EXHIBIT 3 – LOAD AND CUSTOMER FORECAST

2027 Cost of Service

Lakefront Utilities Inc.
EB-2026-0054

TABLE OF CONTENTS

TABLE OF FIGURES

3.1 LOAD AND CUSTOMER FORECAST

3.1.1 Introduction

This section outlines LUI's load forecast for the test year, including the methodology, key assumptions, and resulting billing determinants used to derive rates and rate riders. The forecast reflects expected customer growth and electricity consumption based on historical trends and available information and is consistent with the approach applied in LUI's last Board-approved cost of service.

The following tables compare the proposed test year customer counts and consumption levels to those previously approved by the Ontario Energy Board, highlighting the overall growth underlying the forecast.

Table 1 – Proposed Customer Count vs Previously Approved

Class	2022 BOARD APPR.	2027	GROWTH
Residential	9,611	10,465	854
General Service < 50 kW	1,148	1,131	-17
General Service > 50 to 4999 kW	106	108	2
Unmetered Scattered Load	80	99	19
Sentinel	49	49	0
Streetlights	3,159	3,117	-42
Total	**14,153**	**14,971**	818

Table 2 – Proposed Consumption Count vs Previously Approved

Class	BOARD APPR.	2027	GROWTH
Residential	75,290,019	87,951,385	12661366
General Service < 50 kW	34,580,902	37,827,326	3246424
General Service > 50 to 4999 kW	126,669,984	118,852,354	-7817630
Unmetered Scattered Load	617,799	649,183	31384
Sentinel	44,683	44,093	-590
Streetlights	1,091,871	1,165,955	74084
Total	**238,295,258**	**246,490,297**	8195039
General Service > 50 to 4999 kW	329,698	306,600	- 23,098.06
Sentinel	134	106	- 28.00
Streetlights	2,919	3,006	86.52
Total	**332,751**	**309,711**	-23,040

Table 3 – Customer Class Composition and billing determinants

Customer Class Name	Existing/ Proposed	MSC Metric	Usage Metric
Residential	Existing	Customer	kWh
GS<50	Existing	Customer	kWh
GS 50-2999kW	Discontinue	Connection	kW
GS 3000-4999kW	Discontinue	Connection	kW
GS 50-4999kW	New	Connection	kW
USL	Existing	Customer	kWh
Sentinel	Existing	Customer	kW
Street Lighting	Existing	Connection	kW

Historically, the GS 3,000-4,999 kW rate class has contained a single customer. LUI's review of customer demand and billing characteristics indicates that the customer's demand exceeds the 3,000 kW threshold only intermittently and does not consistently exhibit the load characteristics for which the class was originally established.

LUI also notes that the closure of the former Weetabix manufacturing facility in Cobourg has resulted in the loss of a significant GS 50-2999 customer from the service territory. Post Holdings announced in April 2025 that the Cobourg facility would permanently cease operations by the end of 2025.

Following a review of current and forecast customer demand levels, LUI has determined that maintaining separate GS 50-2,999 kW and GS 3,000-4,999 kW rate classes is no longer appropriate. The GS 3,000-4,999 kW class contains only a single customer whose demand exceeds 3,000 kW on a limited number of occasions during the year.

Accordingly, LUI proposes to discontinue the GS 3,000-4,999 kW rate class and consolidate the existing GS 50-2,999 kW and GS 3,000-4,999 kW classes into a single GS 50-4,999 kW rate class effective January 1, 2027. The proposed consolidation will simplify rate design, improve class stability and better reflect the current distribution of customer demand within LUI's service territory.

To facilitate the understanding of the load forecast, LUI has completed the table below summarizing characteristics unique to the service area of Cooperative Hydro Embrun.

Table 4 – Factors Influencing LUI's Load

#	Factor	Assessment for LUI
1	Customer growth or decline (residential)	Residential customer growth has generally been modest and aligned with historical trends. While customer additions increased by approximately 3% in 2024, this is considered an above-average year rather than a new long-term growth trend. The bridge and test year forecasts therefore reflect continued growth from known development activity but do not assume sustained annual growth at 2024 levels.
2	Customer growth or decline (business)	Commercial and industrial customer counts remain relatively stable, with no known major additions or closures that would materially impact load.
3	Increased / Reduced kW Demand	Demand levels are stable and driven primarily by existing customer usage patterns. No significant changes in load intensity or large new demand customers are anticipated.
4	Weather abnormality	No abnormal or structural changes in weather patterns have been observed. Historical weather variability is addressed through HDD and CDD in the regression model.
5	Infrastructure growth / decline	While the region continues to market industrial and commercial lands, no confirmed infrastructure or development projects are expected to materially impact load within the bridge or test years.
6	Change in Demographics	The service territory reflects a stable population base with modest growth and no significant demographic shifts that would materially influence electricity consumption.
7	Customer composition	Customer mix remains stable, with a predominantly residential base and no material reclassification or shifts in class composition.
8	Growth in net-metering, EVs, battery storage	Emerging technologies are present but remain limited in scale. Their impacts are currently embedded within historical consumption and are not material to the forecast.
9	Growth in energy conservation	Conservation impacts are reflected in historical consumption trends. No new distributor-driven CDM programs are expected to materially alter load in the test year.
10	EV Charging	EV charging exists within the service territory (both residential and public), but remains modest and largely behind-the-meter. No large-scale or separately metered EV load is forecast in the test year.

The utility doesn't believe there are any specific factors that would be unique to them or would have caused a significant change in how it determines its load forecast compared to the last board-approved cost of service.

Demographics and Socioeconomic Profile

LUI serves the communities of Cobourg and Cramahe along the north shore of Lake Ontario. The service territory includes a diverse mix of residential, commercial, institutional, and industrial customers and benefits from its location along the Highway 401 corridor and proximity to the Greater Toronto Area.

The region continues to experience steady residential growth, driven by new housing development, population growth, and the attractiveness of the area as a place to live and work. Both municipalities continue to advance planning initiatives and development projects intended to accommodate future growth. While many of these developments extend beyond the test year horizon and are therefore not reflected in the load forecast, they provide evidence of the area's longer-term growth potential and support the customer growth assumptions incorporated into the forecast.

The local economy is supported by a broad range of sectors, including manufacturing, health care, education, tourism, retail, and professional services. This diversity helps moderate the impact of changes affecting any single customer or industry.

At the same time, individual customer events can have a significant impact on electricity consumption within a utility of LUI's size. Most notably, the cessation of manufacturing operations at Weetabix Canada Inc. resulted in a substantial and permanent reduction in industrial electricity demand. While customer growth within the residential and commercial sectors remains positive, the loss of this large industrial load has materially influenced recent consumption trends and forms an important consideration in the development of the load forecast.

Overall, LUI's service territory continues to exhibit stable economic conditions, ongoing residential growth, and modest commercial development. These characteristics support continued customer growth while recognizing that significant changes affecting individual large customers may materially influence overall system consumption.

Causes, Assumptions, and Adjustments for the Volume Forecast

LUI's load forecast reflects both historical consumption patterns and known changes expected to affect electricity demand during the bridge and test years.

The most significant adjustment relates to the cessation of manufacturing operations at Weetabix Canada Inc. Following the public announcement by Post Holdings in April 2025 and the subsequent cessation of production activities, a substantial and permanent reduction in electricity consumption occurred within LUI's service territory. Historical production-related consumption associated with the facility was removed from the historical wholesale purchase data used to develop the regression model. This adjustment was necessary to ensure that the regression results and resulting forecast reflect ongoing system load rather than historical consumption associated with operations that are no longer expected to occur.

The forecast therefore reflects underlying system demand excluding the former manufacturing load while retaining the residual facility load expected to remain connected during the bridge and test years.

Apart from the Weetabix adjustment, customer growth and consumption patterns are expected to remain generally consistent with recent historical trends. LUI experienced stronger-than-normal customer growth in 2024, with customer counts increasing by approximately 3%; however, this level of growth is not expected to continue annually. The bridge and test year forecasts reflect continued residential and commercial development activity within the Cobourg, Port Hope and Cramahe service territory and incorporate known customer additions included in the customer forecast.

No additional material customer-specific or economic adjustments were required. The resulting forecast reflects weather-normalized historical consumption patterns, known customer developments, and the permanent reduction in load associated with the cessation of manufacturing operations at the former Weetabix facility.

Electric Vehicle (EV) Consideration

LUI has considered the potential impacts of electrification, including electric vehicle ("EV") adoption, as part of its load forecasting process. While EV adoption within Ontario continues to increase, LUI's assessment focused on observable electrification activity within its own service territory and the extent to which those activities are expected to affect electricity consumption during the test year.

Electrification initiatives are already occurring within LUI's service territory. LUI actively promotes and offers residential Level 2 EV charging equipment to customers through its affiliate, LUSI, as part of its customer service and energy transition initiatives. In addition, publicly accessible EV charging infrastructure is available throughout Cobourg and Cramahe. Existing charging locations include municipal, commercial, institutional, and highway corridor facilities, including charging stations located at Venture13, the Cobourg Police Station, Canadian Tire, Petro-Canada, ONroute facilities, Tesla Supercharger locations, and other commercial sites. The Town of Cobourg has also received provincial funding through the EV ChargeON program and has explored opportunities for additional public charging infrastructure.

The majority of EV-related electricity consumption within the service territory occurs through customer-owned charging facilities located behind the meter. As a result, LUI does not have direct visibility into residential EV ownership levels or the number of privately installed charging stations within its service territory. These loads are reflected within historical customer consumption and billing data and are therefore inherently captured within the historical trends used to develop the load forecast.

LUI reviewed available information regarding local development activity, charging infrastructure deployment, and broader electrification trends to assess whether EV adoption is expected to materially affect electricity consumption during the test year. While electrification is expected to contribute to long-term electricity demand growth, LUI has not identified any known charging infrastructure projects or customer developments that are expected to result in a material and measurable increase in distribution system demand during the test year. Accordingly, no specific EV-related load adjustment has been incorporated into the forecast.

LUI recognizes that electrification is likely to become an increasingly important driver of electricity demand over the longer term. The utility will continue to monitor customer adoption trends, municipal infrastructure initiatives, charging infrastructure development, and planning information as part of future load forecast and distribution system planning activities. As additional data becomes available and impacts become measurable, LUI will incorporate those effects into future forecasting analyses where appropriate.

Integrated Energy Planning Considerations

LUI has considered the potential impact of broader economic and environmental factors on electricity demand on a best-efforts basis, consistent with the Ontario Energy Board’s expectations for small distributors.

The service territory is characterized by stable population levels, modest residential development, and limited commercial and industrial expansion. No material changes in employment, population, or housing growth are anticipated over the bridge or test years. No separate economic forecast has therefore been incorporated.

The load forecast is based on a 10-year historical average of heating and cooling degree days, which is considered representative of normal weather conditions. No adjustments have been made for potential changes in average, minimum, or maximum temperatures.

3.1.2 Proposed Methodology

LUI's load forecast methodology reflects a regression-based approach that is commonly used and accepted in Ontario Energy Board cost of service applications.

The forecast is prepared in two phases. First, a regression model is used to forecast wholesale electricity purchases based on historical monthly purchases and a set of explanatory variables. The resulting forecast is then allocated to customer classes to develop the test year billed energy forecast.

As discussed in the previous section, a significant and permanent change occurred within LUI's service territory following the cessation of manufacturing operations at Weetabix Canada Inc. To ensure that the forecast reflects expected future system conditions, historical production-related consumption associated with the facility was removed from the historical wholesale purchase data used to develop the regression model. This adjustment prevents historical manufacturing load that is no longer expected to occur from influencing the forecast and allows the model to better reflect underlying system demand expected during the bridge and test years.

Weather-related variables form a key component of the regression analysis. Specifically, the model incorporates heating degree days ("HDD") and cooling degree days ("CDD"), which measure the impact of weather on electricity consumption. LUI evaluated several weather data sources as part of the model development process and selected the dataset that provided the strongest relationship with historical consumption patterns. Additional discussion regarding the weather variables and weather station selection is provided later in this Exhibit.

Additional variables were evaluated during model development and retained where they improved the overall performance of the regression model. Further details regarding the variables considered and the variable selection process are provided in the sections that follow.

LUI also considered the potential impact of electric vehicle adoption and other forms of electrification. At this time, these impacts are either embedded within historical consumption patterns or remain uncertain and not material to forecast period demand. Accordingly, no separate forecast adjustment was made. LUI will continue to monitor these trends in future applications.

LUI did not apply a Normalized Average Consumption ("NAC") methodology. Given the availability of a robust historical dataset and the performance of the regression model, LUI determined that a regression-based approach was more appropriate.

An Excel load forecast model, a completed Appendix 2-IB, and the forecast information entered in RRWF Tab 10 are filed in support of this application.

3.1.3 Historical Forecast vs. Actual

LUI purchases electricity from Hydro One. In preparing for the Cost-of-Service application, the utility proposes to use a 10-year historical regression.

The following table summarizes the annual wholesale purchases for the ten years 2016 to 2025 as reported to OEB in RRR annual filing "2.1.5 Supply & Delivery Information”.

3.1.3.1 Overview of Wholesale Purchases

LUI purchases electricity from Hydro One.

Table 5 – Historical Monthly Wholesale (2016-2025)

	2016	2017	2018	2019	2020
January	18,621,894	18,475,099	20,381,789	20,005,327	19,062,250
February	17,766,598	16,835,972	17,538,186	18,000,068	18,054,186
March	17,315,447	18,718,356	18,049,529	18,255,192	17,080,401
April	15,629,498	15,594,743	17,058,772	15,793,905	13,578,418
May	15,103,137	14,823,601	15,289,336	14,827,475	13,770,513
June	14,905,961	14,757,124	15,348,979	14,113,635	15,929,183
July	18,234,560	17,595,924	19,818,720	17,591,279	18,578,169
August	18,162,718	16,406,842	18,583,414	16,458,815	17,519,696
September	15,375,827	11,836,475	16,548,231	14,482,095	15,149,968
October	15,008,827	15,234,037	16,350,756	15,033,076	15,951,245
November	15,822,617	16,727,591	17,481,588	17,159,099	16,426,818
December	18,051,924	20,330,001	18,592,365	19,310,061	18,279,417
Total	**199,999,008**	**197,335,765**	**211,041,665**	**201,030,027**	**199,380,264**

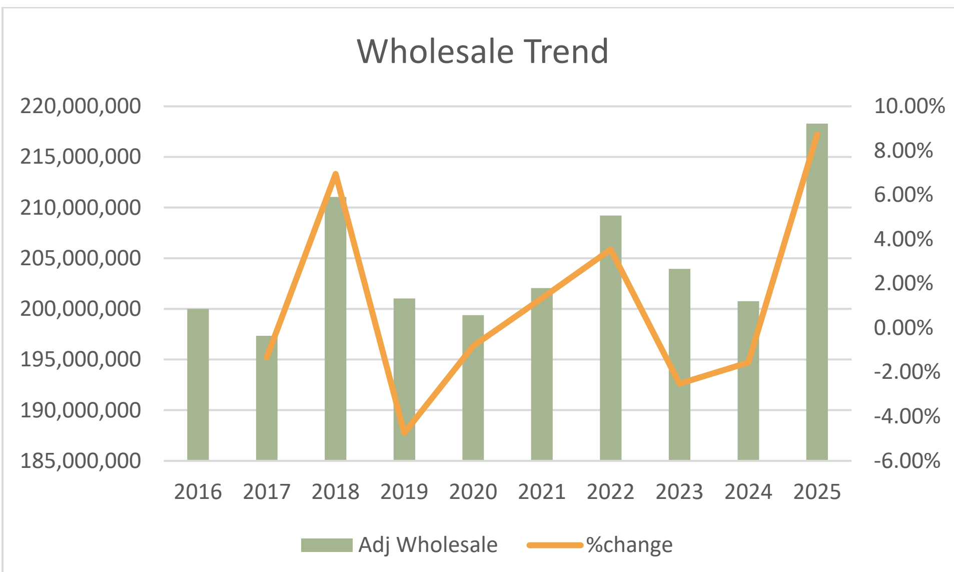
	2021	2022	2023	2024	2025
January	18,673,833	21,090,790	19,990,911	19,239,709	21,309,579
February	17,822,374	18,895,852	18,049,403	16,942,104	19,363,149
March	17,103,306	19,554,498	19,011,298	16,618,259	18,440,644
April	15,014,311	16,452,459	15,893,201	15,010,269	16,095,586
May	14,823,860	15,587,980	15,004,067	14,287,133	14,877,360
June	16,036,298	15,641,479	15,924,610	16,228,706	16,033,042
July	16,886,345	17,948,916	18,076,484	18,262,762	19,633,757
August	18,783,755	18,104,928	17,316,266	17,394,426	18,141,709
September	15,871,132	15,358,719	16,034,213	15,335,893	16,022,360
October	15,676,718	15,016,366	15,141,241	15,271,810	17,065,815
November	16,799,506	16,969,272	16,171,020	16,473,722	18,940,218
December	18,566,257	18,589,236	17,331,552	19,691,339	22,359,251
Total	**202,057,695**	**209,210,495**	**203,944,266**	**200,756,132**	**218,282,470**

Note: Wholesale purchases reflect net system load delivered to LUI. Embedded generation (e.g., MicroFIT) is not included in wholesale purchases and reduces the amount of energy required from the host distributor. Electric vehicle charging, which occurs behind the meter, is included within customer consumption and therefore reflected in wholesale purchases.

Table 6 – Trend in Historical Monthly Wholesale (2016-2025)

Year	Adj Wholesale	%change
2016	199,999,008	
2017	197,335,765	-1.33%
2018	211,041,665	6.95%
2019	201,030,027	-4.74%
2020	199,380,264	-0.82%
2021	202,057,695	1.34%
2022	209,210,495	3.54%
2023	203,944,266	-2.52%
2024	200,756,132	-1.56%
2025	218,282,470	8.73%

The wholesale values show an overall downward trend from 2016 to 2025, with periodic fluctuations.



3.1.3.2 Overview of Variable Used

Heating and Cooling:

Monthly weather observations detailing the amount of heating or cooling required during the month are used to establish the relationship between weather and electricity consumption.

Heating degree days ("HDD") measure the number of degrees Celsius that the average daily temperature falls below 18°C, while cooling degree days ("CDD") measure the number of degrees Celsius that the average daily temperature exceeds 18°C. Environment Canada publishes monthly HDD and CDD observations for weather stations across Canada.

LUI evaluated several weather stations during development of the regression model, including stations located in Cobourg, Toronto Island Airport, and Toronto Pearson International Airport. Given its proximity to the service territory, Cobourg was evaluated first. However, inconsistencies in the underlying weather data reduced confidence in the resulting analysis. Similar issues were identified with the Toronto Island Airport dataset. Toronto Pearson International Airport weather data was found to be more complete and consistent and produced the strongest overall regression results. Although Pearson is located outside the service territory, LUI considers the results reasonable given the broader weather patterns that influence communities along the north shore of Lake Ontario. Accordingly, HDD and CDD data from Toronto Pearson International Airport were used in the final model.

LUI adopted the ten-year average period from 2016 through 2025 as the definition of weather normal. The following table outlines the monthly weather data used in the regression analysis.

On their own, HDD and CDD account for an Adjusted R-Square of 76.49%, indicating that weather is a significant driver of electricity consumption within LUI's service territory.

Days per month:

LUI evaluated and included a "Days per month" variable. Although the variables did not yield particularly significant results, they did slightly improve the R-Square, (76.49% to 78.23%) and therefore LUI opted to keep it as a variable.

Spring and Fall Flag:

LUI tested and included a spring and fall flag to identify the spring and fall months. In LUIs case, April, May, September, October, and November are set at "1". Summer and winter months are set at "0". The results without LUIs variable increases from 78.23% to 79.97% therefore, the utility opted to include the variable in its regression analysis.

Customer Count:

LUI tested and included a "Customer Count" variable. The rationale for testing LUIs particular variable is that load is expected to grow due to more customers being added to the distribution system. In LUI's case, the variable significantly improved the regression analysis results to 79.97% to 84.25%; therefore, the utility opted to keep it.

Covid Indicator:

LUI tested the inclusion of a COVID-19 flag variable to account for temporary and atypical consumption patterns observed during the pandemic period. These impacts are not fully explained by traditional drivers such as weather or customer growth and, if unaddressed, may distort the underlying relationship captured in the regression model.

The COVID-19 flag assigns values between 0 and 1 to reflect the relative severity of public health restrictions in each month, with higher values corresponding to periods of more significant economic and social disruption. This approach allows the model to isolate abnormal consumption patterns during the pandemic without influencing the long-term trend.

In LUI's case, inclusion of the COVID-19 variable materially improved the regression results, increasing the adjusted R-squared to 85.00%. As such, the variable has been retained in the model.

As COVID-19 restrictions have largely subsided, the use of the flag is limited to the historical period to normalize anomalous data. The forecast itself does not assume any future pandemic-related impacts. To the extent that any lasting behavioural or consumption changes persist, these are inherently reflected in the historical data and underlying trend.

Month	Index	Reason
Jan-20	0	No COVID impact
Feb-20	0	No restrictions
Mar-20	0.5	Shutdown begins Mar 17, schools closed
Apr-20	1	Full provincial lockdown
May-20	0.75	Restrictions easing but still severe
Jun-20	0.5	Stage 2 reopenings
Jul-20	0.25	Stage 3 reopenings
Aug-20	0.25	"Almost" normal summer
Sep-20	0.25	Schools open with restrictions
Oct-20	0.5	Wave 2 begins
Nov-20	0.75	Ottawa in Red/Lockdown
Dec-20	1	Province-wide lockdown Dec 26
Jan-21	1	Stay-at-home order
Feb-21	0.75	Gradual reopening
Mar-21	0.5	Restrictions remain
Apr-21	1	Third Wave + stay-at-home order
May-21	0.75	Province still heavily restricted
Jun-21	0.5	Step 1 re-opening
Jul-21	0.25	Step 3 re-opening
Aug-21	0.25	Delta variant but still open
Sep-21	0.25	Vaccine certificate introduced
Oct-21	0.25	Stable but controlled
Nov-21	0.25	Mild restrictions
Dec-21	0.5	Omicron wave begins

Jan-22	0.75	Schools closed + restrictions
Feb-22	0.5	Step-by-step reopening
Mar-22	0.25	Most restrictions lifted
Apr-22	0.25	Masks remain in select settings
May-22	0	Restrictions essentially gone
Jun–Dec 2022	0	No mandated restrictions
Jan–Dec 2025	0	No restrictions; normal conditions

Origin of variables

- HDD: Stats Canada (Ottawa International)
- CDD: Stats Canada (Ottawa International)
- Days per month Computed by the utility
- Customer Count Computed by the utility
- Spring Fall Flag Computed by the utility
- Covid Flag Computed by the utility

Variable Selection Approach.

The regression results align with expectations overall, although a few coefficients may appear non-intuitive at first glance.

The negative intercept does not have a direct practical interpretation and reflects the interaction of multiple variables within the model. This is a common outcome in multivariate regression and does not affect the reliability of the forecast.

The negative coefficient for the spring/fall variable reflects lower consumption during shoulder seasons, when neither heating nor cooling drives electricity use. This is consistent with observed usage patterns.

The inclusion of the COVID-19 variable improved the overall performance of the regression model, increasing the adjusted R-squared from 84.25% to 85.00%. Management determined that retaining the variable provided a more representative characterization of historical consumption patterns during the pandemic period and improved the overall fit of the model.

The COVID-19 variable is applied only to historical observations and is set to zero throughout the forecast period. Accordingly, the forecast does not assume any future pandemic-related restrictions or impacts. Any permanent changes in customer behaviour that may have emerged following the pandemic are reflected in the post-pandemic historical consumption data and underlying trend relationships incorporated within the model.

Overall, the model behaves as expected, and the results are consistent with how load responds to weather and customer activity.

Table 7 – Results without individual variables

Customer Class Name	Proposed Adjusted R-Square
HDD	0.7649
CDD	0.7649
+	
Days per Month	0.7823
+	
Spring Fall	0.7997
+	
Customer Count	0.8425
+	+
Covid	0.8500

3.1.3.3 Regression Results

The table below displays the R-squared for the multiple regression equation. The table also shows the equation's standard error margin and tests the analysis for statistical significance at a 95% confidence interval. In simple terms, 85.00% of the change in wholesale can be explained by the difference in 5 independent variables.

Table 8 – Equation Parameters

R Squared	0.8576
Adjusted R Squared	0.8500
Standard Error	684024.81
F - Statistic	113.40

Table 9 below provides the overall statistics for the regression model. The R squared and adjusted R squared values show how much of the variation in wholesale purchases is explained by the model. In this case, the adjusted R squared of 0.8500 indicates that close to 85 percent of the variation in monthly wholesale kWh is accounted for by the main drivers included in the model. The F statistic confirms that the model as a whole is statistically meaningful.

Table 9 – Multiple Regression Equation

	Coefficients	Standard Error	t Stat	p-Value
Intercept	-2,856,325	3,074,888	-0.929	35.49%
HDD	7,780	635	12.243	0.00%
CDD	24,917	2,597	9.596	0.00%
Days in month	248,263	81,063	3.063	0.27%
Spring/Fall	-691,419	218,456	-3.165	0.20%
Customer	902	158	5.689	0.00%
Covid	-647,742	250,645	-2.584	1.10%

Table 10 summarizes the influence of each variable. The coefficient shows whether the variable increases or decreases consumption and by how much. The t statistic and p value indicate whether the variable is statistically useful in predicting load. Variables with a small p value are generally meaningful contributors to the forecast. In this model, HDD, CDD, days in the month, and the spring/fall flag are strong predictors. The Covid flag was also meaningful and improved the overall model fit, so it was retained.

Table 10 – Independent Analysis

R Squared	R Squared	Coefficient	Intercept
Intercept			
HDD	30.93%	3977.72	15893575.00
CDD	0.38%	1953.07	16979398.00
Days in month	1.73%	287450.63	8299838.50
Spring/Fall	63.13%	-2794933.30	18447782.00
Customer	1.83%	597.74	10684559.00
Covid	0.40%	-439538.07	17100678.00

Table 11 shows a simple, one-variable regression for each independent variable on its own. These results help confirm which variables have a clear relationship with wholesale consumption. HDD and the spring/fall flag show the strongest individual relationships, which is consistent with industry expectations for weather-sensitive load.

Table 11 – Confidence (95%)

0.887	**Durbin-Watson Statistic**
1.62 - 1.79	**Positive autocorrelation detected**
2.176	**Critical F-Statistic - 95% Confidence**
91.87%	**Confidence to which analysis holds**

Table 12 presents the Durbin-Watson statistic, which checks whether the regression residuals are independent from one month to the next. A value close to 2 suggests there is no autocorrelation. The calculated value falls within the acceptable range, which supports the validity of the model assumptions.

Table 12 – Trend in Historical Yearly Wholesale Purchases

kWh Purchased VS kWh Adjusted					
Year	Wholesale	year over year	Adjusted	year over year	Wholesale VS Adj.
2016	199,999,008		202,865,511		2,866,502
2017	200,335,766	2.00	198,804,132	1.98	-1,531,634
2018	211,041,665	2.05	205,995,674	2.04	-5,045,990
2019	201,030,028	1.95	203,831,780	1.99	2,801,752
2020	199,380,264	1.99	202,276,246	1.99	2,895,982
2021	202,057,694	2.01	199,597,511	1.99	-2,460,183
2022	209,210,496	2.04	205,904,667	2.03	-3,305,829
2023	203,944,264	1.97	203,955,172	1.99	10,908
2024	200,756,132	1.98	207,382,789	2.02	6,626,657
2025	218,282,472	2.09	215,424,305	2.04	-2,858,167
2026	215,151,151	1.99	215,151,151	2.00	0
2027	216,836,495	2.01	216,836,495	2.01	0

After completing the regression, the coefficients are applied to the historical wholesale purchases to produce weather-normalized values.

Period						
t	At	Ft	At -Ft	| At -Ft|	(At -Ft)^2	| (At -Ft)/At|
1	199,999,008	202,865,511	-2,866,502	2,866,502	8,216,836,539,337	0.01433
2	200,335,766	198,804,132	1,531,634	1,531,634	2,345,903,196,890	0.00765
3	211,041,665	205,995,674	5,045,990	5,045,990	25,462,017,830,478	0.02391
4	201,030,028	203,831,780	-2,801,752	2,801,752	7,849,813,695,954	0.01394
5	199,380,264	202,276,246	-2,895,982	2,895,982	8,386,710,005,936	0.01452
6	202,057,694	199,597,511	2,460,183	2,460,183	6,052,500,081,749	0.01218
7	209,210,496	205,904,667	3,305,829	3,305,829	10,928,505,543,335	0.01580
8	203,944,264	203,955,172	-10,908	10,908	118,984,744	0.00005
9	200,756,132	207,382,789	-6,626,657	6,626,657	43,912,581,454,044	0.03301
10	218,282,472	215,424,305	2,858,167	2,858,167	8,169,120,053,977	0.01309
11	215,151,151	215,151,151	0	0	0	0.00000
12	216,836,495	216,836,495	0	0	0	0.00000
					MAPE	0.01485

3.1.3.4 Determination of Weather Normalized Forecast

The forecast for the weather-sensitive classes (Residential, GS <50 kW, GS 50-4,999 kW, and USL) was developed using the following methodology:

1. Historical wholesale energy (kWh) was weather-normalized using the regression model described in Section 3.1.2.
2. Actual retail billed kWh, excluding losses, was compiled by customer class for each historical year.
3. Historical class allocation ratios were calculated by dividing each class's actual billed kWh by total actual wholesale kWh.
4. The historical allocation ratios were reviewed to identify changes in class consumption patterns over time.
5. A trend analysis was applied to the historical allocation ratios to develop forecast allocation ratios for 2026 and 2027. This approach was selected because it better reflects the observed evolution of class consumption patterns than a simple historical average.
6. The forecast allocation ratios were applied to the weather-normalized wholesale energy forecast to derive class-level kWh forecasts.
7. For demand-billed classes, forecast kWh was converted to forecast kW using the historical relationship between energy consumption and billing demand.
8. Average kW per customer was calculated using historical data and applied to derive forecast billing determinants for demand-billed classes.

This approach reflects established billing data, recognizes observable changes in customer class consumption patterns, and produces class-level forecasts that management considers representative of expected conditions during the forecast period. In particular, the methodology captures the changing proportion of system load attributable to each customer class, including the declining share of the GS 50-4,999 kW class following the cessation of manufacturing operations by Weetabix Canada Inc.

The methodology is consistent with the principles outlined in Sections 2.3.3 and 2.3.4 of the Chapter 2 Filing Requirements, which require utilities to develop class-level billing determinants based on historical consumption data and to clearly demonstrate the relationship between energy forecasts and billing determinants.

Table 13 – Residential Forecast

Residential kWh					
Year	Actual kWh	Total Wholesale	Ratio%	Predicted Wholesale	Weather Normal
2016	71,073,210	199,999,008	35.54%	202,865,511	72,091,873
2017	74,351,451	200,335,766	37.11%	198,804,132	73,783,009
2018	74,029,701	211,041,665	35.08%	205,995,674	72,259,656
2019	74,597,044	201,030,028	37.11%	203,831,780	75,636,702
2020	78,520,098	199,380,264	39.38%	202,276,246	79,660,596
2021	78,681,800	202,057,694	38.94%	199,597,511	77,723,798
2022	78,715,213	209,210,496	37.62%	205,904,667	77,471,398
2023	77,834,519	203,944,264	38.16%	203,955,172	77,838,682
2024	80,620,889	200,756,132	40.16%	207,382,789	83,282,063
2025	85,280,218	218,282,472	39.07%	215,424,305	84,163,568
2026		*Trend*	40.14%	215,151,151	86,359,637
2027		*Trend*	40.56%	216,836,495	87,951,385

Table 14 – GS < 50kW Forecast.

General Service < 50 kW					
Year	Actual kWh	Total Wholesale	Ratio%	Predicted Wholesale	Weather Normal
2016	32,497,801	199,999,008	16.25%	202,865,511	32,963,578
2017	31,513,523	200,335,766	15.73%	198,804,132	31,272,592
2018	34,673,896	211,041,665	16.43%	205,995,674	33,844,846
2019	34,516,323	201,030,028	17.17%	203,831,780	34,997,376
2020	31,865,480	199,380,264	15.98%	202,276,246	32,328,323
2021	34,235,080	202,057,694	16.94%	199,597,511	33,818,246
2022	35,526,991	209,210,496	16.98%	205,904,667	34,965,613
2023	32,960,487	203,944,264	16.16%	203,955,172	32,962,250
2024	35,493,355	200,756,132	17.68%	207,382,789	36,664,937
2025	37,327,805	218,282,472	17.10%	215,424,305	36,839,038
2026		*Trend*	17.32%	215,151,151	37,267,754
2027		*Trend*	17.45%	216,836,495	37,827,326

Table 15 – GS 50-4999kW Forecast (kWh)

General Service > 50 to 4999 kW					
Year	Actual kWh	Total Wholesale	Ratio%	Predicted Wholesale	Weather Normal
2016	132,906,747	199,999,008	66.45%	202,865,511	134,811,644
2017	130,939,628	200,335,766	65.36%	198,804,132	129,938,551
2018	137,227,858	211,041,665	65.02%	205,995,674	133,946,750
2019	135,822,000	201,030,028	67.56%	203,831,780	137,714,949
2020	127,771,104	199,380,264	64.08%	202,276,246	129,626,968
2021	128,129,272	202,057,694	63.41%	199,597,511	126,569,215
2022	129,967,241	209,210,496	62.12%	205,904,667	127,913,571
2023	122,128,433	203,944,264	59.88%	203,955,172	122,134,965
2024	118,425,675	200,756,132	58.99%	207,382,789	122,334,728
2025	117,760,761	218,282,472	53.95%	215,424,305	116,218,815
2026		*Trend*	56.02%	215,151,151	120,534,299
2027		*Trend*	54.81%	216,836,495	118,852,354

Table 16 – USL Forecast

Unmetered Scattered Load					
Year	Actual kWh	Total Wholesale	Ratio%	Predicted Wholesale	Weather Normal
2016	608,763	199,999,008	0.30%	202,865,511	617,488
2017	615,578	200,335,766	0.31%	198,804,132	610,872
2018	574,952	211,041,665	0.27%	205,995,674	561,205
2019	612,608	201,030,028	0.30%	203,831,780	621,146
2020	612,731	199,380,264	0.31%	202,276,246	621,631
2021	619,714	202,057,694	0.31%	199,597,511	612,169
2022	621,174	209,210,496	0.30%	205,904,667	611,359
2023	621,936	203,944,264	0.30%	203,955,172	621,969
2024	622,522	200,756,132	0.31%	207,382,789	643,071
2025	622,332	218,282,472	0.29%	215,424,305	614,183
2026		*Trend*	0.30%	215,151,151	644,337
2027		*Trend*	0.30%	216,836,495	649,183

3.1.3.5 Determination of Non-Weather Sensitive Forecast

The demand forecast for this class is based on a long-term average intensity method, which is appropriate given the small, non-weather-sensitive, and highly stable nature of the customer group. A 10-year average kW-per-customer value is used to represent the class's typical demand intensity, and the forecast customer count is based on the geometric mean of historical customers to avoid overstating year-to-year fluctuations in this very small population. Forecast demand for 2026–2027 is calculated by multiplying the forecast customer count by the 10-year average kW/customer.

Because this class does not exhibit meaningful weather or economic sensitivity, a regression model—while used for kWh forecasting in larger classes—would not produce statistically reliable results here. Using long-term averages is a recognized and commonly accepted approach for small, stable load groups such as Sentinel or unmetered classes, and provides a reasonable, evidence-based estimate of future demand.

Table 17 – GS 50-4999kW Forecast (kW)

General Service > 50 to 4999 kW					
Year	Demand (kW)	Consumption (kWh)	Ratio%	Cust/Conn	Demand/Cust
2016	318,587	132,906,747	0.24%	132	2414
2017	304,007	130,939,628	0.23%	126	2408
2018	323,336	137,227,858	0.24%	119	2717
2019	311,073	135,822,000	0.23%	113	2763
2020	313,906	127,771,104	0.25%	108	2904
2021	324,431	128,129,272	0.25%	109	2967
2022	331,603	129,967,241	0.26%	112	2972
2023	326,898	122,128,433	0.27%	111	2934
2024	333,737	118,425,675	0.28%	111	3000
2025	363,319	117,760,761	0.31%	112	3237
2026	312,171	122,728,380	0.25%	110	2832
2027	306,600	120,538,050	0.25%	108	2873

Table 18 – Sentinel Forecast

Sentinel					
Year	Demand (kW)	Consumption (kWh)	Ratio%	Cust/Conn	kW/cust
2016	119	45,436	0.26%	33	3.63
2017	119	45,350	0.26%	33	3.60
2018	116	44,653	0.26%	32	3.60
2019	115	44,613	0.26%	32	3.60
2020	113	43,222	0.26%	31	3.60
2021	114	44,024	0.26%	32	3.60
2022	104	44,006	0.24%	29	3.60
2023	112	42,967	0.26%	31	3.60
2024	112	43,308	0.26%	31	3.60
2025	108	42,832	0.25%	30	3.60
2026	107	41,717	0.26%	30	3.60
2027	106	41,313	0.26%	29	3.60

Table 19 – Streetlighting Forecast

Streetlights					
Year	Demand (kW)	Consumption (kWh)	Ratio%	Cust/Conn	
2016	2,949	1,080,613	0.27%	2929	1.01
2017	2,923	1,759,702	0.17%	3082	0.95
2018	2,923	1,077,264	0.27%	3082	0.95
2019	2,949	1,068,727	0.28%	3082	0.96
2020	2,923	1,080,613	0.27%	3082	0.95
2021	2,924	1,077,952	0.27%	3082	0.95
2022	2,932	1,081,156	0.27%	3082	0.95
2023	2,932	1,081,156	0.27%	3082	0.95
2024	2,932	1,083,844	0.27%	3082	0.95
2025	3,177	1,081,156	0.29%	3082	1.03
2026	2,988	1,159,222	0.26%	3099	0.96
2027	3,006	1,165,955	0.26%	3117	0.96

3.1.3.5 Final Load Forecast

The table 20 below shows the final forecast.

Table 20 – Final Load and Customer Forecast

Class		CUSTOMER FORECAST				Geomean	Geomean
Customer Class	**BOARD APPR.**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**
Residential	9,611	9,558	9,686	9,962	10,168	10,316	10,465
General Service < 50 kW	1,148	1,104	1,111	1,114	1,115	1,123	1,131
General Service > 50 to 4999 kW	106	112	111	111	112	110	108
Unmetered Scattered Load	80	86	90	95	96	98	99
Sentinel	49	51	51	49	49	49	49
Streetlights	3,159	3,082	3,082	3,082	3,082	3,099	3,117
TOTAL	**14,153**	**13,993**	**14,132**	**14,414**	**14,623**	**14,795**	**14,971**

Class		CONSUMPTION FORECAST				10YRegr.	10YRegr.
Customer Class	**BOARD APPR.**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**
Residential	75,290,019	78,715,213	77,834,519	80,620,889	85,280,218	86,359,637	87,951,385
General Service < 50 kW	34,580,902	35,526,991	32,960,487	35,493,355	37,327,805	37,267,754	37,827,326
General Service > 50 to 4999 kW	126,669,984	129,967,241	122,128,433	118,425,675	117,760,761	120,534,299	118,852,354
Unmetered Scattered Load	617,799	621,174	621,936	622,522	622,332	644,337	649,183
Sentinel	44,683	44,006	44,006	43,308	42,832	43,993	44,093
Streetlights	1,091,871	1,081,156	1,081,156	1,083,844	1,081,156	1,159,222	1,165,955
TOTAL	**238,295,258**	**245,955,782**	**234,670,538**	**236,289,594**	**242,115,103**	**246,009,242**	**246,490,297**

Class		DEMAND FORECAST				10YRegr.	10YRegr.
Customer Class	**BOARD APPR.**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**
Residential	-	0	0	0	0	0	0
General Service < 50 kW	-	0	0	0	0	0	0
General Service > 50 to 4999 kW	329,698	331,603	326,898	333,737	363,319	312,171	306,600
Unmetered Scattered Load	-	0	0	0	0	0	0
Sentinel	134	104	112	112	108	113	113
Streetlights	2,919	2,932	2,932	2,932	3,177	2,988	3,006
TOTAL	**332,751**	**334,640**	**329,942**	**336,781**	**366,604**	**315,272**	**309,719**

3.1.4 Accuracy of Load Forecast

To assess the accuracy of the customer and load forecast, the utility compared the results of the 10-year regression-based forecast with a statistical trend calculation using Excel's TREND function. For the weather-sensitive kWh forecast, both approaches produced similar totals and no abnormal changes. This supports the reasonableness of the long-term average method. Class shares in the forecast are also in line with historical experience, and the class-level results reconcile to the weather-normalized wholesale forecast, which further supports the consistency of the forecast.

On the demand side, the difference between the two methods is slightly larger. This is expected because demand is generally more stable and customer-driven rather than weather-driven. Small differences between the 10-year allocation and a statistical trend occur when individual customer characteristics or equipment profiles influence the demand series. These variations are normal and do not indicate any issue with the forecast. The 10-year allocation method remains the primary approach, as it is tied to the weather-normalized energy forecast and reflects the class characteristics more accurately than a pure trend calculation. The trend test is used only as a reasonableness check.

Table 21 – Regression vs Trend Formula

Class	Geomean	Geomean	Excel Trend	Excel Trend
Customer Class	**2026**	**2027**	**2026**	**2027**
Residential	10,316	10,465	10,371	10,581
General Service < 50 kW	1,123	1,131	1,120	1,124
General Service > 50 to 4999 kW	110	108	112	112
Unmetered Scattered Load	98	99	100	104
Sentinel	49	49	48	47
Streetlights	3,099	3,117	3,082	3,082
T O T A L	**14,795**	**14,971**	**14,833**	**15,050**

Class	10YRegr.	10YRegr.	Excel Trend	Excel Trend
Customer Class	**2026**	**2027**	**2026**	**2027**
Residential	86,359,637	87,951,385	86,233,056	88,481,194
General Service < 50 kW	37,267,754	37,827,326	37,310,987	38,104,517
General Service > 50 to 4999 kW	120,534,299	118,852,354	111,989,978	107,957,759
Unmetered Scattered Load	644,337	649,183	623,006	623,412
Sentinel	43,993	44,093	42,483	42,060
Streetlights	1,159,222	1,165,955	1,082,500	1,082,769
T O T A L	**246,009,242**	**246,490,297**	**237,282,010**	**236,291,712**

Class	**10YRegr.**	**10YRegr.**	**Excel Trend**	**Excel Trend**
Customer Class	**2026**	**2027**	**2026**	**2027**
Residential	0	0	0	0
General Service < 50 kW	0	0	0	0
General Service > 50 to 4999 kW	312,171	306,600	364,386	374,585
Unmetered Scattered Load	0	0	0	0
Sentinel	113	113	112	113
Streetlights	2,988	3,006	3,177	3,250
T O T A L	**315,266**	**309,711**	**367,675**	**377,948**

Note:
METHOD 1) *10YRegr.*
Wholesale kWh
= Intercept
(coefficients × each explanatory variable)
error term. Variables include HDD, CDD, days in the month, seasonal flag, customer count, and Covid flag.

METHOD 2) *Trend*
=FORECAST (2027, Class2022 to Class2026)

Load Variance Analysis

Table 22 – Year over Year Variance of Consumption and Demand

Customer Class	**2022 Board Approved (kWh)**	**Change to 2027 Test Year (kWh)**	**% Change**	**2027 Test Year (kWh)**
Residential	75,290,019	12,661,366	16.8%	87,951,385
GS < 50 kW	34,580,902	3,523,615	10.2%	38,104,517
GS > 50 to 4999 kW	126,669,984	(8,087,630)	(6.4%)	118,582,354
Unmetered Scattered Load	617,799	31,384	5.1%	649,183
Sentinel	44,683	(590)	(1.3%)	44,093
Streetlighting	1,091,871	74,084	6.8%	1,165,955
Total	238,295,258	8,195,039	3.4%	246,490,297

Customer Class	**2022 Board Approved kW**	**Change to 2027 Test Year kW**	**% Change**	**2027 Test Year kW**
GS > 50 to 4999 kW	329,698	(23,098)	(7.0%)	306,600
Sentinel	134	(21)	(15.7%)	113
Streetlighting	2,919	87	3.0%	3,006
Total	332,751	(23,032)	(6.9%)	309,719

Consumption (kWh) trends reflect the combined effects of weather, customer growth, and changes in customer load characteristics.

Residential and GS < 50 kW consumption continue to exhibit gradual growth throughout the historical and forecast periods, reflecting ongoing customer growth and normal increases in energy use. In contrast, GS > 50 to 4999 kW consumption is forecast to decline modestly, reflecting changes in the operating characteristics and energy requirements of certain larger customers. Growth in the residential and smaller commercial classes partially offsets the reduction in large customer load.

The regression model demonstrates a strong relationship between energy consumption and weather variables, as evidenced by the high adjusted R-squared values. Annual variations in consumption are therefore primarily attributable to weather conditions, with the forecast reflecting normalized weather assumptions.

Total system consumption is forecast to increase from 238.3 GWh in the 2022 Board-approved forecast to 246.5 GWh in the 2027 Test Year, representing overall growth of approximately 3.4% over the period.

Variations within the Unmetered Scattered Load, Sentinel, and Streetlighting classes are relatively small and do not materially affect overall system consumption.

Demand (kW) follows a similar pattern. Demand in the GS > 50 to 4999 kW class declines by approximately 7.0%, consistent with the forecast reduction in energy consumption for the class. Sentinel demand decreases modestly, while Streetlighting demand remains relatively stable. Overall system demand declines by approximately 6.9% over the forecast period as reductions in large customer demand outweigh incremental growth elsewhere on the system.

Overall, the forecast reflects continued growth in the residential and smaller commercial classes, partially offset by reduced load within the GS > 50 to 4999 kW class. The resulting forecast is consistent with historical customer trends, anticipated customer growth, and expected changes in customer load characteristics.

3.1.5 Determination of Customer Forecast

LUI has applied a geometric mean approach to determine forecasted customer counts for 2026 and 2027. This method is appropriate where growth occurs at a relatively steady rate, as it captures the compounding nature of percentage-based changes over time. While the approach is relatively straightforward, it provides a reasonable and stable representation of expected customer growth within LUI's service territory.

The forecast reflects modest and consistent growth, aligned with historical trends and known development activity, including a planned subdivision associated with the new 2024 substation. As noted, this development is expected to be phased in and will not be fully connected by the end of the test year.

Historical and projected customer counts are presented in Table 24 below, covering the period 2014 to 2027. A variance analysis of customer counts and projections is provided in the subsequent table.

For the purposes of both the bridge and test year, LUI has used a 12-month average to determine annual customer and connection counts. This approach smooths intra-year fluctuations and provides a more representative basis for forecasting.

Table 23 – Customer Count Forecast

CUSTOMER FORECAST SUMMARY												
	Residential		General Service < 50 kW		General Service > 50 to 4999 kW		Unmetered Scattered Load		Sentinel		Streetlights	
Date	**Cust#**	**Growth Rate**	**Cust#**	**Growth Rate**	**Cust#**	**Growth Rate**	**Cust#**	**Growth Rate**	**Cust#**	**Growth Rate**	**Cust#**	**Growth Rate**
2016	**8,932**		**1,045**		**132**		**82**		**48**		**2,929**	
2017	**9,043**	1.0124	**1,061**	1.0151	**126**	0.9564	**82**	0.9949	**48**	1.0000	**3,082**	1.0522
2018	**9,132**	1.0099	**1,080**	1.0185	**119**	0.9426	**82**	1.0000	**49**	1.0208	**3,082**	1.0000
2019	**9,213**	1.0089	**1,085**	1.0046	**113**	0.9461	**82**	0.9970	**46**	0.9388	**3,082**	1.0000
2020	**9,332**	1.0129	**1,079**	0.9944	**108**	0.9600	**81**	0.9959	**50**	1.0870	**3,082**	1.0000
2021	**9,442**	1.0118	**1,091**	1.0107	**109**	1.0116	**82**	1.0072	**51**	1.0200	**3,082**	1.0000
2022	**9,558**	1.0123	**1,104**	1.0121	**112**	1.0206	**86**	1.0508	**51**	1.0000	**3,082**	1.0000
2023	**9,686**	1.0134	**1,111**	1.0064	**111**	0.9985	**90**	1.0484	**51**	1.0000	**3,082**	1.0000
2024	**9,962**	1.0286	**1,114**	1.0026	**111**	0.9985	**95**	1.0480	**49**	0.9673	**3,082**	1.0000
2025	**10,168**	1.0207	**1,115**	1.0009	**112**	1.0090	**96**	1.0141	**49**	0.9932	**3,082**	1.0000
Geomean		**1.0145**		**1.0072**		**0.9822**		**1.0171**		**1.0023**		**1.0057**
2026	10,316		1,123		110		98		49		3,099	
2027	10,465		1,131		108		99		49		3,117	

3.1.6 Accuracy of Customer Count

The customer count has been consistent over the past three cost of service applications which is correlated with the proposed customer count in 2027 Cost of Service.

To come up with the best Adjusted R-Square, LUI did an in-depth analysis of its wholesale to better understand the trend in its monthly load as it relates to the variables selected for the regression analysis.

The table below summarizes the year over year variance in each category.

Table 24 – Year over Year load variance

Customer Class	2023 vs 2022	2024 vs 2023	2025 vs 2024	2026 vs 2025	2027 vs 2026
Residential	+128	+276	+206	+148	+149
GS < 50 kW	+7	+3	+1	+8	+8
GS > 50 kW	(1)	0	+1	(2)	(2)
USL	+4	+5	+1	+2	+1
Sentinel	0	(2)	0	0	0
Streetlight	0	0	0	+17	+18
Total	+138	+282	+208	+173	+174

Customer Count Variance Analysis

Customer and connection counts are presented on a 12-month average basis for the bridge and test years.

As shown in Table above, customer growth is driven primarily by the Residential class, which increases from 9,611 customers in the 2022 Board-approved forecast to 10,465 customers in the 2027 Test Year. The forecast reflects the continuation of historical residential growth observed over the study period and expected residential development within LUI's service territory.

Customer counts in the GS < 50 kW and GS > 50 to 4999 kW classes remain relatively stable overall, with only minor fluctuations. The GS > 50 to 4999 kW class declines modestly from 112 customers in 2025 to 108 customers by the Test Year, consistent with recent historical trends.

Overall, total customer counts increase from 14,153 in the 2022 Board-approved forecast to 14,971 in the 2027 Test Year, representing growth of approximately 5.8% over the period. The bridge and test year forecasts are consistent with historical customer growth trends and no material changes have been made to the definition or composition of customer classes.

3.2 CDM ADJUSTMENT TO LOAD FORECAST

3.2.1 CDM and NWS Considerations

LUI's persisting CDM impacts are reflected in historical wholesale purchases and are therefore embedded in the load forecast. As a result, no separate adjustment has been made.

LUI has not been responsible for delivering CDM programs since April 2019 and is not planning or aware of any distributor-initiated CDM activities during the test year. While provincial programs such as Save on Energy (Stream 1 and Stream 2) continue to operate, these initiatives are administered by the IESO and are not forecasted at the distributor level at this time.

LUI has also considered the potential role of Non-Wires Solutions ("NWS"), as outlined in its Distribution System Plan. While NWS is evaluated as part of system planning, no initiatives have been identified that would materially impact load during the bridge or test years.

Given the uncertainty related to the magnitude and timing of centrally delivered CDM programs, and the absence of identified NWS impacts within the test period, no explicit adjustments have been applied to the load forecast.