Interrogatories of Commission Expert

TO: **Maritime Electric Company, Limited**

FROM: **Synapse Energy Economics, Inc.**

DATE: **December 6, 2021**

RE: **UE22503 - Rate Design**

Synapse Second Set of Information Requests to Maritime Electric
December 6, 2021

1) Please refer to MECL's response to IR-10 from Synapse Energy Economics, Inc., in which MECL provided farm customer interval meter data for 2018-2020.
   a) Please confirm that the data provided in response to this IR reflect hourly consumption, and not consumption over some other interval (e.g., 15-minute intervals).
   b) Please confirm that the data provided in response to this IR are the same data that were analyzed in the Farm Study. If yes, please also confirm that the metered accounts are those of "larger" farms, as indicated in the Farm Study (see page 5 of the Farm Study).
   c) Using the data provided by MECL in response to this IR, Synapse has calculated that the average monthly consumption for 2020 for the sample of 87 meters is approximately 959 kWh. Please confirm that this result is accurate, and please further explain why, if the foregoing calculation is accurate, the average consumption is so low for this sample for 2020 given that the focus was on larger farms.

2) Refer to MECL's Application for an Order to Approve the Stage 1 Rate Design Changes filed on May 14, 2021 ("Application"), Appendix A ("Farm Study"). On page 25 of the Farm Study, it is noted that there are approximately 2,200 Residential accounts that are identified as farms by SIC code, whereas in Table 3 of the Application (on page 24), there are reported to be 418 farms with average monthly consumption exceeding 5,000 kWh. Please confirm that the 1,782 farms with monthly consumption of 5,000 kWh or less are included in the totals for the other cohorts in Table 3.

3) Refer to Table 3 on page 24 of the Application for an Order to Approve the Stage 1 Rate Design Changes filed on May 14, 2021.
   a) Please provide the number of farm customers included in Cohort 1 (Usage up to 2,300 kWh) and, separately, the number of farm customers included in Cohort 2 (Usage 2,301 to 5,000) kWh.
   b) Please explain whether the values in column B ("2017 Base Revenue ($000s)") reflects revenues calculated using March 2019 – February 2020 billing determinants, or something else.
   c) Please provide the workpapers showing the calculation of Table 3 values in native format.

4) Refer to Table 4 on page 25 of the Application for an Order to Approve the Stage 1 Rate Design Changes filed on May 14, 2021.
   a) Please explain in detail how the change in residential allocated costs from the preliminary residential load study results was calculated. For example, please explain whether the 2017 cost allocation study unit costs were multiplied by the March 2019 – February 2020 billing determinants, or whether the allocation factors in the 2017 Cost Allocation Study were modified.
   b) Please provide the workpapers showing the recalculation of the residential allocated costs in native format.

5) Refer to Table 2 on page 6 of the Farm Study. Please confirm that the total number of residential accounts reported for each farm type, in the first row, is inclusive of the number of farms indicated in the second row.

6) Refer to MECL's response to IR-9 from Synapse Energy Economics, Inc; Table 7 from the 2017 Cost Allocation Study; and Table 7 from the 2020 Cost Allocation Study. The table below compares the number of sites for selected customer classes in the 2017 Cost Allocation Study and the 2020 Cost Allocation Study.

	Sites		
Class	2017 CAS	2020 CAS	Change
Residential	57,286	61,785	4,499
Residential (S)	7,504	7,709	205
Farm	2,094	523	(1,571)
General Service 1	7,191	7,487	296
General Service 1 (S)	1,704	1,690	(15)
Small Industrial	291	288	(3)

   a) Please provide a detailed accounting of the change in the number of farms from 2017 to 2020. That is, provide the number of farms that were reclassified into each class, as well any reduction in the overall number of farms.
   b) Please explain the basis for any changes in classification of customers as "farms" to other classes, and provide all supporting data and analysis to justify such changes.
   c) MECL's response to IR-9 states that farms with consumption of less than or equal to 5,000 kWh per month are included in the 523 sites in the Cost Allocation Study, and that only 418 farms have consumption greater than 5,000 kWh per month. Please explain whether including farms with usage less than or equal to 5,000 kWh in the "farm" class in 2020 is consistent with the approach described in response to (b) above.
   d) Please provide a revised Table 7 for the 2020 Cost Allocation Study that uses the same classification scheme used in the 2017 Cost Allocation Study for farm customers (i.e., classifying such customers as "farms" rather than as residential or other types of customers.)
   e) Please provide a revised Table 8 for the 2020 Cost Allocation Study that uses the same classification scheme used in the 2017 Cost Allocation Study for farm customers (i.e., classifying such customers as "farms" rather than as residential or other types of customers.)
   f) Please provide a revised Table 11 for the 2020 Cost Allocation Study that uses the same classification scheme used in the 2017 Cost Allocation Study for farm customers (i.e., classifying such customers as "farms" rather than as residential or other types of customers.)