



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Buonaguro  
Counsel for VECC  
(416) 767-1666

October 30, 2008

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**EB-2008-0224**  
**Canadian Niagara Power Inc. – Port Colborne – 2009 Electricity Distribution**  
**Rate Application**

Please find enclosed the interrogatories of the Vulnerable Energy Consumers Coalition (VECC) in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Yours truly,

Michael Buonaguro  
Counsel for VECC

**Canadian Niagara Power Inc. – Port Colborne (CNP-PC)**  
**2009 Electricity Rate Application**  
**Board File No. EB-2009-0224**

**VECC's Interrogatories**

**Question #1**

**Reference:** i) Exhibit 1/Tab 1/Schedule 6, page 3, lines 4-9  
ii) Exhibit 1/Tab 2/Schedule 1, page 4, lines 25-31  
iii) [http://www.oeb.gov.on.ca/OEB/Documents/EB-2006-0268/Comparison of Distributors with 2007 data.xls](http://www.oeb.gov.on.ca/OEB/Documents/EB-2006-0268/Comparison_of_Distributors_with_2007_data.xls)

- a) With respect to the third reference (i.e., the OEB's comparative data for 2005-2007), please provide a schedule that sets out:
- CNP-PC's Total OM&A costs for 2005-2007 per the OEB table
  - CNP-PC's annual lease payments to Port Colborne Hydro Inc. for 2005-2007
  - CNP-PC's net OM&A costs (i.e., excluding the lease costs) for 2005-2007
  - CNP-PC's net OM&A costs per customer for 2005-2007
  -

**Question #2**

**Reference:** i) Exhibit 1/Tab 1/Schedule 12  
ii) Exhibit 3/Tab 2/Schedule 1, page 15

- a) Please re-confirm that CNP-PC is not an embedded distributor and is not billed for "distribution or LV service" by any other distributor? If this is not the case, please clarify.
- b) Please describe more fully why Hydro One Networks' deregistration of the IESO delivery point in Port Colborne results in Hydro One Networks' becoming a customer of CNP-PC for distribution service (per the second reference).
- c) Has CNP-PC been billing Hydro One Networks as a GS>50 kW customer since December 2006?

- d) Are the Hydro One Networks loads included in the Volume and Revenues reported in Exhibit 3/Tab 1/Schedule 2 for 2006-2009? If not, where are these revenues reported in Exhibit 3?
- e) Are the Hydro One Networks revenues included in the Distribution Revenue reported in Exhibit 1/Tab 2/Exhibit 4, page 1?

### **Question #3**

**Reference:** Exhibit 1/Tab 1/Schedule 14, page 2, line 1

- a) Where exactly in the Application is the referenced “reorganization” discussed?

### **Question #4**

**Reference:** Exhibit 1/Tab 1/Schedule 16, page 1

- a) Where in the current Application is the Board’s Order regarding updating of depreciation expense and net fixed assets for assets damaged during the 2006 storm specifically addressed?

### **Question #5**

**Reference:** Exhibit 1/Tab 2/Schedule 1

- a) Are the five 27.6 kV feeders from the Hydro One Networks TS all owned by Port Colborne Hydro and part of the CNP-PC lease (pages 7-8)? If not, please explain.
- b) Please clarify the reference to “Low voltage cost to Hydro One” (page 10). Is the 2009 amount of \$20,784 payable to or receivable from Hydro One Networks?
  - If “payable to”, please reconcile with Exhibit 1/Tab 1/Schedule 12 where CNP-PC stated that it was not an embedded utility.
  - If “receivable from”, does the offset reduce the reported OM&A in the schedule?
  - If the latter, why are the “costs” added in when calculating the Base Revenue Requirement in Exhibit 1/Tab 2/Schedule 4, page 1.
- c) With respect to page 10, please provide a schedule that shows the calculation (i.e., volumes and rates) of the “Low Voltage Costs to Hydro One” for 2008 and 2009.

- d) What are CNP-PC's current plans regarding obtaining authorization to conduct smart metering activities and subsequently install smart meters on 2009 (page 14 and Exhibit 2/Tab 1/Schedule 1/Appendix A, page 4, lines 7-8)?

#### **Question #6**

**Reference:** Exhibit 1/Tab 2/Schedule 4

- a) Please provide a schedule that sets out the calculation of 2009 distribution revenues (by customer class) based on existing rates. The schedule should show the fixed and variable rates plus the associated billing quantities used for each customer class.
- b) With respect to the schedule prepared in response to part (a), please clarify whether the loads used to determine the revenues for GS>50 include Hydro One Networks' loads.
- c) Why are there no "Low Voltage Wheeling Costs" reported for 2006 and 2007?

#### **Question #7**

**Reference:** Exhibit 2/Tab 2/Schedule 1

- a) Please explain the "allocations" shown under Gross Fixed Assets and Accumulated Depreciation for each of the years.
- For each account, was the same allocation percentage used across all four years?
  - Was the same allocation methodology applied to each account for all four years?
  - The BDR report does not set out the allocation by account. Please describe the allocation factor currently used for each account.
- b) Please explain the large increase in the allocation for Account #1960 as between 2006 (\$2,160) and 2009 (\$130,563).
- c) Please confirm that the assets set out in this schedule only include the asset additions by CPN-PC since the execution of the lease with Port Colborne Hydro Inc.
- d) There is a fairly large increase in the allocation of transport equipment (Account 1930) from 2006 to 2009. Please provide an explanation of the

aggregate expenditures made each year by CNPI on Transport Equipment.

**Question #8**

**Reference:** Exhibit 2/Tab 3/Schedule 1, Appendix A

- a) With respect to New Service Lines (page 7), please indicate the number of new customers and number of upgrades to existing services associated with the spending in each year.

**Question #9**

**Reference:** Exhibit 2/Tab 3/Schedule 1, Appendix B, page 1 (lines 11-16)

- a) The referenced BDR report does not appear to provide the derivation of the percentage allocations for each service territory. Please provide the supporting calculations.

**Question #10**

**Reference:** Exhibit 2/Tab 4/Schedule 2, page 1

- a) With respect to Power Supply Expenses, please provide a schedule that for each expense sets out (for 2008 and 2009):
- The volumes involved
  - The assumed rate
  - The total costs.
- b) Please update the calculation to reflect:
- The approved wholesale transmission rates as of January 1, 2009.
  - The forecast cost of power as presented in the Board's RPP Price Report, released October 15, 2008.

**Question #11**

**Reference:** Exhibit 3/Tab 1/Schedule 2, page 1

- a) Please confirm whether the rates used to determine the 2009 revenues by customer class:
- Excluded the smart meter rate adder

- Included/excluded the LV cost adder
  - Were reduced to reflect the transformer ownership allowance, where appropriate.
- b) Please reconcile the Distribution revenues reported here for 2009 with the Base Revenue Requirement reported at Exhibit 9/Tab 1/Schedule 1, page 6.
- c) Please reconcile the Distribution Revenues reported here for 2009 (by customer class) with those reported in the Rate Design Model (Reconciliation of 2009 Rates tab).

## **Question #12**

**Reference:** Exhibit 3/Tab 2/Schedule 1, pages 2-5

- a) Please provide a schedule that sets out:
- the kWh per customer for the Residential, GS<50 and GS>50 customer classes based on the Hydro One Weather Normalized data (per page 2, lines 29-30).
  - The kWh per customer class for the Residential, GS<50 and GS>50 customer classes (for the same year) using CNP-PC's weather normalization methodology.
- b) The CNP-CP weather normalization methodology is based on the premise that the mix of weather sensitive and non-weather sensitive loads for CNP-PC is a reasonable subset of the overall IESO controlled grid. For weather sensitive load, the IESO normalization methodology captures the weather impacts across the entire province and, in doing so, reflects not only the weather across the entire province and reflects the amount of weather sensitive load (e.g., space heating and space cooling) in each customer class.
- Why is it reasonable to assume that, for weather sensitive loads, the weather adjustment for CNP-PC would be the same as for the province as a whole? Are the heating and cooling degree days in CNP-PC similar to those for the province as a whole? Is the saturation of space heating and cooling appliances the same in CNP-PC as it is for the province as whole?
- c) The table on page 5 only compares 30 years of weather data for CNP-PC with that for the years 2005, 2006 and 2007. Please explain how this comparison supports applying the weather correction factor derived from the IESO provincial data to the CNP-PC data.

- d) With respect to the table of page 5, the impact of a heating degree day on electricity load will be different than the impact of a cooling degree day (i.e., each will depend respectively on the extent of installation of electric space heating and cooling equipment).
- Please explain why it is reasonable to compare the sum of the mean heating and cooling days.
  - Please confirm that what the table shows is that for the period 2005-2007, the heating degree days were all lower than the 30 year average while the cooling degree days were all higher.

### **Question #13**

**Reference:** Exhibit 3/Tab 2/Schedule 1, pages 8-9

- a) Please describe the nature of the supply arrangements for the 21 residential customers that will be transferred to Hydro One Networks at the end of 2008. Prior to the transfer, please explain:
- The arrangements between CNP-PC and Hydro One Networks regarding the treatment of revenues from these customers (i.e., what rates were applied to these customers, who billed them, who retained the revenues) and
  - Whether there were any specific cost transfers between CNP-PC and Hydro One associated with these customers. If so, what were the 2007 and 2009 amounts and what were they for?
- b) The elimination of the load transfer arrangements leads to a loss of customers (and revenue) for CNP-PC. Does it also result in a reduction in costs incurred (apart from cost of power related charges)? If so, where are these factored into the 2009 rate application?
- c) The discussion on page 9 makes reference to “normalized values” for Residential usage. Please describe how the weather normalized values for Residential; GS<50; and GS>50 usage were derived.

### **Question #14**

**Reference:** Exhibit 3/Tab 2/Schedule 1, pages 13-15

- a) Please provide a schedule that for each of the years 2005-2007 sets out the number of months that each of the two customers experienced a “billing demand”. (Note: The maximum value for any one year would be 24)

### **Question #15**

**Reference:** Exhibit 3/Tab 2/Schedule 1, page 21

- a) Please confirm that the 2 Standby customers were treated as a separate customer class for purposes of the Cost Allocation Informational filing.

**Question #16**

**Reference:**

- i) Exhibit 3/Tab 3/Schedule 1, page 1
- ii) Exhibit 3/Tab 1/Schedule 2
- iii) Exhibit 3/Tab 2/Schedule 1, page 13 and Appendix A

- a) Please confirm where the following are included in the revenues reported in references (i) and (ii):
- Revenue from the application of standby rates to the two embedded generator customers
  - Revenue from the energy and capacity withdrawn (per reference (iii), page 13) to allow for routine maintenance and/or forced outages.
- b) What was the total standby revenue in each of 2005, 2006, 2007 and 2008?

**Question #17**

**Reference:**

- i) Exhibit 4/Tab 1/Schedule 1, page 2
- ii) Report of the Board on 3<sup>rd</sup> Generation Incentive Regulation for Ontario's Electricity Distributors, July 2008

- a) Given that the term of the 3<sup>rd</sup> Generation IRM is four years (rebasement year plus 3 years (reference (ii), page 7), why is CNP-PC proposing to recover 1/3 of the regulatory costs in the test year?
- b) Are each of the following regulatory costs for the 2009 EDR third party (as opposed to internal or shared) costs:
- Legal Review and Regulatory
  - External Consultation
- c) Where and how is the \$19,800 reflect in the 2009 OM&A forecast shown in Reference Exhibit 4/Tab 2/Schedule 2, page 1

**Question #18**

**Reference:**

- i) Exhibit 4/Tab 1/Schedule 1, pages 2-7
- ii) Exhibit 4/Tab 2/Schedule 2



iii) Exhibit 4/Tab 2/Schedule 4, page 4

- a) With respect to the 2006 (actual) through 2009 forecast OM&A costs shown in reference (ii), please provide a schedule that for each major category of expenses (e.g., Distribution Expense – Operation Total) shows the amount associated with purchased services from affiliates.

### **Question #19**

**Reference:**

- i) Exhibit 4/Tab 2/Schedule 1, Appendix B, page 4
- ii) Exhibit 4/Tab 2/Schedule 1, Appendix C
- iii) Exhibit 4/Tab 2/Schedule 3, Appendix A, page 3

- a) What analysis or assessments has CNP-PC carried out to support the need for a three-year vegetation management cycle?
- b) Please provide CPN-PC spending on vegetation management for 2006, 2007 and 2008. Is all spending reported in sub-account #5135?
- c) Do each of the three geographical zones lead to roughly the same vegetation management expense?
- d) Please explain why there is a need to intensify the vegetation management program in 2009 (per reference (iii)) and what this intensification entails.

### **Question #20**

**Reference:**

- i) Exhibit 4/Tab 2/Schedule 3, Appendix A
- ii) Exhibit 4/Tab 2/Schedule 2

- a) With respect to Account #5005:
  - Please reconcile the \$112,735 decrease in Account #5005 discussed in reference (i) – page 2 – with the reported changes in reference (ii).
  - Please reconcile the comment that expenditures in 2009 are constant per reference (i) with the 17% increase reported in reference (ii).
- b) With respect to Accounts #5125 and 5130:
  - Capital spending in 2008 (per Exhibit 2/Tab 1/Schedule 1, page 2) was less in 2008 than in 2007 and 2006. Please reconcile this with the statement in reference (i) – page 3 – that there was a need to reallocate labour to capital projects in 2008.
  - In what areas was maintenance decreased in 2008 as a result of labour reallocations to capital projects (per reference (i) – page 3)?

- What are the maintenance activities that are receiving increased focus for 2009 (versus 2008)?
- The increase in 2009 over 2008 is much larger than the decrease in 2008 versus 2007 (per reference (ii)). This suggests that the increase in 2009 is more than just a “correction” of the 2008 re-allocation to capital projects. Please explain what accounts for the 12% increase in spending on these two accounts between 2007 and 2009.

### **Question #21**

**Reference:** i) Exhibit 4/Tab 2/Schedule 3, Appendix B  
ii) Exhibit 4/Tab 2/Schedule 2

- Please explain the 22% increase in meter reading expense from 2008 to 2009.
- Please explain the basis for the \$40,000 bad debt expense forecast for 2008 and why the 2009 value increases by more than 50%.
- Where were the labour costs that are now budgeted to Community Relations previously accounted for (reference (i) – page 2)? Have the forecast costs in this account been decreased accordingly?

### **Question #22**

**Reference:** Exhibit 4/Tab 2/Schedule 4, page 4

- For the years 2006, 2007, 2008 and 2009 please provide:
  - The total Corporate services costs of Fortis Ontario that were allocated and the % allocated to CNP-PC
  - The total Corporate services costs of Fortis Inc. that were allocated and the % allocated to CNP-PC
  - The total Administrative services costs of CNPI-Fort Erie that were allocated and the % allocated to CNP-PC
- Please indicate which Service Agreements (per Appendix A) address each of the expenses items set out in the Table on page 4.
- The first Service Agreement in Appendix A suggests that CNPI purchases a range of services from Cornwall Street Railway, Light and Power Company. However, page 4 does not include any services from Cornwall. Please reconcile.

- d) The third Service Agreement in Appendix A suggests that CNPI purchases a range of services from FortisOntario Generation. However, page 4 does not include any services from FOGEN. Please reconcile.

### **Question #23**

**Reference:** Exhibit 4/Tab 2/Schedule 4, Appendix A

- a) With respect to the first Service Agreement in Appendix A (where Cornwall is the service provider):
- Please explain the reference to “approved rate of return” in paragraph 2.01.
  - Who approves Cornwall’s rate of return?
  - What is the “rate of return” used to for purpose of costing services to CNP-PC in 2007, 2008, 2008 and 2009.
- b) With respect to the third Service Agreement in Appendix A (where FortisOntario Generation is the service provider):
- Please explain the reference to “approved rate of return” in paragraph 2.01.
  - Who approves FOGEN’s rate of return?
  - What is the “rate of return” used to for purpose of costing services to CNP-PC in 2007, 2008, 2008 and 2009.
- c) With respect to the fourth Service Agreement in Appendix A (where FortisOntario Inc. is the service provider):
- Please explain the reference to “approved rate of return” in paragraph 2.01.
  - Who approves FortisOntario Inc’s rate of return?
  - What is the “rate of return” used to for purpose of costing services to CNP-PC in 2007, 2008, 2008 and 2009.
- d) Please provide a copy of the Service Agreement for the services provided by Fortis Inc. to CNPI (and CNP-PC).

### **Question #24**

**Reference:** Exhibit 4/Tab 2/Schedule 4, Appendix B

- a) With respect to page 2, please confirm that equipment time is also logged by CNPI’s transmission business and a portion of the costs of Transportation and Work Equipment is allocated to the transmission business.

- b) The Appendix only contains the allocation factors for expense items. Please provide a schedule that sets out the allocation factors for 2006, 2007, 2008 and 2009 for all business centres allocated the following costs:
- Information Technology Hardware and Software (broken down between costs driven by number of workstations and major systems),
  - Transport and Work Equipment,
  - The warehouse and garage components of the Service Centre Rent and Maintenance

### **Question #25**

**Reference:** Exhibit 4/Tab 2/Schedule 5, page 4: Appendix A and Appendix B

- a) Please indicate the total incentive payments for 2006 and 2007 including those deemed to be “primarily shareholder related”.
- b) Please clarify whether the employee numbers and costs in Appendix A include:
- Only those employees directly employed at CNP-PC or, also,
  - Employees of affiliates where costs can be directly allocated to CNP-PC or, also,
  - Employees of affiliates where costs are allocated (using an allocation factor).

If the first, please explain why there are a fractional number of employees in each category.

### **Question #26**

**Reference:** i) Exhibit 4/Tab 3/Schedule 2, page 1  
ii) Exhibit 4/Tab 3/Schedule 1, page 1

- a) Why are the tax calculations segregated for transmission versus distribution but not for the 3 distribution business units?
- b) Please provide a schedule that sets out the 2009 rate base for each of the four regulated units of CNPI.

### **Question #27**

**Reference:** Exhibit 4/Tab 3/Schedule 5, page 1

- a) Please explain the significance of the last paragraph, i.e., how does it impact the calculation of the 2009 revenue requirement.

### **Question #28**

**Reference:** i) Exhibit 5/Tab 1/Schedule 4, page 1  
ii) Exhibit 3/Tab 1/Schedule 2, page 1

- a) What is the source (e.g., year) for the distribution revenue values used to allocate Account #1508 to customer classes? It does not appear to match any of the values reported in Exhibit 3.

### **Question #29**

**Reference:** Exhibit 8/tab 1/Schedule 1

- a) Please clarify the allocation process described at page 1 (lines 15-18). The first sentence suggests the \$9,960 was allocated to all customer classes using CWNB; while the next sentence suggests that the \$9,960 is attributable solely to customers with distributed generation.
- b) The Board's Direction on Cost Allocation (EB-2005-0317, page 32) defines "direct allocation" as the allocation of identifiable OM&A activities to one customer classification. Please confirm that for Accounts #1920 and #1925 where CNP-PC states that it is using "direct allocation", the costs identified are allocated to more than one customer class.
- c) Please confirm that, by virtue of the formula used in the OEB's cost allocation model, OM&A costs that are deemed to be directly allocated are excluded from the allocation base for A&G costs.
- d) With reference to the comment on page 3 that CNP-PC's customer profile has not changed significantly, please complete the following table:

- kWh by Customer Class (delivered)

Customer Class (all)	Cost Allocation Filing		2009 Application	
	kWh	% of Total	kWh	% of Total

- Customer/Connection Count

Customer	Cost Allocation Filing	2009 Application
----------	------------------------	------------------

Class (where applicable)	Number	% of Total	Number	% of Total

- e) Based on the results from part (d), please comment on the appropriateness of assuming that the revenue requirement proportions from the Updated 2006 Cost Allocation study can be used for setting 2009 rates.

### **Question #30**

**Reference:** Exhibit 8/Tab 1/Schedule 2, pages 1 & 3

**Preamble:** For 2009 CNP=PC is proposing to drop the Backup/Standby class and include the existing two customers in with the GS>50 class.

- a) Based on the Cost Allocation Informational filing what would be the overall revenue to cost ratio if the revenues and costs associated with both the GS>50 and the Standby/Backup rate classes were combined from RUN #2 and an aggregated revenue to cost ratio determined?
- b) Please explain why it would not be appropriate to use the results of part (a) for purposes of the 2009 rates.
- c) Please clarify whether the table on page 3 is for CNP-Port Colborne or CNP-Fort Erie. If the later, please correct.

### **Question #31**

**Reference:**

- i) Exhibit 8/Tab 1/Schedule 2, page 3
- ii) Exhibit 9/Tab 1/Schedule 1, page 9, lines 21-26
- iii) Exhibit 9/Tab 1/Schedule 1, Appendix A – Cost Allocation Review Tab

- a) Please confirm that for purposes of the Cost Allocation Informational Filing:
- The Revenues are based on distribution rates (excluding the discounts for transformer ownership allowance)

- The Costs include the cost of the Transformer Ownership Allowance
  - The cost of the Transformer Ownership Allowance is allocated to all customer classes
- b) In reference (iii) the transformer allowance is allocated directly to the GS>50 class. If the response to part (a) is yes, please explain why in reference (iii) the Cost Allocation Revenue Requirement used to derive the Revenue Requirement wasn't adjusted to remove the allocation of the transformer ownership allowance.
- c) Please confirm that (per Exhibit 9, Tab 1, Schedule 1, page 9), CNP-PC is proposing to allocate the cost of the Transformer Ownership Allowance to just the GS>50 class.
- d) Please provide the results of an alternative cost allocation run which is consistent with CNP-PC's proposed treatment of the Transformer Ownership Allowance where:
- The Revenues by class are based the rates reduced by the transformer ownership allowance where applicable
  - The Costs allocated exclude the "cost" of the Transformer Ownership Allowance.
- (Note: For purposes of the response please just file the revise Output Sheet O1)

### **Question #32**

- Reference:**
- i) Exhibit 8/Tab 1/Schedule 2, pages 1-3
  - ii) Exhibit 9/Tab 1/Schedule 1, Appendix A-Cost Allocation Review Tab
- a) Please confirm whether or not CNP-PC's Cost Allocation Informational filing included LV Costs as part of the revenue requirement. If yes, please indicate where in the Cost Allocation Informational filing this cost is accounted for.
- b) If the response to part (a) is no, why – in Appendix A - are LV costs included in the revenue requirement (I.e., \$5,990,730) that is being allocated using the percentages derived from the Cost Allocation Revenue Requirement?

### **Question #33**

- Reference:** Exhibit 9/Tab 1/Schedule 1 (including Appendix A)

- a) With respect to page 6, please explain why the 2009 amount included for the transformer ownership allowance is \$141,484 when the 2009 amount in Appendix A (Transformer Allowance Tab) is \$142,119.
- b) With respect to page 10 and Appendix A (Low Voltage Allocation Tab), please provide a schedule setting out the derivation of the allocation percentages used in Appendix A.
- c) With respect to page 12 (lines 9-16), please provide a schedule that sets out the allocation of revenues by customer class based on:
  - The 2006 approved EDR (i.e., as discussed in the application)
  - The 2009 billing determinants at 2008 rates (Note: The rates used should exclude any LV cost recovery as well as the smart meter rate adder. However, the rates and revenues should capture the reduction due to the transformer ownership allowance)
- d) With respect to page 15, please explain why under the proposal the Residential revenue to cost ratio is virtually the same as in the Cost Allocation Informational filing (i.e., 93.42% vs. 93.43%) but the bill impact is much higher (i.e., 7.1% vs. 4.6%).
- e) With respect to pages 15-16, given that the proportion of revenue requirement being allocated to the Residential class is only increasing from 54.53% to 55.33%, why is it necessary to have virtually a 10 percentage point increase in the proportion of revenue allocated to the fixed service charge in order to maintain a charge that is “consistent with recent increases allowed in the 2<sup>nd</sup> Generation IRM”?
- f) With respect to page 19, please explain why the bill impact (7.9%) for USL is less using the 61.43% R/C ratio from the 2006 Cost Allocation than it is under the 2009 proposal where the bill impact is 9.9% but the R/C ratio is lower (52.51%). One would have expected a higher bill impact if a higher R/C ratio is used.

### **Question #34**

**Reference:** i) Exhibit 9/Tab 1/Schedule 1, Appendix A

- a) Based on a recent 12 consecutive months of actual billing data, please indicate the percentage of total residential customers that:
  - Consume less than 100 kWh per month
  - Consume 100 -> 250 kWh per month
  - Consume 250 -> 500 kWh per month
  - Consume 500 -> 750 kWh per month
  - Consume 750 -> 1000 kWh per month