,817	\$4,114,496	\$7,393,166	\$268,595	\$76,021	\$102,299
Transformer Ownership Allowance		\$464,279	\$0	\$0	\$464,279	\$0	\$0	\$0
Net Class Revenue	CREV	\$32,474,115	\$20,983,817	\$4,114,496	\$6,928,887	\$268,595	\$76,021	\$102,299
	1	1						



2020 Cost Allocation Model

EB-2020-XXXX

Sheet I6.2 Customer Data Worksheet - Hydro One prepared

]	1	2	3	7	8	9
	ID	Total	Residential	GS <50	GS>50-Regular	Street Light	Sentinel	Unmetered Scattered Load
Billing Data			•					
Bad Debt 3 Year Historical Average	BDHA	\$263,350	\$219,413	\$31,456	\$12,481	\$0	\$0	\$0
Late Payment 3 Year Historical Average	LPHA	\$370,875	\$257,083	\$43,650	\$69,968	\$69	\$6	\$98
Number of Bills	CNB	690,720	623,220	54,492	9,720	84	3,024	180
Number of Devices	CDEV	·	·	·	·	13,634	•	
Number of Connections (Unmetered)	CCON	703				94	283	325
Total Number of Customers	CCA	57,560	51,935	4,541	810	7	252	15
Bulk Customer Base	CCB	-						
Primary Customer Base	CCP	57,837	51,935	4,541	810	551		
Line Transformer Customer Base	CCLT	57,760	51,935	4,519	755	551		
Secondary Customer Base	ccs	57,253	51,935	4,541	777			
Weighted - Services	CWCS	70,281	51,935	11,353	6,993	-	-	-
Weighted Meter -Capital	CWMC	12,142,719	8,176,646	1,207,256	2,758,817	-	-	-
Weighted Meter Reading	CWMR	848,898	323,646	159,295	365,957	-	-	-
Weighted Bills	CWNB	727,028	623,220	81,738	19,440	67	2,419	144

Bad Debt Data

Historic Year:	2015	218,352	177,126	41,081	144			
Historic Year:	2016	263,168	211,047	16,343	35,778			
Historic Year:	2017	308,528	270,066	36,943	1,519			
Three-year average		263,350	219,413	31,456	12,481	•	•	-



2020 Cost Allocation Model

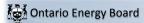
EB-2020-XXXX

Sheet IS Demand Data Worksheet - Hydro One prepared

This is an input sheet for demand allocators.

CP TEST RESULTS	12 CP
NCP TEST RESULTS	4 NCP
Co-incident Peak	Indicator
1 CP	CP 1
4 CP	CP 4
12 CP	CP 12
Non-co-incident Peak	Indicator
1 NCP	NCP 1
4 NCP	NCP 4

			1	2	3	7	8	9
Customer Classes		Total	Residential	GS <50	GS>50-Regular	Street Light	Sentinel	Unmetered Scattered Load
		СР						
		Sanity Check	Pass	Pass	Check 4CP	Check 12CP	Check 12CP	Check 12CP
CO-INCIDENT	PEAK							
1 CP								
Transformation CP	TCP1	236,858	98,744	29,932	108,182	-	-	-
Bulk Delivery CP	BCP1	236,858	98,744	29,932	108,182	-	-	-
Total Sytem CP	DCP1	236,858	98,744	29,932	108,182	-	-	-
4 CP								
Transformation CP	TCP4	903,634	381,463	86,786	435,385	-	-	-
Bulk Delivery CP	BCP4	903,634	381,463	86,786	435,385	-		-
Total Sytem CP	DCP4	903,634	381,463	86,786	435,385	-	-	-
12 CP								
Transformation CP	TCP12	2,379,403	966,519	229,417	1,175,237	6,108	276	1,845
Bulk Delivery CP	BCP12	2,379,403	966,519	229,417	1,175,237	6,108	276	1,845
					1,175,237	6,108	276	1,845
Total Sytem CP	DCP12	2,379,403	966,519	229,417	1,175,237	0,100	210	1,040
		2,379,403	966,519	229,417	1,175,237	6,106	210	1,040
Total Sytem CP NON CO_INCIDE		2,379,403 NCP	966,519	229,417	1,175,237	6,106	270	1,040
			966,519	229,417	1,1/5,23/	Pass	Pass	Pass
NON CO_INCIDE		NCP						
NON CO_INCIDE	NT PEAK	NCP Sanity Check	Pass	Pass	Pass	Pass	Pass	Pass
NON CO_INCIDES 1 NCP Classification NCP from Load Data Provider	NT PEAK	NCP Sanity Check	Pass 101,625	Pass 36,507	Pass 117,685	Pass 1,043	Pass 77	Pass 481
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP	DNCP1	NCP Sanity Check 257,419 257,419	Pass 101,625 101,625	Pass 36,507 36,507	Pass 117,685 117,685	Pass 1,043 1,043	Pass 77 77	Pass 481 481
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP	DNCP1 PNCP1 LTNCP1	NCP Sanity Check 257,419 257,419 #DIV/0!	Pass 101,625 101,625 101,625	Pass 36,507 36,507 36,330	Pass 117,685 117,685 109,694	Pass 1,043 1,043	Pass 77 77 77	Pass 481 481 481
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP	DNCP1	NCP Sanity Check 257,419 257,419	Pass 101,625 101,625	Pass 36,507 36,507	Pass 117,685 117,685	Pass 1,043 1,043	Pass 77 77	Pass 481 481
NON CO_INCIDE! 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP	DNCP1 PNCP1 LTNCP1	NCP Sanity Check 257,419 257,419 #DIV/0!	Pass 101,625 101,625 101,625	Pass 36,507 36,507 36,330	Pass 117,685 117,685 109,694	Pass 1,043 1,043	Pass 77 77 77	Pass 481 481 481
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from	DNCP1 PNCP1 LTNCP1 SNCP1	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796	Pass 101,625 101,625 101,625 101,625	96,507 36,507 36,307 36,330 36,330	Pass 117,685 117,685 109,694 447,240	1,043 1,043 1,043 1,043	Pass 77 77 77 77	Pass 481 481 481
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796	Pass 101,625 101,625 101,625 101,625 393,041	Pass 36,507 36,507 36,330 36,330 120,797	Pass 117,685 117,685 109,694 447,240	1,043 1,043 1,043 1,043 1,043	Pass 77 77 77 77 260	Pass 481 481 481 1,744
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244	Pass 101,625 101,625 101,625 101,625 393,041 393,041	Pass 36,507 36,507 36,507 36,330 36,330 120,797 120,797	Pass 117,685 117,685 109,694 447,240 466,234 466,234	1,043 1,043 1,043 1,043 1,043 4,167	Pass 77 77 77 77 77 260 260	Pass 481 481 481 481 1,744 1,744
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4 LTNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244 986,244 986,244	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041	Pass 36,507 36,507 36,330 36,330 120,797 120,797 120,212	Pass 117,685 117,685 109,694 447,240 466,234 466,234 434,577	1,043 1,043 1,043 1,043 1,043 4,167 4,167	Pass 77 77 77 77 77 260 260 260	Pass 481 481 481 481 1,744 1,744
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244	Pass 101,625 101,625 101,625 101,625 393,041 393,041	Pass 36,507 36,507 36,507 36,330 36,330 120,797 120,797	Pass 117,685 117,685 109,694 447,240 466,234 466,234	1,043 1,043 1,043 1,043 1,043 4,167	Pass 77 77 77 77 77 260 260	Pass 481 481 481 481 1,744 1,744
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4 LTNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244 986,244 986,244	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041	Pass 36,507 36,507 36,330 36,330 120,797 120,797 120,212	Pass 117,685 117,685 109,694 447,240 466,234 466,234 434,577	1,043 1,043 1,043 1,043 1,043 4,167 4,167	Pass 77 77 77 77 77 260 260 260	Pass 481 481 481 481 1,744 1,744
NON CO_INCIDE! 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP	DNCP1 PNCP1 LTNCP1 SNCP1 SNCP1 DNCP4 PNCP4 LTNCP4 SNCP4 SNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244 986,244 986,001 966,664	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041	Pass 36,507 36,507 36,330 36,330 120,797 120,797 120,212	Pass 117,685 117,685 109,694 447,240 466,234 466,234 434,577	1,043 1,043 1,043 1,043 1,043 4,167 4,167	Pass 77 77 77 77 77 260 260 260	Pass 481 481 481 481 1,744 1,744
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP Line Transformer NCP Classification NCP from Load Data Provider	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4 LTNCP4 SNCP4 DNCP4 DNCP4 DNCP4 DNCP4 DNCP4 DNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244 986,244 986,244	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041 393,041 1,037,817	Pass 36,507 36,507 36,530 36,330 120,797 120,797 120,212 120,212 261,371	Pass 117,685 117,685 109,694 447,240 466,234 466,234 434,577 447,240	1,043 1,043 1,043 1,043 1,043 4,167 4,167	Pass 77 77 77 77 77 260 260 260	Pass 481 481 481 481 1,744 1,744 1,744 4,252
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP Line Transformer NCP Secondary NCP Line Transformer NCP Secondary NCP Load Data Provider Primary NCP Primary NCP Primary NCP Primary NCP Primary NCP	DNCP1 PNCP1 LTNCP1 SNCP1 SNCP1 DNCP4 PNCP4 LTNCP4 SNCP4 DNCP4 DNCP4 SNCP4 DNCP4 SNCP4	NCP Sanity Check 257,419 257,419 #DIV/0! 586,796 986,244 986,244 986,001 966,664 2,568,026 2,568,026	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041 393,041 1,037,817 1,037,817	Pass 36,507 36,507 36,330 36,330 120,797 120,212 120,212 261,371 261,374	Pass 117,685 117,685 109,694 447,240 466,234 466,234 433,577 447,240 1,251,598 1,251,598	1,043 1,043 1,043 1,043 1,043 1,043 1,043 1,167 4,167 4,167	Pass 77 77 77 77 77 260 260 260 260 260 628	Pass 481 481 481 1,744 1,744 1,744 4,252 4,252
NON CO_INCIDED 1 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP 4 NCP Classification NCP from Load Data Provider Primary NCP Line Transformer NCP Secondary NCP Line Transformer NCP Classification NCP from Load Data Provider	DNCP1 PNCP1 LTNCP1 SNCP1 DNCP4 PNCP4 LTNCP4 SNCP4 DNCP4 DNCP4 DNCP4 DNCP4 DNCP4 DNCP4	NCP Sanity Check 257,419 257,419 #DIV/01 586,796 986,244 986,244 984,001 966,664	Pass 101,625 101,625 101,625 101,625 101,625 393,041 393,041 393,041 393,041 1,037,817	Pass 36,507 36,507 36,530 36,330 120,797 120,797 120,212 120,212 261,371	Pass 117,685 117,685 109,694 447,240 466,234 466,234 434,577 447,240	1,043 1,043 1,043 1,043 1,043 4,167 4,167 4,167 4,167	Pass 77 77 77 77 77 77 260 260 260 260 260	Pass 481 481 481 481 1,744 1,744 1,744 4,252



Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020 23 of 31

2020 Cost Allocation Model

EB-2020-XXXX

Sheet O1 Revenue to Cost Summary Worksheet - Hydro One prepared

Instructions:

Please see the first tab in this workbook for detailed instructions

Class Revenue, Cost Analysis, and Return on Rate Base

			1	2	3	7	8	9	Ī
Rate Base Assets		Total	Residential	GS <50	GS>50-Regular	Street Light	Sentinel	Unmetered Scattered Load	
crev	Distribution Revenue at Existing Rates	\$32,474,115	\$20,983,817	\$4,114,496	\$6,928,887	\$268,595	\$76,021	\$102,299	ľ
mi	Miscellaneous Revenue (mi)	\$2,971,337	\$2,161,859		\$461,736	\$6,575	\$6,984	\$5,321	
			cellaneous Revenu			40== (=0	*** ***	A10= 000	ļ
	Total Revenue at Existing Rates	\$35,445,452	\$23,145,676	\$4,443,358	\$7,390,622	\$275,170	\$83,005	\$107,620	
	Factor required to recover deficiency (1 + D)	1.0738							
	Distribution Revenue at Status Quo Rates	\$34,869,338	\$22,531,540	\$4,417,972	\$7,439,947	\$288,406	\$81,628	\$109,845	
	Miscellaneous Revenue (mi)	\$2,971,337	\$2,161,859	\$328,862	\$461,736	\$6,575	\$6,984	\$5,321	
	Total Revenue at Status Quo Rates	\$37,840,675	\$24,693,399	\$4,746,835	\$7,901,683	\$294,981	\$88,612	\$115,166	
	Expenses								
di	Distribution Costs (di)	\$6,872,765	\$4,466,838	\$710,448	\$1,622,401	\$34,312	\$16,349	\$22,416	
cu	Customer Related Costs (cu)	\$7,296,377	\$5,764,190	\$879.327	\$631,376	\$695	\$19,064	\$1,725	
ad	General and Administration (ad)	\$6,214,868	\$4,451,134	\$691,149	\$1,028,673	\$16,866	\$15,501	\$11,545	
dep	Depreciation and Amortization (dep)	\$8,442,650	\$5,593,534	\$865,007	\$1,900,969	\$38,250	\$19,037	\$25,852	
INPUT	PILs (INPUT)	\$334,085	\$219,632	\$33,816	\$77,022	\$1,696	\$813	\$1,106	
INT	Interest	\$2,887,958	\$1,898,578	\$292,322	\$665,810	\$14,659	\$7,030	\$9,559	
	Total Expenses	\$32,048,704	\$22,393,906	\$3,472,070	\$5,926,252	\$106,478	\$77,795	\$72,204	
	Direct Allocation	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
NI	Allocated Net Income (NI)	\$5,791,971	\$3,807,710	\$586,269	\$1,335,321	\$29,400	\$14,099	\$19,171	
	Revenue Requirement (includes NI)	\$37,840,675	\$26,201,616	\$4.058.338	\$7,261,574	\$135.878	\$91.894	\$91,375	
	,		quirement Input ed	, ,,	4 ., 2 ., 3 .	*	4 0.,00.	40.,0.0	
		Nevenue Ne	quirement input et	dais Output					
	Rate Base Calculation								
	Net Assets								
dp	Distribution Plant - Gross	\$309,864,707	\$205,200,479	\$31,384,057	\$69,895,803	\$1,564,338	\$772,730	\$1,047,299	
gp	General Plant - Gross	\$52,281,699	\$34,665,707	\$5,345,730	\$11,707,446	\$260,588	\$128,320	\$173,906	
	Accumulated Depreciation	(\$157,819,664) (\$47,704,186)	(\$104,111,167) (\$32,642,599)	(\$15,780,508) (\$5,069,054)	(\$36,171,626) (\$9,494,976)	(\$815,060) (\$217,238)	(\$399,420) (\$119,842)	(\$541,883) (\$160,477)	
со	Capital Contribution Total Net Plant	\$156,622,556	\$103,112,421	\$15,880,226	\$35,936,647	\$792,628	\$381,788	\$518,846	
	Total Net Flant	ψ130,022,330	\$103,112,421	\$13,000,220	\$33,930,047	φ192,020	\$301,700	\$310,040	
	Directly Allocated Net Fixed Assets	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
COP	Cost of Power (COP)	\$157,344,654	\$55,805,347	\$16,126,675	\$84,660,148	\$545,104	\$26,665	\$180,715	
	OM&A Expenses Directly Allocated Expenses	\$20,384,010 \$0	\$14,682,162 \$0	\$2,280,924 \$0	\$3,282,450 \$0	\$51,873 \$0	\$50,914 \$0	\$35,686 \$0	
	Subtotal							**	
	Subtotal	\$177,728,664	\$70,487,509	\$18,407,599	\$87,942,598	\$596,978	\$77,579	\$216,401	
	Working Capital	\$13,329,650	\$5,286,563	\$1,380,570	\$6,595,695	\$44,773	\$5,818	\$16,230	
	Total Rate Base	\$169,952,205	\$108,398,984	\$17,260,796	\$42,532,341	\$837,402	\$387,607	\$535,076	
		Rate I	Base Input equals (Output					
	Equity Component of Rate Base	\$67,980,882	\$43,359,594	\$6,904,318	\$17,012,937	\$334,961	\$155.043	\$214,030	
	Equity Component of Rate Base	\$67,960,062	\$43,359,594	\$6,904,316	\$17,012,937	\$334,961	\$155,043	\$214,030	
	Net Income on Allocated Assets	\$5,791,971	\$2,299,494	\$1,274,765	\$1,975,431	\$188,502	\$10,818	\$42,962	
	Net Income on Direct Allocation Assets	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
	Net Income	\$5,791,971	\$2,299,494	\$1,274,765	\$1,975,431	\$188,502	\$10,818	\$42,962	



2020 Cost Allocation Model

EB-2020-XXXX

Sheet O1 Revenue to Cost Summary Worksheet - Hydro One prepared

Instructions:

Please see the first tab in this workbook for detailed instructions

Class Revenue, Cost Analysis, and Return on Rate Base

Rate Base Assets

RATIOS ANALYSIS

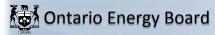
REVENUE TO EXPENSES STATUS QUO%

EXISTING REVENUE MINUS ALLOCATED COSTS

STATUS QUO REVENUE MINUS ALLOCATED COSTS
RETURN ON EQUITY COMPONENT OF RATE BASE

	1	2	3	7	8	9	
Total	Residential	GS <50	GS>50-Regular	Street Light	Sentinel	Unmetered Scattered Load	
100.00%	94.24%	116.96%	108.82%	217.09%	96.43%	126.04%	
(\$2,395,224)	(\$3,055,940)	\$385,020	\$129,049	\$139,291	(\$8,889)	\$16,245	
Defici	ency Input equals	Output					
\$0	(\$1,508,217)	\$688,497	\$640,109	\$159,102	(\$3,282)	\$23,791	
8.52%	5.30%	18.46%	11.61%	56.28%	6.98%	20.07%	

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020 24 of 31



2020 Cost Allocation Model

EB-2020-XXXX

Sheet O2 Monthly Fixed Charge Min. & Max. Worksheet - Hydro One prepared

Output sheet showing minimum and maximum level for Monthly Fixed Charge

Customer Unit Cost per month - Avoided Cost

Customer Unit Cost per month - Directly Related

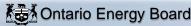
Customer Unit Cost per month - Minimum System with PLCC Adjustment

Existing Approved Fixed Charge

1 2		3	7	8	9
Residential	Residential GS <50		Street Light	Sentinel	Unmetered Scattered Load
\$7.35	\$13.29	\$79.28	\$0.33	\$3.95	\$0.32
\$10.35	\$18.77	\$109.70	\$0.56	\$5.70	\$0.49
\$33.76	\$47.98	\$168.64	\$76.01	\$26.92	\$17.90
\$33.67	\$40.15	\$109.12	\$1.26	\$18.03	\$20.73

Niagara Peninsula Energy Inc. EB-2020-0040 Filed: August 31, 2020

Appendix 7-2
OEB RRWF – Sheets 11 and 12 (Cost Allocation)



Revenue Requirement Workform (RRWF) for 2020 Filers

Cost Allocation and Rate Design

This spreadsheet replaces **Appendix 2-P** and provides a summary of the results from the Cost Allocation spreadsheet, and is used in the determination of the class revenue requirement and, hence, ultimately, the determination of rates from customers in all classes to recover the revenue requirement.

Stage in Application Process: Initial Application

A) Allocated Costs

Name of Customer Class (3) From Sheet 10. Load Forecast		Allocated from vious Study (1)	%		Illocated Class enue Requirement	%
Residential 2 General Service < 50 kW 3 General Service > 50 kW	\$ \$ \$	20,940,354 3,203,396 5,604,282	69.18% 10.58% 18.52%	\$ \$ \$	26,201,616 4,058,338 7,261,574	69.24% 10.72% 19.19%
Unmetered Scattered Load Sentinel Streetlight	\$ \$ \$	109,566 89,264 320,851	0.36% 0.29% 1.06%	\$ \$ \$	91,375 91,894 135,878	0.24% 0.24% 0.36%
77 - 78 - 78 - 78 - 78 - 78 - 78 - 78 -						
Total	\$	30,267,713	100.00%	\$	37,840,675	100.00%
			Service Revenue Requirement (from Sheet 9)	\$	37,840,675.30	

- (1) Class Allocated Revenue Requirement, from Sheet O-1, Revenue to Cost || RR, row 40, from the Cost Allocation Study in this application. This excludes costs in deferral and variance accounts. For Embedded Distributors, Account 4750 Low Voltage (LV) Costs are also excluded.
- (2) Host Distributors Provide information on any embedded distributor(s) as a separate class, if applicable. If embedded distributors are billed in a General Service class, include the allocated costs and revenues of the embedded distributor(s) in the applicable class, and also complete Appendix 2-Q.
- (3) Customer Classes If these differ from those in place in the previous cost allocation study, modify the customer classes to match the proposal in the current application as closely as possible.

B) Calculated Class Revenues

Name of Customer Class		Forecast (LF) X ent approved rates	_	F X current proved rates X (1+d)	LF X	Proposed Rates	N	liscellaneous Revenues
		(7B)		(7C)		(7D)		(7E)
1 Residential	\$	20,983,817	\$	22,531,540	\$	22,531,540	\$	2,161,859
2 General Service < 50 kW	\$	4,114,496	\$	4,417,972	\$	4,417,972	\$	328,862
General Service > 50 kW	\$	6,928,887	\$	7,439,947	\$	7,577,389	\$	461,736
Unmetered Scattered Load	\$	102,299	\$	109,845	\$ \$	104,329	\$ \$ \$	5,321
5 Sentinel 6 Streetlight	\$ \$	76,021	\$ \$	81,628	\$ \$	81,628	\$	6,984
5 Streetlight 7 8 9 1 1 2 8 6 7 7 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	Ü	268,595	•	288,406	•	156,479	•	6,575
Total	\$	32,474,115	\$	34,869,338	\$	34,869,338	\$	2,971,337

⁽⁴⁾ In columns 7B to 7D, LF means Load Forecast of Annual Billing Quantities (i.e., customers or connections, as applicable X 12 months, and kWh, kW or kVA as applicable. Revenue quantities should be net of the Transformer Ownership Allowance for applicable customer classes. Exclude revenues from rate adders and rate riders.

⁽⁵⁾ Columns 7C and 7D - Column Total should equal the Base Revenue Requirement for each.

⁽⁶⁾ Column 7C - The OEB-issued cost allocation model calculates "1+d" on worksheet O-1, cell C22. "d" is defined as Revenue Deficiency/Revenue at Current Rates.

⁽⁷⁾ Column 7E - If using the OEB-issued cost allocation model, enter Miscellaneous Revenues as it appears on worksheet O-1, row 19,

C) Rebalancing Revenue-to-Cost Ratios

Name of Customer Class	Previously Approved Ratios	Status Quo Ratios	Proposed Ratios	Policy Range
	Most Recent Year: 2015	(7C + 7E) / (7A)	(7D + 7E) / (7A)	
	%	%	%	%
Residential	91.65%	94.24%	94.24%	85 - 115
General Service < 50 kW	120.00%	116.96%	116.96%	80 - 120
General Service > 50 kW	120.00%	108.82%	110.71%	80 - 120
Unmetered Scattered Load	119.83%	126.04%	120.00%	80 - 120
Sentinel	91.65%	96.43%	96.43%	80 - 120
Streetlight	91.65%	217.09%	120.00%	80 - 120

⁽⁸⁾ Previously Approved Revenue-to-Cost (R/C) Ratios - For most applicants, the most recent year would be the third year (at the latest) of the Price Cap IR period. For example, if the applicant, rebased in 2012 with further adjustments to move within the range over two years, the Most Recent Year would be 2015. However, the ratios in 2015 would be equal to those after the adjustment in 2014.

⁽⁹⁾ Status Quo Ratios - The OEB-issued cost allocation model provides the Status Quo Ratios on Worksheet O-1. The Status Quo means "Before Rebalancing".

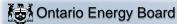
⁽¹⁰⁾ Ratios shown in red are outside of the allowed range. Applies to both Tables C and D.

(D) Proposed Revenue-to-Cost Ratios (11)

Name of Customer Class	Propose	ed Revenue-to-Cost Ratio		Policy Range	
	Test Year	Price Cap IR F	Period		
	2021	2022	2023		
Residential	94.24%	94.24%	94.24%	85 - 115	
General Service < 50 kW	116.96%	116.96%	116.96%	80 - 120	
General Service > 50 kW	110.71%	110.71%	110.71%	80 - 120	
Unmetered Scattered Load	120.00%	120.00%	120.00%	80 - 120	
Sentinel	96.43%	96.43%	96.43%	80 - 120	
Streetlight	120.00%	120.00%	120.00%	80 - 120	

⁽¹¹⁾ The applicant should complete Table D if it is applying for approval of a revenue-to-cost ratio in 2020 that is outside of the OEB's policy range for any customer class. Table D will show that the distributor is likely to enter into the 2021 and 2022 Price Cap IR models, as necessary. For 2021 and 2022, enter the planned revenue-to-cost ratios that will be "Change" or "No Change" in 2019 (in the current Revenue/Cost Ratio Adjustment Workform, Worksheet C1.1 'Decision - Cost Revenue Adjustment, column d), and enter TBD for class(es) that will be entered as 'Rebalance'.

Filed: August 31, 2020 31 of 31



Revenue Requirement Workform (RRWF) for 2020 Filers

New Rate Design Policy For Residential Customers

Please complete the following tables

A Data Inputs (from Sheet 10. Load Forecast)

Customers	51,935
kWh	454,614,210
Proposed Residential Class Specific Revenue	\$ 22.531.540.39
Requirement ¹	

Residential Base Rates on Current Tariff						
Monthly Fixed Charge (\$)	\$	33.67				
Distribution Volumetric Rate (\$/kWh)	\$	-				

B Current Fixed/Variable Split

	Base Rates	Billing Determinants	Revenue	% of Total Revenue
Fixed	33.67	51,935	\$ 20,983,817.40	100.00%
Variable	0	454,614,210	\$ -	0.00%
TOTAL	-	-	\$ 20,983,817.40	-

C Calculating Test Year Base Rates

Number of Department Date Decign Delies	
Number of Remaining Rate Design Policy	
Transition Years ²	0

	T	est Year Revenue @ Current F/V Split	Test Year Base Rates @ Current F/V Split	,	Reconciliation - Test Year Base Rates @ Current F/V Split
Fixed	\$	22,531,540.39	36.15	\$	22,529,403.00
Variable	\$	-	0	\$	-
TOTAL	\$	22,531,540.39	-	\$	22,529,403.00

	New F/V Split	Revenue @ new F/V Split	Final Adjusted Base Rates	Revenue Reconciliation @ Adjusted Rates
Fixed				
Variable				
TOTAL	-	-	-	

Checks ³	
Change in Fixed Rate	
Difference Between Revenues @ Proposed Rates	
and Class Specific Revenue Requirement	

Notes:

- 1 The final residential class specific revenue requirement, excluding allocated Miscellaneous Revenues, as shown on Sheet 11. Cost Allocation, should be used (i.e. the revenue requirement after any proposed adjustments to R/C ratios).
- The distributor should enter the number of years remaining before the transition to fully fixed rates is completed. The change in residential rate design is almost complete and distributors should have either 0 or 1 year remaining. If the distributor has fully transitioned to fixed rates put "0" in cell D40. If the distributor has proposed an additional transition year because the change in the residential rate design will result in the fixed charge increasing by more than \$4/year, put "1" in cell D40.
- 3 Change in fixed rate due to rate design policy should be less than \$4. The difference between the proposed class revenue requirement and the revenue at calculated base rates should be minimal (i.e. should be reasonably considered as a rounding error)