

1 Q. (Reference 2017 GRA Volume II, Exhibit 13, pages 52 of 60 through 60 of 60) Please
2 identify all jurisdictions in the survey that are using Hydro’s proposed methodology
3 for allocating specifically-assigned O&M costs, and all jurisdictions that are using
4 Hydro’s current methodology for allocating specifically-assigned O&M costs.

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7 A. This response was provided by CA Energy Consulting.

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9 The referenced memorandum did not attempt to identify utilities using Hydro’s
10 exact current or proposed methodologies for allocating O&M costs pertaining to
11 specifically assigned transmission assets. As noted therein, utilities apply no
12 dominant methodology in the relatively few cases in which such O&M is not
13 allocated in common with other transmission O&M costs. Instead, other utilities
14 that engage in direct assignment of such O&M costs appear to use their own
15 custom-tailored method. Thus, while other utilities utilize approaches with some
16 features similar to Hydro’s methods, none can be said to utilize Hydro’s current or
17 proposed methods. Based on the industry practice revealed in the table, the lack of
18 exact parallels with Hydro’s approach is of no significance.