

1 h) In the June 25, 2025 presentation to Council, Hydro Ottawa indicated that 87% of citizens
 2 support the proposed rate increase. Please provide the evidence reference that matches this
 3 value and the materials provided to Council.
 4

5 _____

6 **RESPONSE(S):**

7
 8 a) The names of the Hydro Ottawa Holding Inc. Board of Directors and whether or not they are
 9 independent within the meaning of the *Affiliate Relationships Code for Electricity Distributors*
 10 *and Transmitters*, are listed in Table A - Hydro Ottawa Holding Inc. Board of Director
 11 Independence, below.
 12

13 **Table A - Hydro Ottawa Holding Inc. Board of Director Independence**

Director Name	Independence
Bernie Ashe	Yes
Bryce Conrad	No
Catherine Clark	Yes
Matt Davies	Yes
Brian Doxtator	Yes
Laura Dudas	No
Jacqueline Gauthier	Yes
Allan Hubley	No
Melissa Krayne	Yes
Paul McCarney	Yes
Madeleine Meilleur	Yes
Lynn Norton	Yes

14
 15
 16 b) The names of the Hydro Ottawa Limited Board of Directors and whether or not they are
 17 independent within the meaning of the *Affiliate Relationships Code for Electricity Distributors*
 18 *and Transmitters*, are listed in Table B - Hydro Ottawa Limited Board of Director Independence,
 19 below.

1 **Table B - Hydro Ottawa Limited Board of Director Independence**

Director Name	Independence
Bernie Ashe	Yes
Bryce Conrad	No
Laurie Heuff	No

- 2
- 3 c) Hydro Ottawa Holding Inc. is a wholly-owned holding corporation of the City of Ottawa. Hydro
- 4 Ottawa Capital Corporation is a wholly-owned subsidiary of Hydro Ottawa Holding Inc. and
- 5 Hydro Ottawa Limited is the local distribution company, a wholly-owned subsidiary of Hydro
- 6 Ottawa Capital Corporation. See Figure 1 - Corporate Entities Relationship Chart of Schedule
- 7 1-6-1 - Corporate Structure and Governance.
- 8
- 9 d) The Hydro Ottawa Limited Board of Directors is primarily responsible for the direction of the
- 10 business and affairs of Hydro Ottawa Limited, however the Hydro Ottawa Holding Inc. Board of
- 11 Directors receive the materials provided to the Hydro Ottawa Limited Board of Directors and are
- 12 kept informed of the business and affairs of Hydro Ottawa Limited, as its largest operating
- 13 subsidiary.
- 14
- 15 e) The City of Ottawa provides direction to Hydro Ottawa Limited through the approval of City
- 16 Council resolutions and within the confines of its authority under the Hydro Ottawa Holding Inc.
- 17 Shareholder Declaration.
- 18
- 19 f) Hydro Ottawa has not received specific direction from the City of Ottawa on this matter, however
- 20 see Hydro Ottawa's response to Interrogatory 1-PP-1(b) and (c) for a summary of how Hydro
- 21 Ottawa is supporting City of Ottawa decarbonisation objectives.
- 22 g) The investment plan was approved by both the Hydro Ottawa Limited and the Hydro Ottawa
- 23 Holding Inc. Board of Directors. The investment plan was not presented to or approved by the
- 24 City of Ottawa.
- 25
- 26 h) On average, 87% of customers, across all rate classes, provided social permission to proceed
- 27 with Hydro Ottawa's draft plan, evidence of which can be found on pages 4, 5, 15, and 16 of

- 1 Attachment 1-4-2(A) - Customer Engagement Report on Hydro Ottawa's 2026-2030 Rate
- 2 Application, and on pages 4 and 5 and Table 2 of page 10 of Schedule 1-4-2 - Customer
- 3 Engagement on the 2026-2030 Rate Application.

1 **INTERROGATORY RESPONSES TO CONSUMERS COUNCIL OF CANADA**

2
3 **4-CCC-57**

4
5 **EVIDENCE REFERENCE:**

6
7 Exhibit 4, Tab 2, Schedule 1, p. 6

8
9 **QUESTION(S):**

10
11 For each member of the Executive Management Team, please provide the percentage of their time
12 allocated to Hydro Ottawa Limited for each year 2021-2026. Please explain why it is more
13 cost-effective for Hydro Ottawa Limited to contract for the Executive Management Team, rather than
14 having them as full-time employees and contracting their services to other related/affiliated
15 companies.

16
17 _____
18 **RESPONSE(S):**

19
20 The percentage of time allocated to Hydro Ottawa is not done on a per individual basis but rather by
21 the type of Management Service as outlined in Table 2 of Schedule 4-2-1 - Shared Services and
22 Corporate Allocation and Attachment 4-2-1(A) - OEB Appendix 2-N - Shared Services and
23 Corporate Cost Allocation. Appendix 2-N includes the % of Corporate Costs Allocated which one
24 can extrapolate to mean their percentage of time allocated to Hydro Ottawa in each of the years.
25 For ease of reference, in Table A below, the percentages by service offered which includes an
26 executive are presented. For example Management Services includes the portion of Chief
27 Executive Officer's time and Customer Service, Corporate Communications includes the portion of
28 the Chief Customer Officer's time. For a representation of the Executive Management Team,
29 please refer to Figure 2 in Schedule 1-6-1 -Corporate Structure and Governance.

1 **Table A - Percentage of Corporate Costs Allocated from HOHI to HOL (Services that include**
 2 **members of the Executive Management Team)**

Management Service	Historical Years			Bridge Years		Test Years
	2021	2022	2023	2024	2025	2026
Management Services	50%	66%	69%	69%	69%	70%
Finance, Internal Audit, Risk Management	75%	71%	71%	70%	70%	70%
Human Resources	80%	80%	84%	83%	83%	85%
Customer Service, Corporate Communications	46%	67%	80%	80%	80%	80%
Legal	38%	40%	40%	40%	40%	40%
Information Management & Technology	53%	64%	60%	60%	60%	60%
Distribution Leadership	0%	0%	0%	0%	75%	75%

3
 4 From a pricing methodology perspective, both having executive management as full-time
 5 employees of Hydro Ottawa Limited or as employees of Hydro Ottawa Holding Inc. use the same
 6 pricing methodology for services rendered, as such there is no difference in cost between the two
 7 methods. Please refer to the response to interrogatory 4.0-VECC-40 Table A for the overall
 8 percentage of FTEs allocated to Hydro Ottawa from the holding company.

1 **INTERROGATORY RESPONSES TO CONSUMERS COUNCIL OF CANADA**

2
3 **4-CCC-58**

4
5 **EVIDENCE REFERENCE:**

6
7 Exhibit 4, Tab 2, Schedule 1, p. 6

8
9 **QUESTION(S):**

10
11 Has Hydro Ottawa Limited or Hydro Ottawa Holding Inc. ever retained outside consultants to
12 assess their overall corporate structure and the cost-effectiveness of that structure? If so, please
13 provide the results of that work. If not, why not?

14
15 _____
16 **RESPONSE(S):**

17 No, Hydro Ottawa Limited nor Hydro Ottawa Holding Inc. has retained outside consultants to
18 assess their overall corporate structure and the cost-effectiveness of that structure.

19
20 Hydro Ottawa has not felt the need or justification to undergo such a comprehensive and costly
21 study. The existing corporate structure and shared service allocation model have been developed
22 and refined internally to realize economies of scale, manage costs, and maintain service levels, as
23 detailed in the original evidence.

24
25 While a comprehensive assessment has not been conducted, external consultants have been
26 engaged for specific purposes, such as for tax planning and legal advice related to corporate
27 structure, including the recent restructuring for Hydro Ottawa Capital Corporation to acquire 100%
28 of the shares in the issued and outstanding capital of Hydro Ottawa Limited from Hydro Ottawa
29 Holding Inc. (EB-2024-0164).

**INTERROGATORY RESPONSES TO VULNERABLE ENERGY CONSUMERS
 COALITION**

4.0-VECC-40

EVIDENCE REFERENCE:

Exhibit 4, Tab 2, Schedule 1

Table 3 – Summary of Shared Services Provided by Hydro Ottawa 2021-2026 (\$'000s)

Provided By	Provided To	OEB Approved	Historical Years			Bridge Years		Test Year
		2021	2021	2022	2023	2024	2025	2026
Hydro Ottawa	Hydro Ottawa Holding Inc.	\$1,487	\$1,161	\$1,386	\$1,335	\$1,421	\$1,480	\$1,583
Hydro Ottawa	Hydro Ottawa Capital Corporation	\$1,602	\$1,352	\$1,662	\$2,021	\$1,801	\$1,740	\$1,421
Hydro Ottawa	Hydro Ottawa Energy Services Inc.	\$1,712	\$1,261	\$1,298	\$1,528	\$1,676	\$1,709	\$1,777
Subtotal of Shared Services to Hydro Ottawa Affiliates		\$4,800	\$3,775	\$4,346	\$4,884	\$4,898	\$4,929	\$4,780
Hydro Ottawa	Conservation First Framework Wind Down	\$35	\$64	\$6	\$3	\$0	\$0	\$0
Total		\$4,835	\$3,839	\$4,352	\$4,887	\$4,898	\$4,929	\$4,780

Table 4 – Summary of Shared Corporate Services Received by Hydro Ottawa 2021-2026 (\$'000s)

Provided By	Provided To	OEB	Historical Years			Bridge Years		Test Year
		Approved ¹	2021	2022	2023	2024	2025	2026
Hydro Ottawa Holding Inc.	Hydro Ottawa	\$3,816	\$4,017	\$5,018	\$6,433	\$6,893	\$7,436	\$7,712
Hydro Ottawa Holding Inc.	Conservation First Framework	\$11	\$14	\$5	\$7	\$0	\$0	\$0
TOTAL		\$3,827	\$4,031	\$5,023	\$6,439	\$6,893	\$7,436	\$7,712

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QUESTION(S):

- a) For each category, other than the Conservation First Framework, please provide the annualized the FTEs for each employed working for HOL.
- b) For each category, other than the Conservation First Framework, please show the proportion of the costs that are labour related.

RESPONSE(S):

- a) The annualized FTEs working for Hydro Ottawa are shown in Table A below. This represents the equivalent FTEs for Services Provided to Hydro Ottawa by Hydro Ottawa Holding Inc. Table A also shows the total FTEs at Hydro Ottawa Holding Inc. and the resulting percentage that has been allocated to Hydro Ottawa. Table A also includes the total number of employees at the holding company level and the associated percentage allocated to Hydro Ottawa.

1 **Table A - 2021-2026 FTEs Working for Hydro Ottawa**

Provided By	Provided To	Historical Years			Bridge Years		Test Year
		2021	2022	2023	2024	2025	2026
Hydro Ottawa Holding Inc.	Hydro Ottawa	17	20	22	22	23	23
Total number of FTEs in HOHI		31	32	34	36	38	38
% allocated to HOL		54%	61%	65%	61%	60%	61%

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b) The proportion of costs that are labour related allocated to Hydro Ottawa from Hydro Ottawa Holding Inc. is shown in Table B below.

7 **Table B - 2021-2026 Labour Related Costs Proportion (\$'000s)**

Provided By	Provided To	Historical Years			Bridge Years		Test Year
		2021	2022	2023	2024	2025	2026
Hydro Ottawa Holding Inc.	Hydro Ottawa	81%	75%	67%	63%	67%	67%

8

1 Table 11 presents the difference in OM&A expenses for the 2026 Test Year compared to the last
 2 year of OM&A expenditures approved by the OEB (2025 Bridge Year), both in dollar amount
 3 and percentage.

4
 5 **Table 11 – 2025 OEB-Approved OM&A vs. 2026 Test Year OM&A (\$'000s)**

	OEB-Approved	Test	Change	
	2025	2026	\$	%
OM&A	\$104,927	\$140,010	\$35,083	33.4%

6
 7 For more information on OM&A, please see Schedule 4-1-1 - Operations, Maintenance and
 8 Administration Summary and Schedule 4-1-2- Operations, Maintenance and Administration
 9 Program Costs.

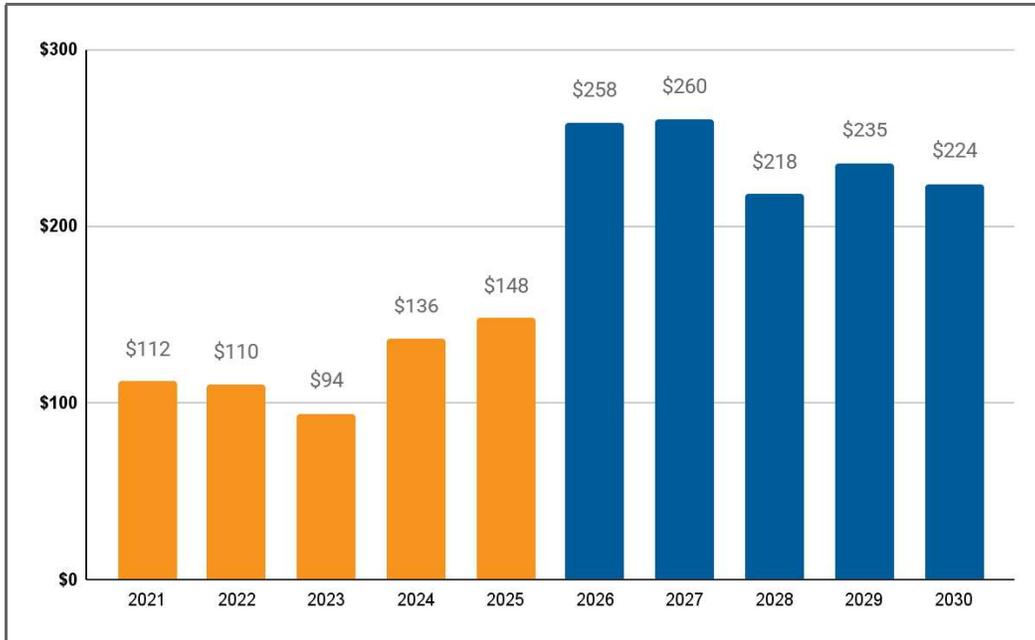
10
 11 **5.1. COST DRIVERS & TRENDS**

12 Table 12 below shows the overall cost drivers for OM&A. Detailed explanations for each item
 13 are provided in Schedule 4-1-2 - Operations, Maintenance and Administration Costs.

14
 15 **Table 12 – Summary of Overall OM&A Cost Drivers (\$'000,000s)**

Cost Driver	Historical Years			Bridge Years		Test Year
	2021	2022	2023	2024	2025	2026
OPENING BALANCE	\$ 91	\$ 85	\$ 101	\$ 113	\$ 115	\$ 119
Inflation		\$ 3	\$ 4	\$ 5	\$ 4	\$ 4
COVID Impact	\$ (6)	\$ 2				
Labour Costs				\$ 4		\$ 6
Proactive Distribution Maintenance						\$ 5
New IT Programs		\$ 1				\$ 6
Major Weather Events		\$ 8	\$ 8			
Labour Strike			\$ 6			
Other Costs		\$ 2	\$ (6)	\$ (7)	-	\$ 1
Total Change	\$ (6)	\$ 16	\$ 12	\$ 3	\$ 4	\$ 21
CLOSING BALANCE	\$ 85	\$ 101	\$ 113	\$ 115	\$ 119	\$ 140

1 **Figure 2 - Summary of 2021-2030 Annual Capital Expenditures (\$'000 000s)**



2

3

4 The proposed increase in capital necessitates a corresponding increase in OM&A expenditures, as

5 shown in Figure 3 below to hire and retain the necessary resources to support the execution of the

6 capital program, and to fund enhanced testing and asset inspection programs to manage system

7 health and reliability with constrained levels of renewal investment relative to the condition needs of

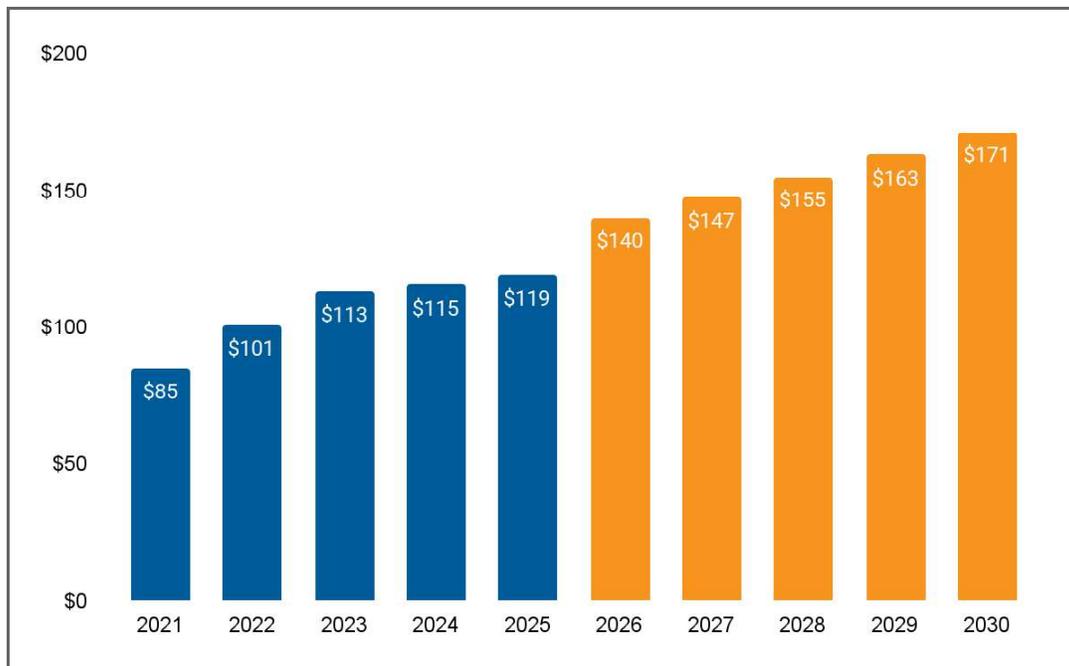
8 the assets. Furthermore, escalating IT costs associated with extreme weather resilience and the

9 implementation of advanced technologies, including cyber security measures for digital and

10 AI-driven systems, must be factored into the OM&A budget to ensure operational continuity and

11 security amidst evolving environmental and technological challenges.

1 **Figure 3 - Summary of 2021-2030 Annual OM&A Expenses (\$'000 000s)⁴**



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2. RATE-SETTING OPTIONS

There are three incentive rate-setting (IR) options for electricity distributors:

- **Price Cap IR:** Base rates are set through a cost of service process for the first year and the rates for the following four years are adjusted using an inflationary index minus a productivity factor.
- **Custom IR:** Rates are set for five years considering a five-year forecast of the utility's costs and sales volumes. This method is intended to be customized to fit the specific utility's circumstances.
- **Annual IR Index:** Existing rates are escalated using the annual adjustment under Price Cap IR, without a rebasing cost of service review.

⁴ 2027-2030 illustrates the OM&A outcome of Hydro Ottawa's Custom Revenue OM&A Factor.

CORPORATE STRUCTURE AND GOVERNANCE

1. INTRODUCTION

Pursuant to section 2.1.3. of the *Chapter 2 Filing Requirements for Electricity Distribution Rate Applications - 2025 Edition for 2026 Rate Applications*, dated December 9, 2024, Hydro Ottawa herein provides information regarding the corporate and utility organizational structure, and corporate governance practices.

2. CORPORATE AND UTILITY ORGANIZATIONAL STRUCTURE

Hydro Ottawa Holding Inc. was created as a result of the *Electricity Act, 1998*, which required all electric utilities to operate as business corporations. Under this structure, Hydro Ottawa Holding Inc. is a for-profit company that continues to be wholly owned by the City of Ottawa, and is governed by an independent board of directors appointed by its shareholder. Hydro Ottawa Holding Inc. wholly-owns and operates two subsidiary holding companies: Hydro Ottawa Capital Corporation and Hydro Ottawa Energy Services Inc.. Hydro Ottawa Capital Corporation wholly-owns and operates Hydro Ottawa Limited¹ (referred to as “Hydro Ottawa” and/or “the utility” in all other evidence in this Application), which is a regulated distribution utility operating in the City of Ottawa and the Village of Casselman.

2.1. CURRENT GOVERNANCE STRUCTURE

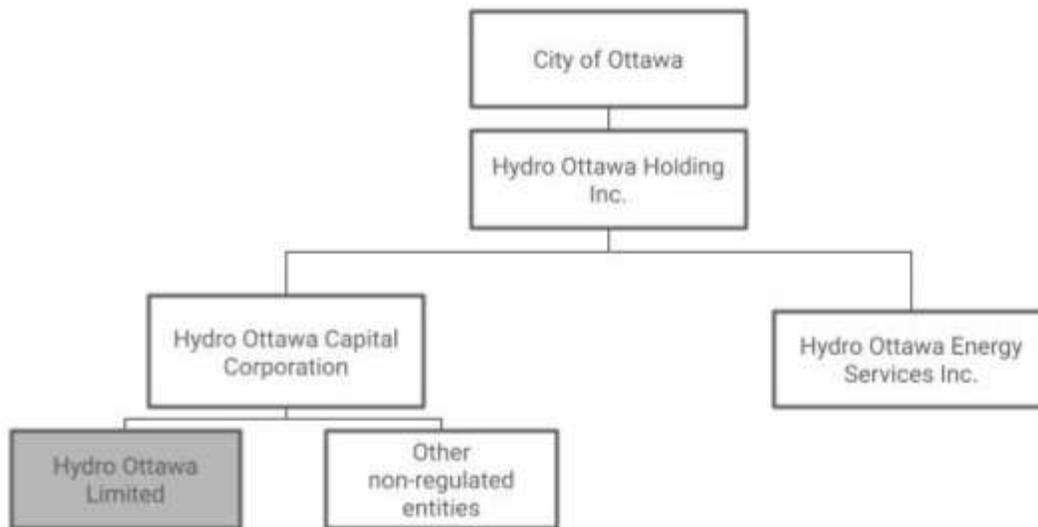
Accountability for the effective oversight of Hydro Ottawa Holding Inc. and its subsidiaries rests with a twelve member Hydro Ottawa Holding Inc. Board of Directors, which provides direction to the Hydro Ottawa Holding Inc. on behalf of the shareholder, the City of Ottawa. The Hydro Ottawa Holding Inc. Board provides leadership within a framework of effective controls that enables risks to be assessed and managed, and is responsible for supervising the management of the business and affairs of the Hydro Ottawa Holding Inc. and its wholly-owned subsidiaries.

¹ Ontario Energy Board, *Decision and Order RE: Hydro Ottawa Holding Inc., Hydro Ottawa Capital Corporation, and Hydro Ottawa Limited, Application for approval for Hydro Ottawa Capital Corporation to acquire 100% of the shares in the issued and outstanding capital of Hydro Ottawa Limited from Hydro Ottawa Holding Inc.*, EB-2024-0164.

1 In carrying out its oversight function, the Hydro Ottawa Holding Inc. Board of Directors is guided
 2 by a Shareholder Declaration issued by Ottawa City Council as revised from time to time. The
 3 Hydro Ottawa Holding Inc. Code of Business Conduct, its Director Conflict of Interest and
 4 Conduct Guidelines, and a Related Party Transaction Disclosure Policy and Process also
 5 govern the actions of the Hydro Ottawa Holding Inc. Board of Directors.

6
 7 In 2006, a separate subsidiary Board of Directors was established to oversee the operations of
 8 the utility, in accordance with the OEB’s *Affiliate Relationships Code for Electricity Distributors
 9 and Transmitters* (ARC). The powers and functions of the utility Board of Directors are set out in
 10 a Shareholder Declaration issued by its shareholder, Hydro Ottawa Capital Corporation. The
 11 chart below depicts the relationship between the various corporate entities.

12
 13 **Figure 1 – Corporate Entities Relationship Chart**
 14



15

1 Hydro Ottawa Holding Inc. costs are allocated to its affiliates based on its budgeted costs and time
 2 to be spent supporting each affiliate for the fiscal year. This initial assessment is completed annually
 3 during budgeting to ensure an accurate allocation of costs. At year-end, the allocations are
 4 reviewed, with any significant differences between actuals and budget being adjusted through a
 5 true-up process to ensure costs are properly allocated to each affiliate.

6
 7 Table 2 below identifies the functional services provided by the Hydro Ottawa Holding Inc. to Hydro
 8 Ottawa and describes the pricing methodology used for each functional service.

9

10 **Table 2 – Pricing Methodology for Services Provided by Hydro Ottawa Holding Inc.**

11 Management Service	Pricing Methodology
Legal	Proportionate share of cost factored by time spent
Corporate Administrative Services	
Finance	
Customer Service, Corporate Communications	
Distribution Leadership	
Information Management and Technology	
Management Services, Internal Audit, Risk Management, Corporate Planning & Performance	Proportionate share of cost factored by revenue, headcount and asset values
HR	Proportionate based on number of employees
Treasury Services	Proportionate share of cost based on value of total debt outstanding
Board of Directors	Proportionate share of cost

12
 13 **3. SHARED SERVICES PROVIDED BY HYDRO OTTAWA**
 14 Table 3 below provides a summary of the services provided by Hydro Ottawa to its affiliates and the
 15 Non-Regulated Activities (CFF Wind Down) in the Historical Years, Bridge Years and 2026 Test
 16 Year as reflected in Attachment 4-2-1(A) - OEB Appendix 2-N - Shared Services and Corporate

Rates Summary 2026-2030

	2025A%	2026F%	2027F%	2028F%	2029F%	2030F%
	2025A	2026F	2027F	2028F	2029F	2030F
	Approved 2025F	Estimate 2026F	Estimate 2027F	Estimate 2028F	Estimate 2029F	Estimate 2030F
Residential (750 kWh)						
Distribution	\$34.51	\$40.04	\$42.64	\$45.47	\$46.98	\$48.36
Change in Distribution		\$5.53	\$2.60	\$2.83	\$1.51	\$1.38
% Change in Distribution		16.02%	6.49%	6.64%	3.32%	2.94%
Total Bill Change		\$6.18	\$2.75	\$2.85	\$1.52	\$1.39
% Total Bill Change		4.01%	1.72%	1.75%	0.92%	0.83%
General Service <50 kW (2000 kWh)						
Distribution	\$85.93	\$96.74	\$102.21	\$108.89	\$110.86	\$112.50
Change in Distribution		\$10.81	\$5.47	\$6.68	\$1.97	\$1.64
% Change in Distribution		12.58%	5.65%	6.54%	1.81%	1.48%
Total Bill Change		\$4.47	\$5.67	\$6.69	\$1.98	\$1.65
% Total Bill Change		1.11%	1.39%	1.62%	0.47%	0.39%
General Service 50 kW - 1,499 kW (185 kW)						
Distribution	\$1,366.91	\$1,650.64	\$1,762.92	\$1,874.23	\$1,936.21	\$1,992.98
Change in Distribution		\$283.73	\$112.28	\$111.31	\$61.98	\$56.78
% Change in Distribution		20.76%	6.80%	6.31%	3.31%	2.93%
Total Bill Change		\$137.74	-\$215.77	\$111.37	\$62.05	\$56.86
% Total Bill Change		1.16%	-1.80%	0.95%	0.52%	0.48%
General Service 1,500 kW - 4,999 kW (1,925 kW)						
Distribution	\$16,219.02	\$17,848.54	\$19,797.60	\$21,144.33	\$21,861.20	\$22,518.01
Change in Distribution		\$1,629.51	\$1,949.06	\$1,346.73	\$716.87	\$656.81
% Change in Distribution		10.05%	10.92%	6.80%	3.39%	3.00%
Total Bill Change		-\$775.93	-\$1,899.42	\$1,347.29	\$931.98	\$854.08
% Total Bill Change		-0.56%	-1.39%	1.00%	0.53%	0.48%
Large Use (7,500 kW)						
Distribution	\$61,692.18	\$71,820.18	\$81,726.18	\$87,224.43	\$93,425.43	\$99,415.68
Change in Distribution		\$10,128.00	\$9,906.00	\$5,498.25	\$6,201.00	\$5,990.25
% Change in Distribution		16.42%	13.79%	6.73%	7.11%	6.41%
Total Bill Change		\$2,820.47	-\$7,229.92	\$5,500.80	\$6,204.38	\$5,994.08
% Total Bill Change		0.48%	-1.22%	0.94%	1.05%	1.00%
Sentinel Lighting (0.4 kW)						
Distribution	\$20.19	\$23.44	\$25.09	\$26.76	\$27.64	\$28.46
Change in Distribution		\$3.25	\$1.65	\$1.66	\$0.88	\$0.82
% Change in Distribution		16.07%	7.06%	6.63%	3.31%	2.95%
Total Bill Change		\$1.37	\$1.68	\$1.66	\$0.88	\$0.82
% Total Bill Change		3.84%	4.52%	4.29%	2.19%	1.97%

Street Lighting (50 kW)						
Distribution	\$928.89	\$947.05	\$710.91	\$751.52	\$756.11	\$762.34
Change in Distribution		\$18.16	-\$236.14	\$40.62	\$4.59	\$6.23
% Change in Distribution		1.96%	-24.93%	5.71%	0.61%	0.82%
Total Bill Change		-\$114.53	-\$310.83	\$40.62	\$4.59	\$6.25
% Total Bill Change		-3.44%	-9.66%	1.40%	0.16%	0.21%
Unmetered Scattered Load (470 kWh)						
Distribution	\$22.98	\$26.25	\$28.20	\$30.04	\$30.94	\$31.39
Change in Distribution		\$3.27	\$1.95	\$1.85	\$0.89	\$0.46
% Change in Distribution		14.24%	7.42%	6.56%	2.97%	1.48%
Total Bill Change		-\$0.70	\$2.00	\$1.85	\$0.89	\$0.46
% Total Bill Change		-0.72%	2.06%	1.87%	0.89%	0.45%

	Approved 2025	Estimate 2026F	Estimate 2027F	Estimate 2028F	Estimate 2029F	Estimate 2030F
Residential (750 kWh)						
Distribution	\$34.51	\$40.04	\$42.64	\$45.47	\$46.98	\$48.36
Change in Distribution		\$5.53	\$2.60	\$2.83	\$1.51	\$1.38
% Change in Distribution		16.02%	6.49%	6.64%	3.32%	2.94%
% Total Bill Change		4.01%	1.72%	1.75%	0.92%	0.83%
General Service <50 kW (2000 kWh)						
Distribution	\$85.93	\$96.74	\$102.21	\$108.89	\$110.86	\$112.50
Change in Distribution		\$10.81	\$5.47	\$6.68	\$1.97	\$1.64
% Change in Distribution		12.58%	5.65%	6.54%	1.81%	1.48%
% Total Bill Change		1.11%	1.39%	1.62%	0.47%	0.39%

	Approved 2025	Estimate 2026F	Estimate 2027F	Estimate 2028F	Estimate 2029F	Estimate 2030F
Residential (750 kWh)						
Distribution	\$ 34.26	\$40.72	\$42.64	\$45.47	\$46.98	\$48.36
Change in Distribution		\$6.46	\$1.92	\$2.83	\$1.51	\$1.38
% Change in Distribution		18.86%	4.72%	6.64%	3.32%	2.94%
Rate Riders	\$0.25	-\$0.68	\$0.00	\$0.00	\$0.00	\$0.00

Distribution with Rate Riders	\$34.51	\$40.04	\$42.64	\$45.47	\$46.98	\$48.36
Change in Distribution		\$5.53	\$2.60	\$2.83	\$1.51	\$1.38
% Change in Distribution		16.02%	6.49%	6.64%	3.32%	2.94%
Total Bill (After Tax)	\$137.92	\$143.45	\$145.91	\$148.46	\$149.82	\$151.06
		\$5.53	\$2.46	\$2.55	\$1.36	\$1.24
% Total Bill Change		4.01%	1.72%	1.75%	0.92%	0.83%
% Total Bill Change before Taxes and OER		4.01%	1.72%	1.75%	0.92%	0.83%