

**GREATER SUDBURY HYDRO INC.**  
**2024 Electricity Distribution Rate Application**  
**EB-2023-0024**  
**Effective May 1, 2024**

IN THE MATTER OF the *Ontario*  
*Energy Board Act, 1998,*  
S.O.1998, c.15 (Sched. B)

AND IN THE MATTER OF an  
Application by Greater Sudbury  
Hydro Inc for an Order or Orders  
pursuant to section 78 of the  
*Ontario Energy Board Act, 1998*  
for 2024 distribution rates and  
related matters.

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## DOCUMENTS AND LIVE MODELS FILED IN SUPPORT OF THE APPLICATION

1. 2023 CURRENT TARIFF OF RATES AND CHARGES (PDF)
2. 2024 IRM RATE GENERATOR MODEL (EXCEL)
3. 2024 GA ANALYSIS WORKFORM (EXCEL)
4. 2024 REVENUE TO COST ADJUSTMENT MODEL (EXCEL)
5. 2024 PROPOSED TARIFF OF RATES AND CHARGES (PDF)
6. 2024 IRM CHECKLIST (EXCEL)

## APPLICATION

1. The Applicant is Greater Sudbury Hydro Inc. ("GSHI"). GSHI is a licensed electricity distributor operating pursuant to license ED-2002-0559. GSHI distributes electricity to approximately 48,000 customers within parts of Greater Sudbury (former City of Sudbury, Town of Coniston, Town of Capreol and Town of Falconbridge) and parts of the Municipality of West Nipissing (Town of Sturgeon Falls and Town of Cache Bay).
2. GSHI hereby applies to the Ontario Energy Board (the "Board") for an order or orders made pursuant to Section 78 of the *Ontario Energy Board Act, 1998* as amended, (the "OEB Act") approving just and reasonable rates for the distribution of electricity based on a 2024 Price Cap Incentive Rate-Setting (IRM) application, effective May 1, 2024.
3. Specifically, GSHI hereby applies for an order or orders granting distribution rates updated and adjusted in accordance with Chapter 3 of the Filing Requirements for Electricity Distribution Rate Applications updated June 15, 2023 ("Filing Requirements"), including the following:
  - a. An adjustment to the retail transmission service rates as provided in Guideline (G-2008-0001) on Retail Transmission Service Rates – October 22, 2008 (Revision 4.0 June 28, 2012);
  - b. The continuation of the Low Voltage Service charges, Wholesale Market Service Rate, Capacity Based Recovery and Rural Rate Protection Charge;
  - c. The continuation of the Standard Supply Service Charge, Specific Service Charges, microFIT Service Charge, Transformation and Primary Metering Allowances, and Loss Factors as approved in the 2020 Cost of Service Application EB-2019-0037;
  - d. The continuation of the Retail Service Charges and the Specific Charge for Access to the Power Poles as approved in the 2020 Cost of Service application EB-2019-0037 and updated annually by the Board (For 2024: EB-2023-0193 and EB-2023-0194).
  - e. The continuation of the Smart Metering Entity Charge as specified by Independent Electricity System Operator Smart Metering Entity application (EB-2022-0137);

- f. Proposed new Rate Riders to address the Lost Revenue Adjustment Mechanism eligible amounts previously approved for prospective disposition effective until April 30, 2025,
  - g. The continuation of the rate rider for recovery of the Advanced Capital Module (2021) proposed to be effective until the effective date of the next cost of service based rate order
  - h. The continuation of the Rate Rider for Disposition of Account 1575 (2020) proposed to be effective until April 30, 2025.
  - i. Disposition of the December 31, 2022, balances in its Group 1 Deferral and Variance Accounts in the amount of \$1,065,465 and the related class specific rate riders effective for a 12-month period until April 30, 2023;
4. This Application is supported by written evidence that may be amended from time to time, prior to the Board's final decision on this Application.
5. In the preparation of this application, GSHI has utilized three Excel models:
- a. 2024 IRM Rate Generator Model
  - b. 2024 GA Analysis Workform
  - c. 2024 Revenue Cost Ratio Adjustment Model
- all developed and provided by the Board and as listed on the Board's website.
6. In the event that the Board is unable to provide a Decision and Order in this Application for implementation by the Applicant as of May 1, 2024, GSHI requests that the Board issue an Interim Rate Order declaring the current Distribution Rates and Specific Service Charges as interim until the decided implementation date of the approved 2024 distribution rates. GSHI also requests that it be permitted to recover the incremental revenue from the effective date to the implementation date, in the event that the effective date does not coincide with the Board's decided implementation for the 2024 distribution rates and charges.
7. The undersigned certifies, to the best of her knowledge, that the evidence filed, including the models and appendices, is accurate, consistent, and complete.

8. The undersigned certifies that GSHI has robust processes and internal controls in place for the preparation, review, verification, and oversight of the account balances being disposed. The undersigned also certifies that the evidence filed is accurate, consistent, and complete to the best of her knowledge.
9. The undersigned certifies, to the best of her knowledge, that the evidence filed in support of this application does not include any personal information, as identified in the certification requirements for personal information in Chapter 1 of the filing requirements.
10. The Applicant requests that a copy of all documents filed with the Board in this proceeding be served on the Applicant as follows:

Tiija Luttrell, CPA, CA  
Manager - Regulatory  
Greater Sudbury Hydro Inc.

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Dated at Sudbury, Ontario, this 11<sup>th</sup> day of October 2023

*Original signed by*

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Catherine Huneault, CPA  
VP – Corporate Services & CFO  
Greater Sudbury Hydro Inc.

# MANAGER'S SUMMARY

## OVERVIEW

Greater Sudbury Hydro Inc. (GSHI) is a licensed electricity distributor operating pursuant to license ED-2002-0559. GSHI distributes electricity to approximately 48,000 customers within parts of Greater Sudbury (former City of Sudbury, Town of Coniston, Town of Capreol and Town of Falconbridge) and parts of the Municipality of West Nipissing (Town of Sturgeon Falls and Town of Cache Bay) all of whom will be impacted by this application.

GSHI's last Cost of Service Application was for distribution rates effective May 1, 2020 (EB-2019-0037); a full settlement was reached and the Board issued a Decision approving the settlement and corresponding Rate Order on May 7, 2020.

On November 22<sup>nd</sup>, 2022, GSHI filed a 2023 Price Cap Incentive Regulation Mechanism (Price Cap IR) (EB-2022-0034) seeking approval for changes to distribution rates. The Board issued a Decision and Rate Order on March 23<sup>rd</sup>, 2023. A copy of the current Tariff of Rates and Charges with an effective date of May 1<sup>st</sup>, 2023 has been filed with this application.

This application has been prepared in accordance with the "Filing Requirements for Electricity Distribution Rate Applications – 2023 Edition for 2024 Rate Applications – Chapter 3, Incentive Rate Setting-Applications, updated on June 15, 2023 ("Filing Requirements") issued by the Board. GSHI utilized the 2024 IRM Rate Generator Model, 2024 GA Analysis Workform, and the 2024 Revenue Cost Ratio Adjustment Model issued by the Board and posted on the 2024 electricity distribution rate applications page on the Board's website. The completed models are included with GSHI's submission. GSHI confirms the accuracy of the billing determinants and other RRR data pre-populated in the Rate Generator Model.

A link to this application can also be found on GSHI's website at the following location:

<https://sudburyhydro.com/regulatory/>

1 **SUMMARY OF SUBMITTED DOCUMENTS**

- 2 1. Manager’s Summary (PDF format)
- 3 *GSHI\_IRM\_2024\_APPL\_SUMM\_20231011.pdf*
- 4 2. Current Tariff of Rates and Charges (PDF format) –
- 5 *GSHI\_IRM\_2024\_Current\_Tariff\_of\_Rates\_and\_Charges\_20231011.pdf*
- 6 3. 2024 IRM Rate Generator Model (Excel format) –
- 7 *GSHI\_IRM\_2024\_Rate\_Generator\_Model\_20231011.xlsb*
- 8 4. 2024 GA Analysis Workform (Excel format) -
- 9 *GSHI\_IRM\_2024\_GA\_Analysis\_Workform\_20231011.xlsb*
- 10 5. 2024 Revenue Cost Ratio Adjustment Model (Excel format) –
- 11 *GSHI\_IRM\_2024\_Revenue\_Cost\_Ratio\_Adjustment\_Model\_1.0\_20231011.xlsm*
- 12 6. 2024 Proposed Tariff of Rates and Charges (PDF format) –
- 13 *GSHI\_IRM\_2024\_Proposed\_Tariff\_of\_Rates\_and\_Charges\_20231011.pdf*
- 14 7. 2024 IRM Checklist (Excel format)
- 15 *GSHI\_IRM\_2024\_Checklist\_20231011.xls*
- 16

17 **REVENUE-TO-COST RATIO ADJUSTMENT**

18 Included in GSHI’s 2020 Cost of Service application (EB-2019-0037) decision, GSHI was approved

19 to phase in an adjustment to certain Revenue to Cost Ratios. Table 1 that follows is an excerpt

20 from the Decision and Order dated May 7, 2020 summarizing the approved adjustments:

21 **Table 1 Summary of 2020 – 2024 Revenue to Cost Ratios**

Rate Class	Settlement Proposal				
	2020	2021	2022	2023	2024
Residential	91.59%	91.95%	92.32%	92.69%	93.06%
GS < 50 kW	118.66%	118.66%	118.66%	118.66%	118.66%
GS > 50 kW	109.46%	109.46%	109.46%	109.46%	109.46%
Street Light	184.47%	168.35%	152.24%	136.12%	120.00%
Sentinel Light	78.69%	82.28%	85.87%	89.47%	93.06%
USL	100.10%	100.10%	100.10%	100.10%	100.10%

22

1 GSHI used the 2024 IRM Revenue Cost Ratio Adjustment Model to adjust the rates and  
2 populated the results of the model into tab 17 of the Rate Generator Model. GSHI notes a  
3 small imbalance of \$71 exists in the Revenue to Cost Ratio model on tab 10. The macro buttons  
4 produced errors that GSHI was not able to rectify. Given the immaterial nature of the  
5 imbalance, GSHI has filed the model with the imbalance and is willing to work with Board Staff  
6 to correct if necessary, during the processing of this application.

7

## 8 **RETAIL TRANSMISSION SERVICE RATES**

9 GSHI has completed the input fields on Sheet 12 of the Rate Generator model relating to Retail  
10 Transmission Service Rates (RTSR). GSHI is charged RTSR's from both the Independent Electricity  
11 System Operator and Hydro One.

12 As indicated in the Filing Requirements, GSHI understands that the model reflects the most  
13 recent Uniform Transmission Rates (UTR's) approved by the Board for 2023 and that Board Staff  
14 will adjust each distributor's model throughout the course of the application.

15

## 16 **DEFERRAL AND VARIANCE ACCOUNTS**

17 GSHI is requesting disposition of its Group 1 variance accounts. These balances were previously  
18 disposed of on a final basis for balances that had accumulated to December 31, 2020 in GSHI's  
19 2022 IRM Application (EB-2021-0026). GSHI completed Sheet 3 of the Rate Generator model  
20 titled "Continuity Schedule". GSHI notes that a variance exists in column BW of this sheet which  
21 are discussed below.

22

### 23 Account 1580 – Total Variance of \$(605,423)

24 A total variance of \$(605,423) for all 1580 accounts exists (1580 – RSVA Wholesale Market Service  
25 Charge \$(262,328) and 1580 – Sub-Account CBR Class B \$(343,095)). This amount agrees to the  
26 amount in account 1580 – Variance WMS – Sub-account CBR Class B, 2.1.7 RRR balance of  
27 \$(605,423). As per the guidelines on footnote 5 of Tab 3 of the Rate Generator Model, the RRR  
28 balance for Account 1580 – RSVA Wholesale Market Service Charge should equal the control  
29 account as reported in the RRR, and would include the balance for Account 1580 – Variance WMS



1 – Sub Account CBR Class B. As these balances are shown separately on the Continuity Schedule,  
2 this variance is expected.

3

4 The individual line variances for these accounts are further explained by the issued disclosed in  
5 GSHI’s 2023 IRM application (EB-2022-0034). GSHI noted in that application that during  
6 preparation of the continuity schedule, that the 2020 balance of (\$172,700) in account 1580 –  
7 Variance WMS – Subaccount CBR Class B was submitted with the incorrect sign during GSHI’s  
8 2020 2.1.7 RRR filing. This was not identified during the preparation of the 2022 IRM application  
9 and therefore, the incorrect amount was disposed. As part of that application, GSHI had  
10 proposed to rectify the error with principal adjustments in the continuity. As noted in GSHI’s  
11 Decision and Rate Order for its 2023 rates, “The OEB is not determining at this time whether the  
12 adjustments made by Greater Sudbury Hydro for 2020 and 2021 activities are reasonable,  
13 including whether the retroactive adjustments for balances already disposed are appropriate in  
14 the manner proposed by the application. The OEB will make this determination at the time of  
15 disposition.”<sup>1</sup> As GSHI is requesting disposition of this account as part of this 2024 IRM  
16 application, GSHI is requesting this matter be reviewed as part of this application.

17 GSHI has further analyzed the error and the impact on the different customers classes and types.  
18 The analysis is included in Table 2 below. GSHI calculated what the resulting rate riders would  
19 have been for the Disposition of Deferral/Variance Accounts (2022) (depicted below as DVA RR)  
20 and for the Disposition of Capacity Based Recovery Account (2022) (depicted below as CBR RR)  
21 had the sign been included correctly and compared that against what the model used in the  
22 application (with the incorrect sign) calculated and included in the Tariff of Rates and Charges.

23

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<sup>1</sup> EB-2022-0034, Decision and Rate Order, March 23, 2023

1

**Table 2 – Analysis of Disposition Balance Error**

Customer Class	Billing Determinants	Units	Original Tariff		Recalculated Tariff		Original Revenue Reconciliation		Revised Revenue Reconciliation		Difference	Difference per Customer/Connection
			DVA RR	CBR RR	DVA RR	CBR RR	DVA RR	CBR RR	DVA RR	CBR RR		
Residential	381,949,546	kWH	0.0007	0.0002	0.0011	-0.0002	267,364.68	76,389.91	420,144.50	- 76,389.91	-	
GS Less Than 50 KW	128,297,209	KWH	0.0008	0.0002	0.0012	-0.0002	102,637.77	25,659.44	153,956.65	- 25,659.44	0.00	
GS 50 to 4,999 kW Class B (excl WMP)	640,749	KW	0.3216	0.0891	0.492	-0.0879	206,064.88	57,090.74	315,248.51	- 56,321.84	4,228.94	8.81
GS 50 to 4,999 kW Class A	127,307	kW	0.3216	-	0.492	-	40,941.93	-	62,635.04	-	- 21,693.11	-4,338.62
GS 50 to 4,999 kW WMP	6,257	kW	1.0739	-	1.0739	-	6,719.39	-	6,719.39	-	-	-
Unmetered Scattered Load	1,032,903	KWH	0.0006	0.0002	0.001	-0.0002	619.74	206.58	1,032.90	- 206.58	-	
Sentinel Lighting	998	KW	0.3373	0.0822	0.4877	-0.8120	336.63	82.04	486.72	- 810.38	742.31	2.13
Street Lighting	18,315	KW	0.3763	0.0788	0.5205	-0.0778	6,891.93	1,443.22	9,532.96	- 1,424.91	227.11	0.02

Total Difference all classes - 16,494.75

2

3 As shown in table 2 above, the erroneously calculated rate rider resulted in either a nil or  
4 immaterial impact for each class and type of customer. As a result, GSHI is now proposing to  
5 make the adjustment to its general ledger to match the IRM continuity and properly reflect the  
6 disposal that occurred. GSHI intends to book the following entry in its general in 2023:

7 DR Variance WMS – Sub-account Class B 343,095  
8 CR RSVA – Wholesale Market Service Charge (343,095)

9

## 10 GLOBAL ADJUSTMENT

11 The OEB's filing requirements require each distributor to complete the Global Adjustment ("GA")  
12 Analysis Workform to determine whether the balance in Account 1589 GA is reasonable. The  
13 Workform compares the general ledger principal balance to an expected principal balance based  
14 on monthly GA volumes, revenues and costs. Distributors compare the actual and expected  
15 balances and explain the associated reconciling items. Any unexplained discrepancy greater than  
16 +/- 1% of the total annual IESO GA charges is assessed by the OEB for materiality and may prompt  
17 further analysis before disposition approval. Please refer to the live completed GA Analysis  
18 Workform submitted as part of this application.

19 GSHI previously disposed of these accounts on a final basis for balances that had accumulated  
20 to December 31<sup>st</sup>, 2020. GSHI is requesting disposition of the balances as at December 31<sup>st</sup>,  
21 2022, as part of this application. GSHI completed the GA analysis Workform for the years 2021  
22 and 2022 and performed analysis over the expected balance in GA 1589. The completed  
23 Workform results in an unresolved difference for 2021 of \$(58,660) equating to -0.3%

1 difference, as well as a difference for 2022 of \$(30,078) equating to a -0.2% difference, which  
2 are both within the Board's +/- 1% threshold.

3 GSHI made adjustments to account 1589 in the continuity schedule relating to an issue that  
4 became apparent while preparing the GA Analysis Workform for 2021 year as part of its 2023  
5 IRM Application. GSHI had incorrectly used a blended rate for the GA rate paid that included  
6 GA deferral recovery amounts to perform its true-ups. GSHI included discussion on this matter  
7 in its 2023 Application (EB-2022-0034) and made a manual adjustment to the continuity  
8 schedule to reflect the balance that should have been included in the correct years in order to  
9 determine whether or not the balances exceeded the threshold for disposition in that  
10 application. The adjustment column shows a reversal in the 2022 portion of the continuity as it  
11 is included in the transaction details for the account in 2022 and was accounted for in the 2021  
12 adjustment. Consistent with the treatment of the adjustments discussed above regarding  
13 account 1580, the following was noted in the Decision and Rate Order for that application "The  
14 OEB is not determining at this time whether the adjustments made by Greater Sudbury Hydro  
15 for 2020 and 2021 activities are reasonable, including whether the retroactive adjustments for  
16 balances already disposed are appropriate in the manner proposed by the application. The OEB  
17 will make this determination at the time of disposition".

18

## 19 **CBR**

20 Consistent with the Accounting Procedures Handbook, GSHI has continued to record Capacity  
21 Based Recovery ("CBR") charges and revenues separately for Class A and Class B customers in  
22 their respective Account 1580 subaccounts. GSHI previously disposed of Account 1580,  
23 Subaccount Class B in its 2022 IRM which consisted of the balances at December 31, 2020. See  
24 the discussion above related to account 1580 and the variances that impacted this account. GSHI  
25 is requesting disposition of this account for balances that accumulated to December 31, 2022 as  
26 part of this application and is requesting the disposition be over the period of one year.

27 GSHI understands that no balance should exist in 1580 sub account CBR Class A. Accordingly,  
28 there is no Class A CBR balance to dispose of in this Application.

29

1 **ACCOUNT 1595**

2 GSHI is seeking disposition of the account balance in its Account 1595 – Sub Accounts 2019 and  
3 2020. These rate riders expired as follows and the remaining residual balance as at December  
4 31, 2022 have been audited:

- 5 • Sub Account 2019 rate riders expired April 30, 2020 – balance of \$13,927
- 6 • Sub Account 2020 rate riders expired April 20, 2021 – balance of \$(148,926)

7 The balance in the 2019 Sub Account is immaterial and the residual balance of \$(148,926) in the  
8 2020 Sub Account is a result of the rate riders being primarily volumetric in nature and GSHI not  
9 experiencing the load forecast that was included in its 2020 Cost of Service application (EB-2019-  
10 0037).

11 GSHI has selected these accounts for disposition on Tab 3 of the Rate Generator Model. GSHI  
12 confirms that residual balances in Account 1595 Sub Accounts for each vintage year have only  
13 been disposed once.

14

15 **LOST REVENUE ADJUSTMENT MECHANISM VARIANCE ACCOUNT**

16 GSHI has a zero balance in its LRAMVA and is not requesting any disposition in this application.  
17 GSHI is requesting rate riders for 2024 to recover LRAM-eligible amounts previously approved.  
18 In OEB Decision EB-2022-0034 the OEB approved the LRAM-eligible amounts for the years 2023-  
19 2027, arising from persisting savings from completed CDM programs, as set out in Table 3 below.  
20 These amounts are to be adjusted mechanistically by the approved inflation minus the X factor  
21 applicable to IRM applications in effect for a given year and recovered through a rate rider in the  
22 corresponding rate year.

23

1

**Table 3 LRAM-Eligible Amounts Approved for Prospective Disposition<sup>2</sup>**

Year	LRAM-Eligible Amount (in 2022 \$)
2023	(36,403)
2024	(37,271)
2025	(38,851)
2026	(38,851)
2027	(38,896)

2

3 For the 2024 rate year, GSHI is requesting approval of a rate rider to credit ratepayers \$(37,271)  
4 x 4.5% (approved inflation minus X factor) which results in a total credit of \$(38,948.20). The  
5 calculations used to generate the requested LRAM-eligible rate riders are included in Table 4  
6 below.

7

**Table 4 LRAM-Eligible Proposed Rate Rider and Calculation**

Rate Class	2024 LRAM-Eligible approved amount (a)	Approved inflation minus X factor (b)	Annual Recovery (c) = (a) x 1 + (b)	Volume (from tab 4 of rate generator model) (d)	Rate Rider (e) = (c)/(d)	Charge Determinant
GA<50 kW	-24,679	4.50%	-25,790	133,108,084	-0.0002	kWh
GS>50 kW	-34,832	4.50%	-36,399	783,607	-0.0465	kW
Streetlighting	22,241	4.50%	23,242	10,057	2.3110	kW
<b>Total</b>	<b>-37,270</b>		<b>-38,947</b>			

8

9 In this application, GSHI is not requesting the continued use of the LRAMVA for distribution-rate  
10 funded CDM activities.

<sup>2</sup> OEB Decision and Order EB-2022-0034, March 23, 2023

1 **SHARED TAX SAVINGS**

2 As described in the Filing Requirements, Board policy (included in *Supplemental Report of the*  
3 *Board on 3<sup>rd</sup> Generation Incentive Regulation for Ontario’s Electricity Distributors*) prescribes a  
4 50/50 sharing of impacts of legislated tax changes from distributors’ tax rates embedded in its  
5 Board approved base rate known at the time of application. The corporation tax rate for the  
6 2024 year as included in Sheet 8 of the Rate Generator model does not differ from the tax rate  
7 approved in GSHI’s 2020 Cost of Service Application (EB-2019-0037) and as such no sharing of tax  
8 savings is applicable.

9

10 **PRICE CAP ADJUSTMENT**

11 GSHI has been assigned a Stretch Factor Group of III as per the Pacific Economics Group (PEG)  
12 report entitled “Empirical Research in Support of Incentive Rate-Setting: 2022 Benchmarking  
13 Update”. Consistent with this report and the Scorecard issued by the OEB in July 2023, GSHI has  
14 updated the Rate Generator Model to reflect the stretch factor group of III. With this data, the  
15 Rate Generator model has calculated an adjustment of 4.5% to base distribution rates based on  
16 a price escalator of 4.8%, less a productivity factor of 0.0% and stretch factor of 0.30%. GSHI has  
17 updated the price escalator in the IRM model on tab 17.

18

19 **BILL IMPACTS**

20 Based on the Proposed Rates and Tariff Schedules included with this application  
21 (GSHI\_IRM\_2024\_Proposed\_Tariff\_of\_Rates\_and\_Charges\_20231011.pdf), bill impacts have  
22 been prepared for all rate classes at varying consumption levels as appropriate for GSHI’s  
23 customer base and are included on tab 21 of the IRM Rate Generator Model. The Bill Impacts  
24 have also been summarized in Table 5 below.

25 For the Streetlighting class, GSHI has utilized the consumption and demand of a typical bill for its  
26 Municipality. The impact has been calculated using all connections for the Municipality rather  
27 than a single connection.

28

1

**Table 5 – Summary of Bill Impacts**

Customer Class	Volume		Distribution Charges		Delivery Charges		Total Bill	
	kWh	kW	\$ Change	% Change	\$ Change	% Change	\$ Change	% Change
Residential RPP	750		\$ 4.21	11.3%	\$ 3.34	6.7%	\$ 3.38	2.7%
GS<50kW RPP	2,000		\$ 11.30	13.5%	\$ 9.62	8.9%	\$ 9.75	3.1%
GS<50kW Non-RPP	68,500	190	\$ 127.95	9.8%	\$ 12.47	0.4%	\$ 14.09	0.1%
USL RPP	500		\$ 2.64	14.6%	\$ 2.22	9.2%	\$ 2.25	3.0%
Sentinel Lighting RPP	162	0.21	\$ 1.62	10.0%	\$ 1.55	9.0%	\$ 1.57	4.6%
Streetlighting Non-RPP	507,000	1,605	\$(7,399.37)	-14.0%	\$ (7,894.51)	-13.2%	\$(8,920.79)	-6.6%
Residential RPP	219		\$ 2.35	6.8%	\$ 2.09	5.5%	\$ 2.12	3.5%
Residential Non-RPP	750		\$ 1.58	4.2%	\$ 0.72	1.4%	\$ 0.81	0.5%
Residential Non-RPP	219		\$ 1.58	4.5%	\$ 1.33	3.5%	\$ 1.50	2.1%

2

3

**4 OTHER ITEMS**

5 GSHI is not including any Z-Factor claims as part of this application.

6 GSHI is not including an Incremental Capital Module as part of this application.