

IC-435 PUB

In relation to lines 19 to 20 at page 11 of the Evidence, please provide a list of the integrated utilities in North America which rely on the Minimum System, which rely on the Zero Intercept System and which rely on any other system.

Response:

Our statements were based on our firm's experience with ratemaking in many different jurisdictions. EES Consulting has not performed a specific survey of utilities in North America.