



November 20, 2025

Ritchie Murray
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4
Registrar@oeb.ca

Dear Ritchie Murray,

Re: 2026 IRM Application for Electricity Distribution Rates (EB-2025-0027) Reply Submission

In accordance with the Ontario Energy Board's ("OEB's") Procedural Order No. 2 dated October 16, 2025, enclosed is InnPower Corporation's ("InnPower") reply to submissions from OEB Staff and the Vulnerable Energy Consumers Coalition ("VECC").

Copies of the attached reply submission are being filed through the OEB's web portal ("RESS") and have been served on OEB Staff and VECC.

Yours truly

L Hampton

Laura Hampton
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Tel: 705-431-4321 ext. 226

Encl.

cc: All parties in EB-2025-0027



InnPower Corporation

ED-2002-0520

InnPower Reply Submission to OEB Staff and VECC

Board File EB-2025-0027

For Rates Effective January 1, 2026

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1 INTRODUCTION

2 InnPower Corporation (“InnPower”) filed an Electricity Distribution Rates application
3 (“Application”) on August 14, 2025, under the Incentive Rate-Setting Mechanism (“Price Cap IR”) to
4 the Ontario Energy Board (“OEB”) for electricity distribution rates and other charges effective
5 January 1, 2026.

6 The Vulnerable Energy Consumers Coalition (“VECC”) requested intervenor status in relation to the
7 Application, which was subsequently granted by the OEB. The OEB issued Procedural Order No. 1
8 on September 24, 2025. On October 3, 2025, OEB Staff and VECC submitted interrogatories
9 requesting additional information and documentation from InnPower. Given the number and
10 complexity of these questions, InnPower requested an extension on October 15, 2025, to complete
11 its written responses. The OEB subsequently approved this request and issued Procedural Order
12 No. 2 on October 16, 2025. Subsequently, InnPower filed its written response to interrogatories
13 and received written submissions by OEB Staff and VECC on November 10, 2025.

14 In its submission, OEB Staff identified no concerns with InnPower’s price cap adjustment, which
15 reflects the application of the 3.70% inflation factor and 0.30% stretch factor resulting in a 3.40%
16 rate adjustment for 2026. InnPower agrees with this submission.

17 OEB Staff identified no concerns with InnPower’s requested adjustments to its Retail Transmission
18 Service Rates (“RTSRs”), which has updated the 2026 Rate Generator Model to reflect the approved
19 2026 Uniform Transmission Rates (“UTRs”). InnPower agrees with this submission.

20 OEB Staff identified no concern with InnPower’s Group 1 Deferral and Variance Account (“DVA”)
21 disposition, which exceed the OEB’s materiality threshold and is proposed to be recovered over a
22 12-month period. InnPower agrees with this submission.

23 OEB Staff made detailed submissions on the following issues, which InnPower has responded to in
24 its reply submission below:

- 25 • Z-Factor Claim – March 2025 ice storm (“Z-factor claim”)
- 26 • Small Cell Wireless Pole Attachments Deferral and Variance Accounts (DVAs)

27 VECC’s written submission was limited to InnPower’s Z-factor claim, which InnPower has
28 responded to in its reply submission below.

1 REPLY SUBMISSION

2 Z-Factor Claim

3 **Background**

4 In late March 2025, a severe ice storm impacted central Ontario, resulting in extensive
5 damage to electrical infrastructure and widespread service interruptions. InnPower
6 Corporation's service territory was significantly affected, with approximately 21,200
7 customers—representing 89% of its customer base—experiencing outages due to ice
8 accumulation on overhead lines and vegetation, compounded by a concurrent loss of
9 supply from Hydro One.

10 Despite advance preparations based on weather warnings, the severity and geographic
11 scope of the event exceeded forecast expectations, prompting emergency declarations
12 across multiple municipalities. InnPower implemented its emergency response plan,
13 mobilizing internal crews, third-party contractors, and mutual assistance partners to
14 restore 90% of affected customers within 56 hours and achieve full restoration by April 4,
15 2025. Restoration activities included emergency repairs, pole and conductor
16 replacements, vegetation management, and system re-energization, with no material
17 shortages encountered. InnPower Corporation submitted that this event was outside of its
18 control, significantly impacted operations and resulted in InnPower Corporation incurring a
19 material level of prudently incurred costs.

20 The utility sought recovery of \$496,013 for incremental operating costs, carrying charges,
21 and revenue requirement associated with capital expenditures. InnPower proposed a 12-
22 month disposition period for operating costs and carrying charges beginning January 1,
23 2026, and a separate rate rider for capital-related recovery until rebasing.

24 **Eligibility**

25 A Z-factor refers to an extraordinary event that is outside of management's control and
26 could not have been reasonably anticipated. The eligibility criteria for recovering costs
27 through a Z-factor are outlined in the OEB's Incentive Regulation Report. To qualify for
28 recovery under this mechanism, all of the following criteria must be met:

- 29 • **Causation:** The costs must be directly attributable to the Z-factor event and
30 demonstrably outside the scope of costs reflected in the distributor's base rates.
- 31 • **Materiality:** The costs must exceed the materiality threshold established by the
32 Ontario Energy Board and must have a significant impact on the distributor's
33 operations. Costs that do not meet this threshold are expected to be absorbed in

- 1 • the normal course of business and managed through operational efficiencies and
2 productivity measures.
- 3 • **Prudence:** The costs must have been prudently incurred. This requires that the
4 distributor’s actions reflect sound judgment and that the chosen response
5 represented a cost-effective solution for ratepayers, even if it was not the lowest
6 upfront cost.

7 InnPower submits its reply to OEB Staff and VECC submissions on each of the three
8 eligibility criteria below:

9

10 Causation

11 Operating Costs

12 Operating costs totaled \$426,794 for incremental labour, contractor services, equipment
13 rentals, materials, and tree clearing, all recorded under a dedicated storm work order to
14 ensure transparency. InnPower confirmed these expenses were exceptional, prudently
15 incurred, and necessary to restore service.

16 OEB Staff and VECC submit that \$426,794 meets the Z-Factor causation criteria and
17 should be recovered over a 12-month disposition period starting January 1, 2026. InnPower
18 notes a small discrepancy between the amount referenced by OEB Staff and the relief
19 requested. InnPower’s request was for \$426,794 in operating costs, plus an additional
20 \$7,665 in carrying charges. OEB Staff identified a total of \$419,127, which reflects the
21 operating amount net of carrying charges¹. Subject to this correction, InnPower agrees
22 with this submission.

23 Capital Costs

24 The utility reported \$798,170 in capital costs to replace poles, transformers, conductors,
25 and other distribution assets on a like-for-like basis, confirming that no betterments or
26 scope enhancements were included and that all work was necessary to restore the system
27 to pre-storm conditions. InnPower calculated a \$61,554 revenue requirement impact
28 associated with these capital expenditures, reflecting depreciation, return on capital, and
29 associated incremental costs that would have been incurred had these assets been funded
30 through ongoing rates. This revenue requirement amount forms part of the total Z-Factor
31 relief sought for the ice-storm event, alongside the requested recovery of incremental
32 operating costs and carrying charges.

33 OEB staff reviewed the claim by comparing InnPower’s evidence to prior Z-Factor
34 decisions, including Elexicon’s 2023 proceeding, where costs for assets near end-of-life or
35 lacking condition data were reduced.¹ OEB staff identifies similar concerns here: several

1. OEB Staff Submission, p 7-8

1 replaced poles lack current condition records and one transformer had only one year of
2 useful life remaining.² Due to this uncertainty, staff recommends a 35% or \$199,282
3 reduction to pole-related capital costs and disallowance of the \$5,717 transformer
4 replacement.³

5 VECC stated that based on the assumption that InnPower has the legacy health
6 information for the replaced assets and can confirm that the assets replaced were not in
7 poor condition, VECC submits the storm meets the OEB's Z-factor eligibility criteria of
8 causation and the OEB should approved InnPower's Z-Factor.⁴ VECC also submits that if
9 InnPower cannot verify the original condition of the replaced assets, the proportion of
10 assets classified as poor or very poor in the 2021 ACA should be applied to the quantities
11 replaced and removed from the Z-Factor claim, on the basis that such assets would likely
12 have been replaced within one to two years. Using wood poles as an example, VECC's
13 approach would remove 20.7% (3 of 14 poles) from the claim, reducing the associated
14 capital expenditures by approximately \$122,100.⁵

15 **Transformer**

16 OEB Staff submits that the \$5,717 transformer should be disallowed because, with only
17 one year of remaining useful life, it would have been replaced under InnPower's planned
18 asset program, consistent with the OEB's prior decision for Elexicon where end-of-life
19 assets were found to not meet Z-Factor causation or prudence criteria.⁶

20 Although InnPower generally operates distribution transformers to failure rather than
21 replacing them solely based on end-of-useful-life estimates, InnPower agrees with this
22 submission.

23 **Poles**

24 InnPower acknowledges OEB staff and VECC's observations regarding the absence of
25 verifiable pole condition data to support a portion of its March 2025 ice-storm Z-Factor
26 claim. As noted in our prior responses, legacy system limitations have resulted in the
27 overwriting of historical asset health records when new assets are added to the database.

28 During the interrogatory response period, InnPower had limited time to compile and
29 analyze detailed asset-condition information related to the poles replaced during the
30 March 2025 ice storm. The available time did not allow staff to fully review historical
31 condition data, cross-reference asset identifiers, or reconcile field activity records with
32 past inspection results. At the time, our priority was ensuring accurate financial
33 information and storm-related restoration costs were provided within the interrogatory
34 deadline.

2. OEB Staff Submission, p 6-7

3. Ibid, p 7

4. VECC Submission, p 7

5. Ibid, p 5

6. OEB Staff Submission, p 7

1 Following the interrogatory process, InnPower undertook a more comprehensive review of
 2 the relevant asset information. Staff returned to historical inspection records, pole-testing
 3 files, and archived field notes to identify and compile the condition data for the affected
 4 poles. Through this work, we were able to locate approximately thirteen specific poles by
 5 cross-referencing dispatch notes from the storm event, emergency locate requests, and
 6 on-site field observations. Because asset tracking documentation during the storm was
 7 limited, these supplemental steps were necessary to verify exact pole locations and
 8 confirm the corresponding asset IDs. Please note, despite best efforts, records could not
 9 be obtained for one pole due to a missing asset ID tag.

10 Once the poles were identified, InnPower conducted site visits to validate that the poles
 11 currently in place were new replacements and to confirm asset identifiers. We then
 12 matched each identifier against our historical pole-testing records. This allowed us to pull
 13 the original condition assessments, including test dates and condition scores, for the poles
 14 that were replaced. All available test data has been compiled and is included with this
 15 submission. Please refer to Table 1 and Table 2 below for detailed results.

16 **Table 1: HI Ranges and Corresponding Asset Condition**

HI Score (%)	Condition	Description	Implications
[85-100]	Very Good	Some evidence of aging or minor deterioration of a limited number of components	Normal Maintenance
[70-85]	Good	Significant Deterioration of some components	Normal Maintenance
[50-70]	Fair	Widespread significant deterioration or serious deterioration of specific components	Increase diagnostic testing; possible remedial work or replacement needed depending on the unit's criticality
[30-50]	Poor	Widespread serious deterioration	Start the planning process to replace or rehabilitate, considering the risk and consequences of failure
[0-30]	Very Poor	Extensive serious deterioration	The asset has reached its end-of-life; immediately assess risk and replace or refurbish based on assessment

17

18 The table shown above is taken from METSCO Energy Solutions' Asset Condition
 19 Assessment (ACA), which provides a standardized methodology for assessing the health of
 20 distribution system assets. METSCO's Health Index (HI) framework assigns each asset a
 21 score from 0% to 100% based on its physical condition, test results, and observed
 22 deterioration. The score corresponds to a condition category—Very Good, Good, Fair, Poor,
 23 or Very Poor—which helps utilities evaluate asset risk and determine appropriate
 24 maintenance or replacement actions.

25 Under this framework, assets in the 85–100% range are considered *Very Good*, showing
 26 only minor signs of aging and requiring normal maintenance. Assets in the 70–85% range

1 fall into the *Good* category, where some deterioration is present but still manageable
2 through routine maintenance. *Fair* condition assets (50–70%) show more widespread
3 deterioration and may require enhanced diagnostic testing or targeted remediation
4 depending on their importance to the system.

5 Assets in *Poor* condition (30–50%) exhibit serious deterioration, and utilities are expected
6 to begin planning for replacement or rehabilitation, particularly where asset failure would
7 affect reliability or safety. Assets in the *Very Poor* category (0–30%) are generally at or near
8 end-of-life and require immediate evaluation and replacement to mitigate risk.

9 This scoring structure has helped guide InnPower’s asset management practices.
10 Consistent with the thresholds described in the METSCO ACA, InnPower typically replaces
11 poles once their condition falls below approximately 30%, unless the pole is classified as
12 *critical*, in which case replacement may occur in the 30–40% range to reduce system risk.
13 The Health Index table therefore aligns directly with how InnPower prioritizes pole testing,
14 condition monitoring, and replacement planning across the distribution system.

15 Please note, the results presented in the table below reflect data collected under two
16 different pole-testing methodologies. Earlier inspection records classified poles only by
17 broad condition categories (e.g., *Poor*, *Fair*, *Good*), whereas InnPower’s current testing
18 approach produces a quantified Health Index (HI) score. To ensure consistency across
19 datasets, InnPower has assigned an appropriate HI score range to each historical condition
20 category, allowing the older qualitative assessments to be aligned with the newer
21 numerical scoring framework.

1 **Table 2: Breakdown of Physical Damage to Electricity Distribution Infrastructure**

Asset Type	Asset / Equipment	Quantity	Repair or replace	Asset Condition
Poles	Wooden pole – 35 ft	1	Replace	Fair Condition (50% -70%)
	Wooden pole – 35 ft	1	Replace	Fair Condition (50% -70%)
	Wooden pole – 35 ft	1	Replace	75% Health Index
	Wooden pole – 40 ft	1	Replace	Fair Condition (50% -70%)
	Wooden pole – 40 ft	1	Replace	95% Health Score
	Wooden pole – 40 ft	1	Replace	79% Health score
	Wooden pole – 40 ft	1	Replace	95% Health Score
	Wooden pole – 40 ft	1	Replace	67% Health Score
	Wooden pole – 40 ft	1	Replace	70% Health Score
	Wooden pole – 40 ft	1	Replace	80% Health Score
	Wooden pole – 40 ft	1	Replace	N/A
	Wooden pole – 50 ft	1	Replace	80% Health Score
	Wooden pole – 50 ft	1	Replace	67% Health Score
	Wooden pole – 50 ft	1	Replace	Good (70%-85%)

1 The results demonstrate that InnPower’s pole management practices are consistent, in
 2 good standing, remain well-structured and are aligned with our condition-based approach.
 3 Poles assessed as Very Poor (HI 0–30%) are scheduled for replacement within the same
 4 calendar year, while poles in Poor condition (HI 30–50%) are planned for replacement
 5 before the next testing cycle (within six years), depending on risk and criticality. Poles in
 6 Fair condition or better (HI above 50%) are monitored through regularly timed cycle
 7 inspection and testing.

8 These practices are consistent with the thresholds outlined in the METSCO Asset Condition
 9 Assessment and supported by updated system-wide metrics in Senpilot, both of which
 10 show that InnPower’s pole population is generally in good condition and managed through
 11 a disciplined, risk-based replacement program.

12 We believe this evidence demonstrates that the majority of assets replaced were in
 13 serviceable condition prior to the storm and that their replacement was directly caused by
 14 the March 2025 ice event, not as part of planned renewal activities. Accordingly, InnPower
 15 respectfully requests that the OEB re-assess the portion of the Z-Factor claim previously
 16 disallowed for pole replacements.

17 Given that there were no records available for one 40-foot pole, InnPower proposes a
 18 disallowance of \$40,569 for poles, instead of the \$199,282 proposed by OEB Staff⁷ and
 19 \$122,100 proposed by VECC⁸.

20 As a result, total disallowance would include \$5,717 for the end-of-life transformer and
 21 \$40,569 for the missing pole data. Considering these reductions, the total capital recovery
 22 would be \$751,884. The resulting revenue requirement would be \$57,985, as noted in
 23 Table 3 below.

24 **Table 3: Revenue Requirement Impact of Capital Expenditures**

Description	%	Amount \$
Incremental Capital		\$ 751,884
Depreciation Expense		(\$ 18,797)
Incremental Capital to be included in Rate Base		\$ 733,087
Deemed Short Term Debt (4%)	6.23%	\$ 1,827
Deemed Log Term Debt (56%)	3.65%	\$ 14,984
Deemed Equity (40%)	9.21%	\$ 27,007
Amortization Expense		\$ 18,797
Grossed up PILS		(\$ 4,630)
Revenue Requirement		\$ 57,985
PILS Calculation		
Deemed Equity		\$ 27,007

7. OEB Staff Submission, p 7

8. VECC Submission, p 5

Add Back Amortization Expense		\$ 18,797
Deduct CCA	8%	(\$ 58,647)
Taxable Income		(\$ 12,843)
PILS before Gross Up	26.5%	(\$ 3,403)
Incremental Grossed Up PILS		(\$ 4,630)

1
2 **Carrying Charges**
3 OEB staff determined that InnPower’s proposed \$7,667 in carrying charges was not
4 calculated in accordance with the OEB’s Filing Requirements and the Accounting
5 Procedures Handbook. Under these requirements, carrying charges must be applied only
6 to the monthly opening balance of eligible costs recorded in Account 1572 (Extraordinary
7 Event Costs), using the OEB’s prescribed interest rates. However, InnPower applied interest
8 to the entire Z-Factor claim amount of \$488,348 and then amortized that amount over a 12-
9 month disposition period, which does not align with the required methodology. As a result,
10 OEB staff is requesting that InnPower recalculate the carrying charges in its reply
11 submission so that interest is applied solely to the actual monthly balances of incremental
12 costs as they were incurred.⁹

13 InnPower agrees with this submission and has recalculated the carrying charges in Table 4
14 below.

15 **Table 4: Ice Storm Cost Carrying Charges**

Interest Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
2.91%	31	28	31	30	31	30	31	31	30	31	30	31
Principal			16,292	205,883	209,197	351,931	414,347	426,794	426,794	426,794	426,794	426,794
Interest				39	509	500	870	1,024	1,021	1,055	1,021	1,055
Accumulated Balance												<u>7,093</u>

16
17 Carrying charges have been recalculated to reflect the updated interest period and revised
18 account balances. Based on this recalculation, InnPower’s updated submission includes
19 carrying charges totaling \$7,093.

20 **Overall**

21 Based on the additional information, updated analyses, and revisions outlined above,
22 InnPower has adjusted its Z-Factor recovery request to reflect the validated asset-
23 condition data, updated carrying charges, and all supporting evidence. The revised
24 recovery amount is summarized in Table 5 below, representing InnPower’s final request for
25 disposition of \$491,872.

1 **Table 5: Relief Requested**

Category	Total
Operating Expenditures	\$ 426,794
Capital Expenditures	\$ 57,985
Total	\$484,779
Carrying Charges	\$7,093
Total Z-Factor Claim	\$491,872

2 * Assumes OEB approved DVA Q3 2025 prescribed interest rate of 2.91%

3

4 **Materiality**

5 InnPower's materiality threshold, based on its approved 2024 distribution revenue
6 requirement of \$13,883,552, is \$69,418. The Z-Factor claim related to the March 29, 2025,
7 ice storm totals \$1,224,964, consisting of \$426,794 in operating costs and \$798,170 in
8 capital costs. This amount significantly exceeds the materiality threshold.

9 OEB Staff and VECC have confirmed that InnPower's request satisfies the materiality
10 requirement for Z-Factor cost recovery. InnPower agrees with these submissions.

11

12 **Prudence**

13 InnPower's response to the March 29, 2025, ice storm was executed in accordance with its
14 Emergency Preparedness Plan and consistent with industry best practices. The company
15 promptly established a centralized command centre to coordinate restoration efforts,
16 ensuring efficient resource allocation, streamlined communication, and adherence to
17 safety standards. Restoration activities included deploying internal crews, engaging mutual
18 assistance partners, and managing labour and contractor costs under pre-negotiated
19 agreements to maintain cost predictability. Materials were primarily sourced from existing
20 inventory, minimizing emergency procurement, and infrastructure repairs were completed
21 to original specifications to avoid additional costs. InnPower's actions reflect prudent
22 utility management, demonstrating preparedness and effective execution during a high-
23 impact, low-frequency event.

24 OEB Staff and VECC concluded that InnPower acted promptly, restored service within a
25 reasonable timeframe, and maintained compliance with its emergency plan, thereby
26 establishing prudence. InnPower agrees with these submissions.

1 Small Cell Wireless Pole Attachments Deferral and Variance Accounts 2 (DVAs)

3 InnPower requested approval to establish four new deferral accounts to track revenues,
4 costs, and carrying charges related to small cell wireless pole attachments, citing growing
5 demand for mobile connectivity and associated operational impacts. These activities were
6 not included in InnPower's 2024 revenue requirement and involve make-ready work,
7 engineering assessments, inspections, and administrative coordination to ensure safe and
8 effective access to distribution infrastructure. Although the forecasted net revenues of
9 \$9,833 from 2025 to 2028 do not meet InnPower's materiality threshold of \$69,418, the
10 company noted that projections are uncertain and may increase before the next rebasing.

11 OEB staff agreed that the proposed accounts meet the causation and prudence criteria but
12 did not support their establishment because the annual forecast amounts fail to meet the
13 materiality requirement. While cumulative revenues by 2028 may slightly exceed the
14 threshold, the average annual impact remains immaterial relative to InnPower's
15 operations. OEB staff emphasized that, under Chapter 2 of the Filing Requirements, annual
16 amounts must exceed the materiality threshold to justify a new deferral account. Although
17 InnPower's estimates assume significant growth in wireless attachments, no installations
18 have been completed to date.¹⁰

19 OEB staff concluded that InnPower may revisit this request in a future application if
20 deployment activity increases and materiality is achieved. InnPower agrees with this
21 submission.

10. OEB Staff Submission, p11

1 **Conclusion**

2 For the reasons identified above, InnPower respectfully requests the following:

- 3 1. Approval of InnPower’s Z-Factor claim and recovery of costs of \$491,872 and the proposed rate riders effective January 1, 2026,
 4 identified in Table 6 and 7 below, as well as filed in InnPower-2026-IRM-Rate-Generator-Model_V1_20251120.
 5 a. As previously indicated, InnPower is seeking disposition over a 12-month period for operating rate riders and annually until
 6 rebasing for revenue requirement rate riders.

7 The table below outlines Operating Rate Riders for total of \$433,887 (\$426,794 principal + \$7,093 interest).

8 **Table 6: Determination of Proposed Z-Factor Operating Rate Riders**

Rate Class	Distribution Revenue Requirement (\$)	Allocation Basis	Allocation of Revenue Requirement (\$)	Unit Amount at Dec 31, 2024	Monthly Fixed Rate Rider (\$)
Residential	\$11,400,478	82.1 %	\$356,221	22,124	\$1.34
General Service < 50 kW	\$1,157,611	8.3 %	\$36,013	1,298	\$2.31
General Service > 50 kW	\$1,050,041	7.6 %	\$32,975	83	\$33.11
Sentinel Lighting	\$29,594	0.2 %	\$868	183	\$0.40
Street Lighting	\$211,849	1.5 %	\$6,508	4,692	\$0.12
Unmetered Scattered Load	\$20,503	0.2 %	\$868	69	\$1.05
Embedded Distributor	\$13,475	0.1 %	\$434	1	\$36.17
Total	\$13,883,552	100%	\$433,887		

9
 10
 11
 12
 13

1 The table below outlines Revenue Requirement Rate Riders for total \$57,985.

2 **Table 7: Determination of Proposed Z-Factor Capital Rate Riders**

Rate Class	Distribution Revenue Requirement (\$)	Allocation Basis	Allocation of Revenue Requirement (\$)	Unit Amount at Dec 31, 2024	Monthly Fixed Rate Rider (\$)
Residential	\$11,400,478	82.1 %	\$47,606	22,124	\$0.18
General Service < 50 kW	\$1,157,611	8.3 %	\$4,813	1,298	\$0.31
General Service > 50 kW	\$1,050,041	7.6 %	\$4,407	83	\$4.42
Sentinel Lighting	\$29,594	0.2 %	\$116	183	\$0.05
Street Lighting	\$211,849	1.5 %	\$870	4,692	\$0.02
Unmetered Scattered Load	\$20,503	0.2 %	\$116	69	\$0.14
Embedded Distributor	\$13,475	0.1 %	\$57	1	\$4.75
Total	\$13,883,552	100%	\$57,985		

3

4 All of which are respectfully submitted this 20th day of November 2025.

5