- (Reference April 5, 2024 Grant Thornton Report, Executive Summary, point 6) It is Q. 1 2 stated "The difference between WACC and Rate of RORB in the 2024 Rate of RORB 3 Application is largely due to reconciling items between invested capital and rate base, primarily the RSA. The example calculation of the RORB does not consider the impact 4 5 of any reconciling items between invested capital and rate base. In a GRA, the test 6 year forecast rebalances the RSA and this is not a material issue. However, in non-7 test years the reconciling items could be significant as the RSA is functioning without 8 a rebalancing effect."
  - a) How significant are the "reconciling items" in this 2024 non-test year?
  - b) Should the RSA be rebalanced whenever the Board approves a change in rates proposed by the utility?
- 13 A. a) The reconciling items for the 2024 non-test year is approximately \$33 million. 14

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b) The response to this depends on the scope of the utility application being considered by the regulator at the time. In instances where the utility is requesting a rate increase based on an overall change in revenue requirement then yes, the RSA should be rebalanced as a part of that process. However, in our opinion if the application is focused on the review of a particular component of revenue requirement, such as the rate of return on rate base, the filing would not require the rebalancing of the RSA at that time.