

ONTARIO ENERGY BOARD

IN THE MATTER OF the Ontario Energy Board Act, 1988, S.O. 1998, c.15, Schedule B, as amend (the "Act");

AND IN THE MATTER OF an application by Canadian Niagara Power Inc. for an Order or Orders pursuant to section 78 of the Act, Approving or fixing just and reasonable distribution rates effective January 1, 2022 and related matters.

INTERROGATORIES

IMT PARTNERSHIP – PC FORGE ("IMT")

**1-IMT-1 Exhibit 1, Page 13, Table 1-1 & Exhibit 8, Page 75
Exhibit 1, Page 39, Table 1-15**

For Table 1-1 Bill Impacts on Page 13 please confirm:

- a) Residential Class Subtotal A - The 11.9% increase is comprised of a 13.42% increase in Distribution Charges offset by the elimination of a Rate Rider for Wind Storm Damage Costs.
- b) Residential Class Subtotal B – With the exception of the small increase related to Line Losses, the reduction from Subtotal A is comprised of Rate Riders related to pass thru costs with the vast majority related to one-time credits for accounts 1508 Other Regulatory Assets - Pole Attachment Charges and 1592 PILS and Tax Variance as per Exhibit 1 Table 1-15 DVA Balances for 2022 Disposition Page 39.
- c) Residential Class Subtotal C – The difference between Subtotal B and Subtotal C is related to increased RTSR rates.
- d) That all other Customer Classes would follow a similar pattern to the Residential Customer Class.

1-IMT-2 Exhibit 1, Page 13, Table 1-1

- a) Please restate Table 1-1 Bill Impacts for each customer class without the impacts of the one-time credits resulting from the disposal of variance accounts 1508 Pole Attachment Charges and 1592 PILS and Tax Variance.
- b) Please provide a Table comparing the proposed Rate Rider by customer class with and without the impacts of 1508 Pole Attachment Charges and 1592 PILS and Tax Variance.

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- c) Should the OEB take into consideration bill impacts in 2023 given that bill impacts in 2022 have been significantly reduced by these one-time credits?

1-IMT-3 Exhibit 1, Page 15

Section 1.2.8 Changes in Methodologies – Accounting Treatment of Shared IT Assets.

- a) Please confirm that the change in accounting treatment from Other Revenue to Expense Offset has no impact on Distribution Rates in this application and is only related to benchmarking.

1-IMT-4 Exhibit 1, Page 27, Table 1-3

- a) Please confirm that in Table 1-3 2017-2022 Revenue Requirement Trend that the 2017 Board approved OM&A does not reflect the change in accounting treatments for Shared IT Assets whereas the 2022 Test Year OM&A does.

1-IMT-5 Exhibit 1, Page 34, Table 1-8

- a) Please confirm that Table 1-8 2017-2022 OM&A Trend the Actual increase in OM&A expenses from the 2017 Board Approved (\$9,915,768) to the 2022 Test Year (\$10,982,649) is 10.8% over 5 years or 2.2% per year.
- b) Please confirm that these increases, which are beyond inflation, include any costs efficiencies achieved during the five years since the 2017 COS Rate Application.

1-IMT-6 Exhibit 1, Page 37, Table 1-12

- a) Please confirm in Table 1-12 2017 Revenue to Cost Ratios that the GS>50 class has been charged distribution rates 8% over costs since 2017.

1-IMT-7 Exhibit 1, Page 46, Figure 1-6

- a) Please confirm in Section 1.7.2 Cost Benchmarking Figure 1-6 Benchmarking Performance – PEG Model that CNP will remain in the Group 4 Cohort which is the second highest cost classification including the change in accounting policy for Share IT Assets.
- b) Does CNP have any plans to improve to the Group 3 Cohort thru OM&A reductions or Capital Expenditure Planning which reflects affordability?

3-IMT-8 Exhibit 3, page 10, Table 3-2

The forecast for the GS>50kW class shows a forecast customer reduction of 193 (2020), 190 (2021) and 187 (2022).

- a) Please confirm the number of GS>50kW customers by month for 2021.

8-IMT-9 Exhibit 8.1

- a) Please confirm if CNP conducted Bench Marking of Distribution Rates by Customer Class with LDCs in both the Niagara Region and LDCs with similar customer counts in the province of Ontario?

- b) The table below is from the 2019 Electricity Utility Year Book. Please confirm that CNP has the highest Distribution Revenue in every Customer Class listed with emphasis on the GS 50-4,999 kW class.

Statistics by Customer Class For the Year Ended December 31, 2019					Alectra Utilities Corporation	Canadian Niagara Power Inc.	Grimsby Power Incorporated	Niagara Peninsula Energy Inc.	Niagara-on- the-Lake Hydro Inc.	Welland Hydro-Electric System Corp.
Residential Customers										
Number of Customers					956,265	26,773	10,726	50,792	8,060	21,721
Metered kWh					7,409,613,789	208,333,696	94,082,684	434,759,152	75,007,658	165,806,296
Distribution Revenue (\$)					300,908,965	11,581,161	3,638,371	19,823,369	2,819,516	7,159,469
Metered kWh per Customer					7,748	7,781	8,771	8,560	9,306	7,633
Distribution Revenue per Customer (\$)					315	433	339	390	350	330
General Service <50kW Customers										
Number of Customers					84,405	2,494	799	4,475	1,371	1,777
Metered kWh					2,729,854,474	68,296,620	19,809,070	126,745,089	42,102,477	50,506,434
Distribution Revenue (\$)					77,681,761	2,627,213	579,650	3,917,774	1,174,117	1,143,864
Metered kWh per Customer					32,342	27,384	24,792	28,323	30,709	28,422
Distribution Revenue per Customer (\$)					920	1,053	725	875	856	644
General Service >50kW, Large User (>5000kW) and Sub Transmission										
Number of GS >50kW Customers					13,910	188	106	800	126	166
Number of Large Users					33	-	-	-	1	-
Number of Sub Transmission Customers					-	-	-	-	-	-
Metered kWh					16,188,521,519	183,204,908	65,434,374	642,357,416	111,093,673	151,352,404
Distribution Revenue (\$)					172,002,117	4,245,281	739,121	6,320,654	1,150,710	1,697,564
Metered kWh per Customer					1,161,050	974,494	617,305	802,947	874,753	911,761
Distribution Revenue per Customer (\$)					12,336	22,581	6,973	7,901	9,061	10,226
Unmetered Scattered Load Connections										
Number of Connections					11,276	46	65	335	30	261
Metered kWh					46,077,372	1,299,487	336,466	1,560,915	254,508	952,930
Distribution Revenue (\$)					1,814,637	61,562	37,336	259,440	8,418	39,742
Metered kWh per Connection					4,086	28,250	5,176	4,659	8,484	3,651
Distribution Revenue per Customer (\$)					161	1,338	574	774	281	152

8-IMT-10 Exhibit 8.1

Table A below summarizes IMT's actual Distribution Charges for the first six months of 2021 which have been annualized (times 2) and compared to other LDCs in the Niagara Region.

Table A											
Distribution Charges											
		Jan	Feb	Mar	Apr	May	Jun	2021 Half Yr Act	2021 Full Yr Est		
CNP	Billed kW	3098.30	3421.44	2908.22	2813.18	2851.20	2794.18	17886.53	35773.06	Comparison	
							Average monthly kW		2981.088	vs CNP	
CNP	Total Distribution	\$23,266.16	\$25,657.92	\$21,849.40	\$21,135.44	\$21,424.37	\$20,993.77	\$134,327.07	\$268,654.14		
Alectra	Total Distribution	\$8,807.68	\$9,643.58	\$8,292.57	\$8,021.74	\$8,138.03	\$7,970.23	\$50,873.83	\$101,747.66	-\$166,906.47	164.04%
NPEI	Total Distribution	\$11,382.56	\$12,542.97	\$10,692.40	\$10,343.03	\$10,485.35	\$10,274.02	\$65,720.34	\$131,440.68	-\$137,213.45	134.86%
Grimsby Power	Total Distribution	\$10,150.90	\$11,164.68	\$9,541.84	\$9,230.11	\$9,359.13	\$9,169.21	\$58,615.87	\$117,231.74	-\$151,422.40	148.82%
NOTL	Total Distribution	\$7,866.94	\$8,627.61	\$7,402.56	\$7,160.77	\$7,263.24	\$7,114.33	\$45,435.46	\$90,870.92	-\$177,783.21	174.73%
Welland Hydro	Total Distribution	\$10,313.45	\$11,327.69	\$9,699.45	\$9,382.60	\$9,515.25	\$9,321.20	\$59,559.65	\$119,119.30	-\$149,534.84	146.97%
									Average	-\$156,572.07	153.88%
							CNP 2022 at Proposed Rates		\$305,350.13		
							Increase		13.66%		

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- a) Please confirm that CNP will charge IMT on average \$156,572 (153.88%) more in Distribution Charges for fiscal year 2021 than any other LDC in the Niagara Region? See Appendix A for details of calculations.
- b) Please confirm that CNP is proposing to increase Distribution Charges to IMT by an additional \$36,696 (13.66%) in 2022?
- c) Does CNP consider the current rates for the GS 50-4,999 kW Customer Class conducive to attracting new job creating commercial/industrial businesses for the residents in the areas in which it serves?
- d) Has CNP discussed its rate competitiveness (with emphasis on job creating commercial/industrial businesses) for this Customer Class with the Council, Mayor, or Business Development departments in the cities it serves?
- e) See Table 8-2 Allocation of Base Revenue Requirement by Customer Class Exhibit 8 Page 6. Please confirm that for 2022 IMT represents \$305,350 (1.344%) of CNPs \$22,117,708 Base Revenue Requirement.
- f) Please quantify the expected Distribution Revenue in 2022 for the top five (5) customers in the GS>50 customer class and the resulting percentage of CNPs Base Revenue Requirement as follows:

IMT	\$305,350	1.344%
IMT Plus Next Highest Customer	\$	%
IMT Plus Next Two Highest Customers	\$	%
IMT Plus Next Three Highest Customers	\$	%
IMT Plus Next Four Highest Customers	\$	%

Note: Next Highest Customer may have greater annual billing kW than IMT.

8-IMT-11 Exhibit 8.1

Table B below summarizes IMT's actual Distribution Charges for the first six months of 2021 which have been annualized (times 2) and compared to other LDCs in the province of Ontario with similar customer counts.

Table B - Distribution Rate Comparison to LDCs in Ontario with 20,000 to 40,000 Customers							
		2019	GS>50	Annual	Distribution Rates		Annual
		Customers	kW	Billing kW	Monthly	Volume	Distribution Charges
							CNP Comparison
Bluewater Power		36,743	1000-4999	35,773.06	\$3,499.11	\$1.8871	\$109,496.65
PUC Distribution		33,647	50-4999	35,773.06	\$119.68	\$7.0368	\$253,164.00
Essex Powelines		30,393	50-4999	35,773.06	\$245.11	\$2.3703	\$87,734.19
Canadian Niagara Power		29,455	50-4999	35,773.06	\$169.70	\$7.4535	\$268,670.87
Kingston Hydro		27,778	50-4999	35,773.06	\$114.26	\$3.4744	\$125,661.03
North Bay Hydro (2020)		24,199	50-2999	35,773.06	\$315.75	\$2.6359	\$98,083.20
Westario Power		23,774	50-4999	35,773.06	\$242.85	\$2.5629	\$94,596.97
Welland Hydro		23,664	50-4999	35,773.06	\$299.56	\$3.2302	\$119,148.85
ERTH Power (Main Zone)		23,380	1000-4999	35,773.06	\$2,660.95	\$1.6213	\$89,930.26
Halton Hills Hydro		22,528	1000-4999	35,773.06	\$278.80	\$4.9614	\$180,830.04
Festival Hydro		21,382	50-4999	35,773.06	\$247.22	\$2.6690	\$98,444.93

- a) Please confirm that the Distribution Charges to IMT charged by CNP are the highest for LDCs with between 20,000 to 40,000 customers in the province of Ontario by a substantial and material amount (other than Hydro One and Algoma Power).
- b) Please confirm that PUC Distribution charges (second highest) may include transmission assets which can increase Distribution Charges but result in offsetting reduced RTSR rates charged by PUC compared to CNP. In other words, both Distribution charges and RTSR charges should be considered when comparing LDC rate competitiveness.
- c) As a result of the Distribution Rates CNP charges IMT, does CNP's consider it has impacted IMT's competitiveness in the market place province wide?

8-IMT-12 Exhibit 8.2.1 Retail Transmission Service Rates (RTSR)

Table C below summarizes IMT's actual RTSR charges for the first six months of 2021 which have been annualized (times 2) and compared to other LDCs in the Niagara Region.

Table C											
Transmission Charges											
		Jan	Feb	Mar	Apr	May	Jun	2021 Half Yr Act	2021 Full Yr Est	Comparison	
CNP	Billed kWh	3098.30	3421.44	2908.22	2813.18	2851.20	2794.18	17886.53	35773.06	vs CNP	
CNP	Total Transmission	\$15,350.24	\$16,951.18	\$14,408.50	\$13,937.64	\$14,125.99	\$13,843.47	\$88,617.01	\$177,234.03		
Alectra	Total Transmission	\$15,781.83	\$17,427.79	\$14,813.62	\$14,329.52	\$14,523.16	\$14,232.69	\$91,108.61	\$182,217.22	\$4,983.19	2.81%
NPEI	Total Transmission	\$14,548.71	\$16,066.06	\$13,656.15	\$13,209.87	\$13,388.38	\$13,120.61	\$83,989.77	\$167,979.54	-\$9,254.49	-5.22%
Grimsby Power	Total Transmission	\$13,083.83	\$14,448.40	\$12,281.14	\$11,879.79	\$12,040.33	\$11,799.53	\$75,533.02	\$151,066.04	-\$26,167.99	-14.76%
NOTL	Total Transmission	\$13,307.53	\$14,695.43	\$12,491.11	\$12,082.91	\$12,246.19	\$12,001.27	\$76,824.43	\$153,648.85	-\$23,585.18	-13.31%
Welland Hydro	Total Transmission	\$15,680.83	\$17,316.25	\$14,718.81	\$14,237.81	\$14,430.21	\$14,141.60	\$90,525.51	\$181,051.01	\$3,816.99	2.15%
									Average	-\$10,041.50	-5.67%
								CNP 2022 at Proposed Rates	\$197,585.32		
								Increase	11.48%		

- a) Please confirm that on average CNPs RTSR rates charged to IMT are 5.67% higher than the average for LDCs in the Niagara Region. See Appendix B for details.
- b) Please confirm that CNP does not have any transmission assets included in Distribution Rate Base and thus Distribution Rates. Considering that CNP owns and operates transmission assets in parts of its service territory should that not result in lower RTSR rates?
- c) Please confirm that other LDCs in the Niagara Region have transmission assets in Distribution Rates which can increase distribution charges but result in lower RTSR charges.
- d) Please confirm that CNP is proposing to increase RTSR charges by 11.48% (\$20,351) to IMT in 2022 and states that the increase is a result of 2021 increase in Uniform Transmission Rates charged by the province.
- e) Please confirm that LDCs with May 1st Distribution Rate effective dates such as NOTL and Welland Hydro already account for the 2021 Uniform Transmission Rate increase which would only make CNP less competitive in Table C above.

8-IMT-13 Exhibit 8.3.4 Total Loss Factor

Table D below compares CNPs total loss factor for a Primary Metered Customer <5,000 kW to LDCs in the Niagara Region.

Table D											
Loss Factor - Primary < 5000 kW											
		Jan	Feb	Mar	Apr	May	Jun	2021 Half Yr Act	2021 Full Yr Est		
CNP	Metered kWh	621,437	695,866	746,784	582,000	463,339	471,288	3,580,714	7,161,427	Comparison	Loss
										vs CNP	Factor
CNP	Billed kWh	647,972	725,579	778,672	606,851	483,124	491,412	3,733,610	7,467,220		1.0427
Alectra	Billed kWh	638,588	715,071	767,395	598,063	476,127	484,296	3,679,541	7,359,083	-108,138	1.0276
NPEI	Billed kWh	641,198	717,994	770,532	600,508	478,073	486,275	3,694,580	7,389,161	-78,060	1.0318
Grimsby Power	Billed kWh	643,311	720,360	773,071	602,486	479,649	487,877	3,706,755	7,413,509	-53,711	1.0352
NOTL	Billed kWh	638,526	715,002	767,321	598,005	476,081	484,248	3,679,183	7,358,366	-108,854	1.0275
Welland Hydro	Billed kWh	644,492	721,682	774,490	603,592	480,529	488,773	3,713,558	7,427,116	-40,104	1.0371
									Average	-77,773	
								CNP 2022 at Proposed Rates			1.0439

- a) Please confirm that CNP has the highest loss factor of any LDC in the Niagara Region.
- b) Please confirm that CNP is proposing to increase the Total Loss Factor for 2022.
- c) Please confirm that CNP has prioritized capital expenditures related to voltage conversion in the 2022 DSP.
- d) Given the significant amount of Capital Expenditures between 2017-2021 why has CNP's Total Loss Factor not shown any improvements?
- e) What benefit to the Loss Factor is attributed to the Capital Expenditures between 2017-2021?

8-IMT-14 Exhibit 8.6, Page 23, Table 8-21 Bill Impact Information

Table 8-21 shows the 2022 Bill Impact for the GS 50-4,999 kW Customer Class at 1.0%. IMT has compared its bills for the first six calendar months of 2021 and recalculated them using the 2022 Proposed Tariff of Rates and Charges.

- a) Please confirm that on average IMT's monthly bills for the first half of 2021 will increase 2.93% under CNPs proposed Tariff of Rates and Charges for 2022. Please ensure that all line items not impacted by the Tariff of Rates and Charges (Cost of Power/Global Adjustment) remain constant for comparison purposes.
- b) Does CNP consider it Just and Reasonable that IMT's increases will be 3 times the amount for this Customer Class than shown in Table 8-21?

8-IMT-15 Exhibit 8.6 Bill Impact Information

Exhibit 8 Page 77 shows the detailed calculations for Bill Impacts for the GS 50-4,999 kW Customer Class.

- a) Please confirm that the impact of 1508 Pole Rental Charges and 1592 PILS and Tax Variance are a material part of the increased credit in the Total Deferral/Variance Account Rate Rider of (\$0.2140)/kW in 2021 to (\$1.5127)/kW in 2022 or 606.87%. Please confirm that the credit to bill impacts and are one time in nature and the credit balances in these two Deferral/Variance accounts have accrued over several years.
- b) Please confirm that the adjustments which resulted in the large credits in the deferral and variance accounts 1508 and 1592 are reflected in 2022 Distribution Rates.
- c) IMT has calculated its bill impacts for the first six months of the 2021 calendar year using the 2022 Proposed Tariff of Rate and Charges assuming the Total Deferral/Variance Account Rate Riders remains at the (\$0.2140)/kW amount in the 2021 Tariff of Rates and Charges. Please confirm that this would result in bill impacts for IMT of 9.37% over 2021 actuals. Please confirm that these are the impacts that will materialize in 2023 once the impact of the one-time credits included in the 2022 Total Deferral/Variance Account expire at the end of 2022.
- d) Please recalculate IMT's bill impacts for the first six months of 2021 using the 2022 Proposed Tariff of Rates and Charges but using the Total Deferral/Variance Account Rate Riders as request in 1-IMT-2 (without the impact of 1508 Pole Rental Charges and 1592 PILS and Tax Variance).
- e) Given the extent to which CNP's charges to IMT substantially exceed both LDCs in the Niagara Region and LDCs in the Province of Ontario, what steps will CNP propose to reduce (not increase) the charges billed to IMT in 2022 and beyond.

Appendix A – Distribution Rate Comparison Niagara Region Details

		Jan	Feb	Mar	Apr	May	Jun	2021 Half Yr Act	2021 Full Yr Est
Billed KW		3098.30	3421.44	2908.22	2813.18	2851.20	2794.18	17886.53	35773.06
Distribution Charges									
CNP	Monthly Rate	169.7	169.7	169.7	169.7	169.7	169.7		
	Fixed Amount	\$172.95	\$156.22	\$172.95	\$167.38	\$172.95	\$167.38	\$1,009.83	\$2,019.66
	Variable Rate	7.4535	7.4535	7.4535	7.4535	7.4535	7.4535		
	Variable Amount	\$23,093.21	\$25,501.70	\$21,676.45	\$20,968.07	\$21,251.42	\$20,826.39	\$133,317.24	\$266,634.47
	Total Distribution	\$23,266.16	\$25,657.92	\$21,849.40	\$21,135.44	\$21,424.37	\$20,993.77	\$134,327.07	\$268,654.14
Alectra St. Catharines	Monthly Rate	403.54	403.54	403.54	403.54	403.54	403.54		
	Fixed Amount	\$411.28	\$371.48	\$411.28	\$398.01	\$411.28	\$398.01	\$2,401.34	\$4,802.68
	Variable Rate	2.71	2.71	2.71	2.71	2.71	2.71		
	Variable Amount	\$8,396.40	\$9,272.10	\$7,881.29	\$7,623.73	\$7,726.75	\$7,572.22	\$48,472.49	\$96,944.98
	Total Distribution	\$8,807.68	\$9,643.58	\$8,292.57	\$8,021.74	\$8,138.03	\$7,970.23	\$50,873.83	\$101,747.66
NPEI Niagara Falls	Monthly Rate	130.43	130.43	130.43	130.43	130.43	130.43		
	Fixed Amount	\$132.93	\$120.07	\$132.93	\$128.64	\$132.93	\$128.64	\$776.15	\$1,552.30
	Variable Rate	3.6309	3.6309	3.6309	3.6309	3.6309	3.6309		
	Variable Amount	\$11,249.63	\$12,422.91	\$10,559.47	\$10,214.39	\$10,352.42	\$10,145.37	\$64,944.19	\$129,888.39
	Total Distribution	\$11,382.56	\$12,542.97	\$10,692.40	\$10,343.03	\$10,485.35	\$10,274.02	\$65,720.34	\$131,440.68
Grimsby Power Grimsby	Monthly Rate	219.11	219.11	219.11	219.11	219.11	219.11		
	Fixed Amount	\$223.31	\$201.70	\$223.31	\$216.11	\$223.31	\$216.11	\$1,303.85	\$2,607.71
	Variable Rate	3.2042	3.2042	3.2042	3.2042	3.2042	3.2042		
	Variable Amount	\$9,927.59	\$10,962.98	\$9,318.53	\$9,014.00	\$9,135.82	\$8,953.10	\$57,312.01	\$114,624.03
	Total Distribution	\$10,150.90	\$11,164.68	\$9,541.84	\$9,230.11	\$9,359.13	\$9,169.21	\$58,615.87	\$117,231.74
NOTL Niagara on the Lake	Monthly Rate	291.88	291.88	291.88	291.88	291.88	291.88		
	Fixed Amount	\$297.48	\$268.69	\$297.48	\$287.88	\$297.48	\$287.88	\$1,736.89	\$3,473.77
	Variable Rate	2.4431	2.4431	2.4431	2.4431	2.4431	2.4431		
	Variable Amount	\$7,569.47	\$8,358.92	\$7,105.08	\$6,872.89	\$6,965.77	\$6,826.45	\$43,698.58	\$87,397.15
	Total Distribution	\$7,866.94	\$8,627.61	\$7,402.56	\$7,160.77	\$7,263.24	\$7,114.33	\$45,435.46	\$90,870.92
Welland Hydro Welland	Monthly Rate	299.56	299.56	299.56	299.56	299.56	299.56		
	Fixed Amount	\$305.30	\$275.76	\$305.30	\$295.46	\$305.30	\$295.46	\$1,782.59	\$3,565.17
	Variable Rate	3.2302	3.2302	3.2302	3.2302	3.2302	3.2302		
	Variable Amount	\$10,008.14	\$11,051.94	\$9,394.15	\$9,087.15	\$9,209.95	\$9,025.75	\$57,777.06	\$115,554.13
	Total Distribution	\$10,313.45	\$11,327.69	\$9,699.45	\$9,382.60	\$9,515.25	\$9,321.20	\$59,559.65	\$119,119.30

Appendix B – RTSR Comparison Niagara Region Details

Transmission Charges									
CNP	Network Service	2.6314	2.6314	2.6314	2.6314	2.6314	2.6314		
	Line/Trans/Connect	2.3230	2.3230	2.3230	2.3230	2.3230	2.3230		
	Total Trans Rate	4.9544	4.9544	4.9544	4.9544	4.9544	4.9544		
	Total Trans \$	\$15,350.24	\$16,951.18	\$14,408.50	\$13,937.64	\$14,125.99	\$13,843.47	\$88,617.01	\$177,234.03
Alectra St. Catharines	Network Service	2.6937	2.6937	2.6937	2.6937	2.6937	2.6937		
	Line/Trans/Connect	2.4000	2.4000	2.4000	2.4000	2.4000	2.4000		
	Total Trans Rate	5.0937	5.0937	5.0937	5.0937	5.0937	5.0937		
	Total Trans \$	\$15,781.83	\$17,427.79	\$14,813.62	\$14,329.52	\$14,523.16	\$14,232.69	\$91,108.61	\$182,217.22
NPEI Niagara Falls	Network Service	2.9114	2.9114	2.9114	2.9114	2.9114	2.9114		
	Line/Trans/Connect	1.7843	1.7843	1.7843	1.7843	1.7843	1.7843		
	Total Trans Rate	4.6957	4.6957	4.6957	4.6957	4.6957	4.6957		
	Total Trans \$	\$14,548.71	\$16,066.06	\$13,656.15	\$13,209.87	\$13,388.38	\$13,120.61	\$83,989.77	\$167,979.54
Grimsby Power Grimsby	Network Service	2.6657	2.6657	2.6657	2.6657	2.6657	2.6657		
	Line/Trans/Connect	1.5572	1.5572	1.5572	1.5572	1.5572	1.5572		
	Total Trans Rate	4.2229	4.2229	4.2229	4.2229	4.2229	4.2229		
	Total Trans \$	\$13,083.83	\$14,448.40	\$12,281.14	\$11,879.79	\$12,040.33	\$11,799.53	\$75,533.02	\$151,066.04
NOTL Niagara on the Lake	Network Service	3.3707	3.3707	3.3707	3.3707	3.3707	3.3707		
	Line/Trans/Connect	0.9244	0.9244	0.9244	0.9244	0.9244	0.9244		
	Total Trans Rate	4.2951	4.2951	4.2951	4.2951	4.2951	4.2951		
	Total Trans \$	\$13,307.53	\$14,695.43	\$12,491.11	\$12,082.91	\$12,246.19	\$12,001.27	\$76,824.43	\$153,648.85
Welland Hydro Welland	Network Service	2.8693	2.8693	2.8693	2.8693	2.8693	2.8693		
	Line/Trans/Connect	2.1918	2.1918	2.1918	2.1918	2.1918	2.1918		
	Total Trans Rate	5.0611	5.0611	5.0611	5.0611	5.0611	5.0611		
	Total Trans \$	\$15,680.83	\$17,316.25	\$14,718.81	\$14,237.81	\$14,430.21	\$14,141.60	\$90,525.51	\$181,051.01

8-IMT-16 Exhibit 8, Page 7, Table 8-3

The Bill Impact for GS>50kW is based upon a customer with a demand of 60kW with a class demand of 522,202kW with a forecast of 187 customers.

- a) Please provide the average monthly demand for the GS>50kW rate class?
- b) How many customers in the GS>50kW rate class have a monthly average demand <75kW?
- c) How many customers in the GS>50kW rate class have a monthly average demand >200kW?
- d) How many customers in the GS>50kW rate class have a monthly average demand >500kW?
- e) Please calculate the bill impacts for GS>50kW customers with a monthly demand of 200kW?
Provide any assumptions.
- f) Please calculate the bill impacts for GS>50kW customers with a monthly demand of 500kW?
Provide any assumptions.

9-IMT-17 Exhibit 9, Page 20, Table 9-6, Group 2 Accounts

The table shows the proposed disposition for Group 2 Accounts and Balances as of December 31, 2020. The rate rider associated with the large proposed disposition of Group 2 Accounts is forecast to end December 2022. However, this rate rider provides the primary offset to the increased bill impact caused by the large increase in the volumetric distribution charge.

- a) Please provide a similar table as provided in the evidence at Table 9-6 for the Group 2 Accounts for 2021, 2022 and 2023 if available. If not available, please explain.