

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR AN ORDER OF THE COMMISSION)
AUTHORIZING APPLICANT TO MODIFY ITS)
RATES, CHARGES, AND TARIFFS FOR RETAIL)
ELECTRIC SERVICE IN OKLAHOMA)

CAUSE NO. PUD 201500273

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CORPORATION COMMISSION
OF OKLAHOMA

Direct Testimony

of

William H. Wai

on behalf of

Oklahoma Gas and Electric Company

December 18, 2015

William H. Wai
Direct Testimony

1 Q. **Please state your name and business address.**

2 A. My name is William H. Wai. My business address is 321 North Harvey, Oklahoma City,
3 Oklahoma 73102.
4

5 Q. **By whom are you employed and in what capacity?**

6 A. I am currently employed by Oklahoma Gas and Electric Company (“OG&E” or
7 “Company”) as Manager of Pricing. I am responsible for retail electricity pricing, rate
8 design and tariffs. In that capacity, I direct and supervise the Company’s pricing team
9 that develops and supports pricing structures, charges and service provisions of tariffs,
10 product platforms, pilot programs and other retail electricity pricing initiatives. On a
11 normal day, the pricing depart collects customer usage and revenue data, analyzes various
12 cost information, researches different regulated retail electricity pricing practices, and
13 studies the impacts of OG&E’s pricing practices on customers. My responsibilities also
14 include overseeing implementation of the Company’s retail electricity rate and pricing
15 plans.
16

17 Q. **Please summarize your educational background and professional qualifications.**

18 A. I earned my Bachelor of Science in Economics from Guangdong Institute for Nationals in
19 Guangdong, China. I have a Masters of Business Administration from the University of
20 Oklahoma awarded in 2000. My current responsibility includes directing and supervising
21 the research of retail customers, and developing appropriate pricing schedules for
22 incorporation into the retail tariffs. Prior to assuming my current position in OG&E, I
23 have worked with the Company in various positions in the Investor Relations, Corporate
24 Risk, and Structured Services. Within Structured Services, I was initially hired as Senior
25 Quantitative Analyst and consequently promoted to be the Director of the department.
26 During the 12 years I worked with the Structured Services group, my responsibilities
27 included valuating and pricing complex commercial transactions across various financial
28 engineering frameworks, and quantifying various financial risk measures in the
29 Company’s business management efforts. I am a Financial Risk Manager and an Energy

1 Risk Professional both certified by the Global Association of Risk Professionals
2 (“GARP”). I am also a member of Chartered Financial Analyst (“CFA”) Oklahoma
3 Society.
4

5 Q. **Have you previously filed testimony before the Oklahoma Corporation Commission**
6 **(“Commission”)?**

7 A. No.
8

9 Q. **What is the purpose of your testimony?**

10 A. The purpose of my testimony is three-fold. First, I will briefly describe the process of
11 developing the rates proposed by the Company in this application. Second, I describe
12 structural changes to certain of the Company’s existing tariffs. These changes are aimed
13 at attaining the goals addressed by OG&E witnesses Ahmad Faruqui and Bryan J. Scott.
14 Third, I show comparisons between the current and proposed rates, and discuss customer
15 impact associated with these changes and updates. Finally, I sponsor OG&E’s Proof of
16 Revenue (Schedules M-1 through M-5 as well as Schedule N) proposed rate design.
17

18 Developing Proposed Rates

19 Q. **Please generally describe how the Company develops the rates requested in a**
20 **general rate case?**

21 A. The major steps in developing new or updated rates are as follows:

22 1) Develop *pro forma* year data - actual test year data (revenues and billing
23 determinants¹) are collected. The information is then adjusted so that rates can be
24 designed based on the revenues and expenses which are expected to occur in a normal
25 year of operations. The results of these normalizing adjustments are typically referred to
26 as the *pro forma* year data. The specific adjustments for the test year used in this
27 application are presented in Schedule H-2 of this filing and addressed in more detail by
28 OG&E Witness Gwin Cash.

29 2) Determination of revenue in the *pro forma* year from current rates - current rate
30 revenue is calculated by applying the rates approved in the Company’s previous rate case

¹ Billing determinants are customers’ kWh usage, kW demand, and customer count.

1 to the billing determinants contained within the *pro forma* year data. The Proof of
2 Revenue Schedule M-4, which I sponsor, includes the calculation of current rate revenue
3 for each rate class.

4 3) Cost of Service Study (“COSS”) - the *pro forma* year data along with other inputs are
5 used in the development of the Cost of Service Study (“COSS”) as described in the direct
6 testimony of OG&E witness David Smith. Elements of the resulting Cost of Service
7 Study serve as the foundation for rate design.

8 4) Rate design – the cost of providing service developed in the COSS is compared to the
9 *pro forma* revenue from current rates and a deficiency or surplus is identified. Proposed
10 rates are then designed to recover the appropriate revenue. The COSS provides the
11 revenue requirement by class and are adjusted through the revenue allocation process.
12 OG&E witness Bryan J. Scott describes the revenue allocation process and presents those
13 results in his Direct Testimony.

14 5) Proof of revenue – the proposed rates are used to calculate the proposed revenue for
15 each rate class. Schedule M-4 shows these calculations, including, the sum of the revenue
16 requested from each rate classes, plus other listed revenue, equaling the total OG&E
17 requested revenue.

18
19 **Q. What are the Company’s objectives when designing rates?**

20 **A.** The Company’s rate design is driven by the following objectives:

- 21 • promotion of efficient consumption of energy,
- 22 • provide pricing product choices that meet customers’ pricing preferences, and
- 23 • recovery of authorized revenue requirements.

24
25 **Q. How does OG&E develop the proposed rates?**

26 **A.** As discussed, the proposed rates are designed to incorporate the change in rates that
27 ensure revenues match the deficiency or surplus defined within the revenue allocation
28 process. Major steps of the rate design process include determination of the unit costs for
29 each rate class, application of the unit costs and marginal costs to create initial price
30 levels, determination of rate structure and final rates through an iterative process to
31 ensure proper recovery of revenue requirements. The iterative process includes the

1 evaluation of proposed rates against rate design objectives through impact and unit cost
2 analyses.

3
4 Unit Costs

5 **Q. What are unit costs?**

6 A. Unit costs are the cost for the attributes of electric service. Customer costs are those costs
7 associated with metering, billing, customer care, and local distribution facilities. Demand
8 costs are those costs associated with wires (transmission and distribution system) fixed
9 cost, and can also include fixed production costs. Energy costs are costs associated with
10 electricity supply such as fuel and other variable cost. Unit costs are these costs by each
11 billing determinant.

12 Unit costs are developed from the functionalized and classified cost components
13 in the Cost of Service Study (“COSS”) and are calculated by dividing the revenue
14 requirements of these components by the associated billing units (such as demand and
15 time-differentiated kWh) for each class and service level of customers.

16
17 **Q. Would it be proper to set prices using only unit costs?**

18 A. No. While unit costs are very important, other criteria must also be considered when
19 establishing prices and tariff structures. It is important to keep in mind all objectives of
20 rate design. Unit costs provide an embedded cost basis for each rate and represent the
21 simplest division of costs among customer classes; however, this is not always the most
22 comprehensive pricing, since it does little to recognize the variations of costs by time
23 periods (*e.g.* hourly marginal costs) which encourage more efficient allocation of
24 resources to customers. OG&E’s proposed prices reflect a balance between embedded
25 cost, marginal cost, customer preference, and recovery of the proposed revenue
26 requirement without undue impacts on customers.

1 Q. **Have you developed a unit cost for each rate category and service level based on the**
2 **component cost revenue requirements?**

3 A. Yes. The unit costs for each rate class and service level contained within the Company's
4 cost of service study were calculated in the manner I have described above. As an
5 example, Direct Exhibit WHW-1 illustrates the unit cost calculations for the R-1 class.
6

7 Marginal Costs

8 Q. **What are marginal costs?**

9 A. Marginal costs are the change in the total cost of production that results from producing
10 one additional unit of energy. Marginal costs are also divided into short-run marginal
11 costs and long-run marginal costs. Short-run marginal costs typically include only the
12 variable costs such as fuel and variable operations and maintenance costs associated with
13 production occurring within the constraints of currently available assets. Long-run
14 marginal costs consider the cost of expanding production capabilities to meet future load
15 growth.
16

17 Q. **How are marginal costs used within the rate design process?**

18 A. Marginal costs are used to set rates that promote more efficient use of resources. One
19 example is the use of marginal costs in setting on-peak period pricing. If consumers are
20 exposed to the marginal cost of energy, the resulting consumption decisions should
21 encourage a more efficient use of production resources and serve to lower the overall
22 production cost to all consumers.
23

24 Structural Changes to Existing Rates

25 Q. **Have you provided the proposed tariff changes?**

26 A. Yes. I have provided the proposed tariff changes in Schedule N of the MFR package.
27

28 Q. **What structural changes has the Company made for some of its existing rate**
29 **structures?**

30 A. The tariffs proposed in this application include two general changes to the existing rate
31 structures, they are:

1 1) incorporation of a kW demand charge for non-demand non-time-variable tariffs, and
2 2) changes to the season definitions for the Standard Residential (R-1) tariff so as to
3 eliminate separate rates for the shoulder months.
4

5 **Q. For which rate class did you introduce a kW demand charge?**

6 A. I introduced a kW demand charge to each of the existing OG&E non-time variable rates
7 which do not currently include a demand component. The proposed Residential (“R-1”),
8 General Service (“GS-1”), Oil and Gas Producers (“OGP-ND”), Municipal Water
9 Pumping (“PM”) and Public School-Non Demand (“PS-ND”) will each have a kW
10 demand charge part incorporated into their existing two-part tariffs. The existing rates
11 that already have a kW demand charge will continue as a three-part rate; and their kW
12 demand charges are updated to reflect the latest cost of service information.
13

14 **Q. For which current rates has this Commission previously approved a kW demand
15 charge?**

16 A. Public School Demand (“PSD”), Power and Light (“PL”) and Large Power and Light
17 (“LPL”) have had a kW demand charge in their respective rate schedules for many years.
18 The proposed rates in this Application simply extend the precision of the three part rate
19 structure to additional customers.
20

21 **Q. What is the seasonal change to the R-1 tariff?**

22 A. I eliminated the Shoulder Season defined in the R-1 tariff by redefining the Summer
23 Season and Winter Season as follows:

24 Summer Season: The five OG&E Revenue Months of June through October

25 Winter Season: The seven OG&E Revenue Months of November through May
26

27 **Q. Why are you changing the season definition of the R-1 tariff?**

28 A. The objective of this change is to make the season definitions of the R-1 tariff consistent
29 with the season definitions of other OG&E tariffs.

1 Q. **Are you also making changes to the pricing of existing tariffs?**

2 A. Yes. As I discuss below, I have proposed price changes to all of the rate schedule tariffs.

3

4

CURRENT VERSUS PROPOSED RATES

5

Residential Rate Design

6 Q. **What is the overall result of the proposed rate design changes to R-1 residential**
7 **customers?**

8 A. The overall average impact to R-1 residential customer bills is a monthly bill increase of
9 7.3% or \$8.05 per month per customer.

10

11 Q. **Please describe the proposed changes to OG&E's current residential rates.**

12 A. The price changes to the R-1 tariff include an introduction of a monthly kW demand
13 charge, an increase in the monthly customer charge, from \$13.00 to \$26.54, and a
14 lowering of the energy prices paid by those customers. The change in the customer
15 charge and the addition of kW demand charge will more accurately reflect the fixed cost
16 of providing electric service to a customer. In addition, as I mentioned previously, there
17 will not be a Shoulder Season in the tariff. The proposed rate changes are presented in
18 Table 1, below.

Table 1. Comparison of Proposed Residential Prices

Residential (R-1) Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$26.54	\$13.00	\$13.54
KW Demand Charge			
<i>All kW</i>	\$2.75 Per kW	\$0.00 Per kW	\$2.75 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun- Sept	
<i>First 1,400 kWh</i>	\$0.049 Per kWh	\$0.0573 Per kWh	(\$0.0083) Per kWh
<i>Over 1,400 kWh</i>	\$0.049 Per kWh	\$0.0680 Per kWh	(\$0.0190) Per kWh
Winter Season	Nov-May	Nov-Apr	
<i>First 600 kWh</i>	\$0.017 Per kWh	\$0.0573 Per kWh	(\$0.0403) Per kWh
<i>Over 600 kWh</i>	\$0.017 Per kWh	\$0.0173 Per kWh	(\$0.0003) Per kWh
Shoulder	May & Oct	May & Oct	
<i>All kWh</i>	N/A	\$0.0573	N/A

1 Q. **What is the basis for increasing the monthly customer charge to \$26.54?**

2 A. As shown in Direct Exhibit WHW-1, the unit cost for the customer component is \$26.77
3 on average. OG&E’s current customer charge for R-1 customers is \$13.00 per month, or
4 less than one-half the cost intended to be covered by the charge. As discussed by OG&E
5 witnesses Bryan Scott and Ahmad Faruqui, the Company believes it is important for
6 customers to understand their true cost of service.

7
8 Q. **How much is the newly added kW demand charge?**

9 A. The proposed kW demand charge is \$2.75 per kilowatt per month.

1 Q. **Did you assess the proposed rates against the unit cost for the residential class?**

2 A. Yes. OG&E computed the monthly billing amount for customers with twelve months of
3 test year data (July 1, 2014 and June 30, 2015) under the proposed rate. The analysis
4 includes all Oklahoma jurisdiction customers billed on the residential standard rate;
5 however those customers without a complete year of usage data were excluded, resulting
6 in an analysis of 412,252 R-1 customers.

7 In order to understand the potential for intra-class subsidies, we compared the
8 billing under the proposed rates to the billing under a unit cost based rate.² The result
9 would indicate where any of the identified customer groups are not aligned with their
10 share of costs. Table 2 shows the results of this comparison.

Table 2. Comparison of unit costs and proposed rate for residential customers

Segmented Results Residential Unit Costs vs Proposed Residential								
Segment	Number of Customers	Percent Difference	Annual kWh/Cust	Monthly kWh/Cust		Unit Cost	Proposed	Difference
				Summer	Winter	\$/Cust/Month	\$/Cust/Month	\$/Cust/Month
Total	412,252	-1.11%	13,514	536	590	118.91	117.60	(1.32)
Small Users	137,404	-1.32%	6,144	268	244	73.10	72.13	(0.97)
Normal Users	137,428	-1.37%	11,837	504	483	110.39	108.87	(1.52)
Large Users	137,420	-0.84%	22,558	837	1,042	173.25	171.79	(1.46)
Low Income	36,068	-0.87%	13,257	488	616	105.79	104.88	(0.92)
Not Low Income	376,184	-1.13%	13,538	541	587	120.17	118.82	(1.35)
Summer Users	137,418	-2.26%	11,086	572	352	107.81	105.37	(2.44)
Winter Users	137,417	0.19%	15,813	453	865	128.32	128.57	0.25
Non-Seasonal	137,417	-1.45%	13,641	584	553	120.60	118.85	(1.75)

11 A percentage difference that is less than zero indicates those groups in which customers
12 will typically pay less than the costs they create, or are being subsidized, while a positive
13 difference indicates those segments that are paying more than their share of the costs. The
14 average difference column indicates the average absolute difference relative to the unit
15 cost. For example, under the proposed rate design, winter users are paying 1.33%, or
16 \$1.70 per month, less than residential unit costs indicate should be paid. The feedback to
17 the rate design process is to set the prices such that those groups which are being
18 subsidized by other groups receive, within reason, higher increases to create a reasonable
19 movement toward eliminating intra-class subsidies.

² Unit costs are based on full cost of service while the proposed rates only collect the allocated revenue.

General Service Rate Design

1
2 **Q. What are the proposed changes to the General Service (“GS”) tariff?**

3 A. OG&E proposes to increase the customer charge, add a kW demand charge and modify
4 the energy charge. Additionally, the Company is eliminating the block pricing currently
5 included in the energy charge. Table 3 below shows the proposed prices and the current
6 prices.

Table 3. Comparison of GS Current and Proposed Rates

General Service (GS) SL - 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$24.70	\$23.80
KW Demand Charge			
<i>All kW</i>	\$2.90 Per kW	\$0.00 Per kW	\$2.90 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>First 5,000 kWh</i>	\$0.070 Per kWh	\$0.0740 Per kWh	(\$0.0040) Per kWh
<i>Over 5,000 kWh</i>	\$0.070 Per kWh	\$0.0820 Per kWh	(\$0.0120) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.024 Per kWh	\$0.0600 Per kWh	(\$0.0360) Per kWh
<i>Over 1,000 kWh</i>	\$0.024 Per kWh	\$0.0240 Per kWh	\$0.0000 Per kWh

7 **Q. What is the basis for the increased customer charge for the GS class?**

8 A. The change in the customer charge is based on the allocated share of customer
9 component costs for the GS-1, service level 5 class, which is \$50.13 per customer per
10 month. The proposed customer charge is \$48.50, which reflects the weighted average of
11 the customer cost component for all GS customers.

12
13 **Q. What is the impact of these changes to GS customers?**

14 A. The average billing impact to a GS customer is approximately 13.0%, or a \$22.72 per
15 month increase, as shown in Table 4 below.

Table 4 General Service Customer Impact

General Service Standard					
Customer Category	Customer Count	kWh	Average kWh	Revenue Change Percent	Revenue Change /Customer/Month
Small Users	17,617	32,850,439	1,865	57.1%	\$ 23.16
Normal Users	17,618	176,807,993	10,036	17.7%	\$ 19.08
Large Users	17,620	835,116,136	47,396	6.9%	\$ 25.93
Total	52,855	1,044,774,568	19,767	13.0%	\$ 22.72
Summer Users	17,619	406,802,666	23,089	11.3%	\$ 23.73
Winter Users	17,618	246,112,174	13,969	18.1%	\$ 22.27
Non-Seasonal	17,618	391,859,728	22,242	11.7%	\$ 22.17
Total	52,855	1,044,774,568	19,767	13.0%	\$ 22.72
Low Max kW	16,435	49,894,266	3,036	36.6%	\$ 18.32
Avg Max kW	17,802	200,942,881	11,288	14.5%	\$ 16.65
Lg Max kW	18,618	793,937,421	42,644	9.5%	\$ 32.42
Total	52,855	1,044,774,568	19,767	13.0%	\$ 22.72
Undefined LF	6,012	8,836,951	1,470	53.9%	\$ 20.08
Low LF	15,614	135,143,503	8,655	37.9%	\$ 35.16
Avg LF	15,614	402,512,068	25,779	11.2%	\$ 24.68
High LF	15,615	498,282,046	31,910	3.6%	\$ 9.36
Total	52,855	1,044,774,568	19,767	13.0%	\$ 22.72

Time-of-Use (“TOU”) Rate Design

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Q. Will TOU customers see a demand charge added to their rates?

A. No. Time-variable rates including Residential Time-of-Use (“R-TOU”), Residential Variable Peak Pricing (“R-VPP”), General Service Time-of-Use (“GS-TOU”), General Service Variable Peak Pricing (“GS-VPP”), Oil and Gas Producers Time-of-Use (“OGP-TOU”), Municipal Water Pumping Time-of-Use (“PM-TOU”), and Municipal Water Pumping Variable Peak Pricing (“PM-VPP”) will continue as a two-part rate without a kW demand charge. OG&E witness Bryan Scott further discusses the reasoning behind leaving TOU and VPP customers on a two-part rate.

Q. What changes are you proposing to the non-demand Time-of-Use (“TOU”) tariffs?

A. The proposed pricing for these tariffs all include an increased customer charge relative to the current customer charges. I am also adjusting the energy charges where appropriate. These changes are shown in Table 5 below.

Table 5 Comparison of Time-of-Use Rates

Residential TOU (R-TOU) Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$26.54	\$13.00	\$13.54
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.200 Per kWh	\$0.140 Per kWh	\$0.060 Per kWh
<i>Off- Peak</i>	\$0.031 Per kWh	\$0.027 Per kWh	\$0.004 Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 600 kWh</i>	\$0.053 Per kWh	\$0.0573 Per kWh	(\$0.004) Per kWh
<i>Over 600 kWh</i>	\$0.017 Per kWh	\$0.0173 Per kWh	(\$0.0003) Per kWh

General Service TOU (GS-TOU) SL-2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$24.70	\$23.80
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.200 Per kWh	\$0.223 Per kWh	(\$0.023) Per kWh
<i>Off- Peak</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.0600 Per kWh	(\$0.020) Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.0240 Per kWh	\$0.0020 Per kWh

Oil and Gas Producers TOU (OGP-TOU) SL-2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$22.95	\$25.55
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.200 Per kWh	\$0.223 Per kWh	(\$0.023) Per kWh
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.020 Per kWh	\$0.0230 Per kWh	(\$0.003) Per kWh

Public Schools ND - TOU (PS-ND-TOU) SL 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$15.65	\$32.85
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.200 Per kWh	\$0.238 Per kWh	(\$0.038) Per kWh
<i>Off- Peak</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.0600 Per kWh	(\$0.020) Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.0240 Per kWh	\$0.0020 Per kWh

Municipal Water Pumping TOU (PM-TOU) SL 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$23.80	\$24.70
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.200 Per kWh	\$0.223 Per kWh	(\$0.023) Per kWh
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.02 Per kWh	\$0.02 Per kWh	\$0.000 Per kWh

1 Variable Peak Pricing Rate Design

2 Q. **Are you proposing changes to the VPP program?**

3 A. Yes. The Company is proposing three changes to the VPP program. First, the Company
4 is asking to make the VPP program a permanent rate option for the Residential and GS
5 classes. Second, the Company proposes to update the customer charge and energy prices
6 to recover the revenue requirement. Finally, the Company is asking to update the criteria
7 used to determine the daily on-peak price level for the VPP programs on an annual basis.

8

9 Q. **How many residential and general service customers participate in the VPP
10 programs?**

11 A. As of June, 2015, 99,550 residential and 4,409 general service customers are enrolled in
12 VPP rates.

13

14 Q. **What are the proposed rate changes to the VPP rates?**

15 A. The proposed pricing for the VPP tariff is shown in Table 6 below.

Table 6. Comparison of VPP Rates

Residential Service VPP (R-VPP) Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$26.54	\$13.00	\$13.54
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>Off- Peak</i>	\$0.031 Per kWh	\$0.027 Per kWh	\$0.004 Per kWh
<i>Critical Peak</i>	\$0.350 Per kWh	\$0.380 Per kWh	(\$0.030) Per kWh
<i>On Peak tier 1</i>	\$0.031 Per kWh	\$0.027 Per kWh	\$0.004 Per kWh
<i>On Peak tier 2</i>	\$0.070 Per kWh	\$0.068 Per kWh	\$0.002 Per kWh
<i>On Peak tier 3</i>	\$0.140 Per kWh	\$0.140 Per kWh	\$0.000 Per kWh
<i>On Peak tier 4</i>	\$0.350 Per kWh	\$0.380 Per kWh	(\$0.030) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 600 kWh</i>	\$0.053 Per kWh	\$0.057 Per kWh	(\$0.004) Per kWh
<i>Over 600 kWh</i>	\$0.017 Per kWh	\$0.017 Per kWh	(\$0.000) Per kWh

General Service VPP (GS-VPP) SL- 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$24.70	\$23.80
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
<i>Critical Peak</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
<i>On Peak tier 1</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
<i>On Peak tier 2</i>	\$0.080 Per kWh	\$0.082 Per kWh	(\$0.002) Per kWh
<i>On Peak tier 3</i>	\$0.160 Per kWh	\$0.223 Per kWh	(\$0.063) Per kWh
<i>On Peak tier 4</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.060 Per kWh	(\$0.020) Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.024 Per kWh	\$0.002 Per kWh

Oil and Gas Producers VPP (OGP-VPP) SL 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$22.95	\$25.55
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
<i>Critical Peak</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
<i>On Peak tier 1</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
<i>On Peak tier 2</i>	\$0.080 Per kWh	\$0.082 Per kWh	(\$0.002) Per kWh
<i>On Peak tier 3</i>	\$0.160 Per kWh	\$0.223 Per kWh	(\$0.063) Per kWh
<i>On Peak tier 4</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.023 Per kWh	\$0.017 Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.023 Per kWh	\$0.003 Per kWh

Public Schools ND VPP (PS ND VPP) SL 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$15.65	\$32.85
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
<i>Critical Peak</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
<i>On Peak tier 1</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
<i>On Peak tier 2</i>	\$0.080 Per kWh	\$0.082 Per kWh	(\$0.002) Per kWh
<i>On Peak tier 3</i>	\$0.160 Per kWh	\$0.238 Per kWh	(\$0.078) Per kWh
<i>On Peak tier 4</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.060 Per kWh	(\$0.020) Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.024 Per kWh	\$0.002 Per kWh

Municipal Water Pumping VPP (PM-VPP) SL 2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$23.80	\$24.70
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>Off- Peak</i>	\$0.037 Per kWh	\$0.027 Per kWh	\$0.010 Per kWh
<i>Critical Peak</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
<i>On Peak tier 1</i>	\$0.040 Per kWh	\$0.027 Per kWh	\$0.013 Per kWh
<i>On Peak tier 2</i>	\$0.080 Per kWh	\$0.082 Per kWh	(\$0.002) Per kWh
<i>On Peak tier 3</i>	\$0.160 Per kWh	\$0.223 Per kWh	(\$0.063) Per kWh
<i>On Peak tier 4</i>	\$0.390 Per kWh	\$0.430 Per kWh	(\$0.040) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.040 Per kWh	\$0.020 Per kWh	\$0.020 Per kWh
<i>Over 1,000 kWh</i>	\$0.026 Per kWh	\$0.020 Per kWh	\$0.006 Per kWh

1 Public Schools Non-Demand (“PS-ND”) and Public Schools Demand (“PS-D”) Rate Design

2 Q. **What are the proposed rate changes to the PS-ND rates?**

3 A. The Company proposes that Public Schools ND, rates are increased to move toward their
4 cost of service. The proposed increase is shown below in Table 7. This increase also
5 includes the addition of a demand charge, as discussed above.

Table 7. Comparison of current and proposed Public Schools ND rates

Public Schools ND (PS ND) SL-2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$15.65	\$32.85
KW Demand Charge			
<i>All kW</i>	\$2.90 Per kW	\$0.00 Per kW	\$2.90 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>All kWh</i>	\$0.0700 Per kWh	\$0.0764 Per kWh	(\$0.0064) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.024 Per kWh	\$0.06 Per kWh	(\$0.036) Per kWh
<i>Over 1,000 kWh</i>	\$0.024 Per kWh	\$0.024 Per kWh	\$0.0000 Per kWh

- 1 Q. **What are the proposed rate changes to the PS-D rates?**
- 2 A. The Company is proposing an increase to the PS-D rate, as shown in Table 8 below.

Table 8. Comparison of current and proposed Public Schools D SL5 rates

Public Schools Demand (PS D) SL -5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$80.00	\$70.00	\$10.00
KW Demand Charge			
<i>Summer kW</i>	\$11.61 Per kW	\$11.40 Per kW	\$0.21 Per kW
Winter kW	5.95	5.7	0.25
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>All kWh</i>	\$0.0250 Per kWh	\$0.0120 Per kWh	\$0.0130 Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0250 Per kWh	\$0.0120 Per kWh	\$0.0130 Per kWh

1 Q. **Did the Company consider combining the PS-ND and PS-D classes with the addition**
 2 **of the demand charge?**

3 A. Yes. The Company did consider combining the two classes, however it was determined
 4 that the two classes varied greatly in both demand levels and annual energy consumption
 5 and were better served by remaining as two separate rates. Therefore, the Company has
 6 changed the name of these two classes:

- 7 • PS-ND becomes PS-Small, and
- 8 • PS-D becomes PS-Large.

9

10 Q. **What are the impacts to these classes?**

11 A. The overall impact to the PS-Small Service Level 5 customers is an increase of 13.4%,
 12 about \$61.51 per month on average. For the PS-Large Service Level 5 customers, the
 13 average monthly bill is increased by 12.4% or slightly more than \$380.44.

14

15 Oil & Gas Producers (“OGP”) Rate Design

16 Q. **What are the proposed rate changes to the OGP rates?**

17 A. The changes proposed for OGP classes are presented in Table 9 below.

Table 9. Comparison of current and proposed OGP rates

Oil Gas Producers (OGP) SL-2 thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$48.50	\$22.95	\$25.55
KW Demand Charge			
<i>All kW</i>	\$3.10 Per kW	\$0.00 Per kW	\$3.10 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>All kWh</i>	\$0.0400 Per kWh	\$0.0519 Per kWh	(\$0.0119) Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.017 Per kWh	\$0.023 Per kWh	(\$0.006) Per kWh

1 Q. **What are the overall impacts to these classes?**

2 A. The overall impact to OGP, Service Level 5 customers is an increase of 3.0%, equating to
3 an average monthly increase of \$7.66.
4

5 Municipal Pumping (“PM”) Rate Design

6 Q. **What are the proposed rate changes to the PM rate?**

7 A. The proposed pricing for the PM tariff is shown in Table 10.

Table 10. Comparison of current and proposed PM rates

Municipal Water Pumping ((PM) SL- 2 Thru 5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$23.80	\$24.70
KW Demand Charge			
<i>All kW</i>	\$3.15 Per kW	\$0.00 Per kW	\$3.15 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>All kWh</i>	\$0.0240 Per kWh	\$0.0390 Per kWh	(\$0.0150) Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.017 Per kWh	\$0.020 Per kWh	(\$0.003) Per kWh

8 Q. **What are the overall impacts to these classes?**

9 A. PM Service Level 5 customer’s average billing will decrease by 0.2% or \$0.78 per
10 month.
11

12 Power & Light (“PL”) and PL Time of Use (“PL-TOU”) Rate Design

13 Q. **What are the proposed prices for the PL and PL-TOU rates?**

14 A. The COSS showed that PL Service Level 1-4 should receive a slight decrease, while PL
15 SL-5 should receive a price level increase. The COSS also showed similar results for PL-
16 TOU; SL 1-4 should receive a slight decrease while SL-5 receives an increase. As a
17 result, OG&E proposes that there be no change to price levels in SL 1-4 for PL and PL-

1 TOU. The proposed prices and the prices currently in effect are reflected in Tables 11
 2 and 12.

Table 11. Comparison of current and proposed PL SL5 rates

Power and Light (PL) SL-5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$80.00	\$77.00	\$3.00
KW Demand Charge			
<i>Summer kW</i>	\$11.61 Per kW	\$12.75 Per kW	(\$1.14) Per kW
Winter kW	5.95	6.40	-0.45
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>All kWh</i>	\$0.0250 Per kWh	\$0.0130 Per kWh	\$0.0120 Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0250 Per kWh	\$0.0130 Per kWh	\$0.0120 Per kWh

Table 12. Comparison of current and proposed PL-TOU SL5 rates

Power and Light TOU (PL-TOU) SL-5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$80.00	\$77.00	\$3.00
KW Demand Charge			
<i>All kW</i>	\$5.76 Per kW	\$5.81 Per kW	(\$0.05) Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.0930 Per kWh	\$0.0950 Per kWh	(\$0.0020) Per kWh
<i>Off- Peak</i>	\$0.0180 Per kWh	\$0.0120 Per kWh	\$0.0060 Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0180 Per kWh	\$0.0120 Per kWh	\$0.0060 Per kWh

3 Q. **What are the impacts to customers from the proposed prices?**

4 A. The class impacts results are shown based on a division of customers by size and load
 5 factor. These are provided in Exhibit WHW-2.

Large Power & Light (“LPL”) Rate Design

1
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3
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7

Q. What changes are proposed for the LPL rates?

A. Similar to PL and PL-TOU, the COSS indicated that LPL SL 1 and 5 needed a price level increase, while SL 2-4 needed minimal changes. OG&E included more of the fixed cost recovery in the demand charge and reduced energy prices. These changes effectively reward high load factor customers for their lower cost of service. The proposed prices and the prices currently in effect are reflected in Table 13.

Table 13. Comparison of current and proposed LPL rates

Large Power and Light TOU (LPL-TOU) SL-1 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$118.00	\$300.00	-\$182.00
KW Demand Charge			
<i>All kW</i>	\$7.32 Per kW	\$2.77 Per kW	\$4.55 Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
On Peak	\$0.0600 Per kWh	\$0.0890 Per kWh	(\$0.0290) Per kWh
Off- Peak	\$0.0034 Per kWh	\$0.0080 Per kWh	(\$0.0046) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 2,000,000 kWh</i>	\$0.0034 Per kWh	\$0.0100 Per kWh	(\$0.0066) Per kWh
<i>Over 2,000,000 kWh</i>	\$0.0034 Per kWh	\$0.0080 Per kWh	(\$0.0046) Per kWh

Large Power and Light TOU (LPL-TOU) SL-2 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$118.00	\$300.00	-\$182.00
KW Demand Charge			
<i>All kW</i>	\$7.44 Per kW	\$3.37 Per kW	\$4.07 Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.0440 Per kWh	\$0.0890 Per kWh	(\$0.0450) Per kWh
<i>Off- Peak</i>	\$0.0034 Per kWh	\$0.0080 Per kWh	(\$0.0046) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 2,000,000 kWh</i>	\$0.0034 Per kWh	\$0.0100 Per kWh	(\$0.0066) Per kWh
<i>Over 2,000,000 kWh</i>	\$0.0034 Per kWh	\$0.0080 Per kWh	(\$0.0046) Per kWh

Large Power and Light TOU (LPL-TOU) SL-3 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/per Month</i>	\$118.00	\$135.00	-\$17.00
KW Demand Charge			
<i>All kW</i>	\$8.60 Per kW	\$4.56 Per kW	\$4.04 Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.0770 Per kWh	\$0.0900 Per kWh	(\$0.0130) Per kWh
<i>Off- Peak</i>	\$0.0040 Per kWh	\$0.0100 Per kWh	(\$0.0060) Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0040 Per kWh	\$0.0100 Per kWh	(\$0.0060) Per kWh

Large Power and Light TOU (LPL-TOU) SL-4 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$118.00	\$135.00	-\$17.00
KW Demand Charge			
<i>All kW</i>	\$8.60 Per kW	\$4.56 Per kW	\$4.04 Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.0770 Per kWh	\$0.0900 Per kWh	(\$0.0130) Per kWh
<i>Off- Peak</i>	\$0.0040 Per kWh	\$0.0100 Per kWh	(\$0.0060) Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0040 Per kWh	\$0.0100 Per kWh	(\$0.0060) Per kWh

Large Power and Light TOU (LPL-TOU) SL-5 Monthly Prices			
	Proposed	Current	Change
Customer Charge			
<i>\$/ per Month</i>	\$80.00	\$77.00	\$3.00
KW Demand Charge			
<i>All kW</i>	\$11.42 Per kW	\$5.40 Per kW	\$6.02 Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.0900 Per kWh	\$0.0900 Per kWh	\$0.0000 Per kWh
<i>Off- Peak</i>	\$0.0080 Per kWh	\$0.0110 Per kWh	(\$0.0030) Per kWh
Winter Season	Nov-May	Nov-May	
<i>All kWh</i>	\$0.0080 Per kWh	\$0.0110 Per kWh	(\$0.0030) Per kWh

- 1 Q. **What are the impacts to these customer classes under the proposed tariffs?**
- 2 A. The class impacts and unit cost analyses results determined by size and load factor are
- 3 contained within Exhibit WHW-2.

1 Municipal Lighting (“LM”) and Outdoor Security Lighting (“OSL”) Rate Design

2 **Q. What are the proposed changes for the lighting classes?**

3 A. Lighting service consists of two components. The first component is the lighting fixture
4 and can also include a separate pole to position the light at the location desired by the
5 customer. The second component is the energy to power the light. OG&E’s primary
6 objective is to move the proposed prices closer to current costs of providing for the
7 various fixtures and poles. Energy prices were adjusted based on the COSS. The
8 resulting components were combined to create the price for each lighting fixture. Prices
9 were adjusted based on the ratio of costs to current prices, resulting in an increase of
10 10.5% for LM and 3.8% to OSL.

11
12 Distributed Generation (“DG”) Rate Design

13 **Q. What are the proposed rate changes to the R-TOU kW and the Com-TOU kW**
14 **rates?**

15 A. The proposed pricing for these tariffs is shown in Table 14, the approval of these tariffs is
16 currently pending before this Commission in Cause No. PUD 201500274. The prices for
17 these tariffs were based on COSS results for all DG customers including those in service
18 prior to November of 2014. These proposed tariffs are not intended to apply to the entire
19 DG population; the costs to provide service to the entire population were used to establish
20 prices that are more stable for post October of 2014 customers. However, pre-November
21 2014 customers may voluntarily elect to receive the new tariffs.

22
23 **Q. How many customers will be affected by the change?**

24 A. I estimate that less than 15 customers will be affected by the proposed rate changes.

Table 14. Proposed TOU-kW rates for DG

Residential Time-of-Use KW (R-TOU-kW) Monthly Prices			
	Proposed	Pending PUD201500274	Change
Customer Charge			
<i>\$/per Month</i>	\$26.54	\$18.00	\$8.54
KW Demand Charge			
<i>All kW</i>	\$1.78 Per kW	\$2.68 Per kW	(\$0.90) Per kW
Energy Charge			
Summer Season	Jun- Oct	Jun- Oct	
<i>On Peak</i>	\$0.1300 Per kWh	\$0.1730 Per kWh	(\$0.0430) Per kWh
<i>Off- Peak</i>	\$0.0140 Per kWh	\$0.0137 Per kWh	\$0.0003 Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 600 kWh</i>	\$0.0140 Per kWh	\$0.0137 Per kWh	\$0.0003 Per kWh
<i>Over 600 kWh</i>	\$0.0140 Per kWh	\$0.0137 Per kWh	\$0.0003 Per kWh
Commercial Time-of-Use (COM-TOU-kW) Monthly Prices			
	Proposed	Pending PUD201500274	Change
Customer Charge			
<i>\$/per Month</i>	\$48.50	\$34.75	\$13.75
KW Demand Charge			
<i>All kW</i>	\$3.94 Per kW	\$3.30 Per kW	\$0.64 Per kW
Energy Charge			
Summer Season	Jun-Oct	Jun-Oct	
<i>On Peak</i>	\$0.2750 Per kWh	\$0.1875 Per kWh	\$0.0875 Per kWh
<i>Off- Peak</i>	\$0.0140 Per kWh	\$0.0143 Per kWh	(\$0.0003) Per kWh
Winter Season	Nov-May	Nov-May	
<i>First 1,000 kWh</i>	\$0.0140 Per kWh	\$0.0143 Per kWh	(\$0.0003) Per kWh
<i>Over 1,000 kWh</i>	\$0.0140 Per kWh	\$0.0143 Per kWh	(\$0.0003) Per kWh

1 Community Solar Rate Design

2 Q. **Please discuss the Community Solar Program (“CSP”) tariff.**

3 A. The CSP was proposed by the Company in Cause No. PUD 201500340 and is pending
4 before this Commission. At this time, the Company proposes no changes to the pricing
5 but will make adjustments as necessary pending the outcome of both Cause No. PUD
6 201500340 and this Cause.

7
8 PROOF OF REVENUE

9 Q. **Why must current rate revenues be determined for the pro forma year data?**

10 A. Current rate revenues are the foundation of the proposed rate design. The proposed rates
11 are determined to ensure that the revenue deficiency—the difference between the current
12 rate revenue and the proposed rate revenue—will be recovered following the
13 implementation of the rate changes approved in the rate case.

14
15 Q. **How is current rate revenue determined for the purpose of rate design?**

16 A. Current rate revenue is calculated by applying the rates approved in the Company’s
17 previous rate case to the billing determinants contained within the pro forma year data.
18 The Proof of Revenue section of Minimum Filing Requirements, Schedule M-4, includes
19 the calculation of current rate revenue for each rate class.

20
21 Q. **Is the current rate revenue shown in the Proof of Revenue equivalent to the pro
22 forma year revenue shown in Schedule H-2?**

23 A. Yes, they are equivalent, but there are some differences which are discussed below. The
24 pro forma revenue reflected on Schedule H-2 and Schedule M-4 revenue differ due to the
25 manner in which they are derived. The Schedule M-4 revenue contains adjustments to
26 account for these differences and ensure that rates are designed against the appropriate
27 revenue deficiency.

1 Q. **Can you provide examples of specific differences between Schedule H-2 and**
2 **Schedule M-4 revenue?**

3 A. Returned check fees are an example of miscellaneous revenue that is not directly
4 attributable to the billing determinants used to calculate current rate revenue. While the
5 revenue from returned check charges is applicable to the Company's allowed revenue, it
6 is not included in Schedule M-4 revenue calculations based on billing determinants. The
7 difference due to these types of charges is captured in the Schedule M-4 revenue by
8 allocating these to the various classes and adjusting the current revenues by the allocated
9 amount.

10 Cancel and re-bill activities create differences between the revenue within each
11 schedule. When a bill is cancelled and re-billed outside of the accounting period in
12 which the original bill was issued, a mismatch of the determinants and revenues is
13 created in the month containing the cancel/re-bill. The issue is compounded when the
14 rates in the original period are different than those in the current period. If a winter bill is
15 re-billed in a summer period, the cancellation and re-bill results in the removal and
16 addition of the quantities through an adjustment in the current month. While these
17 procedures are appropriate for accounting purposes, for rate design the resulting
18 misalignment of these adjustments creates a difference in the calculation of the revenue
19 within Schedule M current rate revenue. In order to ensure the current rate revenue upon
20 which rate design is based is accurately reflected in the Schedule M-4 revenues, a
21 reconciliation adjustment is made to match the current rate revenue to Schedule H-2
22 revenue. The same adjustment is made to then adjust the proposed rate revenues in
23 Schedule M-4.

24
25 Q. **Why is it important for the current rate revenues to match the pro forma year**
26 **revenues?**

27 A. The Company must ensure that the proposed rate change results in a level of revenue
28 recovery that is consistent with the COSS. See the Direct Testimony of OG&E witness
29 Bryan J. Scott for a detail of the resulting COSS and revenue allocation.

1 Q. **What are the results from the Proof of Revenues?**

2 A. M-4, the Proof of Revenues statement, shows that the proposed prices when applied to
3 the test year *pro forma* billing determinants will produce the revenues requested by the
4 Company as shown in its COSS and Schedule B-1.

5

6 Q. **Does this conclude your direct testimony?**

7 A. Yes.

OKLAHOMA GAS AND ELECTRIC COMPANY
COST OF SERVICE UNIT COST CALCULATION
RESIDENTIAL STANDARD S/L-5

TEST YEAR ENDING June 30, 2015

Unit Cost Components			
Total Customer Component	\$ 187,289,780	PD (Peak Component)	\$ 139,377,182
Total Energy Component	\$ 2,443,567	PD (Avg Component)	\$ 90,737,787
Total Demand Component	\$ 379,592,112	Trans Demand	\$ 63,953,022
Total of All Components	\$ 569,325,459	Dist Demand	\$ 85,524,122
Muni/LIAP Adjustment + Reconciliation	\$ 2,664,385	Total Demand Component	\$ 379,592,112
POR tie	\$ 566,661,074		

Customer Charge	Annual Billing Units	Miscellaneous Revenue	Customer Component	Rev Req Less Miscellaneous	Calculated New Price
	6,539,580	\$ 12,238,482	\$ 187,289,780	\$ 175,051,298	\$ 26.77
LIAP Credits	499,668				\$ (10.00)

	Energy	PD (Peak Component)	PD (Avg Component)	Transmission Demand	Distribution Demand	Energy and Demand Total Revenue Req From Unit Cost	Calculated New Price
Energy Charge							Energy Charge
Summer							Summer
First 1,400 kWh	2,695,829,310	\$ 934,676	\$ 113,251,267	\$ 34,707,625	\$ -	\$ 148,893,567	\$ 0.0552
Over 1,400 kWh	621,900,392	\$ 215,620	\$ 26,125,915	\$ 8,006,696	\$ -	\$ 34,348,231	\$ 0.0552
Winter							Winter
First 600 kWh	2,043,262,518	\$ 708,423	\$ -	\$ 26,306,112	\$ -	\$ 27,014,536	\$ 0.0132
Over 600 kWh	1,686,841,964	\$ 584,848	\$ -	\$ 21,717,354	\$ -	\$ 22,302,201	\$ 0.0132
Total kWh	7,047,834,184	\$ -	\$ -	\$ -	\$ -	\$ -	
Demand							Demand
Max kW	54,293,751	\$ -	\$ -	\$ 63,953,022	\$ 85,524,122	\$ 149,477,144	\$ 2.75
		\$ 2,443,567	\$ 139,377,182	\$ 90,737,787	\$ 63,953,022	\$ 85,524,122	\$ 382,035,679

Proposed LPL-TOU SL-1 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
LPL-TOU SL1	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 28,499 kW	0	0	0	0	0	1	0	0	0	0	1
						\$238,770					\$238,770
						2.27%					2.27%
26,000 to 28,499 kW	0	0	0	0	1	0	0	0	0	0	1
					\$220,001						\$220,001
					4.29%						4.29%
23,500 to 25,999 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
21,000 to 23,499 kW	0	0	0	0	1	0	0	0	0	0	1
					-\$6,324						-\$6,324
					-0.19%						-0.19%
18,500 to 20,999 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
16,000 to 18,499 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
13,500 to 15,999 kW	0	0	0	0	0	0	0	0	0	1	1
										-\$176,269	-\$176,269
										-3.67%	-3.67%
11,000 to 13,499 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
8,500 to 10,999 kW	0	0	0	0	0	0	0	0	0	1	1
										-\$422,370	-\$422,370
										-13.87%	-13.87%
6,000 to 8,499 kW	0	0	0	0	0	0	0	0	0	1	1
										-\$105,631	-\$105,631
										-4.45%	-4.45%
3,500 to 5,999 kW	0	0	0	0	0	1	1	0	0	0	2
						\$18,922	\$5,825				\$24,746
						2.51%	0.53%				1.34%
1,000 to 3,499 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
Totals	0	0	0	0	2	2	1	0	0	3	8
	\$0	\$0	\$0	\$0	\$213,677	\$257,692	\$5,825	\$0	\$0	-\$704,270	-\$227,077
	0.00%	0.00%	0.00%	0.00%	2.53%	2.28%	0.53%	0.00%	0.00%	-6.89%	-0.73%

Proposed LPL-TOU SL-2 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
LPL-TOU SL2	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 28,499 kW	0	0	0	1	0	0	0	0	3	0	4
				\$991,167					-\$3,483,181		-\$2,492,014
				12.53%					-6.19%		-3.88%
26,000 to 28,499 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
23,500 to 25,999 kW	0	0	0	0	0	0	0	1	0	0	1
								-\$339,416			-\$339,416
								-4.51%			-4.51%
21,000 to 23,499 kW	0	0	0	0	0	1	0	0	0	0	1
						-\$124,760					-\$124,760
						-2.51%					-2.51%
18,500 to 20,999 kW	0	0	0	0	1	1	0	0	0	0	2
					-\$51,684	\$256,962					\$205,278
					-1.59%	6.63%					2.88%
16,000 to 18,499 kW	0	0	0	1	0	0	0	0	1	1	3
				\$216,129					-\$240,099	-\$407,359	-\$431,329
				7.04%					-4.25%	-6.73%	-2.92%
13,500 to 15,999 kW	0	0	0	0	0	1	2	1	1	0	5
						-\$72,421	-\$228,437	-\$253,830	-\$259,386		-\$814,074
						-1.97%	-3.07%	-6.10%	-5.33%		-4.04%
11,000 to 13,499 kW	0	0	0	1	0	1	1	0	0	0	3
				\$109,748		\$53,141	-\$56,594				\$106,295
				5.27%		1.99%	-1.74%				1.33%
8,500 to 10,999 kW	0	0	2	1	0	0	1	2	0	0	6
			\$271,089	\$59,435			-\$118,002	-\$292,120			-\$79,598
			11.23%	4.58%			-4.25%	-5.04%			-0.65%
6,000 to 8,499 kW	0	0	0	1	0	1	0	2	1	2	7
				\$44,927		-\$80		-\$197,167	-\$144,226	-\$408,104	-\$704,650
				4.29%		-0.01%		-4.85%	-5.70%	-7.44%	-4.83%
3,500 to 5,999 kW	0	0	0	0	4	4	6	3	1	0	18
					\$133,674	-\$99,319	-\$240,237	-\$233,461	-\$92,577		-\$531,920
					4.02%	-2.63%	-3.84%	-5.82%	-7.73%		-2.87%
1,000 to 3,499 kW	0	0	0	0	0	0	2	0	0	0	2
							-\$66,270				-\$66,270
							-4.36%				-4.36%
Totals	0	0	2	5	5	9	12	9	7	3	52
	\$0	\$0	\$271,089	\$1,421,406	\$81,990	\$13,524	-\$709,539	-\$1,315,994	-\$4,219,470	-\$815,464	-\$5,272,458
	0.00%	0.00%	11.23%	9.23%	1.25%	0.07%	-3.34%	-5.15%	-5.98%	-7.07%	-3.04%

Proposed LPL-TOU SL-3 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
LPL-TOU SL3	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 12,999 kW	0	0	1 -\$64,410 -3.72%	0	0	0	0	0	0	0	1 -\$64,410 -3.72%
12,000 to 12,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
11,000 to 11,999 kW	0	0	0	1 \$30,657 1.49%	0	0	0	0	0	0	1 \$30,657 1.49%
10,000 to 10,999 kW	0	0	0	0	0	0	1 -\$77,789 -2.48%	0	0	0	1 -\$77,789 -2.48%
9,000 to 9,999 kW	0	0	0	0	0	1 -\$18,528 -0.75%	0	0	0	0	1 -\$18,528 -0.75%
8,000 to 8,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
7,000 to 7,999 kW	0	0	0	0	0	0	1 -\$22,053 -1.06%	0	0	0	1 -\$22,053 -1.06%
6,000 to 6,999 kW	0	0	0	0	1 \$74,644 5.31%	0	1 -\$47,465 -2.74%	0	0	0	2 \$27,180 0.87%
5,000 to 5,999 kW	0	0	0	2 \$91,315 5.07%	0	0	0	0	0	1 -\$151,703 -7.08%	3 -\$60,388 -1.53%
4,000 to 4,999 kW	0	0	0	0	1 -\$16,982 -1.87%	1 \$16,465 1.52%	2 -\$63,182 -2.50%	1 -\$61,830 -4.03%	1 -\$94,300 -6.04%	0	6 -\$219,829 -2.89%
3,000 to 3,999 kW	0	0	0	0	2 -\$31,189 -2.00%	4 -\$48,701 -1.38%	2 -\$77,269 -3.63%	1 -\$56,717 -5.53%	2 -\$134,164 -5.70%	0	11 -\$348,039 -2.83%
2,000 to 2,999 kW	0	0	0	0	0	1 \$364 0.06%	1 -\$24,866 -2.87%	3 -\$116,582 -5.31%	4 -\$212,714 -5.84%	1 -\$61,263 -7.14%	10 -\$415,061 -5.07%
Totals	0 \$0 0.00%	0 \$0 0.00%	1 -\$64,410 -3.72%	3 \$121,972 3.16%	4 \$26,474 0.68%	7 -\$50,400 -0.66%	8 -\$312,623 -2.51%	5 -\$235,129 -4.95%	7 -\$441,178 -5.84%	2 -\$212,967 -7.10%	37 -\$1,168,261 -2.60%

Proposed LPL-TOU SL-4 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
LPL-TOU SL4	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 12,999 kW	0	0	0	0	0	0	1 -\$277,572 -4.35%	0	0	0	1 -\$277,572 -4.35%
12,000 to 12,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
11,000 to 11,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
10,000 to 10,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
9,000 to 9,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
8,000 to 8,999 kW	0	0	0	0	0	0	1 -\$100,295 -3.55%	0	0	0	1 -\$100,295 -3.55%
7,000 to 7,999 kW	0	0	0	0	1 -\$159,479 -10.74%	0	0	0	0	0	1 -\$159,479 -10.74%
6,000 to 6,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
5,000 to 5,999 kW	0	0	0	1 -\$1,239 -0.14%	0	0	0	0	0	0	1 -\$1,239 -0.14%
4,000 to 4,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
3,000 to 3,999 kW	0	0	0	0	1 -\$18,433 -2.08%	2 -\$48,019 -2.87%	0	0	0	0	3 -\$66,452 -2.60%
2,000 to 2,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
Totals	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	1 -\$1,239 -0.14%	2 -\$177,912 -7.51%	2 -\$48,019 -2.87%	2 -\$377,868 -4.10%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	7 -\$605,039 -4.28%

Proposed LPL-TOU SL-5 Impact by kW size and LF showing Number of Customers,\$ Impact and % impact												
LPL-TOU SL5	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total	
Over 6,499 kW	0	0	0	1 \$317,479 15.43%	0	0	1 \$180,083 7.17%	0	0	0	2 \$497,562 10.89%	
6,000 to 6,499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
5,500 to 5,999 kW	0	0	0	0	0	0	2 \$287,268 7.28%	0	0	0	2 \$287,268 7.28%	
5,000 to 5,499 kW	0	0	0	0	1 \$163,224 12.33%	0	0	0	0	0	1 \$163,224 12.33%	
4,500 to 4,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
4,000 to 4,499 kW	0	0	0	0	0	1 \$117,029 10.07%	1 \$97,658 7.08%	1 \$85,555 5.79%	0	0	3 \$300,243 7.47%	
3,500 to 3,999 kW	0	0	0	0	0	1 \$96,207 9.76%	1 \$95,959 8.68%	1 \$84,727 6.37%	1 \$78,045 5.34%	0	4 \$354,938 7.27%	
3,000 to 3,499 kW	0	0	0	0	0	0	1 \$79,836 7.22%	0	0	0	1 \$79,836 7.22%	
2,500 to 2,999 kW	0	0	0	0	0	0	0	1 \$50,128 4.54%	0	0	1 \$50,128 4.54%	
2,000 to 2,499 kW	0	0	0	0	0	0	0	1 \$47,694 5.56%	1 \$42,124 4.62%	0	2 \$89,818 5.08%	
1,500 to 1,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
1,000 to 1,499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
Totals	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	1 \$317,479 15.43%	1 \$163,224 12.33%	2 \$213,236 9.93%	6 \$740,804 7.37%	4 \$268,104 5.62%	2 \$120,168 5.06%	0 \$0 0.00%	0 \$0 0.00%	16 \$1,823,013 8.02%

Proposed PL-TOU SL-1 Impact by kW size and LF showing Number of Customers,\$ Impact and % impact												
PL-TOU SL1	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total	
Over 3,249 kW	2 -\$5,112 -1.63%	0	0	0	0	0	0	0	0	0	2 -\$5,112 -1.63%	
3,000 to 3,249 kW	1 -\$2,092 -1.00%	0	0	0	0	0	0	0	0	0	1 -\$2,092 -1.00%	
2,750 to 2,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
2,500 to 2,749 kW	1 -\$3,084 -1.65%	0	0	0	0	0	0	0	0	0	1 -\$3,084 -1.65%	
2,250 to 2,499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
2,000 to 2,249 kW	0	1 -\$5,223 -3.18%	0	0	0	0	0	0	0	0	1 -\$5,223 -3.18%	
1,750 to 1,999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
1,500 to 1,749 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%	
1,250 to 1,499 kW	3 -\$4,939 -1.76%	0	0	0	1 -\$14,276 -5.10%	0	0	0	0	0	4 -\$19,215 -3.43%	
1,000 to 1,249 kW	1 -\$1,467 -2.21%	0	0	0	0	0	0	0	0	0	1 -\$1,467 -2.21%	
750 to 999 kW	0	1 -\$5,254 -6.86%	0	0	0	0	0	0	0	0	1 -\$5,254 -6.86%	
500 to 749 kW	0	0	0	1 -\$6,694 -5.41%	0	0	0	0	0	0	1 -\$6,694 -5.41%	
Totals	8 -\$16,695 -1.58%	2 -\$10,476 -4.35%	0 \$0 0.00%	1 -\$6,694 -5.41%	1 -\$14,276 -5.10%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	12 -\$48,141 -2.83%

Proposed PL-TOU SL-2 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-TOU SL2	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 2,849 kW	1 \$13,058 5.31%	0	0	0	0	0	0	0	0	0	1 \$13,058 5.31%
2,600 to 2,849 kW	0	1 -\$1,347 -0.75%	0	0	0	0	0	0	0	0	1 -\$1,347 -0.75%
2,350 to 2,599 kW	1 -\$618 -0.47%	0	0	0	0	0	0	0	0	0	1 -\$618 -0.47%
2,100 to 2,349 kW	0	1 -\$2,098 -1.06%	0	0	0	0	0	0	0	0	1 -\$2,098 -1.06%
1,850 to 2,099 kW	0	0	0	1 -\$12,316 -4.00%	0	0	0	0	0	0	1 -\$12,316 -4.00%
1,600 to 1,849 kW	0	0	1 -\$7,064 -2.71%	0	0	0	0	0	0	0	1 -\$7,064 -2.71%
1,350 to 1,599 kW	1 -\$889 -1.04%	0	1 -\$5,890 -2.64%	0	0	0	0	0	0	0	2 -\$6,778 -2.20%
1,100 to 1,349 kW	0	0	1 -\$4,579 -2.72%	0	0	1 -\$14,381 -4.53%	0	0	0	0	2 -\$18,960 -3.90%
850 to 1,099 kW	0	0	0	0	1 -\$11,414 -5.18%	0	0	0	0	0	1 -\$11,414 -5.18%
600 to 849 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
350 to 599 kW	0	0	0	0	0	0	0	1 -\$8,554 -5.53%	0	0	1 -\$8,554 -5.53%
100 to 349 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
Totals	3 \$11,551 2.49%	2 -\$3,446 -0.91%	3 -\$17,533 -2.69%	1 -\$12,316 -4.00%	1 -\$11,414 -5.18%	1 -\$14,381 -4.53%	0 \$0 0.00%	1 -\$8,554 -5.53%	0 \$0 0.00%	0 \$0 0.00%	12 -\$56,093 -2.25%

Proposed PL-TOU SL-3 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-TOU SL3	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 2,849 kW	1 -\$1,813 -1.54%	2 -\$10,589 -1.84%	1 -\$12,429 -1.97%	1 -\$12,758 -2.27%	0	1 -\$18,420 -2.42%	0	0	0	0	6 -\$56,010 -2.11%
2,600 to 2,849 kW	0	0	0	1 -\$11,383 -2.41%	0	1 -\$19,324 -2.46%	0	0	0	0	2 -\$30,707 -2.44%
2,350 to 2,599 kW	0	1 -\$4,372 -1.83%	1 -\$7,928 -2.06%	1 -\$10,178 -2.18%	1 -\$12,590 -2.22%	0	0	0	0	0	4 -\$35,068 -2.11%
2,100 to 2,349 kW	0	0	0	0	1 -\$10,810 -2.18%	1 -\$13,403 -2.35%	2 -\$35,144 -2.47%	0	0	0	4 -\$59,357 -2.39%
1,850 to 2,099 kW	0	0	1 -\$5,574 -2.34%	1 -\$7,347 -2.29%	1 -\$10,895 -2.39%	0	1 -\$13,857 -2.44%	2 -\$33,463 -2.62%	0	0	6 -\$71,137 -2.49%
1,600 to 1,849 kW	0	0	1 -\$5,054 -1.94%	1 -\$6,613 -2.24%	1 -\$9,898 -2.24%	1 -\$12,417 -2.46%	1 -\$14,584 -2.56%	1 -\$15,194 -2.73%	2 -\$32,724 -2.67%	0	8 -\$96,484 -2.50%
1,350 to 1,599 kW	1 -\$1,566 -1.20%	2 -\$6,454 -2.24%	0	1 -\$5,913 -2.21%	1 -\$8,654 -2.32%	2 -\$18,400 -2.43%	0	0	2 -\$29,633 -2.55%	0	9 -\$70,619 -2.37%
1,100 to 1,349 kW	0	1 -\$2,647 -2.46%	2 -\$7,976 -2.23%	1 -\$4,610 -2.20%	1 -\$6,898 -2.30%	0	1 -\$8,430 -2.44%	0	1 -\$12,258 -2.78%	0	7 -\$42,820 -2.43%
850 to 1,099 kW	1 -\$985 -1.69%	3 -\$6,312 -1.78%	4 -\$12,633 -2.11%	1 -\$3,874 -2.15%	0	0	1 -\$7,410 -2.51%	1 -\$8,870 -2.52%	4 -\$39,681 -2.68%	0	15 -\$79,765 -2.40%
600 to 849 kW	0	4 -\$5,898 -1.91%	6 -\$16,044 -2.22%	2 -\$6,138 -2.24%	1 -\$4,048 -2.29%	5 -\$27,262 -2.52%	2 -\$12,097 -2.52%	2 -\$13,719 -2.67%	3 -\$22,912 -2.58%	1 -\$8,826 -2.61%	26 -\$116,945 -2.44%
350 to 599 kW	0	1 -\$1,013 -2.29%	4 -\$6,472 -2.33%	5 -\$9,447 -2.39%	5 -\$12,188 -2.50%	6 -\$20,179 -2.52%	3 -\$10,063 -2.64%	4 -\$18,145 -2.62%	2 -\$10,942 -2.63%	0	30 -\$88,450 -2.53%
100 to 349 kW	1 -\$259 -2.98%	1 -\$524 -2.59%	2 -\$1,440 -2.72%	4 -\$4,342 -2.65%	3 -\$3,767 -2.69%	3 -\$5,574 -2.66%	5 -\$8,061 -2.83%	3 -\$7,747 -2.65%	6 -\$11,883 -2.73%	2 -\$4,747 -2.76%	30 -\$48,342 -2.76%
Totals	4 -\$4,623 -1.47%	15 -\$37,809 -1.95%	22 -\$75,552 -2.14%	19 -\$82,604 -2.29%	15 -\$79,749 -2.32%	20 -\$134,980 -2.47%	16 -\$109,646 -2.52%	13 -\$97,138 -2.63%	20 -\$160,033 -2.66%	3 -\$13,572 -2.65%	147 -\$795,705 -2.42%

Proposed PL-TOU SL-4 Impact by kW size and LF showing Number of Customers,\$ Impact and % impact											
PL-TOU SL4	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 2,849 kW	0	0	1	0	1	0	0	0	0	0	2
			-\$19,738		-\$21,674						-\$41,412
			-2.93%		-2.86%						-2.89%
2,600 to 2,849 kW	0	0	0	0	2	0	0	0	0	0	2
					-\$40,586						-\$40,586
					-3.07%						-3.07%
2,350 to 2,599 kW	0	0	0	0	1	0	0	0	0	0	1
					-\$16,033						-\$16,033
					-3.19%						-3.19%
2,100 to 2,349 kW	0	0	0	2	1	1	0	0	0	0	4
				-\$24,934	-\$16,572	-\$17,554					-\$59,060
				-2.89%	-2.91%	-3.29%					-3.00%
1,850 to 2,099 kW	0	0	0	1	0	0	0	0	0	0	1
				-\$10,890							-\$10,890
				-3.11%							-3.11%
1,600 to 1,849 kW	0	1	1	0	0	2	0	0	0	0	4
		-\$3,848	-\$7,168			-\$28,934					-\$39,950
		-1.95%	-2.57%			-2.92%					-2.72%
1,350 to 1,599 kW	0	0	0	1	2	0	0	1	0	0	4
				-\$8,590	-\$19,214			-\$17,229			-\$45,033
				-3.09%	-2.85%			-3.20%			-3.03%
1,100 to 1,349 kW	1	1	0	1	0	0	0	0	0	0	3
	-\$525	-\$2,874		-\$7,370							-\$10,769
	-0.64%	-2.16%		-2.75%							-2.23%
850 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0
											\$0
											0.00%
600 to 849 kW	1	1	2	0	1	0	1	0	1	0	7
	\$203	-\$1,667	-\$5,478		-\$5,006		-\$7,819		-\$10,305		-\$30,073
	0.94%	-2.09%	-2.28%		-2.93%		-3.11%		-3.19%		-2.76%
350 to 599 kW	0	0	0	1	2	1	0	0	0	0	4
				-\$2,771	-\$5,611	-\$3,065					-\$11,447
				-2.59%	-2.72%	-2.77%					-2.70%
100 to 349 kW	1	0	3	1	3	0	0	1	0	0	9
	\$127		-\$2,429	-\$192	-\$2,720			-\$4,039			-\$9,252
	1.47%		-1.98%	-1.11%	-2.16%			-3.04%			-2.27%
Totals	3	3	7	7	13	4	1	2	1	0	41
	-\$195	-\$8,389	-\$34,814	-\$54,747	-\$127,415	-\$49,552	-\$7,819	-\$21,267	-\$10,305	\$0	-\$314,504
	-0.17%	-2.05%	-2.64%	-2.91%	-2.94%	-3.03%	-3.11%	-3.17%	-3.19%	0.00%	-2.88%

Proposed PL-TOU SL-5 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-TOU SL5	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 2,249 kW	0	0	0	2	3	0	1	1	0	0	7
				\$12,518	\$18,568		\$7,313	\$8,791			\$47,190
				0.90%	0.88%		0.89%	1.00%			0.91%
2,050 to 2,249 kW	0	1	1	0	0	0	1	1	0	0	4
		\$2,091	\$3,228				\$7,918	\$7,393			\$20,630
		0.98%	0.94%				1.05%	0.92%			0.98%
1,850 to 2,049 kW	1	0	1	1	2	0	3	0	0	0	8
	\$773		\$3,128	\$4,002	\$7,913		\$17,127				\$32,943
	0.77%		0.97%	0.93%	0.75%		0.86%				0.84%
1,650 to 1,849 kW	0	0	0	3	0	5	2	0	0	0	10
				\$7,951		\$18,442	\$9,360				\$35,753
				0.68%		0.74%	0.80%				0.74%
1,450 to 1,649 kW	0	0	1	0	4	1	4	1	0	0	11
			\$2,491		\$11,326	\$3,143	\$19,605	\$5,446			\$42,012
			0.88%		0.71%	0.73%	0.91%	0.92%			0.83%
1,250 to 1,449 kW	2	2	4	6	5	12	2	0	1	0	34
	\$1,780	\$2,549	\$7,425	\$16,061	\$13,754	\$39,568	\$7,555		\$5,176		\$93,866
	0.95%	0.67%	0.86%	0.90%	0.78%	0.82%	0.84%		0.96%		0.84%
1,050 to 1,249 kW	1	0	8	2	5	7	3	1	1	0	28
	\$967		\$15,460	\$3,211	\$11,182	\$19,709	\$9,867	\$4,005	\$4,856		\$69,257
	0.79%		1.07%	0.69%	0.76%	0.79%	0.87%	0.95%	0.99%		0.86%
850 to 1,049 kW	1	7	5	9	10	14	7	1	1	0	55
	\$813	\$7,399	\$5,017	\$14,302	\$16,321	\$33,640	\$18,122	\$3,533	\$3,450		\$102,597
	1.24%	0.86%	0.65%	0.76%	0.66%	0.86%	0.82%	1.01%	0.92%		0.80%
650 to 849 kW	1	3	13	7	15	15	9	1	0	0	64
	\$122	\$1,798	\$14,937	\$8,230	\$21,107	\$26,374	\$19,750	\$2,783			\$95,101
	0.25%	0.63%	0.95%	0.75%	0.76%	0.76%	0.90%	0.90%			0.81%
450 to 649 kW	4	12	23	30	22	20	21	5	0	0	137
	\$2,576	\$6,001	\$16,240	\$25,900	\$22,804	\$27,099	\$33,974	\$8,942			\$143,537
	1.08%	0.75%	0.75%	0.74%	0.77%	0.85%	0.88%	0.91%			0.81%
250 to 449 kW	0	9	34	68	58	41	44	12	0	1	267
		\$2,424	\$14,470	\$36,355	\$38,717	\$36,963	\$45,987	\$14,565		\$1,219	\$190,699
		0.67%	0.73%	0.73%	0.81%	0.86%	0.89%	0.95%		1.00%	0.82%
50 to 249 kW	26	43	309	315	363	220	149	21	14	99	1,559
	\$957	\$3,611	\$33,936	\$52,282	\$73,385	\$58,552	\$44,913	\$6,321	\$3,520	\$10,401	\$287,879
	0.33%	0.52%	0.45%	0.72%	0.81%	0.94%	0.97%	0.85%	0.80%	0.47%	0.74%
Totals	36	77	399	443	487	335	246	44	17	100	2,184
	\$7,989	\$25,872	\$116,333	\$180,812	\$235,076	\$263,490	\$241,492	\$61,778	\$17,002	\$11,620	\$1,161,464
	0.76%	0.72%	0.67%	0.76%	0.78%	0.84%	0.90%	0.93%	0.92%	0.50%	0.80%

Proposed PL-1 Impact by kW size and LF showing Number of Customers,\$ Impact and % impact											
PL-SL1	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
550 to 599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
500 to 549 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
450 to 499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
400 to 449 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
350 to 399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
300 to 349 kW	0	0	0	1 -\$2,127 -3.77%	1 -\$2,308 -3.21%	0	0	0	0	0	2 -\$4,435 -3.46%
250 to 299 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
200 to 249 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
150 to 199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
100 to 149 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
50 to 99 kW	1 -\$2,184 -60.61%	0	0	0	0	0	0	0	0	0	1 -\$2,184 -60.61%
Totals	1 -\$2,184 -60.61%	0 \$0 0.00%	0 \$0 0.00%	1 -\$2,127 -3.77%	1 -\$2,308 -3.21%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	3 -\$6,619 -5.02%

Proposed PL-2 Impact by kW size and LF showing Number of Customers,\$ Impact and % impact											
PL-SL2	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 3,399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
3,100 to 3,399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
2,800 to 3,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
2,500 to 2,799 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
2,200 to 2,499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,900 to 2,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,600 to 1,899 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,300 to 1,599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,299 kW	0	1 -\$1,760 -1.46%	0	0	0	0	0	0	0	0	1 -\$1,760 -1.46%
700 to 999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
400 to 699 kW	0	1 -\$2,286 -5.05%	0	0	1 -\$2,797 -2.13%	0	0	0	0	0	2 -\$5,082 -2.87%
100 to 399 kW	1 -\$2,166 -12.38%	0	0	1 -\$2,243 -7.58%	0	0	0	0	0	0	2 -\$4,409 -9.36%
Totals	1 -\$2,166 -12.38%	2 -\$4,046 -2.45%	0 \$0 0.00%	1 -\$2,243 -7.58%	1 -\$2,797 -2.13%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	5 -\$11,252 -3.27%

Proposed PL-3 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-SL3	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,099 kW	1 -\$2,025 -1.94%	1 -\$2,152 -1.99%	1 -\$3,862 -2.05%	2 -\$12,385 -1.92%	2 -\$15,811 -1.91%	2 -\$15,723 -1.90%	2 -\$19,376 -1.93%	1 -\$14,315 -1.91%	0	0	11 -\$85,649 -1.92%
1,000 to 1,099 kW	0	0	0	1 -\$4,881 -1.96%	0	1 -\$5,232 -1.96%	0	0	0	0	2 -\$10,113 -1.96%
900 to 999 kW	0	0	0	0	0	0	1 -\$5,896 -1.96%	0	0	0	1 -\$5,896 -1.96%
800 to 899 kW	0	0	0	0	1 -\$4,030 -1.97%	2 -\$9,575 -1.97%	0	0	2 -\$12,494 -1.96%	1 -\$6,584 -1.96%	6 -\$32,683 -1.97%
700 to 799 kW	1 -\$1,316 -2.28%	1 -\$2,288 -2.02%	0	0	0	0	1 -\$4,848 -1.97%	1 -\$5,348 -1.97%	0	0	4 -\$13,799 -2.00%
600 to 699 kW	1 -\$822 -2.64%	0	0	1 -\$2,568 -2.02%	1 -\$3,289 -2.00%	2 -\$7,646 -2.00%	1 -\$3,719 -2.01%	1 -\$4,506 -1.99%	1 -\$5,400 -1.98%	0	8 -\$27,950 -2.01%
500 to 599 kW	1 -\$941 -2.30%	1 -\$1,225 -2.25%	1 -\$1,950 -2.09%	1 -\$2,588 -2.03%	2 -\$5,397 -2.05%	0	2 -\$6,626 -2.05%	0	0	0	8 -\$18,728 -2.07%
400 to 499 kW	1 -\$875 -2.47%	0	2 -\$3,304 -2.13%	3 -\$5,939 -2.09%	3 -\$6,323 -2.13%	0	1 -\$2,904 -2.05%	2 -\$6,133 -2.04%	0	0	12 -\$25,478 -2.10%
300 to 399 kW	0	1 -\$921 -2.56%	2 -\$2,317 -2.31%	4 -\$5,973 -2.19%	2 -\$3,448 -2.15%	0	5 -\$11,835 -2.08%	3 -\$7,570 -2.08%	0	0	17 -\$32,064 -2.14%
200 to 299 kW	2 -\$996 -3.50%	0	2 -\$2,307 -2.31%	3 -\$3,502 -2.33%	4 -\$4,714 -2.32%	6 -\$9,213 -2.21%	4 -\$6,889 -2.17%	2 -\$3,960 -2.14%	8 -\$16,404 -2.13%	0	31 -\$47,984 -2.21%
100 to 199 kW	0	3 -\$1,793 -2.99%	5 -\$2,987 -3.01%	6 -\$4,617 -2.66%	7 -\$6,066 -2.37%	8 -\$8,730 -2.39%	7 -\$9,253 -2.88%	6 -\$8,438 -2.26%	6 -\$7,810 -2.30%	2 -\$2,942 -2.26%	50 -\$52,636 -2.41%
0 to 99 kW	2 -\$653 -6.00%	3 -\$1,097 -5.01%	8 -\$3,466 -3.98%	5 -\$2,538 -3.42%	6 -\$3,154 -3.37%	6 -\$3,416 -3.17%	4 -\$2,681 -2.88%	2 -\$1,596 -2.66%	3 -\$2,261 -2.73%	0	39 -\$20,862 -3.31%
Totals	9 -\$7,628 -2.47%	10 -\$9,477 -2.41%	21 -\$20,193 -2.45%	26 -\$44,992 -2.14%	28 -\$52,233 -2.13%	26 -\$59,535 -2.08%	28 -\$74,027 -2.07%	18 -\$51,866 -2.05%	20 -\$44,369 -2.11%	3 -\$9,526 -2.04%	189 -\$373,844 -2.12%

Proposed PL-4 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-SL4	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,099 kW	0	0	0	0	2 -\$20,513 -2.64%	2 -\$19,983 -2.62%	1 -\$10,825 -2.67%	0	0	0	5 -\$51,322 -2.64%
1,000 to 1,099 kW	1 -\$2,131 -2.10%	1 -\$3,865 -2.27%	0	0	1 -\$6,543 -2.56%	0	0	0	0	0	3 -\$12,540 -2.38%
900 to 999 kW	0	0	0	0	1 -\$6,378 -2.56%	0	0	1 -\$9,497 -2.67%	0	0	2 -\$15,874 -2.62%
800 to 899 kW	1 -\$1,645 -2.24%	0	0	0	0	0	0	0	0	0	1 -\$1,645 -2.24%
700 to 799 kW	0	0	0	2 -\$7,764 -2.56%	1 -\$4,339 -2.58%	0	0	0	0	0	3 -\$12,103 -2.56%
600 to 699 kW	0	0	0	1 -\$3,776 -2.53%	3 -\$12,640 -2.58%	1 -\$4,999 -2.60%	0	0	0	0	5 -\$21,415 -2.58%
500 to 599 kW	0	0	0	1 -\$2,893 -2.50%	0	0	0	0	0	0	1 -\$2,893 -2.50%
400 to 499 kW	0	0	0	1 -\$2,495 -2.50%	1 -\$3,382 -2.54%	0	1 -\$3,566 -2.62%	0	0	0	3 -\$9,443 -2.56%
300 to 399 kW	1 -\$347 -1.77%	0	2 -\$2,985 -2.40%	0	1 -\$2,357 -2.51%	2 -\$5,997 -2.60%	1 -\$3,597 -2.64%	0	0	0	7 -\$15,283 -2.53%
200 to 299 kW	0	0	2 -\$1,512 -2.36%	0	0	1 -\$1,749 -2.55%	0	0	0	0	3 -\$3,261 -2.46%
100 to 199 kW	0	0	1 -\$740 -2.37%	2 -\$1,689 -2.43%	0	1 -\$914 -2.55%	0	1 -\$1,620 -2.62%	1 -\$1,643 -2.66%	1 -\$1,991 -2.67%	7 -\$8,597 -2.57%
0 to 99 kW	0	0	0	1 -\$533 -2.40%	1 -\$315 -2.34%	1 -\$99 -2.01%	1 -\$101 -2.05%	0	0	0	4 -\$1,048 -2.30%
Totals	3 -\$4,123 -2.12%	1 -\$3,865 -2.27%	5 -\$5,237 -2.39%	8 -\$19,149 -2.52%	11 -\$56,467 -2.59%	8 -\$33,742 -2.61%	4 -\$18,088 -2.65%	2 -\$11,116 -2.66%	1 -\$1,643 -2.66%	1 -\$1,991 -2.67%	44 -\$155,423 -2.57%

Proposed PL-5 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PL-1 SL5	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,099 kW	0	2 \$10,769 3.14%	2 \$28,555 5.19%	2 \$47,594 7.00%	5 \$143,565 7.73%	4 \$196,831 8.54%	2 \$107,296 8.92%	0	0	1 \$55,187 10.01%	18 \$589,796 7.87%
1,000 to 1,099 kW	0	0	0	0	0	2 \$52,973 8.14%	1 \$35,533 9.09%	0	0	0	3 \$88,506 8.50%
900 to 999 kW	0	0	0	4 \$58,947 6.71%	0	4 \$102,322 8.49%	1 \$31,966 9.20%	0	0	0	9 \$193,236 7.95%
800 to 899 kW	0	2 \$8,831 3.99%	3 \$30,894 6.40%	3 \$40,612 6.84%	6 \$98,657 7.37%	6 \$134,009 8.34%	0	1 \$35,063 9.46%	0	0	21 \$348,066 7.54%
700 to 799 kW	0	1 \$4,482 3.93%	3 \$20,526 5.26%	2 \$20,135 6.12%	4 \$61,099 7.39%	4 \$79,838 8.40%	3 \$72,957 9.12%	0	0	0	17 \$259,038 7.60%
600 to 699 kW	1 \$858 1.02%	2 \$3,875 2.02%	2 \$14,588 5.53%	5 \$51,469 6.93%	17 \$237,676 7.82%	3 \$51,087 8.55%	2 \$39,859 8.89%	1 \$22,322 9.42%	0	0	33 \$421,735 7.52%
500 to 599 kW	3 -\$1,738 -0.87%	5 \$12,348 2.93%	7 \$34,013 4.92%	8 \$66,314 6.76%	9 \$106,735 7.86%	15 \$221,687 8.42%	11 \$197,133 9.12%	2 \$40,244 9.44%	0	0	60 \$676,737 7.63%
400 to 499 kW	0	6 \$14,527 4.00%	10 \$43,478 5.08%	25 \$170,001 6.63%	29 \$260,732 7.55%	13 \$148,717 8.34%	11 \$156,432 9.08%	4 \$64,942 9.54%	0	0	98 \$858,829 7.52%
300 to 399 kW	2 \$110 0.17%	5 \$8,855 3.89%	28 \$95,010 4.95%	32 \$171,740 6.88%	39 \$282,620 7.67%	23 \$216,847 8.39%	10 \$104,283 9.01%	2 \$24,276 9.34%	0	0	141 \$903,741 7.29%
200 to 299 kW	7 \$2,405 3.66%	13 \$18,995 4.23%	63 \$154,415 5.57%	102 \$388,114 6.91%	122 \$616,172 7.65%	60 \$397,106 8.43%	23 \$187,909 8.96%	5 \$49,562 9.36%	0	1 \$13,497 10.15%	396 \$1,828,175 7.48%
100 to 199 kW	5 \$1,814 3.34%	25 \$20,033 3.51%	245 \$363,693 5.65%	430 \$940,483 6.73%	328 \$973,192 7.59%	180 \$672,814 8.28%	82 \$358,439 8.87%	19 \$91,397 9.36%	7 \$44,312 9.87%	2 \$13,810 9.93%	1,323 \$3,479,987 7.31%
0 to 99 kW	5 \$472 1.65%	102 \$31,547 4.11%	1,900 \$880,493 5.27%	2,483 \$1,711,347 6.39%	1,529 \$1,455,704 7.30%	680 \$847,729 8.09%	273 \$417,032 8.68%	73 \$109,971 9.26%	32 \$57,393 9.56%	6 \$10,900 9.77%	7,083 \$5,522,586 6.78%
Totals	23 \$3,919 0.79%	163 \$134,264 3.66%	2,263 \$1,665,665 5.36%	3,096 \$3,666,756 6.59%	2,088 \$4,236,152 7.52%	994 \$3,121,961 8.29%	419 \$1,708,839 8.91%	107 \$437,778 9.38%	39 \$101,705 9.69%	10 \$93,394 9.99%	9,202 \$15,170,433 7.20%

Proposed PSD-3 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD 3	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,100 to 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
900 to 999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
800 to 899 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
700 to 799 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
600 to 699 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
500 to 599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
400 to 499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
300 to 399 kW	0	0	1 -\$172 -0.33%	0	0	0	0	0	0	0	1 -\$172 -0.33%
200 to 299 kW	0	0	1 -\$91 -0.20%	0	0	0	0	0	0	0	1 -\$91 -0.20%
100 to 199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
Totals	0 \$0 0.00%	0 \$0 0.00%	2 -\$263 -0.27%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	2 -\$263 -0.27%

Proposed PSD-4 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD 4	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,100 to 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
900 to 999 kW	0	0	1 -\$412 -0.29%	0	0	0	0	0	0	0	1 -\$412 -0.29%
800 to 899 kW	0	1 -\$309 -0.28%	0	0	0	0	0	0	0	0	1 -\$309 -0.28%
700 to 799 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
600 to 699 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
500 to 599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
400 to 499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
300 to 399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
200 to 299 kW	0	0	1 -\$219 -0.53%	0	0	0	0	0	0	0	1 -\$219 -0.53%
100 to 199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
Totals	0 \$0 0.00%	1 -\$309 -0.28%	2 -\$631 -0.35%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	3 -\$940 -0.32%

Proposed PSD-5 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD 5	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,199 kW	0	0	1 \$37,550 11.80%	0	0	0	0	0	0	0	1 \$37,550 11.80%
1,100 to 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
900 to 999 kW	0	0	1 \$15,710 11.62%	0	0	1 \$39,948 13.67%	0	0	0	0	2 \$55,658 13.02%
800 to 899 kW	0	0	1 \$15,345 11.64%	0	0	0	0	0	0	0	1 \$15,345 11.64%
700 to 799 kW	0	0	1 \$13,656 11.83%	1 \$23,063 12.77%	0	0	0	0	0	0	2 \$36,719 12.40%
600 to 699 kW	0	0	1 \$11,644 11.39%	1 \$16,491 12.87%	0	0	0	0	0	0	2 \$28,136 12.21%
500 to 599 kW	0	0	3 \$35,196 11.79%	2 \$30,562 12.94%	0	0	0	0	0	0	5 \$65,758 12.30%
400 to 499 kW	0	0	3 \$27,878 11.89%	0	0	0	0	0	0	0	3 \$27,878 11.89%
300 to 399 kW	0	0	4 \$27,202 11.86%	3 \$26,489 12.61%	1 \$12,018 13.49%	0	0	0	0	0	8 \$65,709 12.43%
200 to 299 kW	0	0	14 \$77,285 11.95%	12 \$80,470 12.68%	0	0	0	0	0	0	26 \$157,755 12.31%
100 to 199 kW	0	4 \$5,259 11.68%	41 \$70,988 12.16%	23 \$43,017 12.78%	7 \$19,388 13.36%	5 \$17,013 13.86%	0	0	0	0	80 \$155,665 12.62%
Totals	0 \$0 0.00%	4 \$5,259 11.68%	70 \$332,453 11.89%	42 \$220,092 12.75%	8 \$31,406 13.41%	6 \$56,960 13.73%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	130 \$646,171 12.39%

Proposed PSD-TOU-3 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD TOU 3	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,100 to 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
900 to 999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
800 to 899 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
700 to 799 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
600 to 699 kW	0	1 \$1,401 1.75%	0	1 \$316 0.27%	0	0	0	0	0	0	2 \$1,717 0.87%
500 to 599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
400 to 499 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
300 to 399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
200 to 299 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
100 to 199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
Totals	0 \$0 0.00%	1 \$1,401 1.75%	0 \$0 0.00%	1 \$316 0.27%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	2 \$1,717 0.87%

Proposed PSD-TOU-4 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD TOU 4	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,749 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,600 to 1,749 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,450 to 1,599 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,300 to 1,449 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,150 to 1,299 kW	0	0	6 \$8,271 0.66%	0	0	0	0	0	0	0	6 \$8,271 0.66%
1,000 to 1,149 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
850 to 999 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
700 to 849 kW	0	0	0	1 \$324 0.24%	0	0	0	0	0	0	1 \$324 0.24%
550 to 699 kW	0	0	0	0	2 -\$334 -0.11%	0	0	0	0	0	2 -\$334 -0.11%
400 to 549 kW	0	0	2 \$1,156 0.85%	0	0	0	0	0	0	0	2 \$1,156 0.85%
250 to 399 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
100 to 249 kW	0	0	1 \$427 1.36%	0	1 \$132 0.23%	0	0	0	0	0	2 \$559 0.63%
Totals	0 \$0 0.00%	0 \$0 0.00%	9 \$9,853 0.70%	1 \$324 0.24%	3 -\$201 -0.06%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	13 \$9,977 0.52%

Proposed PSD-TOU-5 Impact by kW size and LF showing Number of Customers,\$ impact and % impact											
PSD TOU 5	1-10%	11-20%	21-30%	31-40%	41-50%	51-60%	61-70%	71-80%	81-90%	91+%	Total
Over 1,199 kW	0	0	2 \$15,012 3.77%	0	0	0	0	0	0	0	2 \$15,012 3.77%
1,100 to 1,199 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
1,000 to 1,099 kW	0	0	0	0	0	0	0	0	0	0	0 \$0 0.00%
900 to 999 kW	0	0	5 \$30,591 4.10%	0	2 \$15,072 3.04%	0	0	0	0	0	7 \$45,663 3.67%
800 to 899 kW	0	1 \$4,785 4.63%	1 \$5,244 3.80%	0	1 \$6,939 3.00%	0	0	0	0	0	3 \$16,968 3.59%
700 to 799 kW	0	0	1 \$4,123 3.36%	0	0	0	0	0	0	0	1 \$4,123 3.36%
600 to 699 kW	0	0	0	0	1 \$4,884 3.22%	0	0	0	0	0	1 \$4,884 3.22%
500 to 599 kW	0	0	2 \$6,625 3.76%	2 \$8,128 3.39%	0	0	0	0	0	0	4 \$14,754 3.55%
400 to 499 kW	0	0	1 \$2,863 3.91%	3 \$10,354 3.42%	1 \$4,051 3.15%	0	0	0	0	0	5 \$17,267 3.42%
300 to 399 kW	0	0	0	5 \$12,592 3.45%	1 \$3,137 3.40%	1 \$3,076 3.36%	0	0	0	0	7 \$18,804 3.43%
200 to 299 kW	0	0	13 \$21,000 3.80%	5 \$9,632 3.58%	3 \$6,607 3.37%	0	0	0	0	0	21 \$37,238 3.66%
100 to 199 kW	0	2 \$759 5.77%	30 \$17,508 4.53%	14 \$8,388 3.96%	7 \$5,882 3.53%	1 \$1,075 3.47%	0	0	0	0	54 \$33,612 4.15%
Totals	0 \$0 0.00%	3 \$5,544 4.76%	55 \$102,966 3.97%	29 \$49,093 3.54%	16 \$46,570 3.19%	2 \$4,151 3.39%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	0 \$0 0.00%	105 \$208,323 3.67%