YUKON ENERGY CORPORATION

DIESEL CONTINGENCY FUND ("DCF") & RELATED AMENDMENTS TO THE ENERGY RECONCILIATION ADJUSTMENT ("ERA")

COMPLIANCE FILING – INTERROGATORY RESPONSES FILED

May 8, 2015

Yukon Utilities Board
(YUB)

REFERENCE: **Application, Table 1-1 (Page 1-4); Appendix A, Table A1 (page A-1); and Appendix B, Table B1 (page B-9)**

TOPIC: **Need for ERA**

PREAMBLE: **Clarification of the accounting requirements and assumptions behind the DCF and ERA calculations is needed.**

QUESTION:

a) Table 1-1 demonstrates the expected diesel generation with the long-term average (LTA) hydro generation for a range of YEC grid loads from 390 gigawatt hours (GWh) to 475 GWh. Table A1 provides the DCF calculation for the years 2012-2014, with the 2014 amounts based on preliminary actual numbers. Table B1 provides the ERA calculation for 2012 under Options A and B as stated in the application with each option compared to a drought scenario. For 2012, from Table 1-1 (and from line 15 of Table A1) for a YEC grid load (net of Fish Lake hydro and wind) of 423,310 MW.h, the expected diesel generation is 15,622 MW.h. Table A1 shows for 2012 actual diesel generation of 2,683 MW.h the DCF is credited for 12,939 (15,622-2,683) MW.h or at 28.71 cents/kW.h the dollar amount is $3,715,000. Table B1 shows that under LTA costs for 2012, there is a requirement to charge AEY $439,000 based on ERA calculations. Is the assumption on which these numbers are based that whatever amount gets credited to the DCF account (a balance sheet account), the offset is debited to an income statement account such as diesel costs or conversely, if the DCF account is debited, the income statement account is credited?

b) Is the income statement, no matter the load level, charged the LTA diesel costs for the grid load incurred? If yes, please explain and demonstrate numerically that there is not a double counting of diesel costs when considering the DCF and ERA.

c) If the response to part (b) above confirms there is no double counting between the DCF and ERA, please demonstrate by way of numerical example how YEC would be harmed if the ERA was discontinued with the existence of the DCF, as provided by YEC.

ANSWER:

(a)

Yes. Amounts credited to the DCF are charged to YEC's income statement account for diesel expenses. Conversely, amounts charged against the DCF (and paid to YEC) are credited to YEC's income statement account for diesel expenses. Diesel costs incurred for actual generation (net of capital charges or RFID charges) are also charged to YEC's income statement for diesel expenses.

(b)

Yes. Regardless of the grid load level, the income statement is charged the LTA diesel costs for the grid load incurred (net of secondary generation). LTA diesel for each year is determined by reference to Table 1-1 of the Compliance Filing, based solely on the actual grid load for the year (net of secondary generation, expected wind and LTA Fish Lake) generation.[1]

In the example for 2012 Actuals from Table A1, YEC's income account is charged for 15,622 MW.h of LTA diesel generation as the fuel expense for the actual firm grid load of 423,310 MW.h (net of LTA wind and LTA Fish Lake generation).

For income statement disclosure purposes, LTA diesel represents the total expense to YEC for that grid load. For a given grid load that occurs in any year, the LTA diesel cost to YEC's income statement is fixed and not affected by the range of DCF determinations that may occur depending on water conditions in that year. By way of example, the following shows a range of DCF outcomes for the same grid load and LTA diesel for 2012 (see Figure 1):

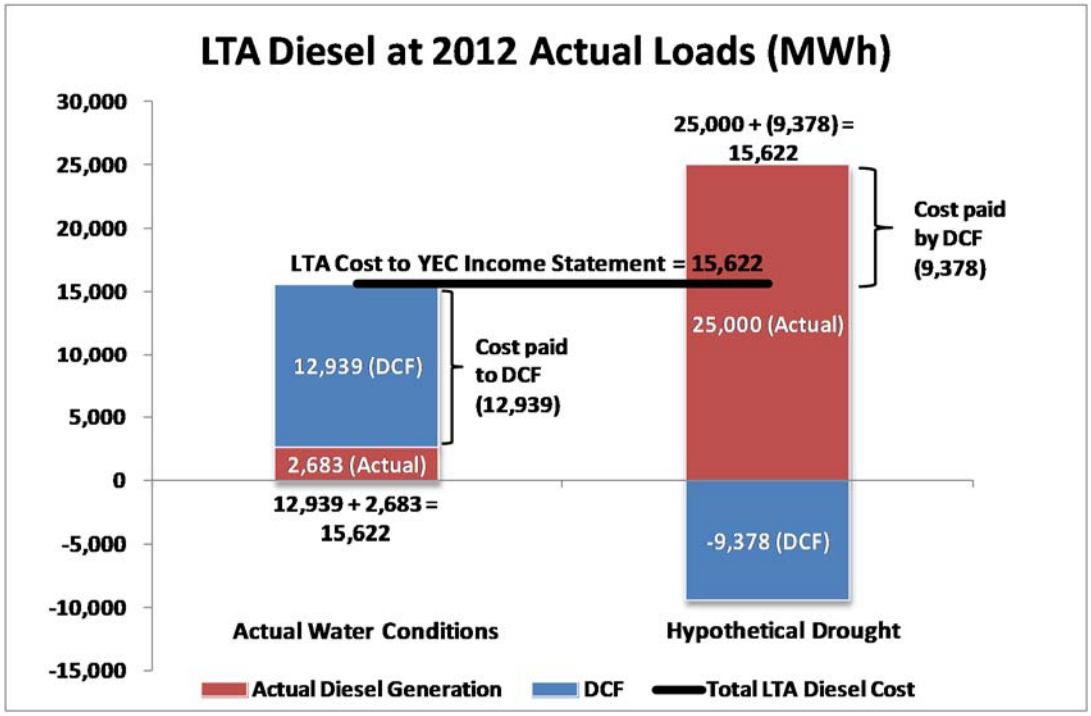
- Table A1, Line 18 (and Table B2, Line 18) shows the case which occurred, where actual diesel generation is less than LTA diesel. As described above, the total expense is 15,622 MW.h (LTA Diesel for the grid load). A portion of this total

[1] Table A1 at Lines 13 to 15 shows the determination of "expected" or LTA Diesel for each year from 2012 to 2014 based on actual grid load net of expected Fish Lake and Wind and Table 1-1, Attachment 1. The "Expected Diesel" values in Table 1-1 at various YEC grid loads were provided by the YECSIM model and its estimates of LTA YEC hydro generation at various grid load levels under the assumptions set out in the GRA (or as set out in any future filing with the Board for approved changes to Table 1-1).

is "allocated" to fuel cost for actual diesel generation (2,683 MW.h) and the residual becomes the transfer into the DCF (12,939 MW.h).

- Table B2, Line 18 shows a hypothetical drought case where actual diesel generation is more than LTA diesel. The total expense remains 15,622 MW.h (LTA Diesel for the grid load). In the drought case, however, the actual diesel generation at 25,000 MW.h exceeds this LTA diesel. Therefore, the DCF is drawn down (credit of 9,378 MW.h to fuel expense on the income statement), to reduce the 25,000 MW.h to the 15,622 MW.h LTA diesel.

Figure 1: LTA Diesel at 2012 Actual Loads (MW.h)



In summary, the LTA diesel cost in any year on YEC's income statement is determined by the actual grid load and not by the DCF per se, i.e., the DCF is only derived after the LTA diesel is determined.

The ERA in any year relates to the LTA diesel cost for YEC and not to the DCF. Accordingly, there is no double counting of the diesel costs when considering the DCF and the ERA.

The ERA does not record any "additional" diesel cost - it only reallocates a share of the recorded LTA diesel cost variance from the GRA forecast to the wholesale customer (based on that customer's share of responsibility for the load variance from GRA forecast).

As reviewed in response to YUB-YEC-1-003(a), the following example for 2012 explains and demonstrates how the ERA is derived and that there is no double counting of diesel costs when considering the DCF and ERA (see also Figure 2 and Table A-1 in Attachment 1-1):

- YEC's GRA revenue requirement included 7,926 MW.h of LTA diesel costs based on a forecast load of 405,314 MW.h (net of expected wind generation and assuming LTA Fish Lake - see Table B1, Line G).

- YEC's actual 2012 grid load was 423,310 MW.h, or 17,995 MW.h higher than GRA forecast. In Figure 2, the bar on the left stratifies this incremental load in 2012 by "source", i.e., to the wholesale customer (AEY), to YEC retail and major industrial customers, and to overall YEC system losses.

- As a result of the higher-than-GRA forecast grid load of 17,995 MW.h, YEC incurred added costs on its income statement for 7,696 GW.h of LTA diesel due to grid load being higher than forecast in the GRA (LTA diesel @ actual load = 15,622 MW.h minus LTA diesel at GRA load = 7,926 MW.h). In Figure 2, the bar on the right stratifies this incremental LTA diesel impact by "source".
    - Incremental LTA or expected diesel averaged 42.77% of the incremental grid generation load (7,926 MW.h divided by 17,995 MW.h).
    - Wholesale sales being higher than GRA forecast are estimated to account for 14,440 MW.h of the total added grid generation load of 17,995 MW.h (13,272 plus 8.8% losses), and 6,176 MW.h of the total added LTA diesel costs of 7,696 MW.h (14,440 times 42.8%).
    - On a similar basis, higher retail and industrial sales can be estimated to account for 1,287 MW.h of added LTA diesel costs (the balance of 233 MW.h added LTA diesel costs reflecting the impact of a higher average system losses on all grid sales).

- As shown in Figure 2, the ERA allows YEC to recover from its wholesale customer the portion of added expected diesel generation costs incurred by YEC (i.e., costs to YEC over and above the expected diesel generation costs as approved for the GRA forecast grid load, net of any related added revenues) that is due to added wholesales over and above the wholesales approved in the GRA. Table B1 shows the steps to make this determination, resulting in an ERA charge to YECL for 6,176 MW.h of added diesel generation.[2]

- Therefore, YEC incurred higher LTA diesel costs of 7,696 MW.h due to load growth above GRA forecasts, and wholesales is responsible for 6,176 MW.h of this cost increase. The ERA allows YEC to recover from YECL the portion of YEC's LTA diesel cost increase caused by wholesales (net of any related revenue increase).

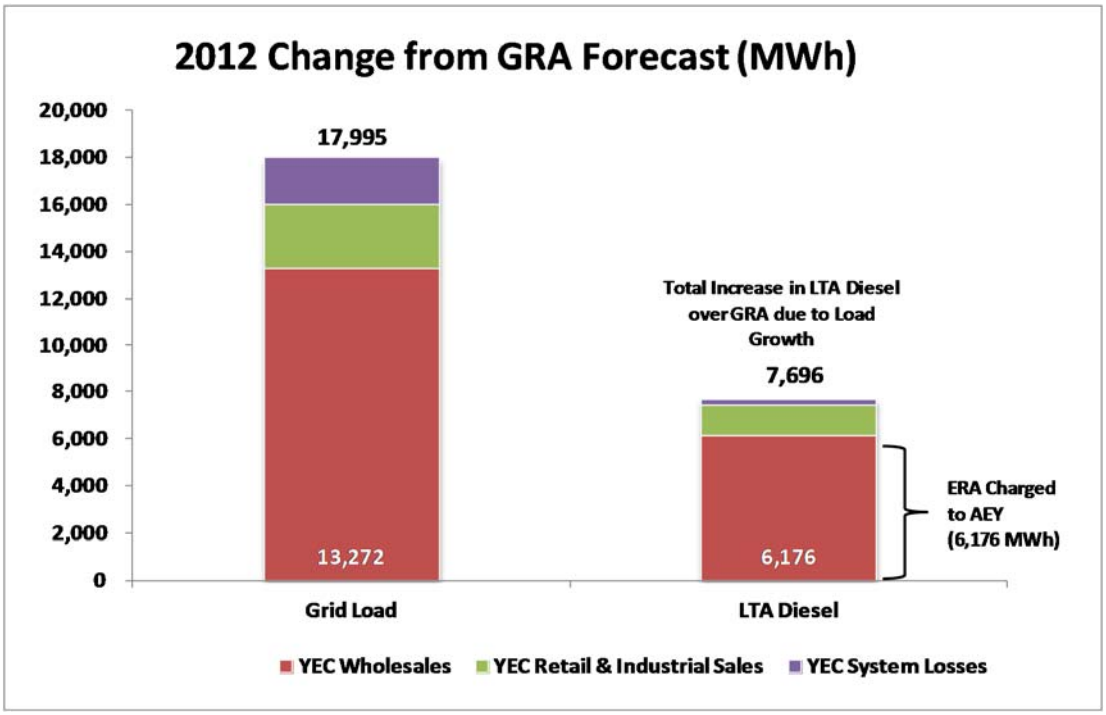
- The ERA determination derives entirely from the LTA diesel determination for YEC, and is not affected by DCF determinations, i.e., the ERA amount for 2012 in Table A-1 is not affected by swings in DCF amounts depending on actual water conditions and actual hydro generation.

- In short, there is no double counting of diesel costs when considering the DCF and ERA.

Figure 2 and Table A1 in Attachment 1-1 summarize the key points from the above example, showing that the ERA allows YEC to recover a portion of its added LTA diesel cost increase resulting from grid load increases compared to the GRA forecast.

[2] The steps set out in Table B1 take into account incremental wholesales above GRA (net of Fish Lake impacts), the related incremental generation required for these wholesales (after including grid losses), and the 42.8% average incremental LTA diesel generation required for YEC's overall incremental generation (relative to GRA forecast).

Figure 2: 2012 YEC Change (Increase) from GRA Forecast (MW.h)



(c)

If the ERA was discontinued, then YEC would not be able to recover the incremental diesel costs it faces when YECL wholesales are higher than GRA forecast. This would have an adverse financial impact to YEC.

In the above example under (b) for 2012, YEC would be unable to recover the incremental costs incurred on its income statement for the 6,176 MW.h of added diesel generation resulting from YECL wholesales exceeding GRA forecasts upon which YEC's rates were approved. As demonstrated in Table B1, these incremental costs (at $0.2871 per kW.h) equal $1.773 million; net of incremental revenues of $1.335 million earned by YEC on these added wholesales, the net amount of $0.439 million would not be recovered by YEC if the ERA was discontinued.

It is noted that the ERA also works to protect YECL in situations when YECL wholesales are less than GRA forecast. For example, Table B3 provides preliminary 2014 results show overall grid load and wholesales both below GRA forecasts, and a resultant ERA payment by YEC to YECL of $0.19 million.

Attachment 1-1:

Table A-1: DCF and ERA at 2012 Actual Loads (MW.h)

		LTA Diesel	
	Grid Load	**Actual Water Conditions**	**Hypothetical Drought**
GRA Forecast	405,314	7,926	7,926
Incremental Growth			
YEC Wholesales	13,272	6,176	6,176
YEC Retail & Industrial Sales	2767	1,288	1,288
YEC System Losses	1,956	233	233
Total Change	17,995	7,696	7,696
LTA Diesel share of Load Growth		42.77%	42.77%
Total Actual Load & LTA Diesel	423,309	15,622	15,622
Diesel Cost Impacts on YEC Income Statement			
Actual Diesel Generation		2,683	25,000
DCF		12,939	-9,378
Total LTA Diesel Cost		15,622	15,622
ERA Impact on YEC Income Statement (before consider revenue offsets)			
Wholesales charge AEY	13,272	6,176	6,176
Final Net LTA Diesel Cost to YEC		9,447	9,447

REFERENCE: **Application, Appendix A, Table A1 (page A-1); Appendix B, Table B1 (page B-9)**

TOPIC: **Fish Lake**

QUESTION:

a) In Table A1, line 3 shows Fish Lake (FL) generation of 3,388 MW.h. Line 10 shows expected generation for FL at 4,380 MW.h. How was the line 3 generation for FL determined?

b) For line M, please explain the meaning of Fish Lake impact and provide how the 992 MW.h was derived.

ANSWER:

(a)

The Fish Lake generation of 3,388 MW.h shown in Line 3 of Table A1 is the actual generation from Fish Lake for 2012 as provided by ATCO Electric Yukon.

During 2012, Unit #1 of FL was not in service. Line 10 of Table A1 therefore showed the approved long-term average for FL for 2012 at 4,380 MW.h [8,730 less 4,350 for Unit #1].[1]

(b)

Line M of Table B1 shows 992 MW.h for 2012. This number was derived by subtracting actual FL generation for 2012 from expected or LTA FL generation for 2012 [4,380-3,388=992 MW.h],[2] and indicates that FL generation in 2012 was 992 MW.h less than LTA or expected FL generation.

[1] Board Order 2009-02 and Board Order 2014-06 approved LTA for FL at 8,730 MW.h with both Units. In 2012 and 2013, Unit #1 of FL, which accounts for 4,350 MW.h of the FL LTA, was not in service.
[2] See response to (a) for actual and expected or LTA FL generation for 2012.

The purpose of Line M in Table B1 is to remove the impact of FL (as defined here) when assessing changes in YECL wholesales that are subject to the ERA. Accordingly, the following occur in Table B1 (numbers for 2012):

- Line L shows the incremental wholesales (actual wholesales less GRA approved forecast) [310,264-296,000=14,264 MW.h].

- Line M shows the "Fish Lake Impact" on YECL wholesales, i.e., the extent to which wholesales have been increased (or decreased) due to FL actual generation being less than (or more than) LTA or expected FL generation. [992 MW.h as derived above].

- Line N shows incremental wholesales net of Fish Lake [14,264-992=13,272 MW.h]. The net impact is to reduce the incremental wholesale amount used to determine the ERA to be charged to AEY.

- In summary, if FL had been operating at LTA, AEY would have only needed to purchase 13,272 MW.h of incremental wholesales.

FL variance from LTA generation is addressed in the DCF determination (see Table A1) as directed in Order 2013-1 (paragraph 255), and YEC's Expected Diesel Generation in rates (Line 16) therefore assumes LTA FL generation has been removed from the YEC Grid load (Line 12).

Accordingly, there is no basis for YEC to charge AEY an ERA for the FL impacts on added wholesales in 2012 (as these added wholesales due to lower FL generation did not increase YEC's expected LTA diesel generation requirements).

REFERENCE: **Application, Appendix B, Table B1 (page B-9)**

TOPIC: **Total YEC expected incremental diesel generation (line E)**

QUESTION:

a) Line C shows expected total diesel generation for the 2012 net YEC grid load. Line E provides a determination of YEC expected incremental diesel generation based on the last approved GRA net load (405,314 MW.h). If the DCF calculation covers total actual net load, please explain how the diesel generation in the incremental net load calculations has not already been accounted for in the DCF calculation.

b) Table B1 determines the ERA or incremental diesel costs incurred by YEC due to wholesales to YECL being higher than the last approved GRA level of wholesales to YEC. How does YEC collect the incremental diesel costs for sales from YEC customers (not including wholesales to YECL) that are above the last GRA approved level of sales?

ANSWER:

(a)

The incremental LTA diesel generation (Line C in Table B1) from incremental grid load ***has*** been reflected in the DCF calculation. As reviewed in response to YUB-YEC-1-001, the DCF is determined based on the difference between LTA diesel generation at the grid load incurred and actual diesel consumed, i.e., the DCF equals LTA diesel less actual diesel generation.

Additional comment is provided below to assist on this matter.

First, the following are clarified from Table B1 for 2012 (assuming "Actual diesel Costs" based on LTA):

1. Line C shows expected diesel of 15,622 MW.h at LTA for the actual 2012 grid load (423,310 MW.h; line F), this equals:

- Line A (actual diesel generation) of 2,683 MW.h [per Table A1]; plus
- Line B (actual diesel paid by YEC to DCF) of 12,939 MW.h [per Table A1].

2. Line E shows YEC's expected incremental diesel generation of 7,696 MW.h; this equals:
   - Line C (expected diesel generation at actual load) of 15,622 MW.h; less
   - Line D (expected diesel generation at GRA load; 405,314 MW.h; line G) of 7,926 MW.h.

YEC's payment into the DCF fully reflects the expected diesel at the actual grid load, net of actual diesel generation that occurred on the grid. The net result for 2012 is that YEC incurs added costs for 7,696 GW.h of diesel due to grid load being higher than forecast in the GRA.

YEC's Rate Schedule 42 applicable to wholesales provides for an average rate on all wholesales plus an ERA applicable (i) only when the DCF is active, and (ii) only on incremental wholesales (relative to the GRA forecast used to set rates) that affect incremental costs or savings to YEC for diesel.

Accordingly, in the context of the above 2012 example, the ERA allows YEC to recover from its wholesale customer the portion of added expected diesel generation costs incurred by YEC (i.e., costs to YEC over and above the expected diesel generation costs as approved for the GRA forecast grid load, net of any related added revenues) that is due to added wholesales over and above the wholesales approved in the GRA.

(b)

YEC does not collect all incremental diesel costs caused by incremental sales (i.e., sales above the last GRA approved levels) to its retail and major industrial customers (i.e., customers other than wholesales to YECL). Partial offset of such incremental diesel costs occurs to the extent provided for in approved customer rates. This is consistent with the Board's direction in Order 2015-01, Appendix A (page 30) as follows:

> *The Board is of the view that for sales in excess of the forecast, the risks lie with the regulated utility. That is, the utility assumes the forecast risk for those*

revenues and related costs in excess of forecast and for those periods where there is no forecast — non-test years.

A key purpose of the ERA is to ensure that YEC is kept whole with regard to costs incurred for **wholesales** to the retail utility (where YECL uses all such purchases for re-sale to retail customers). Accordingly, Rate Schedule 42 includes specific provisions (through the ERA) to address specific incremental diesel cost impacts related to variances from the approved GRA wholesale load forecast used to set the average rate that otherwise applies under Rate Schedule 42.

No similar provisions exist to keep YEC whole with regard to costs incurred for YEC sales to its retail or major industrial customers.

REFERENCE: **Appendix A to Board Order 2015-01, pages 22-23; Application, page 4**

TOPIC: **ERA**

The Board notes that ECSIM is a planning model and does not lend "itself to retrospective verification".
…

For the ERA, the Board interprets costs narrowly; to be clear, the costs are for actual diesel generation costs, not forecast or derived costs from the YECSIM model.

and

In summary, as reviewed in Appendix B, adoption of Reference B for YEC's actual diesel costs (i.e., before any DCF determinations) when implementing the ERA yields impacts which YEC believes would be patently unacceptable to all stakeholders including the Board.

QUESTION:

a) If the ERA model worked on the premise that if actual diesel generation (not based on DCF expected levels) is less than or equal to expected diesel generation, there would be no ERA determination, otherwise there would be an ERA determination according to Table B1 (Actual diesel costs based on Long-term Average), what would the impact be to YEC? Would this eliminate the "patently unacceptable" impacts to all stakeholders? Please explain.

b) If in the response to part (a) above, there is an impact to YEC, please provide the detailed calculations showing that impact.

c) In Table B1, please confirm that the added revenue (Line Q) is added revenue to YEC and that it is based on the wholesale rates charged to YECL.

ANSWER:

(a) and **(b)**

It is YEC's understanding that the question is asking about the impact of applying the ERA as follows (Table B1 is used for reference):

i. If actual diesel generation (Line A in Table B1) is less than or equal to expected diesel generation (assume that this means Line D in Table B1, i.e., expected diesel generation at GRA load): then no ERA determination; and

ii. Otherwise (i.e., if actual diesel generation at Line A in Table B1 is more than expected diesel generation at Line D in Table B1): there would be an ERA determination according to Table B1 with actual diesel costs based on LTA.

As demonstrated for 2012 in Table B1 and in response to YUB-YEC-1-001, having no ERA per (i) above, when actual diesel generation as defined therein does not exceed GRA expected diesel, would result in harm to YEC.

- More specifically, under such a procedure YEC would not be able to recover the incremental LTA diesel costs relevant to increase in wholesales in 2012.

- This would have adverse financial impact to YEC at $0.439 million as per Table B1 (see response to YUB-YEC-1-001 for detailed calculations showing the impact on YEC).

This outcome is logical given the following points:

- The harm to YEC from increased wholesale load is higher total diesel cost based on LTA or expected diesel cost impacts, not based on actual diesel generation.

- Actual diesel generation at current grid loads is typically affected mainly by actual water availability rather than actual grid loads, and can vary widely from year to year regardless of actual grid loads or changes to grid loads from GRA forecasts.

- Higher LTA diesel costs are therefore not tied to actual diesel generation per se, and the fact that actual diesel generation is less than GRA forecast at LTA has no bearing on the LTA diesel costs that YEC will include in its income statement.

In summary, as reviewed in response to YUB-YEC-1-001(a), the fact that actual diesel generation per Line A of Table B1 is less than expected diesel at GRA load forecast has no relevance as to what costs YEC incurs on its income statement for diesel generation at the grid load actually incurred.

- As shown in Table B1, in 2012 YEC incurred costs on its income statement for 15,622 MW.h of expected diesel generation - with 7,696 MWh of expected incremental diesel generation due to higher grid loads than forecast in the GRA, and a net cost to YEC of $0.439 million from higher wholesales than forecast in the GRA (after considering added revenues).

- The fact that actual diesel generation per Line A was only 2,683 MW.h had no bearing on the costs that YEC incurred on its income statement for 2012 (because these costs on YEC's income statement must reflect the LTA of 15,622, MW.h).

- Table B3 shows a similar issue for 2014 preliminary (where actual diesel per Line A is also less than GRA expected diesel), except that in this instance actual grid load and actual YECL wholesales are both less than GRA forecast and YECL would be the party harmed by failure to have an ERA determination (i.e., the ERA would provide for a rebate of $0.19 million to YECL).

The above deal with a case where actual diesel generation is less than expected diesel generation.

The "patently unacceptable" impacts to all stakeholders as demonstrated in the Compliance Filing related to the drought example where actual diesel generation exceeds expected diesel generation. In cases where actual diesel generation is more than expected diesel generation and an ERA is determined per (ii) above (with actual diesel costs based on LTA), the "patently unacceptable" impacts to all stakeholders would be eliminated (see Table B1). In general, whenever actual diesel generation

exceeds GRA forecasts for expected diesel, YEC would also be able to recover the incremental diesel costs relevant to increase in wholesales.

(c)

Confirmed, Line Q of Tables B1 and B3 is the added revenue to YEC. The calculation of the added revenue to YEC includes approved wholesale rate of 8.298 cents/kW.h plus average approved YEC Rider J per kW.h (which YECL is required to flow through to YEC). Please refer to Note 4 to Table B3 in Appendix B of YEC's Compliance Filing.

REFERENCE: **Application, Table 1-1, page 1-4**

TOPIC: **Inclusion of load levels 390 and 395 (GWh)**

QUESTION:

a) Were the 390 and 395 GWh load levels provided or based on results from the YECSIM model?

b) If the answer to part (a) above is yes, please confirm that all variables and parameters used in the model were identical to those used from Table 1.1-1 provided in YEC's January 31, 2014 Revised DCF Proposal.

c) If part (b) above is not confirmed, please explain and provide details of all changes including tables with columns showing the original assumption or parameter an adjacent column showing the revised assumption or parameter and a third column providing a reason for the change.

ANSWER:

(a)

Yes.

(b)

Confirmed.

(c)

The response to (b) is confirmed.

REFERENCE: **Application, Attachment 2, page 2-1**

TOPIC: **Rider E Rate Schedule**

QUESTION:

a) Please provide revised Rider E rate schedules with the same ending date (March 31, 2016) but with commencement dates of July1, 2015; August 1, 2015; and September 1, 2015.

b) Please indicate any assumptions with regards to the calculations used in the determination of the different start dates as described in part (a) above.

ANSWER:

(a) and **(b)**

Please see Table 1 below for the requested estimates, which show the following Rider E:

- As proposed in YEC's Compliance Filing a refund of 0.43 cents/kW.h will be applied to all firm kW.h consumed for the period from May 1, 2015 to March 31, 2016.

- A refund of 0.56 cents/kW.h will be applied to all firm kW.h consumed for the period from July 1, 2015 to March 31, 2016.

- A refund of 0.61 cents/kW.h will be applied to all firm kW.h consumed for the period from August 1, 2015 to March 31, 2016.

- A refund of 0.68 cents/kW.h will be applied to all firm kW.h consumed for the period from September 1, 2015 to March 31, 2016.

For the purpose of the calculations of Rider E with different commencement dates, YEC assumed the following:

- Effective July 1, 2015 to end of March 31, 2016, Rider E estimated based on YEC and AEY firm retails, including major industrial, sales for the 9 months of 2014 [excludes April-June sales];

- Effective August 1, 2015 to end of March 31, 2016, Rider E estimated based on YEC and AEY firm retails, including major industrial, sales for the 8 months of 2014 [excludes April-July sales]; and

- Effective September 1, 2015 to end of March 31, 2016, Rider E estimated based on YEC and AEY firm retails, including major industrial, sales for the 7 months of 2014 [excludes April-August sales].

AEY monthly sales are based on most recent data provided by AEY.

YEC also updated the total sales for the previous 12 months based on most recent actual data available for both YEC and AEY, which is lower by about 250 MW.h compared to the total firm retail sales noted in Table A3 of YEC's Compliance Filing.[1]

[1] Updated YEC and AEY retail sales for the previous 12 months do not affect the 2014 numbers as per the Compliance Filing for the DCF (Table A1) or the ERA (Table B3) as the changes mostly reflect updates to AEY 2014 actuals.

Table 1: Rider E Estimates with Different Effective Dates

Line	Activity	Rider Estimate
Proposed DCF Refund Rider (cents/kW.h) Effective May 1, 2015		
A	**DCF Rebate/(Collections) Required ($000s)**	**$1,627**
B	Retail & Major Industrial Sales for the previous 12 months (MW.h)	**379,268**
C=A/B	**Proposed DCF Refund Rider (cents/kW.h) Effective May 1, 2015**	**0.43**
DCF Refund Rider (cents/kW.h) Effective July 1, 2015		
A	**DCF Rebate/(Collections) Required ($000s)**	**$1,627**
B	Retail & Major Industrial Sales for the 9 months of 2014 (MW.h)	**291,442**
C=A/B	**Proposed DCF Refund Rider (cents/kW.h) Effective May 1, 2015**	**0.56**
DCF Refund Rider (cents/kW.h) Effective August 1, 2015		
A	**DCF Rebate/(Collections) Required ($000s)**	**$1,627**
B	Retail & Major Industrial Sales for the 8 months of 2014 (MW.h)	**264,625**
C=A/B	**Proposed DCF Refund Rider (cents/kW.h) Effective May 1, 2015**	**0.61**
DCF Refund Rider (cents/kW.h) Effective September 1, 2015		
A	**DCF Rebate/(Collections) Required ($000s)**	**$1,627**
B	Retail & Major Industrial Sales for the 7 months of 2014 (MW.h)	**240,225**
C=A/B	**Proposed DCF Refund Rider (cents/kW.h) Effective May 1, 2015**	**0.68**