



**London
Hydro**

111 Horton St.
P.O. Box 2700
London, ON N6A 4H6

Powering London.
Empowering You.

December 19, 2013

By E-mail

Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto, Ontario M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

Dear Ms. Walli,

**RE: London Hydro Inc.
Reply Submission
2014 Electricity Distribution Rate Application (EB-2013-0150)**

Please find enclosed London Hydro's submission in response to the written submissions of Board Staff and of Vulnerable Energy Consumer Coalition (VECC), issued and received on December 9, 2013.

An electronic version of this final submission has been submitted to the Board by e-mail and filed via the Board's RESS system. Two paper copies of the Final Submission will be delivered via courier to the Board.

Should you have any questions or concerns with the Final Submission, please do not hesitate to contact the undersigned at (519) 661-5800 Ext. 5750.

Yours truly,

Original signed by

Mike Chase, CMA. MBA
Director of Finance and Regulatory Compliance
London Hydro Inc.

cc by email: Michael Janigan, VECC
Shelley Grice, VECC
David Arnold, London Hydro Inc.



**London
Hydro**

2014 ELECTRICITY DISTRIBUTION RATE APPLICATION

EB-2013-0150

London Hydro Inc.

Reply Submission

To

ONTARIO ENERGY BOARD

Board Staff

And

Vulnerable Energy Consumer Coalition

(“VECC”)

London Hydro Inc.

2014 IRM Distribution Rate Application (EB-2013-0150)

REPLY SUBMISSION

London Hydro Inc. (“London Hydro”) filed an application (“the Application”) with the Ontario Energy Board (the “Board”) on September 26, 2013, under section 78 of the Ontario Energy Board Act, 1998, seeking approval for changes to its distribution rates and other charges, to be effective May 1st, 2014. The Application was filed in accordance with the Board’s guideline for the 2014 4th Generation Incentive Regulation Mechanism.

London Hydro submits its reply to the written submissions of the Board Staff and of Vulnerable Energy Consumer Coalition (“VECC”) issued and received on December 9, 2013. The submission is made to the following matters:

Board Staff submission:

- Review and Disposition of Lost Revenue Adjustment Mechanism;

VECC submission:

- Lost Revenue related to CDM.

London Hydro understands that the Board will adjust the stretch factor, productivity factor and inflation factor prior to final approval in accordance with the Report of the Board, titled “Rate Setting Parameters and Benchmarking under the Renewed Regulatory Framework for Ontario’s Electricity Distributors” (EB-2010-0379), issued on November 21, 2013 and updated on December 4, 2013.

Lost Revenue Adjustment Mechanism Variance Account (LRAMVA)

London Hydro submitted an LRAM claim in its original application in accordance with the Board's 2008 guidelines (EB-2008-0037). London Hydro relied on the results presented in the Ontario Power Authority's ("OPA") Final 2012 Results Report to calculate its claim for lost revenues. The OPA has been given the authority to evaluate and measure the impact of the CDM programs.

As a result of interrogatories, London Hydro updated its LRAM claim to properly characterize its lost revenue adjustment as an LRAMVA in accordance with the Board's Guidelines for Electricity Distributor Conservation and Demand Management issued on April 26, 2012 (EB-2012-0003).

Board Staff Submission

The Board Staff submitted that London Hydro's updated request is properly characterized as a disposition of its LRAMVA since the lost revenues are in relation to CDM programs implemented between 2011 and 2014.

The Board Staff noted that London Hydro received Board approval of an LRAM amount of \$176,092 in its 2013 cost of service application (EB-2012-0146). This amount consisted of lost revenues from the 2011 CDM programs in 2011 and the persisting lost revenues from the 2011 CDM programs in 2012. The increase in the balance of the updated LRAMVA mainly results from the difference in the application of multiplier factor to the peak demand savings for the GS 50 kW to 4,999 kW rate class. The Board Staff also noted that the Board approved the LRAM on a final basis in London Hydro's cost of service application (EB-2012-0146).

London Hydro Submission

In response to the concern by the Board Staff in identifying the LRAMVA amount in relation to the lost revenues in 2012 solely from 2012 programs, the class specific LRAMVA schedule is presented in Appendix A reflecting the lost revenues in 2012 solely from 2012 programs. This schedule is the existing evidence provided in response to the Board Staff Interrogatories Question #1, and it excludes the lost revenues from 2011 CDM programs in 2011 and the persisting lost revenues from the 2011 CDM programs in 2012.

London Hydro presents the amount and resulting rate riders of LRAMVA from 2012 CDM programs only in the following table.

2012 LRAMVA Rate Riders

effective May 1, 2014

Customer Class	Savings	Amount	Carrying Charges	Total LRAMVA	Billing Determinants	Unit	Rate Rider
Residential	3,048 MWh	\$ 42,449.59	\$ 1,115.68	\$ 43,565.27	1,085,576,654	kWh	\$ 0.00004
GS < 50 kW	1,384 MWh	\$ 12,617.10	\$ 330.90	\$ 12,948.01	398,880,653	kWh	\$ 0.00003
GS 50 to 4,999 kW	30 MW	\$ 47,168.02	\$ 1,234.74	\$ 48,402.76	3,932,952	kW	\$ 0.01231
Totals		\$ 102,234.72	\$ 2,681.32	\$ 104,916.04			

Vulnerable Energy Consumer Coalition (“VECC”) Submission

VECC submitted the amended representation of lost revenues as an LRAMVA is appropriate and reflects the updated CDM Guidelines for CDM initiatives for the period of 2011-2014.

VECC also noted that London Hydro received Board approval of an LRAM amount of \$176,092 in its 2013 cost of service application (EB-2012-0146). This amount consisted of lost revenues from the 2011 CDM programs in 2011 and the persisting lost revenues from the 2011 CDM programs in 2012. VECC also noted that the updated lost revenues are based on the OPA’s Annual CDM Report 2012 Final Verified Results whereas the original LRAM was based on Draft Verified Results. VECC further noted the difference in the application of the multiplier factor to the peak demand savings for the GS 50 kW to 4,999 kW rate class. VECC also submitted that

London Hydro's request in this application should be based on 2012 lost revenues resulted from the 2012 CDM programs excluding lost revenues from participation in Demand Response 3 programs.

London Hydro Submission

In responding to the valid questions raised by interveners with respect to the impact of the provincial saveONenergy DEMAND RESPONSE program on electricity distribution revenues, all parties (i.e. the interveners and regulators) need firstly to acknowledge the reality that this provincial CDM program has some fundamental design flaws (from an LDC perspective). Specifically, the role of the LDC is limited to promoting the DEMAND RESPONSE program within each LDC's respective franchise service territory. It is understood that due to the legal agreement between the Ontario Power Authority and the group of authorized DR aggregators, LDC's aren't privy to (i) which of their customers are enrolled in the Demand Response 3 ("DR3") program, (ii) the terms of their participation i.e. contracted amount of load curtailment by season, 100 hour option versus 200 hour option, length of contract, etc., or (iii) the specific dates and times when there was a DR3 activation, and which customers were involved in each activation. This shortcoming raises problems on two fronts, namely:

- For LDC system planners and system operators reviewing and responding to the peak loads experienced on a distribution feeder or transformer station bus, there is no insight available as to whether the observed load is artificially lower than would otherwise be the case due to DR3 load curtailments coincident with these feeder and station peaks.
- Customers that are enrolled with an aggregator in the DR3 marketplace will undoubtedly have an interval-style revenue meter installed. As such it should be relatively easy to ascertain the impact on the LDC's revenues by providing specific evidence-based answers to the following questions related to the customer's peak load:
 - Was the activation coincident with the customer's peak load, e.g. does the customer's peak load condition occur at 2:30 pm whereas the DR3 activation was from 4:00 pm to 7:00 pm, was the DR3 activation even on the same day as the customer's monthly billing peak, etc?

- Did the activation artificially influence the customer's billing peak, e.g. if the DR3 activation artificially suppressed the customer's billing peak on a particular day, would the customer have achieved the same peak load condition on a different day of the month?
- Although DR3 is a year-round program, is the effect on participating customers the same for every month?

For commercial, industrial and institutional customers (small business in the "*general service less than 50 kW*" tariff classification excluded), the variable component of an LDC's revenues is based on the customer's monthly peak load. Events such as DR3 activations that artificially reduce a customer's monthly peak load will also reduce the LDC's revenue from participating customers.

The second bullet is the focus of several interrogatories (concerning *Lost Revenue Adjustment Mechanism* claims) as the answers will provide clarity on the fundamental question of the impact of DR3 activations on each LDC's distribution revenues. Whereas the Ontario Power Authority and their authorized DR aggregators are certainly in a position to provide an evidence-based response (at the conclusion of what is readily acknowledged would be a significant analysis undertaking), unfortunately the question has been posed to the LDC community that does not possess the requisite insight concerning DR3 participation and DR3 activations to provide an indisputable response.

The best information available to the LDC community (for the purposes of LRAM claims) is the published final results of the Ontario Power Authority that has been assigned the regulatory authority to evaluate and measure the impact of provincial CDM programs. London Hydro relied on the OPA published report being the valid and best information available to calculate its lost revenues in the absence of access to DR3 activation data.

Should the validity of the lost revenue calculation being based on the OPA published verified results be questioned, the materiality of the lost revenue claimed versus the extensive analysis required to serve as evidence, should also be taken into consideration.

Submission Summary

London Hydro submits that the LRAM amount approved for recovery by the Board was fully deducted from the updated LRAMVA balance at the effective date of the recovery (May 1, 2013). The remaining balance of the updated LRAMVA mainly results from the difference in the application of multiplier factor to the peak demand savings for the GS 50 kW to 4,999 kW rate class. London Hydro respectfully asks the Board to consider the approval of the full LRAMVA claim as recalculated in accordance with the Board's 2012 guidelines; and, at the same time, acknowledges that the Board approved the LRAM on a final basis in London Hydro's cost of service application (EB-2012-0146).

Should the Board decide London Hydro should only be permitted to recover its lost revenues from its 2012 CDM programs rather than the full amount of LRAMVA calculated in accordance with the Board's Guidelines for Electricity Distributor Conservation and Demand Management issued on April 26, 2012, the company respectfully submits that it should be allowed to recover its lost revenue from its 2012 CDM programs, including the Demand Response 3 programs, as a result of the decision of its 2014 IRM distribution rate application.

London Hydro also submits that the relief requested in this Application, as provided in its Reply Submission, is just and reasonable, and respectfully requests that the Board direct London Hydro to prepare a draft Rate Order that implements the requested relief with an effective date of May 1, 2014.

All of which is respectfully submitted.

Appendix A

1568 LRAM Variance Account and 2012 LRAMVA Rate Riders

from 2012 CDM programs only

London Hydro - LRAMVA Calculations for Year 2012

Initiative	Net Savings - YEAR 2012 Programs		Months	Billing Determinants	Level of CDM Activities Approved and Included in Load Forecast*	LRAMVA Quantities		Variable Distribution Rates		LRAMVA YEAR 2012
	Incremental Peak Demand Savings (kW)	Incremental Energy Savings (kWh)				Actual Results (OPA Report)	LRAM Variance (kWh or kW)	2011 (effective May 1, 2011)	2012 (effective May 1, 2012)	Amount (\$)
Consumer Program										
Appliance Retirement	179	855,873	Jan-Dec	12	kWh	855,873	855,873	0.0139	0.01394	\$ 11,919
Appliance Exchange	10	17,215	Jan-Dec	12	kWh	17,215	17,215	0.0139	0.01394	\$ 240
HVAC Incentives	652	1,100,981	Jan-Dec	12	kWh	1,100,981	1,100,981	0.0139	0.01394	\$ 15,333
Conservation Instant Coupon Booklet	6	38,182	Jan-Dec	12	kWh	38,182	38,182	0.0139	0.01394	\$ 532
Bi-Annual Retailer Event	40	731,361	Jan-Dec	12	kWh	731,361	731,361	0.0139	0.01394	\$ 10,185
Retailer Co-op						-	-	0.0139	0.01394	\$ -
Residential Demand Response (switch /pstat)						-	-	0.0139	0.01394	\$ -
Residential Demand Response (IHD)						-	-	0.0139	0.01394	\$ -
Residential New Construction						-	-	0.0139	0.01394	\$ -
Home Assistance Program	29	304,467	Jan-Dec	12	kWh	304,467	304,467	0.0139	0.01394	\$ 4,240
Adjustment to Previous Year's Verified Results:										
HVAC Incentives			Jan-Dec	12	kWh	-	-	0.0139	0.01394	\$ -
Conservation Instant Coupon Booklet			Jan-Dec	12	kWh	-	-	0.0139	0.01394	\$ -
Bi-Annual Retailer Event			Jan-Dec	12	kWh	-	-	0.0139	0.01394	\$ -
						-	-			
Residential Total	916	3,048,080				-	3,048,080	\$ 0.01390	\$ 0.01394	\$ 42,450
Business Program										
Retrofit	176	855,571	Jan-Dec	12	kWh	855,571	855,571	0.0089	0.00922	\$ 7,797
Direct Install Lighting	61	228,414	Jan-Dec	12	kWh	228,414	228,414	0.0089	0.00922	\$ 2,082
New Construction	5	19,535	Jan-Dec	12	kWh	19,535	19,535	0.0089	0.00922	\$ 178
Retrofit - Efficiency: Equipment Replacement Incentive (part of the C&I program schedule)			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
Demand Response 3	533	7,751	May-Sep	5	kWh	7,751	7,751	0.0089	0.00922	\$ 71
Pre-2011 Programs completed in 2011:										
Electricity Retrofit Incentive Program			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
High Performance New Construction	8	273,104	Jan-Dec	12	kWh	273,104	273,104	0.0089	0.00922	\$ 2,489
Adjustment to Previous Year's Verified Results:										
Retrofit			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
Direct Install Lighting			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
Energy Audit			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
High Performance New Construction			Jan-Dec	12	kWh	-	-	0.0089	0.00922	\$ -
						-	-			
General Services Less than 50 kW Total	783	1,384,376				-	1,384,376	\$ 0.00890	\$ 0.00922	\$ 12,616
Industrial Program										
Retrofit	1,972	9,578,223	Jan-Dec	12	kW	23,660	23,660	1.5822	1.59092	\$ 37,573
Energy Manager	1	30,445	Jan-Dec	12	kW	16	16	1.5822	1.59092	\$ 26
Retrofit - Efficiency: Equipment Replacement Incentive (part of the C&I program schedule)			Jan-Dec	12	kW	-	-	1.5822	1.59092	\$ -
Demand Response 3	994	23,964	May-Sep	5	kW	4,972	4,972	1.5822	1.59092	\$ 7,910
Pre-2011 Programs completed in 2011:										
Electricity Retrofit Incentive Program			Jan-Dec	12	kW	-	-	1.5822	1.59092	\$ -
High Performance New Construction	87	250,710	Jan-Dec	12	kW	1,045	1,045	1.5822	1.59092	\$ 1,660
Adjustment to Previous Year's Verified Results:										
Electricity Retrofit Incentive Program			Jan-Dec	12	kW	-	-	1.5822	1.59092	\$ -
High Performance New Construction			Jan-Dec	12	kW	-	-	1.5822	1.59092	\$ -
						-	-			
General Services 50 kW to 4,999 kW Total	3,054	9,883,342				-	29,693	\$ 1.58220	\$ 1.59092	\$ 47,168
GRAND TOTAL	4,753	14,315,797				-	4,462,149			\$ 102,234

Monthly Savings - 2012			
	Residential (kWh)	GS<50 kW (kWh)	GS>50 kW (kW)
Jan	254,007	114,719	2,060
Feb	254,007	114,719	2,060
Mar	254,007	114,719	2,060
Apr	254,007	114,719	2,060
May	254,007	116,269	3,054
Jun	254,007	116,269	3,054
Jul	254,007	116,269	3,054
Aug	254,007	116,269	3,054
Sep	254,007	116,269	3,054
Oct	254,007	114,719	2,060
Nov	254,007	114,719	2,060
Dec	254,007	114,719	2,060

Assumes demand response resources have a persistence of 1 year

*No CDM activity is incorporated into load forecast prior Year 2013

Allocation of programs:	Retrofit	New Construction
to General Services Less than 50 kW (business programs)	8.2%	8.2%
to General Services 50 kW to 4,999 kW (Industrial programs)	91.8%	91.8%
	100.0%	100.0%

LONDON HYDRO - 1568 LRAM Variance Account

Month /Year	All Classes - Amount	All Classes - Principal Balance	Interest Rate*	Carrying Charges**	Year-to-Date Carrying Charges	Account Balance
January 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
February 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
March 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
April 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
May 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
June 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
July 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
August 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
September 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
October 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
November 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
December 2011	\$ -	\$ -	1.47%	\$ -	\$ -	\$ -
January 2012	\$ 7,811	\$ 7,811	1.47%	\$ -	\$ -	\$ 7,811.24
February 2012	\$ 7,811	\$ 15,622	1.47%	\$ 9.10	\$ 9.10	\$ 15,631.57
March 2012	\$ 7,811	\$ 23,434	1.47%	\$ 19.45	\$ 28.55	\$ 23,462.26
April 2012	\$ 7,811	\$ 31,245	1.47%	\$ 28.24	\$ 56.79	\$ 31,301.73
May 2012	\$ 9,472	\$ 40,717	1.47%	\$ 38.90	\$ 95.69	\$ 40,812.95
June 2012	\$ 9,472	\$ 50,190	1.47%	\$ 49.06	\$ 144.75	\$ 50,334.32
July 2012	\$ 9,472	\$ 59,662	1.47%	\$ 62.49	\$ 207.24	\$ 59,869.12
August 2012	\$ 9,472	\$ 69,134	1.47%	\$ 74.28	\$ 281.52	\$ 69,415.71
September 2012	\$ 9,472	\$ 78,607	1.47%	\$ 83.30	\$ 364.82	\$ 78,971.33
October 2012	\$ 7,876	\$ 86,483	1.47%	\$ 97.87	\$ 462.70	\$ 86,945.27
November 2012	\$ 7,876	\$ 94,359	1.47%	\$ 104.20	\$ 566.90	\$ 94,925.54
December 2012	\$ 7,876	\$ 102,235	1.47%	\$ 117.48	\$ 684.38	\$ 102,919.10
January 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 812.02	\$ 103,046.74
February 2013	\$ -	\$ 102,235	1.47%	\$ 115.29	\$ 927.31	\$ 103,162.03
March 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 1,054.95	\$ 103,289.67
April 2013	\$ -	\$ 102,235	1.47%	\$ 123.52	\$ 1,178.47	\$ 103,413.19
May 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 1,306.11	\$ 103,540.83
June 2013	\$ -	\$ 102,235	1.47%	\$ 123.52	\$ 1,429.63	\$ 103,664.35
July 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 1,557.27	\$ 103,791.99
August 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 1,684.91	\$ 103,919.63
September 2013	\$ -	\$ 102,235	1.47%	\$ 123.52	\$ 1,808.43	\$ 104,043.15
October 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 1,936.07	\$ 104,170.79
November 2013	\$ -	\$ 102,235	1.47%	\$ 123.52	\$ 2,059.59	\$ 104,294.31
December 2013	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 2,187.23	\$ 104,421.95
January 2014	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 2,314.87	\$ 104,549.59
February 2014	\$ -	\$ 102,235	1.47%	\$ 115.29	\$ 2,430.16	\$ 104,664.88
March 2014	\$ -	\$ 102,235	1.47%	\$ 127.64	\$ 2,557.80	\$ 104,792.52
April 2014	\$ -	\$ 102,235	1.47%	\$ 123.52	\$ 2,681.32	\$ 104,916.04

*Board Prescribed Interest Rate

**Carrying charges on opening principal balances

Sub-account Residential

Month /Year	Savings Month	Billing Determinants	Effective Variable Rates	Amount	Principal Balance	Interest Rate*	Days	Carrying Charges**	Year-to-Date Carrying Charges	Account Balance
January 2011		kWh	\$ 0.01400	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
February 2011		kWh	\$ 0.01400	\$ -	\$ -	1.47%	28	\$ -	\$ -	\$ -
March 2011		kWh	\$ 0.01400	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
April 2011		kWh	\$ 0.01400	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
May 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
June 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
July 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
August 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
September 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
October 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
November 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
December 2011		kWh	\$ 0.01390	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
January 2012	254,007	kWh	\$ 0.01390	\$ 3,531	\$ 3,531	1.47%	31	\$ -	\$ -	\$ 3,530.69
February 2012	254,007	kWh	\$ 0.01390	\$ 3,531	\$ 7,061	1.47%	29	\$ 4.11	\$ 4.11	\$ 7,065.50
March 2012	254,007	kWh	\$ 0.01390	\$ 3,531	\$ 10,592	1.47%	31	\$ 8.79	\$ 12.90	\$ 10,604.98
April 2012	254,007	kWh	\$ 0.01390	\$ 3,531	\$ 14,123	1.47%	30	\$ 12.76	\$ 25.67	\$ 14,148.44
May 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 17,664	1.47%	31	\$ 17.58	\$ 43.25	\$ 17,706.87
June 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 21,204	1.47%	30	\$ 21.28	\$ 64.53	\$ 21,269.01
July 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 24,745	1.47%	31	\$ 26.40	\$ 90.94	\$ 24,836.26
August 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 28,286	1.47%	31	\$ 30.81	\$ 121.75	\$ 28,407.93
September 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 31,827	1.47%	30	\$ 34.08	\$ 155.83	\$ 31,982.86
October 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 35,368	1.47%	31	\$ 39.63	\$ 195.46	\$ 35,563.34
November 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 38,909	1.47%	30	\$ 42.62	\$ 238.07	\$ 39,146.81
December 2012	254,007	kWh	\$ 0.01394	\$ 3,541	\$ 42,450	1.47%	31	\$ 48.44	\$ 286.52	\$ 42,736.11
January 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 339.51	\$ 42,789.11
February 2013					\$ 42,450	1.47%	28	\$ 47.87	\$ 387.38	\$ 42,836.98
March 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 440.38	\$ 42,889.97
April 2013					\$ 42,450	1.47%	30	\$ 51.29	\$ 491.67	\$ 42,941.26
May 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 544.67	\$ 42,994.26
June 2013					\$ 42,450	1.47%	30	\$ 51.29	\$ 595.96	\$ 43,045.55
July 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 648.95	\$ 43,098.55
August 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 701.95	\$ 43,151.54
September 2013					\$ 42,450	1.47%	30	\$ 51.29	\$ 753.24	\$ 43,202.83
October 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 806.24	\$ 43,255.83
November 2013					\$ 42,450	1.47%	30	\$ 51.29	\$ 857.53	\$ 43,307.12
December 2013					\$ 42,450	1.47%	31	\$ 53.00	\$ 910.52	\$ 43,360.12
January 2014					\$ 42,450	1.47%	31	\$ 53.00	\$ 963.52	\$ 43,413.12
February 2014					\$ 42,450	1.47%	28	\$ 47.87	\$ 1,011.39	\$ 43,460.98
March 2014					\$ 42,450	1.47%	31	\$ 53.00	\$ 1,064.39	\$ 43,513.98
April 2014					\$ 42,450	1.47%	30	\$ 51.29	\$ 1,115.68	\$ 43,565.27

*Board Prescribed Interest Rate

**Carrying charges on opening principal balances

Sub-account General Services Less than 50 kW

Month /Year	Savings Month	Billing Determinants	Effective Variable Rates	Amount	Principal Balance	Interest Rate*	Days	Carrying Charges**	Year-to-Date Carrying Charges	Account Balance
January 2011		kWh	\$ 0.00900	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
February 2011		kWh	\$ 0.00900	\$ -	\$ -	1.47%	28	\$ -	\$ -	\$ -
March 2011		kWh	\$ 0.00900	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
April 2011		kWh	\$ 0.00900	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
May 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
June 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
July 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
August 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
September 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
October 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
November 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
December 2011		kWh	\$ 0.00890	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
January 2012	114,719	kWh	\$ 0.00890	\$ 1,021.00	\$ 1,021.00	1.47%	31	\$ -	\$ -	\$ 1,021.00
February 2012	114,719	kWh	\$ 0.00890	\$ 1,021.00	\$ 2,041.99	1.47%	29	\$ 1.19	\$ 1.19	\$ 2,043.18
March 2012	114,719	kWh	\$ 0.00890	\$ 1,021.00	\$ 3,062.99	1.47%	31	\$ 2.54	\$ 3.73	\$ 3,066.72
April 2012	114,719	kWh	\$ 0.00890	\$ 1,021.00	\$ 4,083.99	1.47%	30	\$ 3.69	\$ 7.42	\$ 4,091.41
May 2012	116,269	kWh	\$ 0.00922	\$ 1,072.00	\$ 5,155.99	1.47%	31	\$ 5.08	\$ 12.51	\$ 5,168.49
June 2012	116,269	kWh	\$ 0.00922	\$ 1,072.00	\$ 6,227.98	1.47%	30	\$ 6.21	\$ 18.72	\$ 6,246.70
July 2012	116,269	kWh	\$ 0.00922	\$ 1,072.00	\$ 7,299.98	1.47%	31	\$ 7.75	\$ 26.47	\$ 7,326.46
August 2012	116,269	kWh	\$ 0.00922	\$ 1,072.00	\$ 8,371.98	1.47%	31	\$ 9.09	\$ 35.56	\$ 8,407.55
September 2012	116,269	kWh	\$ 0.00922	\$ 1,072.00	\$ 9,443.98	1.47%	30	\$ 10.09	\$ 45.65	\$ 9,489.63
October 2012	114,719	kWh	\$ 0.00922	\$ 1,057.71	\$ 10,501.69	1.47%	31	\$ 11.76	\$ 57.41	\$ 10,559.10
November 2012	114,719	kWh	\$ 0.00922	\$ 1,057.71	\$ 11,559.40	1.47%	30	\$ 12.65	\$ 70.06	\$ 11,629.46
December 2012	114,719	kWh	\$ 0.00922	\$ 1,057.71	\$ 12,617.10	1.47%	31	\$ 14.39	\$ 84.46	\$ 12,701.56
January 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 100.21	\$ 12,717.31
February 2013					\$ 12,617.10	1.47%	28	\$ 14.23	\$ 114.44	\$ 12,731.54
March 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 130.19	\$ 12,747.29
April 2013					\$ 12,617.10	1.47%	30	\$ 15.24	\$ 145.43	\$ 12,762.53
May 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 161.18	\$ 12,778.29
June 2013					\$ 12,617.10	1.47%	30	\$ 15.24	\$ 176.43	\$ 12,793.53
July 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 192.18	\$ 12,809.28
August 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 207.93	\$ 12,825.04
September 2013					\$ 12,617.10	1.47%	30	\$ 15.24	\$ 223.18	\$ 12,840.28
October 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 238.93	\$ 12,856.03
November 2013					\$ 12,617.10	1.47%	30	\$ 15.24	\$ 254.17	\$ 12,871.28
December 2013					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 269.93	\$ 12,887.03
January 2014					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 285.68	\$ 12,902.78
February 2014					\$ 12,617.10	1.47%	28	\$ 14.23	\$ 299.91	\$ 12,917.01
March 2014					\$ 12,617.10	1.47%	31	\$ 15.75	\$ 315.66	\$ 12,932.76
April 2014					\$ 12,617.10	1.47%	30	\$ 15.24	\$ 330.90	\$ 12,948.01

*Board Prescribed Interest Rate

**Carrying charges on opening principal balances

Sub-account General Services 50 kW to 4,999 kW

Month /Year	Savings Month	Billing Determinants	Effective Variable Rates	Amount	Principal Balance	Interest Rate*	Days	Carrying Charges**	Year-to-Date Carrying Charges	Account Balance
January 2011		kW	\$ 1.58810	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
February 2011		kW	\$ 1.58810	\$ -	\$ -	1.47%	28	\$ -	\$ -	\$ -
March 2011		kW	\$ 1.58810	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
April 2011		kW	\$ 1.58810	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
May 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
June 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
July 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
August 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
September 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
October 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
November 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	30	\$ -	\$ -	\$ -
December 2011		kW	\$ 1.58220	\$ -	\$ -	1.47%	31	\$ -	\$ -	\$ -
January 2012	2,060	kW	\$ 1.58220	\$ 3,259.55	\$ 3,259.55	1.47%	31	\$ -	\$ -	\$ 3,259.55
February 2012	2,060	kW	\$ 1.58220	\$ 3,259.55	\$ 6,519.10	1.47%	29	\$ 3.80	\$ 3.80	\$ 6,522.89
March 2012	2,060	kW	\$ 1.58220	\$ 3,259.55	\$ 9,778.64	1.47%	31	\$ 8.12	\$ 11.91	\$ 9,790.56
April 2012	2,060	kW	\$ 1.58220	\$ 3,259.55	\$ 13,038.19	1.47%	30	\$ 11.78	\$ 23.70	\$ 13,061.89
May 2012	3,054	kW	\$ 1.59092	\$ 4,859.46	\$ 17,897.65	1.47%	31	\$ 16.23	\$ 39.93	\$ 17,937.58
June 2012	3,054	kW	\$ 1.59092	\$ 4,859.46	\$ 22,757.11	1.47%	30	\$ 21.57	\$ 61.49	\$ 22,818.60
July 2012	3,054	kW	\$ 1.59092	\$ 4,859.46	\$ 27,616.57	1.47%	31	\$ 28.33	\$ 89.83	\$ 27,706.40
August 2012	3,054	kW	\$ 1.59092	\$ 4,859.46	\$ 32,476.03	1.47%	31	\$ 34.38	\$ 124.21	\$ 32,600.24
September 2012	3,054	kW	\$ 1.59092	\$ 4,859.46	\$ 37,335.48	1.47%	30	\$ 39.13	\$ 163.34	\$ 37,498.83
October 2012	2,060	kW	\$ 1.59092	\$ 3,277.51	\$ 40,613.00	1.47%	31	\$ 46.49	\$ 209.83	\$ 40,822.83
November 2012	2,060	kW	\$ 1.59092	\$ 3,277.51	\$ 43,890.51	1.47%	30	\$ 48.94	\$ 258.77	\$ 44,149.27
December 2012	2,060	kW	\$ 1.59092	\$ 3,277.51	\$ 47,168.02	1.47%	31	\$ 54.65	\$ 313.41	\$ 47,481.43
January 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 372.30	\$ 47,540.32
February 2013					\$ 47,168.02	1.47%	28	\$ 53.19	\$ 425.49	\$ 47,593.51
March 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 484.38	\$ 47,652.40
April 2013					\$ 47,168.02	1.47%	30	\$ 56.99	\$ 541.37	\$ 47,709.39
May 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 600.26	\$ 47,768.28
June 2013					\$ 47,168.02	1.47%	30	\$ 56.99	\$ 657.25	\$ 47,825.27
July 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 716.14	\$ 47,884.16
August 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 775.03	\$ 47,943.05
September 2013					\$ 47,168.02	1.47%	30	\$ 56.99	\$ 832.02	\$ 48,000.04
October 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 890.90	\$ 48,058.93
November 2013					\$ 47,168.02	1.47%	30	\$ 56.99	\$ 947.89	\$ 48,115.92
December 2013					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 1,006.78	\$ 48,174.80
January 2014					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 1,065.67	\$ 48,233.69
February 2014					\$ 47,168.02	1.47%	28	\$ 53.19	\$ 1,118.86	\$ 48,286.88
March 2014					\$ 47,168.02	1.47%	31	\$ 58.89	\$ 1,177.75	\$ 48,345.77
April 2014					\$ 47,168.02	1.47%	30	\$ 56.99	\$ 1,234.74	\$ 48,402.76

*Board Prescribed Interest Rate

**Carrying charges on opening principal balances

2012 LRAMVA Rate Riders

effective May 1, 2014

Customer Class	Savings	Amount	Carrying Charges	Total LRAMVA	Billing Determinants	Unit	Rate Rider
Residential	3,048 MWh	\$ 42,449.59	\$ 1,115.68	\$ 43,565.27	1,085,576,654	kWh	\$ 0.00004
GS < 50 kW	1,384 MWh	\$ 12,617.10	\$ 330.90	\$ 12,948.01	398,880,653	kWh	\$ 0.00003
GS 50 to 4,999 kW	30 MW	\$ 47,168.02	\$ 1,234.74	\$ 48,402.76	3,932,952	kW	\$ 0.01231
Totals		\$ 102,234.72	\$ 2,681.32	\$ 104,916.04			