



**Lakefront  
Utilities  
Inc.**

June 18, 2021

Ms. Christine Long, Registrar  
Ontario Energy Board  
2300 Yonge Street, 27<sup>th</sup> Floor, P.O. Box 2319  
Toronto, ON M4P 1E4

**Re: Lakefront Utilities Inc.  
EB-2021-0039  
Response to OEB Staff – Error Checking Review**

Dear Ms. Long:

On June 1, 2021, the Ontario Energy Board (OEB) Staff sent a series of clarification questions to Lakefront Utilities Inc. (LUI) regarding its 2022 Cost of Service Application EB-2021-0039.

LUI has reproduced each of those questions below and provided a response to each question. As noted in the responses, questions #14 and #15 will require updates to the models which will ultimately impact the application. Lakefront has confirmed that it will update the models during the interrogatory process.

Should the board have questions regarding this matter please contact Dereck Paul at [dpaul@lusi.on.ca](mailto:dpaul@lusi.on.ca) or myself at [agiddings@lusi.on.ca](mailto:agiddings@lusi.on.ca).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Adam Giddings".

Adam Giddings, CPA CA  
Director of Regulatory Finance  
Lakefront Utilities Inc.

Cc: Dereck C. Paul, President and CEO  
Cc: Michael R. Buonaruro – counsel to the Applicant  
Cc: Manuela Ris-Schofield – consultant to the Applicant

➤ **OEB Staff Question #1**

1. The “Total Cost per Customer” for 2020 shown in the table in Exhibit 1, page 147 and the text in Exhibit 1, page 148 do not match (\$603 and \$6003 respectively).

**Lakefront Response**

Lakefront notes the \$6003 was an input error. The amount should be \$603 which is consistent with the amount recorded in the table and is consistent with prior years. The update excerpt from the Business Plan is included in Appendix A.

➤ **OEB Staff Question #2**

2. Exhibit 1, page 148 states “LUI’s 2019 OM&A cost per customer was the 4th lowest in the province.” The 2019 OEB yearbook shows that LUI’s OM&A per customer was 14th at \$254.29, whereas the 2019 PEG report shows the “total cost per customer is 4th at \$501.

**Lakefront Response**

The reference to OM&A cost per customer of \$501 was an error and should have read “total cost per customer” which is based on the Scorecard data. The wording in Exhibit 1 has been updated and the applicable page has been attached as Appendix B.

➤ **OEB Staff Question #3**

3. In the Distribution System Plan: 2022-2026, Page 15 (Exhibit 2 page 139), Table 2-1, the “System O&M” forecast for 2023 is listed as “1,39”.

**Lakefront Response**

The 2023 system O&M forecast should be \$1,039. The updated table is provided below.

Lakefront Utilities Inc.

Distribution System Plan: 2022 – 2026

*Table 2-1: Historical actuals and forecast capital expenditures and system O&M (rounded thousands)*

Category	Historical (\$ '000)					Forecast (\$ '000)				
	2017	2018	2019	2020	2021*	2022	2023	2024	2025	2026
System Access (Gross)	423	572	361	177	100	75	318	244	330	336
System Renewal (Gross)	1,800	482	826	733	845	1,300	1,131	869	1,173	1,195
System Service (Gross)	33	40	0	1,109	550	525	315	242	327	333
General Plant (Gross)	105	96	71	89	168	60	131	574	135	138
<b>Gross Capital Expenses</b>	<b>2,360</b>	<b>1,190</b>	<b>1,258</b>	<b>2,109</b>	<b>1,663</b>	<b>1,960</b>	<b>1,894</b>	<b>1,929</b>	<b>1,965</b>	<b>2,002</b>
Contributed Capital	202	359	137	268	100	100	0	0	0	0
<b>Net Capital Expenses after Contributions</b>	<b>2,158</b>	<b>831</b>	<b>1,121</b>	<b>1,841</b>	<b>1,563</b>	<b>1,860</b>	<b>1,894</b>	<b>1,929</b>	<b>1,965</b>	<b>2,002</b>
<b>System O&amp;M</b>	<b>835</b>	<b>991</b>	<b>986</b>	<b>1,057</b>	<b>975</b>	<b>1,020</b>	<b>1,039</b>	<b>1,058</b>	<b>1,078</b>	<b>1,098</b>

\*Estimated actuals based on current projections and pipeline projects.

➤ **OEB Staff Question #4**

4. Exhibit 2, Table 2.1 refers to CGAAP and NEW GAAP values, when the rest of the application references in MIFRS.

**Lakefront Response**

As stated, the reset of the application references MIRFS. Table 2.1 should reference MIFRS and has been updated below.

Particulars	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS
	Last Board Approved	2017	2018	2019	2020	2021	2022
Net Capital Assets in Service:							
Opening Balance	16,703,034	17,272,610	18,909,049	18,728,285	18,832,227	19,577,033	19,991,980
Ending Balance	17,272,610	18,909,049	18,728,285	18,832,227	19,577,033	19,991,980	20,850,030
<b>Average Balance</b>	<b>16,987,822</b>	<b>18,090,830</b>	<b>18,818,667</b>	<b>18,780,256</b>	<b>19,204,630</b>	<b>19,784,507</b>	<b>20,421,005</b>
Working Capital Allowance	2,552,431	2,361,003	2,141,376	2,416,004	2,692,507	2,648,983	2,711,078
<b>Total Rate Base</b>	<b>19,540,253</b>	<b>20,451,833</b>	<b>20,960,043</b>	<b>21,196,261</b>	<b>21,897,138</b>	<b>22,433,489</b>	<b>23,132,083</b>

Expenses for Working Capital	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS	MIFRS
	Last Board Approved	2017	2018	2019	2020	2021	2022
Eligible Distribution Expenses:							
3500-Distribution Expenses - Operation	525,404	574,731	646,650	680,237	753,224	667,624	707,393
3550-Distribution Expenses - Maintenance	195,787	260,745	343,942	305,444	304,062	307,241	312,541
3650-Billing and Collecting	566,316	572,056	489,721	531,084	554,625	562,378	580,283
3700-Community Relations	20,219	15,276	21,564	16,141	17,215	19,474	19,757
3800-Administrative and General Expenses	1,058,304	961,070	1,103,498	1,086,604	1,057,725	1,127,745	1,199,520
6105-Taxes other than Income Taxes	62,359	59,800	57,970	56,399	55,042	57,200	58,058
6205-Sub-account LEAP Funding	5,850	5,988	5,900	5,850	5,850	5,850	6,213
<b>Total Eligible Distribution Expenses</b>	<b>2,434,239</b>	<b>2,449,667</b>	<b>2,669,245</b>	<b>2,681,758</b>	<b>2,747,743</b>	<b>2,747,511</b>	<b>2,883,765</b>
3350-Power Supply Expenses	31,598,177	29,030,375	25,882,435	29,531,634	33,152,355	32,572,257	33,263,943
<b>Total Expenses for Working Capital</b>	<b>34,032,416</b>	<b>31,480,042</b>	<b>28,551,680</b>	<b>32,213,392</b>	<b>35,900,098</b>	<b>35,319,768</b>	<b>36,147,708</b>
Working Capital factor	7.5%	7.5%	7.5%	7.5%	7.5%	7.5%	7.5%
<b>Total Working Capital</b>	<b>2,552,431</b>	<b>2,361,003</b>	<b>2,141,376</b>	<b>2,416,004</b>	<b>2,692,507</b>	<b>2,648,983</b>	<b>2,711,078</b>

➤ **OEB Staff Question #5**

5. Capital expenditures are shown in Table 2-AB in the excel file for Chapter 2 Appendices, and in Exhibit 2 pages 39 and 139 (page 15 of DSP). The tables do not show capital contributions for each year and do not show correct “gross” and “net” values.

**Lakefront Response**

Lakefront has updated Table 2-AB in the excel file for Chapter 2 Appendices as summarized below:

First year of Forecast Period:  
2022

CATEGORY	Historical Period (previous plan <sup>1</sup> & actual)												Forecast Period (planned)							
	2017			2018			2019			2020			2021			2022	2023	2024	2025	2026
	Plan	Actual	Var	Plan	Actual	Var	Plan	Actual	Var	Plan	Actual	Var	Plan	Actual <sup>2</sup>	Var					
	\$ '000			\$ '000			\$ '000			\$ '000			\$ '000							
<b>System Access</b>	180	423	135.0%	120	572	376.7%	120	361	200.8%	180	177	-1.7%	200	100	-50.0%	75	318	244	330	336
<b>System Renewal</b>	1,220	1,800	47.5%	1,420	482	-66.1%	1,100	826	-24.9%	970	733	-24.4%	1,470	845	-42.5%	1,300	1,131	869	1,173	1,195
<b>System Service</b>	250	33	-86.8%	75	40	-46.7%	120	-	-100.0%	50	1,109	2118.0%	50	550	1000.0%	525	315	242	327	333
<b>General Plant</b>	120	105	-12.5%	155	96	-38.1%	430	71	-83.5%	500	89	-82.2%	200	168	-16.0%	60	131	574	135	138
<b>TOTAL EXPENDITURE</b>	1,770	2,361	33.4%	1,770	1,190	-32.8%	1,770	1,258	-28.9%	1,700	2,108	24.0%	1,920	1,663	-13.4%	1,960	1,895	1,929	1,965	2,002
<b>Capital Contributions</b>		202	--		359	--		137	--		268	--		100	--	100	-			
<b>Net Capital Expenditures</b>		2,158	--		831	--		1,121	--		1,841	--		1,563	--	1,860	1,894	1,929	1,965	2,002
<b>System O&amp;M</b>	\$ 745	\$ 835	12.1%	\$ 797	\$ 991	24.3%	\$ 853	\$ 986	15.6%	\$ 912	\$ 1,057	15.9%	\$ 976	\$ 975	-0.1%	\$ 1,020	\$ 1,039	\$ 1,058	\$ 1,078	\$ 1,098

➤ **OEB Staff Question #6**

6. The %Change rows of Table 2-J contained in Exhibit 4 and in the excel file for Chapter 2 Appendices do not match.

**Lakefront Response**

Lakefront has updated the percentages in Table 4.2 (Appendix 2-JA) as included in Exhibit 4 has highlighted the updates below.

	Last Rebasing Year (2017 Board-Approved)	Last Rebasing Year (2017 Actuals)	2018	2019	2020	2021	2022
<b>Reporting Basis</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>	<b>MIFRS</b>
Operations	\$525,404	\$574,731	\$646,650	\$680,237	\$753,224	\$667,624	\$707,393
Maintenance	\$195,787	\$260,745	\$343,942	\$305,444	\$304,062	\$307,241	\$312,541
<b>SubTotal</b>	<b>\$721,191</b>	<b>\$835,477</b>	<b>\$990,592</b>	<b>\$985,681</b>	<b>\$1,057,287</b>	<b>\$974,865</b>	<b>\$1,019,934</b>
%Change (year over year)		15.8%	18.6%	-0.5%	7.3%	-7.8%	4.6%
%Change (Test Year vs Last Rebasing Year - Actual)							22.1%
Billing and Collecting	\$566,316	\$572,056	\$489,721	\$531,084	\$554,625	\$562,378	\$580,283
Community Relations	\$20,219	\$15,276	\$21,564	\$16,141	\$17,215	\$19,474	\$19,757
Administrative and General+LEAP	\$1,064,154	\$967,058	\$1,109,398	\$1,092,454	\$1,063,575	\$1,133,595	\$1,205,733
<b>SubTotal</b>	<b>\$1,650,689</b>	<b>\$1,554,390</b>	<b>\$1,620,683</b>	<b>\$1,639,678</b>	<b>\$1,635,414</b>	<b>\$1,715,446</b>	<b>\$1,805,772</b>
%Change (year over year)		-5.8%	4.3%	1.2%	-0.3%	4.9%	5.3%
%Change (Test Year vs Last Rebasing Year - Actual)							16.2%
<b>Total</b>	<b>\$2,371,880</b>	<b>\$2,389,866</b>	<b>\$2,611,275</b>	<b>\$2,625,359</b>	<b>\$2,692,701</b>	<b>\$2,690,311</b>	<b>\$2,825,707</b>
%Change (year over year)		0.8%	9.3%	0.5%	2.6%	-0.1%	5.0%

➤ **OEB Staff Question #7**

7. The “Total Debt” in Table 5.6 contained in Exhibit 5 and contained in the excel file for Chapter 2 Appendices, Table 2-OA do not match.

**Lakefront Response**

Lakefront has updated the calculation for the total debt percentage, highlighted in the table below.

<b>Particulars</b>	<b>Capitalization Ratio</b>	<b>Cost Rate (%)</b>
<b>Debt</b>		
Long-term Debt	56%	3.05%
Short-term Debt	4%	1.75%
<b>Total Debt</b>	<b>60%</b>	<b>2.97%</b>
<b>Equity</b>		
Common Equity	40%	8.34%
Preferred Shares	0%	0.00%
<b>Total Equity</b>	<b>40%</b>	<b>8.34%</b>
<b>Total</b>	<b>100%</b>	<b>5.12%</b>

➤ **OEB Staff Question #8**

8. The GA Analysis Workform, Tab GA 2017, Reconciling item #8, principal adjustment resulting from the audit of \$(2,373,485) does not agree with the DVA Continuity Schedule, Tab 2a, 2017 principal adjustment of \$(3,347, 937).

**Lakefront Response**

The difference of \$974,452 was reconciled and included in the 2018 GA Analysis Workform. The adjustment and reconciliation were documented in responses to the Ontario Energy Board in Lakefront's 2020 IRM - EB-2019-0050.

➤ **OEB Staff Question #9**

9. One regression model is presented in Exhibit 3, page 15, and in the load forecasting model, sheet 6.1 Regression Scenarios. The regression model used on sheet 6. WS Regression Analysis is different. Please indicate which one is proposed.

**Lakefront Response**

The regression model presented on page 15 of Exhibit 3 and sheet 6.1 Regression Scenarios are the same model. The model presented on 6. WS Regression Analysis is from a previous version, please disregard.

➤ **OEB Staff Question #10**

10. A CDM adjustment variable is detailed in Exhibit 3, page 20, but none exists as a variable in the regression model, nor as an adjustment to wholesale purchases. Where is this reflected?

**Lakefront Response**

As indicated page 20 in Exhibit #3, the CDM adjustment was not incorporated in the regression model.

➤ **OEB Staff Question #11**

11. In the Cost Allocation model, the consistency checks on the Sheet I8 Demand Data, are not satisfied. This should not occur on the NCP allocators, and appears incorrect.

**Lakefront Response**

Lakefront has used the profiles provided by Hydro One, scaled to match the load forecast as it relates to the respective classes, to populate Sheet I8 Demand Data. Lakefront has filed the data in response to the error checking.

For the time being, Lakefront is relying on the results of the demand profile model, but Lakefront is open to updating the 4CP and 12CP with calculated results to meet the sanity check if agreed by the parties that it is the correct approach.

➤ **OEB Staff Question #12**

12. The proposed USL rate at Exhibit 8, page 5 does not reconcile to RRWF.

**Lakefront Response**

Lakefront confirms that the USL rate calculated as \$11.38 is accurate and the rate design model has been updated and included below is Table 8.1 in Exhibit 8. Lakefront notes the rate included in the RRWF has been updated in response to OEB Staff Question #13.

Customer Class Name	Proposed Rates at Current Fixed to Variable Split		
	Rate	Fixed %	Variable %
Residential	\$25.14	100.00%	0.00%
General Service < 50 kW	\$27.42	55.09%	44.91%
General Service 50-2999 kW	\$89.88	11.43%	88.57%
General Service 3000-4999 kW	\$4,467.60	48.53%	51.47%
Street Lighting	\$1.73	83.66%	16.34%
Sentinel Lights	\$7.62	66.69%	33.31%
Unmetered Scattered Load	<b>\$11.38</b>	51.74%	48.26%

➤ **OEB Staff Question #13**

13. The final tariff for GS 3000 – 4,999, Street Lighting, USL, and Sentinel do not reconcile to the RRWF or Exhibit 8, page 5.

**Lakefront Response**

Lakefront has updated the Tab 13. Rate Design in the RRWF cells U31, U32, U33, and U34. The update does not have an impact on the total revenue deficiency.

Below is a summary of the rates included in Exhibit 8, page 5 Table 8.1, the Final Tariff, and the Revenue Requirement Workform (RRWF).

Customer Class Name	Exhibit 8, page 5 - Table 8.1	Final Tariff	Reveue Requirement Workform
Residential	\$25.14	\$25.14	\$25.14
General Service < 50 kW	\$27.42	\$27.42	\$27.42
General Service 50-2999 kW	\$89.88	\$89.88	\$89.88
General Service 3000-4999 kW	\$4,467.60	\$6,174.88	\$6,174.88
Street Lighting	\$1.73	\$1.59	\$1.59
Sentinel Lights	\$7.62	\$6.34	\$6.37
Unmetered Scattered Load	\$11.38	\$15.37	\$15.37

Based on the updates, the rates per the final Tariff agree to the Revenue Requirement Workform. The rates in Table 8.1 are hypothetical rates if Lakefront kept the existing fixed/variable split.

## OEB Staff Additional Items

The following 3 items were updated by the OEB while Lakefront Utilities was preparing this application.

### ➤ OEB Staff Question #14

14. *Chapter 2 Appendices – Appendix 2-ZB* – Cell B 137. The OER Credit value was updated, from 21.2 to 18.92%, effective May 1, 2021. <https://www.oeb.ca/newsroom/2021/ontario-energy-board-sets-new-electricity-prices-households-and-small-businesses>

### Lakefront Response:

Lakefront confirms that the OER credit value used for the purposes of calculation the Cost of Power was 21.20% and commits to updating the OER credit to 18.92% during the interrogatory process.

### ➤ OEB Staff Question #15

15. The forecast commodity prices in *Chapter 2 Appendices – Appendix 2-ZA* have changed effective May 01, 2021 <https://www.oeb.ca/sites/default/files/rpp-price-report-20210422.pdf>

### Lakefront Response

Lakefront confirms that the forecast commodity prices used to calculate the Cost of Power was the price indicated in Chapter 2 Appendices. Lakefront commits to updating the forecast commodity prices during the interrogatory process.

### ➤ OEB Staff Question #16

16. Lakefront states that it does not have a unique circumstance with respect to MicroFIT, and “applied the generic rate of \$5.40” and included \$5.40 in the tariff. The generic rate was updated to \$4.55 in February 2021.

[2021 electricity distribution rate applications | Ontario Energy Board \(oeb.ca\)](#) , Letter issued Feb 25, 2021.

### Lakefront Response

Lakefront confirms that it does not have a unique circumstance with respect to MicroFIT and will update the revised generic rate from \$5.40 to \$4.55 in the tariff.

**Appendix A - Question #1 - Total Cost per Customer - Excerpt from Business Plan**



occurred on July 27, 2020 and impacted 7,705 Cobourg customers. All 27.6 kV Cobourg customers were being supplied at the time from the Brook Road substation due to the July 23<sup>rd</sup> outage and the ongoing work on the Victoria Street substation. It was discovered that a relay setting was not updated in 2015 when the transformer was replaced and was therefore set too low for the current loading conditions on the transformer. The relay was adjusted to its correct setting and the load was restored.

The average number of times that power to a customer is interrupted is another measure of system reliability and is also a high priority for Lakefront. LUI customers experienced interrupted power 1.54 times during 2020. As noted above, the decrease in reliability is attributed to two outages in July 2020.

The Ontario Energy Board, along with consultants from the Pacific Economics Group LLC (PEG), prepared a report in order to evaluate all LDCs' efficiencies. These efficiencies are based on each utility's actual cost compared to the average levels predicted by a study conducted by PEG. Based on the efficiency levels achieved, each utility is grouped in their ranking with the most efficient being assigned to Group 1 and the least efficient to Group 5. Based on the above, LUI's efficiency assessment remains in Group/Cohort 2.

Total cost per customer is calculated as the sum of Lakefront's capital and operating costs, including certain adjustments to make the costs more comparable between utilities, and dividing this cost figure by the total number of customers that LUI serves. Lakefront's cost per customer in 2020 is **\$603**. A low total cost could be an indicator of insufficient capital investment rather than efficiency. LUI's 2019 OM&A cost per customer was the 4<sup>th</sup> lowest in the province. LUI continues to achieve strong financial performance by balancing system reliability and service, while minimizing controllable costs associated with operating, maintenance, and administration.

## Financial Ratios

Particulars	2015	2016	2017	2018	2019	2020	Target
<b>Financial Ratios</b>							
Liquidity: Current Ratio (Current Assets/Current Liabilities)	1.88	1.25	0.82	1.62	1.32	0.91	
Leverage: Total Debt (includes short-term and long-term debt to Equity Ratio)	1.09	1.03	1.07	1.07	1.02	0.97	
Profitability: Regulatory Return on Equity: Deemed	9.12%	9.12%	8.78%	8.78%	8.78%	8.78%	
Profitability: Regulatory Return on Equity: Achieved	7.69%	7.72%	6.57%	7.76%	7.58%	5.49%	

The current ratio is a test to see if a company is capable of paying its short-term debts and financial obligations. A ratio under 1 indicates the company's current liabilities are greater than its current assets possibly causing them the inability to meet their short-term obligations. On the other hand, a greater than 1 ratio shows the company has a good standing with meeting its creditors' demand. Although it depends on industry to industry, an adequate current ratio falls between 1.5 and 3.

The total debt to equity ratio is a measure of financial leverage used to finance a company's assets. This leverage is evaluated from the proportion between the shareholder's equity and debt. Ideally, the Ontario Energy Board structured the capital mix at a 60/40 (or 1.5) ratio. A ratio of more than

**Appendix B - Question #2 - OM&A Cost per Customer - Excerpt from Exhibit 1**

- 1           • On July 23, 2020, Lakefront had an outage that impacted 4,955 Cobourg customers.  
 2           Crews were dispatched and discovered an issue at the Victoria St. substation in  
 3           Cobourg and Lakefront engaged with a third-party to replace the bus bars and clean  
 4           the switchgear cells affected by the flash over.  
 5
- 6           • A second outage occurred on July 27, 2020 and impacted 7,705 Cobourg customers.  
 7           All 27.6 kV Cobourg customers were being supplied at the time from the Brook Rd.  
 8           substation due to the July 23<sup>rd</sup> outage and the ongoing work. It was discovered that a  
 9           relay setting was not updated in 2015 when the transformer was replaced and was  
 10          therefore set too low for the current loading conditions on the transformer. The  
 11          relay was adjusted to its correct setting and the load was restored.

12 The average number of times that power to a customer is interrupted is another measure of system  
 13 reliability and is also a high priority for Lakefront. LUI customers experienced interrupted power  
 14 1.54 times during 2020. As noted above, the decrease in reliability is attributed to two outages in  
 15 July 2020.

16 The Ontario Energy Board, along with consultants from the Pacific Economics Group LLC (PEG),  
 17 prepared a report in order to evaluate all LDCs efficiencies. These efficiencies are based on each  
 18 utility’s actual cost compared to the average levels predicted by a study conducted by PEG. Based  
 19 on the efficiency levels achieved, each utility is grouped in their ranking with the most efficient  
 20 being assigned to Group 1 and the least efficient to Group 5. Based on the above, LUI’s efficiency  
 21 assessment remains in Group/Cohort 2.

22 Total cost per customer is calculated as the sum of Lakefront’s capital and operating costs, including  
 23 certain adjustments to make the costs more comparable between utilities and dividing this cost  
 24 figure by the total number of customers that LUI servers. A low total cost could be an indicator of  
 25 insufficient capital investment rather than efficiency. LUI’s 2019 **total cost per customer as**  
 26 **recorded in the Scorecard** was the 4<sup>th</sup> lowest in the province. **The Scorecard cost per customer is**  
 27 **based on the PEG model and is derived from a combination of both capital and operational**  
 28 **expenses.** LUI continues to achieve strong financial performance by balancing system reliability and  
 29 service, while minimizing controllable costs associated with operating, maintenance, and  
 30 administration.

31 **Table 1.42: Public Policy Responsiveness**

Particulars	2015	2016	2017	2018	2019	2020	Target
<b>Conservation and Demand Management</b>							
Net Cumulative Energy Savings (Percent of target achieved)	18.40%	30.45%	60.95%	89.00%	136.00%	TBD	12.17 GWh
<b>Connection of Renewable Generation</b>							
Impact Assessments Completed On Time	100.00%	N/A	100.00%	100.00%	0.20%	N/A	
New Micro-embedded Generation Facilities Connected On Time	100.00%	100.00%	100.00%	100.00	N/A	N/A	90.00%