



The Public Utilities

A report by the Staff of the Public Utilities Commission of Ohio

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**FirstEnergy Ohio Edison Company** 

Case Nos. 07-551-EL-AIR 07-552-EL-ATA 07-553-EL-AAM 07-554-EL-UNC



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#### STAFF'S REPORT OF INVESTIGATION

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In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Increase Rates for Distribution Service, Modify Certain Accounting Practices and for Tariff Approvals.

Case No. 07-551-EL-AIR Case No. 07-552-EL-ATA Case No. 07-553-EL-AAM Case No. 07-554-EL-UNC

Submitted to The Public Utilities Commission

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Increase Rates for Distribution Service, Modify Certain Accounting Practices and for Tariff Approvals.

Case No. 07-551-EL-AIR Case No. 07-552-EL-ATA Case No. 07-553-EL-AAM Case No. 07-554-EL-UNC

Alan R. Schriber, Chairman Paul A. Centolella, Commissioner Ronda Hartman Fergus, Commissioner Valerie A. Lemmie, Commissioner Donald L. Mason, Commissioner

To The Honorable Commission:

In accordance with the provisions of R.C. Section 4909.19, the Commission's Staff has conducted its investigation in the above matter and hereby submits its findings in the within Staff Report.

The Staff Report has been jointly prepared by the Commission's Utilities Department and Service Monitoring and Enforcement Department.

In accordance with R.C. Section 4909.19, copies of the Staff Report have been filed with the Docketing Division of the Commission and served by certified mail upon the mayors of all affected municipalities and other public officials deemed representative of the service area affected by the application. A copy of said report has also been served upon the utility or its authorized representative. Interested parties are advised that written objections to any portion of the Staff Report must be filed within thirty (30) days of the date of the filing of said report after which time the Commission will promptly set this matter for public hearing. Written notice of the time, place, and date of such hearing will be served upon all parties to the proceeding.

The Staff Report is intended to present for the Commission's consideration the results of the Staff's investigation. It does not purport to reflect the views of the Commission nor should any party to said proceeding consider the Commission as bound in any manner by the representations or recommendations set forth therein. The Staff Report, however, is

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legally cognizable evidence upon which the Commission may rely in reaching its decision in this matter. (See Lindsey v. Pub. Util. Comm., 111 Ohio St. 6 (1924)

Respectfully submitted,

Utilities Department

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# STAFF ACKNOWLEDGEMENTS

The Staff Report components reflect the results of investigations conducted by the Staff of the Applicant's rate application. The Staff person responsible for each component is shown below:

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# BACKGROUND

The Applicant, the Ohio Edison Company, was incorporated in Ohio on July 5, 1930, as a consolidation of Northern Ohio Power and Light, The Pennsylvania Ohio Power and Light Company, The Ohio Edison Company, The Akron Steam Heating Company and the London Light and Power Company. In 1997, Ohio Edison Company and its subsidiary, Pennsylvania Power, merged with the former Centerior Energy Corp. to create the FirstEnergy Corp. (FE), headquartered in Akron, Ohio.

The Applicant is a public utility and an electric light Company providing retail distribution services to approximately 1,000,000 customers in central and northeastern Ohio, in all or part of 36 counties.

The Applicant's current distribution rates were part of the bundled rates established in its last base rate proceeding, Case No. 89-1001-EL-AIR. The Applicant's operation as a vertically integrated utility encompassing generation, transmission, and distribution functions was the basis for the bundled rates.

On June 22, 1999, the Ohio General Assembly passed Amended Substitute Senate Bill No. 3 of the 123<sup>rd</sup> General Assembly (S.B. 3). Senate Bill 3 restructured the electric utility industry and provided for electric utilities to file a transition plan that included unbundling electricity rates into generation, transmission, and distribution components. Senate Bill 3 further provided for a Market Development Period (MDP), January 1, 2001 through December 31, 2005, to allow a competitive market to develop for the generation function. Unbundled distribution rates were to remain unchanged during the MDP. The Governor signed the legislation on July 6, 1999 and it became effective on October 5, 1999.

In accordance with S. B. 3, the Commission issued an opinion and order on July 19, 2000, approving and modifying the stipulation and recommendation with regard to the Applicant's electric transition plan, Case No. 99-1212-EL-ETP. The Commission authorized base electric distribution rates, as unbundled, to remain frozen beyond the MDP through December 31, 2007.

The Commission, by its Entry in Case No. 03-1461-EL-UNC, encouraged the Applicant to develop plans which balanced rate certainty, financial stability for the distribution utility and further the development of the competitive market. On October 21, 2003, the Applicant filed a Rate Stabilization Plan (RSP) in Case No. 03-2144-EL-ATA in response to the Commission's request. Under the RSP, distribution rates were to remain frozen through December 31, 2007, except for revenues to recover costs related to changes in laws, environmental compliance, taxes, emergencies and reliability.

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FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR et al.

On September 9, 2005, the Applicant filed a Rate Certainty Plan (RCP) in Case No. 05-1125-EL-UNC, et seq. The rate-certainty plan, among other things, intended to maintain level distribution rates for 2006 through 2008.

On May 8, 2007, the Applicant filed a notice of intent to file an application to increase rates for electric distribution service in its entire service territory. The Applicant requested that its test period begin March 1, 2007, and end February 29, 2008, and that the date certain be May, 31, 2007. The Commission approved the Applicant's requested test year and date certain by its entry of May 30, 2007.

On June 7, 2007, the Applicant filed an application to increase distribution rates. By entry dated August 1, 2007, the Commission ordered that the application be accepted as of June 7, 2007.

The rates proposed by the Applicant for increase, when applied to test year sales volumes, would generate \$160,762,886 of additional base distribution revenues or an increase of 31.05%.

# **OPERATING INCOME AND RATE BASE**

# SCOPE OF INVESTIGATION

The scope of the investigation was designed to determine if the Applicant's filed exhibits concerning operating income, rate base and other data are reasonable for ratemaking purposes, and if the financial and statistical records supporting the data can be relied upon. The Staff interviewed Applicant's key management personnel and reviewed both internal and published financial reports to assure understanding of the Applicant's operation and organization. The Staff's investigation of test year operating income and date certain rate base included a review of the Applicant's budget and forecasting techniques, verification of the operating revenue computation, and an examination of the Applicant's continuing property records. In addition, the existence and the used and useful nature of the assets were verified through physical inspections. Other independent analyses were performed as the Staff considered necessary under the circumstances.

The Staff reviewed and analyzed the Applicant's proposed adjustments to operating income and rate base and traced them to supporting work papers and to source data. As a result of its review and analysis, the Staff accepted some of the proposed adjustments as appropriate, changed some proposed adjustments using alternative approaches, and proposed new adjustments as required to make the test year operating income and date certain rate base consistent with sound regulatory accounting practices, more representative of normal operations and appropriate for ratemaking purposes.

The purpose of the Staff's investigation was to develop financial data for ratemaking purposes; it was not intended to provide a basis for expressing an opinion on the financial statements of the Company as a whole. The following sections of this report summarize the results of the Staff investigation which it believes are relevant to the determination of test year operating income and rate base.

FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR et al.

#### **REVENUE REQUIREMENTS**

The Staff's recommended revenue increase range is detailed on Staff's Schedule A-1.

#### RATE BASE

The rate base represents the Applicant's net investment in plant, materials and supplies, and other assets as of the date certain, May 31, 2007, which were used and useful in providing electric distribution utility service to its customers and upon which its investors are entitled to the opportunity to receive a fair and reasonable rate of return.

The Staff's analysis of the rate base is divided into Plant in Service, Depreciation Reserve, Construction Work in Progress, Working Capital, and Other Rate Base Items. A comparison of the rate base submitted by the Applicant and that which is recommended by the Staff is shown on Schedule B-1. Schedules B-2 through B-6 provide additional support for the Staff's findings.

#### Plant in Service

The plant in service, as presented by the Applicant, is the surviving original cost of the distribution, sub-transmission, and general plant that is used and useful in providing electric service to its distribution customers. The Staff reviewed and tested the Applicant's plant accounting system to ascertain if the information in the Applicant's plant ledgers and supporting continuing property records (CPR) represent a reliable source of original cost data. The testing included a sample selection of plant additions, retirements and transfers since the prior base rate case. Plant additions as well as various items from the CPR were selected for on-site inspections for complete verification of existence and their used and usefulness. The Staff determined that there were no significant discrepancies and that the Applicant's plant accounting system represented a reliable source of original cost data.

As a result of its investigation, the Staff recommends certain adjustments be made to the Applicant's date certain plant investment for ratemaking purposes. These adjustments are identified below and summarized on Schedule B-2.2 and reflected on Schedule B-2.1.

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## Transmission Land Plant Adjustment

In Case No. 99-1212-EL-AIR, the Commission adopted the FERC seven factor test set forth in Order No. 888, for the purpose of classifying transmission and distribution facilities to be transferred to American Transmission System Incorporated (ATSI). The FirstEnergy operating companies continue to own all land, easements, franchises, and other rights associated with the transmission facilities leased by ATSI from the FirstEnergy operating companies pursuant to a Ground Lease. The Staff's investigation has determined that the Ground Lease has not been renegotiated since the original agreement effective September 1, 2000. Staff is of the opinion that the revenue received from ATSI does not support the revenue required on the land investment. Therefore, the Staff has excluded all Transmission land in Account 350 as shown on Schedule B-2.3. The Staff also excluded all revenues associated with the Ground Lease as shown on Staff's Schedule C-3.2. This adjustment to land is shown on Schedule B-2.2a.

## Transportation Equipment and Power Operated Equipment

The Staff adjusted accounts 392 and 396 to exclude vehicles that either should have been retired or are no longer part of the distribution Company. This adjustment is shown on Schedule B-2.2b.

# Reclassification of Transportation Equipment and Power Operated Equipment

During its investigation, the Staff discovered that some vehicles and some power operated equipment had been transferred between Ohio Edison, CEI and Toledo Edison but not reflected in the companies' plant accounting systems. This adjustment recognizes the reclassification of these items to the appropriate operating companies and is shown on Schedule B-2.2c.

#### General Plant

As a result of discrepancies associated with the Applicant's General Office Transportation Plant Account, the Staff determined further analysis of all General Office assets was necessary. At the time of the writing of this Staff Report, the Staff requested additional documentation to assure Staff of the proper classification of all General Office plant accounts. The Staff's review is still in progress and the results of this review will be provided prior to making a final determination of the appropriate level of plant in service for purposes of this proceeding.

## **Depreciation**

Depreciation is the process which distributes the original cost of depreciable assets, adjusted for net salvage, over the normal life of the property in a systematic and rational manner. The Staff's investigation of depreciation is segregated into two areas: Depreciation Reserve, and Depreciation Accrual Rate and the corresponding Depreciation Expense. Each of these is discussed in detail in the following sections.

#### Depreciation Reserve

The Applicant maintains depreciation reserve, by account, on a total Company basis. In order to determine if the Applicant's booked reserve for depreciation is proper and adequate, the Staff generally finds it useful to compare the book reserve with a calculated theoretical reserve, as a guide to whether past accrual rate calculations have been appropriate. The Staff compared the Applicant's booked reserve level with a calculated theoretical reserve, based on the Staff's recommended accrual rates and May 31, 2007 plant balances. The Staff determined that the overall booked reserve is in close agreement with the theoretical reserve calculation. Therefore, it is the Staff's opinion that the actual jurisdictional reserve for depreciation, as adjusted by the Staff on Schedule B-3, is proper and adequate and should be used for purposes of this proceeding. The Staff adjusted the Applicant's depreciation reserve to exclude reserve associated with the adjustments discussed in the Plant in Service section. These adjustments are summarized on Schedule B-3.1.

#### Depreciation Accrual Rates and Depreciation Expense

The Applicant's current depreciation accrual rates were prescribed by this Commission in Case No. 92-1424-EL-AAM.

The Applicant filed a depreciation study for its electric plant. The Applicant's accrual rates, for most electric accounts, were developed using the straight line whole life method. With exception, the Accounts 370 and 371, Meters and Installation on Customer Premises, were developed using the straight line remaining life method.

The Staff conducted an independent depreciation study utilizing actuarial methods and judgment to develop its accrual rate parameters and based its accrual rates on the straight line whole life method. The Staff recommended accrual rates are shown on Schedule B-3.2a. The Staff recommends that the Applicant be ordered to use the accrual rates shown on Schedule B-3.2a for book depreciation purposes, effective concurrently with customer rates from this proceeding.

The Staff's calculation of depreciation expense based on the adjusted jurisdictional plant in service balances at date certain and the accrual rates discussed above, is shown on Schedule B-3.2.

Also included in the depreciation expense on Schedule B-3.2 is the Staff's calculation of depreciation on the gross-up of the net of tax AFUDC created as a result of implementing SFAS No. 109. The Staff recalculated the SFAS No. 109 accrual rate to reflect a composite based on the Staff's recommended accrual rates as opposed to the Applicant's proposed accrual rates.

#### Construction Work In Progress (CWIP)

The Applicant did not request an allowance for CWIP in its filing and the Staff, as shown on Schedule B-4, did not recommend an allowance.

## Working Capital

Working Capital has been generally defined as the average amount of capital provided by investors in the Company, over and above the investment in plant and other specifically identified rate base items, to bridge the gap between the time expenditures are required to provide service and the time collections are received for that service. As such, the objective of including a working capital allowance in rate base is to produce a total rate base that will result in allowing investors the opportunity to earn a fair return on all capital invested by them in utility operations.

The Applicant conducted and submitted a lead/lag study in the current proceeding. The Staff performed a detailed review of the Applicant's sponsored study. The review included testing the mathematical accuracy of the study, tracing information to source documents, and a detailed review including interviewing Applicant employees regarding the assumptions and methodologies used by the Applicant in its study. Based on its review, the Staff made certain adjustments to the Applicant's study to reflect the Staff's position and past Commission decisions.

The Staff's working capital calculation is comprised of three different components. The calculation contains a revenue lag allowance component, an expense lag allowance component and an allowance for materials and supplies component.

The Staff conducted a thorough review of the Applicant's revenue lag calculation. Based on that review, Staff agrees with the Applicant's calculated revenue lag of 24.4 days. The Applicant's revenue lag of 24.4 days was determined by netting its electric and generation revenue lag days against the Applicant's revenue lead days associated with its Energy for Education program revenue. The Staff also undertook a review of the Applicant's expense lag calculation. Based on its review and understanding of how the Applicant calculated its expense lag, Staff made certain adjustments to the Applicant's calculated expense lag days to reflect past Commission decisions relative to uncollectibles account expense, vacation pay and interest expense. Also, the Staff made some adjustments to the study related to purchase power expense, payroll, outside services employed other expenses, Ohio property tax, Pennsylvania franchise tax, Ohio sales use tax and Municipal tax.

The Staff's working capital allowance for materials and supplies is based on a thirteenmonth average balance ending February 29, 2008 for materials and supplies held for normal operating and repair purposes.

#### Other Rate Base Items

The Applicant's Other Rate Base Items are detailed on its Schedule B-6. Certain of Applicant's Other Rate Base Items are estimated beyond the date certain. The Staff's valuation of Other Rate Base Items is as of the date certain. Several items have been eliminated by Applicant utilizing zero percent allocation factors to the distribution operation. Also, the Applicant proposed adjustments to several of these balances. These adjustments are detailed on the Applicant's Schedules B-6.1A through B-6.1T.

The Staff accepted some of the Applicant's adjustments, revised or corrected others, and proposed new adjustments.

As a result of the August 29, 2007 Ohio Supreme Court ruling in *Elyria Foundry Co. v. Pub. Util. Comm.*, 114 Ohio St. 3d 305, 2007-Ohio 4164, the Applicant's Date Certain, Deferred Fuel Regulatory Asset balance and the Applicant's Date Certain, Accumulated Deferred Income Taxes balance (associated with the Deferred Fuel Regulatory Asset above) was reduced to zero and excluded from Rate Base. The Staff's summary of these adjustments is presented on Schedule B-6 (line 9 and line 125).

The mechanism to recover certain increased fuel costs incurred during the 2006-2008 timeframe is the subject of review in Case No. 07-1003-EI-ATA and Case No. 07-1004-EL-AAM. These cases are currently pending before the Commission.

FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR et al.

#### ALLOCATIONS

The process of jurisdictional allocations for plant in service, depreciation reserve, and operating income has been drastically simplified by the corporate reorganizations undertaken subsequent to the legislation providing for industry restructuring. With only a few exceptions, the generation and transmission assets previously owned by the Company have been transferred to unregulated FirstEnergy affiliates. Therefore, most rate base and operating income accounts are either 100% jurisdictional or 100% non-jurisdictional. For those accounts for which allocations are necessary (such as administrative and general expenses or balances for various employee benefits), allocation factors have been constructed as the weighted average of accounts which are themselves either 100% or 0% jurisdictional.

The Staff reviewed the Applicant's working papers supporting the proposed allocation factors, the methods and the calculations used in their derivation, and the supporting source documents. The Staff is of the opinion that the allocation factors proposed by the Applicant are appropriate and reasonable for the purposes of this proceeding.

#### OPERATING INCOME

The Applicant's test year operating income combined three months of actual data for the period March 1, 2007, through February 29, 2008, with nine months of forecast data for the period June 1, 2007, through February 29, 2008. The Staff adjusted the Applicant's test year operating income as required to render it appropriate as a basis for setting rates.

The Staff's proforma operating income is the Staff's adjusted test year operating income modified to reflect the Applicant's proposed increase in revenues and the associated increases in uncollectible accounts expense, commercial activities taxes, and federal income taxes.

Schedules C-1 and C-2 present the Staff's determination of operating income. The calculations, methodologies, and rationale used to develop the Staff's adjusted proforma operating income are detailed on Schedules A-1.1, C-1.1, C-3.1 through C-3.18, and C-4.

## Proforma Adjustments

Schedule C-1.1 sets forth the Applicant's proposed increase in distribution operating revenues and affected expenses. The increase in revenues is the combined result of the increase in base revenues created by the Applicant's proposed tariffs and an increase for bad check and reconnection charges. Further discussion of the Applicant's proposed revenue increases can be found in various other sections of this report. Associated increases in uncollectible accounts expense, commercial activities taxes, and federal income taxes are also summarized on this schedule.

#### Current Adjustments

#### Base Revenue

The Applicant and the Staff adjusted current base revenues to annualize test year sales volumes using the most recent rates granted by the Commission, weather normalized sales volumes, and customer growth. Moreover, the Applicant and Staff also adjusted current revenue by deducting other miscellaneous current revenues from Schedule E-4 (current). The Staff also adjusted the Applicant's Schedule E-4 current revenues by adding employee discounts back. Staff is of the opinion that this employee benefit should be reflected as an expense. Staff's adjustment is presented on Schedule 3.1.

#### Labor Annualization

The Applicant annualized test year labor expense to reflect estimated employee and wage levels expected for the end of the test year. The Applicant included in its labor expense estimate payroll costs including straight time labor, overtime labor, and incentive compensation. Also included are allocated costs for shared services provided by FirstEnergy Service Co. employees.

The Staff annualized test year labor expense to reflect the average employee levels for the six month period ending with August 2007 for both CEI and FE Service Co. Wage rates for non bargaining employees include a 3.5% annual wage increase to be effective February 1, 2008. Wage rates for bargaining employees include a 3.5% annual wage increase effective May 1, 2007. Test year labor expense also includes incentive pay at 6% of straight time pay for bargaining employees. Test year labor also includes a three-year average expense for bonus pay and severance pay. The Staff's adjustment is shown on Schedule C-3.2.

## Miscellaneous Expense

The Staff adjusted test year operating expense to exclude advertising costs associated with public relations and goodwill in Accounts 923, Outside Services Employed and 930.2, Advertising Expense; a loan amount that was incorrectly charged to Account 903, Customer Record and Collection Expense; and amounts charged to Account 514, Steam - Maintenance Miscellaneous Steam Plant, for expenses incurred for security and other maintenance costs associated with a plant that was retired prior to the transfer of assets to non-regulated The Staff also adjusted operating expense to exclude the generation. expenditures incurred for various sporting events and golf outings in Accounts 593, Maintenance of Overhead Line and 921, Office Supplies and Expenses. Applicant was able to provide the Staff actual expenditures for sporting events for the months of March through May; however, specific sporting events are not budgeted for individually, making it virtually impossible to determine the forecasted amounts for specific events. Therefore, the Applicant provided the actual expense amounts for the calendar year 2006 and stated that they would provide an accurate representation of test year expenses. Staff concurs and eliminated these identified costs from test year expenses. The Staff's adjustment is presented on Schedule C-3.3.

## Depreciation Expense

Depreciation expense is adjusted to reflect the Staff's recommended depreciable plant in service as of the date certain. This adjustment is presented on Schedule C-3.4 with the supporting calculations shown on Schedule B-3.2. Further discussion on depreciation can be found in the Rate Base Section of this report.

#### **Regulatory Assets Amortization**

The Applicant and the Staff proposed adjustments to test year operating expenses to reflect the amortization of deferred amounts associated with fuel, distribution reliability, transition taxes, line extensions, and demand side management. The Applicant estimated deferred balances for these items through the end of the rate stabilization period, December 31, 2008, and proposed to amortize the estimated deferred amounts. The Staff amortized the date certain balances of these items with the exception of deferred fuel.

Consistent with the recommendation in the rate base section of this report, the Staff did not propose an amortization adjustment for deferred fuel in this proceeding as a result of the Ohio Supreme Court ruling in *Elyria Foundry Co. v. Pub. Util. Comm.*, 114 Ohio St. 3d 305, 2007-Ohio 4164. The Staff's adjustments are shown on Schedule C-3:5.

## Pension and Other Post-Retirement Employee Benefits (OPEB) Expense

Both the Staff and the Applicant adjusted test year pension and OPEB expenses to eliminate the effect of financing and other non-service related expenses. The adjustment also adjusts for the difference between the test year budget expenses for pension and OPEB and the test year budget amounts for ongoing service costs of the operating Company. The Staff's adjustment can be found on Schedule C-3.6.

#### Social and Service Club Dues

Both the Staff and the Applicant adjusted test year operating expenses to eliminate social and service club dues. The Staff's adjustment is shown on Schedule C-3.7.

#### Federal Income Taxes

The Staff computed test year federal income taxes to reflect the recommended adjustments to operating revenues and expenses. The Staff's federal income tax computation reflects inter-period interest allocation and the normalization of tax accelerated depreciation and other tax-to-book timing differences.

Schedule C-3.8 shows the calculation of the federal income tax adjustment. Schedule C-4 shows the detailed calculation of federal income taxes.

#### Reclassification of Assessments

The Staff reclassified test year PUCO and OCC assessments from operation and maintenance expense to taxes other than income. The Staff's reclassification adjustment is shown on Schedule C-3.9. The Staff's calculation of PUCO and OCC assessments is shown on Schedule C-3.9.

#### Taxes Other Than Income Taxes

Taxes other than income taxes were adjusted to reflect the proper base and the latest known tax rates. For example, property taxes were computed by applying the latest known property tax rate to the property valuation at date certain, F.I.C.A. taxes were calculated based on test year adjusted payroll and so forth. Schedule C-3.10 provides a summary of the calculated taxes and the resultant tax adjustment. The supporting calculations are provided on Schedules C-3.10a through C-3.10g.

## Vehicle Lease Costs

The Staff and the Applicant adjusted the test year to annualize the increase in vehicle lease cost. The Staff's adjustment is shown on Schedule C-3.11.

#### Uncollectible Expense

The Applicant's test year uncollectable expense account is based on total Company revenues, such as generation, transition and transmission. Staff calculated the uncollectable expense using a ratio based on the jurisdictional operating revenue components and the total uncollectable expense provision. The Staff's adjustment is presented on Schedule C-3.12.

#### Amortization Associated with Deferred Tax Balance True-up

The Applicant conducted a preliminary study to determine the appropriate accumulated deferred income tax balances related to distribution property. The Applicant proposes an amortization of the differential between booked balances and those determined through the study over the net plant balance average life remaining. The Applicant proposes 100% allocation factor of the amortization amounts. The Staff is investigating the calculation of the deferred income tax balances and waiting for final approved balances. In the meantime, the Staff has included the estimated amortization amounts in the revenue requirements until the final amounts have been determined. The Staff also utilized the accelerated vs. book deprecation jurisdictional allocation factor to allocate its adjustment as shown on Schedule C-3.13.

#### Advertising Expense

Both the Staff and the Applicant adjusted test year operating expenses to remove expenses related to promotional advertising. The Staff's adjustment is presented on Schedule C-3.14.

#### Other Operating Revenue and Distribution Expense

The Staff adjusted account 456- Other Electric Revenue, to remove the annual ATSI lease revenue for the reasons detailed in the Staff's plant in service text. Staff's adjustments are shown on Schedule C-3.15.

#### **Reclassification of Interest on Customers' Deposits**

Consistent with the treatment of customers' deposits as an offset to the Applicant's rate base, the Staff reclassified the associated interest expense to operating expenses. The Staff's adjustment is on Schedule C-3.16.

#### Rate Case Expense

The Staff used the Applicant's estimated rate case expense of \$447,000 for this proceeding, for all three operating companies and the service Company. The Staff amortized the expense over a three-year period. The Staff's adjustment can be found on C-3.17.

The Staff recommends that the Commission review the Applicant's revised estimate of rate case expense which should be submitted as a late filed exhibit before making a final determination of the appropriate level of rate case expense for use in this proceeding.

#### Forfeited Discounts Revenue

The Staff adjusted test year forfeited discounts revenues to reflect the Staff's adjustment to operating revenues. Staff's adjustments are shown on Schedule C-3.18.

# RATE OF RETURN

The Staff believes that a rate of return in the range of 7.90% to 8.35% is fair and reasonable. The recommended rate of return was developed using a corporate consolidated cost of capital approach, which reflects a market-derived cost of equity, the Applicant's embedded cost of long-term debt and preferred stock, and the embedded capital structure. See Schedule D-1.

#### Capital Structure

The Applicant, Ohio Edison Company, is a wholly-owned subsidiary of First Energy Corporation which is a publicly traded, public utility holding company. As a result, the Staff used First Energy Corporation's consolidated capital structure to estimate a rate of return for the Applicant. Substituting the parent company's capital structure for the wholly owned subsidiary is legitimate as parent and subsidiary capital structures would be equivalent under a regimen of efficient capital budgeting, and capital costs could not be separated for each corporate entity. The Staff used the consolidated capital structure of the First Energy Corporation, from Applicant's Schedule D-1A, in the rate of return determination.

#### Cost of Long Term Debt

The Staff employed the embedded cost of long term debt of First Energy Corporation, as of May 31, 2007, on a parent-consolidated basis, from Applicant's Schedule D-3A. In the calculation of the weighted cost of debt, the annual interest is divided by the carrying value. The debt calculation includes the effect of unamortized debt expense, unamortized discount or premium on sale, and unamortized gain or loss on reacquisition on both the interest cost and the carrying value. Staff utilized the embedded cost of long term debt of 6.22% on Schedule D-1.

#### Cost of Common Equity

The Staff considered a group of utilities which are representative of the industry for purposes of cost of equity estimation. This group consists of companies publicly traded on the New York Stock Exchange, and are categorized in the sectors of electric utilities, gas distribution utilities, and gas and electric utilities. These companies have market capitalizations of greater than \$1.5 billion, and have Value Line betas of one or less. Applying further criteria enabled Staff to select the following comparable group of twenty-three:



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Company Name	<u>Ticker</u>
AGL Resources, Inc.	ATG
Atmos Energy Corporation	ATO
CenterPoint Energy, Inc.	CNP
Consolidated Edison, Inc.	ED
Constellation Energy Group, Inc.	CEG
DPL Inc	DPL
DTE Energy Company	DTE
Energen Corporation	EGN
Entergy Corporation	ETR
Exelon Corporation	EXC
FirstEnergy Corporation	FE
FPL Group, Inc.	FPL
MDU Resources Group, Inc.	MDU
National Fuel Gas Company	NFG
OGE Energy Corporation	OGE
Piedmont Natural Gas Company, Inc.	PNY
Pinnacle West Capital Corporation	PNW
Public Service Enterprise Group Inc.	PEG
Questar Corporation	STR
The Southern Company	SO
WGL Holdings, Inc.	WGL
Wisconsin Energy Corporation	WEC
Xcel Energy Inc.	XEL

Staff believes this group possesses risk characteristics roughly corresponding to that of the business function of providing distribution energy utility service to retail customers. The Staff has explicitly *not* considered any additional risk factors relating to provision of electric generation service, inasmuch as FirstEnergy's proposed auction plan is designed to relieve the Company of such risk.

The Staff employed a cost of equity estimate for the comparable group companies that are the average of their capital asset pricing model (CAPM) and discounted cash flow (DCF) derived estimates. In calculating its CAPM cost of common equity estimate, the Staff employed the average of the Value Line betas, being .85 and the Ibbotson<sup>1</sup> derived spread of arithmetic mean total returns between large company stocks and long term government bonds (i.e., "risk free return"; 6.5%). These were used in the CAPM formulation with the weighted average of 10 year and 30 year weekly closing Treasury yields for the period from September 18, 2006 through September 10, 2007. The weighting was done in a manner that emphasized later quarters to a greater degree.

<sup>\*</sup> Ibbotson Associates 2007 Yearbook: Stocks, Bonds, Bills and Inflation; Valuation Edition

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The averaged 10 year yield is 4.76%. The averaged 30 year yield is 4.93%. These average to 4.85%. This was added to the product of the beta and the 6.5% spread, and resulted in a CAPM cost of equity estimate of 10.39%. See Schedule D-1.3.

. . . . . .

In calculating its DCF cost of common equity estimate, for each comparable company, the Staff employed the annual average stock price, the sum of the last four quarterly declared dividends, estimates of the expected rate of growth of earnings, and generic issuance costs related to the external equity financing. The stock price employed is the average weekly closing price for the period from September 18, 2006 through September 10, 2007.

The DCF model assumes that earnings growth and dividends growth are the same. The Staff averaged earnings per share estimates from Reuters, Yahoo, MSN, and Value Line to get DCF growth estimates for each company. See Schedule D-1.2. The Value Line average incorporates both the explicit long-range earnings estimate shown in the "box" and the implicit continuous growth rate calculated from the estimates of earnings per share.

For the Staff's determination of DCF cost of equity, a non-constant DCF growth rate was assumed. Dividends were assumed to grow at a rate derived from financial analysts' growth estimates for the first five years. The Staff's DCF growth estimates were used for the first five years, as they are averages of estimates from various investor news services. From the twenty-fifth year on, the growth rate was assumed to equal the long-term growth rate in GNP. For the sixth through twenty-fourth years, dividends vary between the two rates in a linear fashion. The long-term growth rate in GNP was the average annual change in GNP from the U. S. Department of Commerce for 1929 through 2005. See Schedule D-1.4.

Based on long-term GNP growth, the respective company DCF growth estimate and dividend, a stream of annual dividends was calculated. The internal rate of return derived from the dividend stream and the stock price was used for Staff's non-constant growth DCF cost of equity estimate.

The comparable group non-constant DCF cost of equity estimates average 10.29%. When averaged with the 10.39% CAPM estimate, the result is 10.34%. See Schedule D-1.2. Using a 100 basis point range of uncertainty, the cost of equity estimate becomes 9.84% to 10.84%. See Schedule D-1.1. To provide for this return, allowance must be made for issuance and other costs, as shown on Schedule D-1.1, resulting in an adjustment factor of 1.02288. Applying this factor to the baseline cost of common equity range, results in a recommendation of 10.06% to 11.09%.

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# RATES AND TARIFFS

By its application in Case No. 07-551-EL-AIR, et al, Ohio Edison requests authority to modify its electric distribution service tariffs, schedules, rates and charges applicable to service under direct Commission jurisdiction.

The Commission Staff has investigated the rates and tariffs matters proposed by the Applicant. The results of that investigation are herein reported. It is the intent of Staff to provide analysis with regard to the acceptability and reasonableness of the rules, regulations, terms, conditions, and revenue recovery mechanisms contained in the proposed tariffs. The proposals made by Staff may require adjustments based on the revenue authorized by the Commission in these proceedings.

In its analyses, Staff utilizes various documents provided by the Applicant (the Notice of Intent To File of May 8, 2007; the Original Filing of June 7, 2007; the Update Filing of August 6, 2007; and the responses to data requests issued by Staff), as well as formal and informal discussions with various Company personnel. When applicable, Staff will identify the source documents utilized in its analyses. Because of the use of various source documents, some of the figures used in this section (e.g. current revenue, proposed revenue, increase requested) may not exactly match the numbers used in determining the revenue requirement in other sections of this report. The Staff of the Rates and Tariffs Division has, however, utilized the documents to best-reflect the reasonableness of its recommendations

#### TARIFF ANALYSIS

#### **Electric Service Regulations**

In general, FirstEnergy has proposed to modify the Electric Service Regulations of the current tariffs of Ohio Edison, The Cleveland Electric Illuminating Company and The Toledo Edison Company so that they are consistent. To describe every individual proposed modification to each Company's tariffs would not be efficient. The following analysis is presented in the form of an "exception" report, including Staff's (of the Rates and Tariffs Division of the Utilities Department and the Investigation and Audit Division of the Service Monitoring and Enforcement Department) recommended "fix." Unless otherwise noted, Staff recommends approval of the other proposed provisions.

## Section I – General Provisions

The Applicant is proposing to delete the language that tells customers where they can inspect copies of the Electric Service Regulations and the Schedule of Rates. The Applicant's rationale for this proposed change is that tariffs are available in multiple locations. Staff is of the opinion that the Applicant should not delete this language, but should modify it to include the other locations and sources in which these tariffs are being made available.

#### Section II – Applications and Contracts

(E): This language was previously located in Section II A. The Applicant also modified this language to include a distinction between Same Day Connection and Re-Connection Charges. Although Staff agrees with this proposed change, the proposed language could be easier understood by customers if it read:

"If the customer requests service for the same day on which the request has been made and the service is presently not connected, the Company will charge the customer the Same Day Connection Charge pursuant to the Company's Tariff Sheet 75, Miscellaneous Charges. This fee may be charged at the time of the request or charged with the customer's next monthly billing, at the Company's discretion, and only if the Company provides the service on the same date requested. (The Same Day Connection Charge does not apply to requests for reconnection after nonpayment which is governed by Electric Service Regulations, Sheet 4, Section XI, Paragraph D)".

#### Section III - Credit Worthiness and Deposits

- (A): This section states that "customers are required to establish creditworthiness, which may include a deposit, as a condition to furnishing or continuing to furnish service". Staff believes that since customers are required to establish creditworthiness, this section should include language that either states all the options to establish credit or references the rule governing the establishment of credit. Staff recommends that this section should read: "Customers are required to establish creditworthiness in accordance with the provisions of 4901:1-10-14, O. A.C., which lists options for satisfying this requirement, which must be met as a condition to furnishing or continuing to furnish service".
- (B): This paragraph incorrectly cites Chapter 4901:1-17 of the Ohio Administrative Code (O.A.C.) as a reference on how interest will be paid on the deposit. The reference should be Chapter 4901:1-10-14 (J), O.A.C.

## Section V - Rate Schedule Alternatives

(A): Staff recommends the last sentence in the paragraph be removed. The last sentence states, "No refund will be made representing the difference in charges under different rate schedules applicable to the same class of service". This tariff appears to violate the Commission ruling in *White Plastics v. Columbus Southern Power*, Case No. 83-0650-EL-CSS. This case held that a Company may owe refunds to a customer for placing that customer on the wrong rate schedule if the customer makes an inquiry regarding its rates and the Company fails to properly investigate the customer's rate.

#### Section VI – Billing and Payment

- (D): The Applicant is proposing to delete the current language "the Company's filed tariffs and its Standard Rules and Regulations, as are applicable to that customer, provided that such transfer of a final bill shall not be used to disconnect service to a residential Customer who is not responsible for such bill. This provision shall not be construed to permit disconnection of a residential account for an unpaid final bill at such a second location if the customer initiated another such account at least ninety (90) days prior to termination of service to the account for which the final bill was rendered." Staff recommends the Applicant should not delete this language.
- (I): This is new language being proposed by the Applicant. Staff feels this section would read clearer to customers if specific dates were being used instead of terms such as "billing portion 9 meter readings in mid-June". Staff is recommending the Applicant use specific dates in this proposed language.

#### Section VII - Service Connections and Line Extensions

The issue of cost recovery for line extensions was a significant issue in the electric transition plans. The issue was ultimately resolved via a series of Commission-approved stipulations in Case No. 01-2708-EL-COI. For FirstEnergy, the cost recovery mechanism was a blend of up-front capital payments, periodic customer payments, and deferrals as regulatory assets. The stipulation was intended to be a "stop-gap" measure to allow the Company a cost recovery mechanism during the time its distribution rates were frozen.

In Case No. 07-551-EL-AIR, the Applicant proposes to continue only the up-front payments concept. It proposes the following:



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Residential: Standard Single Family \$300 (\$100 if geothermal) Non-Standard Single Family \$300 + 100% of the cost > \$5000 Multi Family Installation \$100 per unit

General Service 40% of the cost Transmission Installations 100% of the cost

The distribution rate freeze ends with the outcome of this case. While Staff is not adverse to an up-front payment as one of the cost recovery mechanisms, it recommends a slightly different approach. Staff proposes the following:

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Standard Single Family \$100 (\$50 if geothermal) Non-Standard Single Family \$200 + 100% of the cost > \$5000 Multi Family Installation \$50 per unit General Service 40% of the cost Transmission Installations 60% of the cost

Staff further recommends that for the non-standard single family costs exceeding \$5000, the customer be offered a monthly extended payment option (including interest) of up to four years.

#### Section VIII – Use of Service

(D): This section would require customers who want parallel interconnection with the Company's distribution system to pay for a dedicated telephone line for an interval meter. To make this section consistent with the requirements of Rule 4901:1-28 (C), Staff recommends that the following sentence be added stating that: "The requirement for a dedicated telephone line does not apply to service for net metering"

#### Section IX - Meters, Transformers and Special Facilities

- (A): Staff recommends the proposed language "by the customer at his expense in accordance with the Company's standards" be replaced with "consistent with the Company's standards, by the customer at the customer's expense".
- (B): Staff recommends the language "for any reason whatsoever" be removed.
- (C): The language in this paragraph which reads, "the period specified in Chapter 4901:1-10 of the O.A.C.", would force the customer to look in a different place to determine the time period during which the customer is allowed one free meter

test. Staff recommends that the above mentioned language be replaced with: "a 36 month period".

- (F): Staff recommends the proposed language "in the sole discretion of the Company" be replaced with the current tariff language "subject to the approval of the Company".
- (G): This paragraph advises the customer of the Company's right to access a customer's premise. Staff believes this provision should also state the customer's right to request the employee to provide Company ID as required by Rule 4901:1-10-13, O.A.C.
- (G): The second paragraph concerns failure to grant access by a customer or landlord and states "If a customer or a landlord fails to grant access for reasons described above, and judicial redress is necessary to secure such access, . . .". Staff believes the term "judicial redress" should be changed to "court order", which Staff believes is easier for a customer to understand.
- (G): The second sentence of this section's second paragraph concerns what the Company may collect if judicial redress is necessary and states "This would include, without limitation, any court costs and attorney's fees, which may be added to an account of the customer or if applicable, the landlord, and shall be due with the current charges on that account". The tariff, as it currently reads, would allow the Company to charge court costs and attorney fees to the customer even if the Company was unsuccessful in litigation against the customer. Staff recommends that the Company only be allowed to add court costs and attorney fees to a customer or landlord's bill when a judicial officer awards the Company those costs and fees. Staff also recommends replacing the word "may" with the word "would" in the second sentence of the second paragraph.

#### Section X - Customer's Wiring, Equipment and Special Services

(A): Staff recommends that this paragraph cite the specific rule and not just the chapter regarding the requirement for inspection on a new service installation. Chapter 4901:1-10 is a very large chapter, which has no section titled "installation". These circumstances would make it difficult for a customer to find the specific rule pertaining to this paragraph. Staff recommends that the words, "Rule 4901:1-10-05 (E) replaces the words "Chapter 4901:1-10", in this paragraph.

## Section XI. Collection of Past Due Bills and Disconnection of Service

(B): Field Collection Charge - Staff recommends that the Company add language that will limit the number of times the Company can assess this charge for a delinquent account. Staff recommends the following language be added: "The Company shall not charge this fee more than once prior to either collecting the delinquent amount or disconnecting the service".

## Tariff Structure

As with the service regulations, FE has proposed to modify the structure of the distribution electric service schedules of Ohio Edison, The Cleveland Electric Illuminating Company and The Toledo Edison Company so that they are consistent. In doing so, the number of schedules has been reduced to eight: Residential (RS), General Service - Secondary (GS), General Service - Primary (GP), General Service - Subtransmission (GSU), General Service – Transmission (GT), Street Lighting (STL), Traffic Lighting (TL) and Private Outdoor Lighting (POL). For example, OE currently has seven Residential Rate Sheets in effect. In this application, that number has been reduced to one. The significant tariff structure modifications not only create occasional anomalous results to individual customers, but also create problems in Staff's traditional comparisons of "current" to "proposed." Those problems will be addressed in the applicable section of this report.

The current tariff structure has evolved through the years as the individual components have been requested by the Company and approved as reasonable, at the time, by the Commission in various rate and tariff proceedings. In recent years Staff and the Applicant have had informal discussions regarding the need to reduce the number of schedules, simplify the rates and have a consistent tariff format for the three FE operating companies. The four proposed General Service schedules are voltage-based. Customers receiving like services should be facing the same charges and provisions. Therefore, as a whole, Staff finds that the proposed structure is a reasonable reflection of distribution-related costs and recommends the structure be approved.

#### REVENUE DISTRIBUTION AND RATE DESIGN ANALYSIS

#### Rate and Revenue Guidelines

General guidelines or objectives are followed in Staff's review of rate schedules and design. The applicable schedules should provide the utility the opportunity of recovering an authorized revenue. The various schedules should represent a reasonable distribution of revenue between and among the various customer groups. The particular schedules should be equitable and reasonable, should provide for

customer understanding and continuity of rates, and should cause minimal customer impact. When employing these standards to develop and design rates, the results should be understandable to all the customers billed under the schedule.

Rate design criteria are to be viewed as a package, in that they are interrelated. Although each item can be separately identified and applied to rate schedule determinations, no single standard is overriding in determining proper rate design. The rate schedules which comprise a particular utility's tariff should provide for recovery of expenses found proper in the course of a regulatory proceeding. If the rate schedule is designed on the basis of cost causation, it will provide for expense recovery in the long term, given changes in the customer consumption characteristics. Normally, and to the extent sufficient information is available, cost of service studies and related expense analyses are necessary to determine the appropriate level of revenue to be generated and the appropriate recovery of such revenue.

The rate schedules should be designed to be equitable and reasonable to the customers served pursuant to their applicability. This criterion involves several considerations. The rate schedules should, to the extent practicable, be predicated upon the cost associated with a particular service rendered. Customers receiving like services should be facing the same charges and provisions. Also, differences in applicable charges should be representative of differences in costs.

From a practicable rate design standpoint, absolute equality between costs and revenues may be difficult to achieve in the short term. While it may be viewed as equitable to set rates at cost, if there is a substantial divergence from the current rates, the resulting impact on individual customers may be viewed as unreasonable. While desiring cost supported charges, Staff considers such items as resulting typical customer billings and resulting revenue increases which would necessarily occur. These tests help provide benchmarks with regard to reasonableness of charges in rate forms. While it is the Staff's position that rate schedules reflect costs, it is also important to consider the continuity associated with current and proposed pricing structures. This may result in movement towards more closely aligning revenue with costs rather than an absolute match at a particular time period.

In summary, electric rates should:

- Be predicated on costs
- Be fair, equitable and reasonable
- Provide for customer understanding
- Cause minimal impact (sometimes called "gradualism")
- Provide continuity in pricing structures
- Provide the utility the opportunity to recover an authorized revenue by providing for the recovery of costs found proper in a regulatory proceeding

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To this list might be added:

- Promote conservation
- Promote energy efficiency
- Promote economic development
- Promote the energy policies of the State

The preceding paragraphs in this section are "boilerplate," in that they are used, in one form or another, in all rate-related Staff Reports. The standards are true and they are important. Each of the standards has value. They are, however, subjective, and it is generally impossible to fully accomplish them all. Sometimes one standard (the most obvious being that the rates must provide the utility with the opportunity to recover its authorized revenue requirement) supersedes, to a degree, the others. Sometimes the standards are in conflict (e.g. in this application, the standard for cost-based rates and the standard for providing for customer understanding conflicts with the need to provide continuity in pricing structures).

From discussions with the Company, and from the application and supporting testimony, it is apparent to Staff that the Applicant, in its proposal, has taken the standards into consideration. It is also apparent that, while this is a "distribution" rate case, the Applicant has placed an emphasis on the rate impacts, as proposed in the application, on "total" bills (including "generation" and "transmission" rates, and also including the impact of the elimination of the Regulatory Transition Charges). Staff does not find this to be an unreasonable approach; but, it does have its limitations, as will be later discussed.

#### Cost of Service Analysis

Cost of service studies approximate the costs incurred by an Applicant in providing service and identifies the cause of the costs. These are determined by assigning the costs to the customer class relative to what each class imposes on the system. There are several steps involved, as listed below:

- Functionalization: The separation of costs according to production, transmission or distribution function.
- Classification: The separation of costs as being customer, demand or energy related. Customer costs are independent of customer usage characteristics and are costs which are associated with customer service connections to the system and vary with the number of customers served. Demand and capacity costs are those expenses which vary with the rate in which the service is used, such as the cost of meeting peak demand. Energy costs are the costs which vary according to the volume of energy consumed, or the customer's kilowatt-hour consumption.

• Allocation: The last step is the allocation of costs to each customer class. This is determined by a combination of the number of customers, class demands, and energy usage.

The Cost of Service Study filed by the Applicant is an embedded fully allocated cost of service study by rate class for the test period ended February 29, 2008, as adjusted. The Cost of Service Study first functionalizes items such as plant investment, operating expenses and taxes between the distribution function and to "all other." These costs are then classified as customer, demand or energy related. Next, those costs that have been determined to be distribution-related are allocated to the various customer classes. Finally, the Cost of Service Study calculates the revenue responsibility of each class required to generate the recommended rate of return.

The Applicant further delineated distribution plant costs by sub-functionalizing assets through the identification and separation of primary and secondary voltages. The voltage peaks are based on the average of three summer coincident voltage peak months (June, July, August). The allocation factors were developed based on customer, energy and demand statistics for the test period. These costs were then classified as customer, energy or demand-related.

Cost of service studies are subjective, especially the allocation of costs to customer classes. Staff, admittedly, did not do a line-by-line review of each expense and rate-base-related item. From its analysis, Staff concluded that the Applicant generally followed acceptable allocation guidelines (e.g. the National Association of Regulatory Commissioners Electric Utility Cost Allocation Manual). The cost of service study results are, of course, considered by Staff in developing its recommendations; but, by no means, are they the sole consideration.

#### **Revenue Distribution**

The allocation of the authorized revenue requirement between and among the various customer classes is of obvious importance. Just as the rates, in total, must give the utility the ability to recover its authorized revenue requirement, so must the rates in a particular schedule give the utility the opportunity to recover the revenue authorized for that schedule. Traditionally, Staff presents tables which compare "current revenues," by class to "proposed revenues" (both Applicant-proposed and Staff-proposed), by class. As previously discussed, the Applicant has proposed (and the Staff has accepted) a significant tariff restructuring. Thus, the traditional presentation by Staff becomes somewhat convoluted.

Therefore, Staff's analysis (including the current, Applicant-proposed and Staffproposed revenue distribution) is presented in Table 1. In this Table, the current revenues (tariff revenues only) are taken from the Applicant's cost of service study (Exhibit E-3.2) and the proposed revenues (less miscellaneous charges) are taken from FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR, et al.

the updated filing (Exhibit E-4, as supported by Exhibit E-4.1). While these revenues may not exactly match the current and proposed revenues in the application, Staff finds that they are appropriate for its analysis of the revenue distribution. It is also important to note that the Staff-proposed revenue, in total, is designed to match the Applicantproposed revenue, in total. This is not a recommendation, in any way, that the Applicant's proposed revenue requirement be approved. It is done only for illustrative and comparison purposes.

The Table reflects Staff's proposed modifications to the revenue distribution at the full proposed revenues. Adjustments have been recommended to the revenue assigned to the General Service schedules and the Private Outdoor Lighting schedule to better reflect costs

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# Table 1

TABLE 1 Proposed Schedules	Total Retail	RS	GS	GP	GSUB	GT	TL	SL Incl E SIP	POL	Contract
Rate Base	1,628,182	993,662	433,889	75,960	12,983	52,284	975	24,726	1 <b>1,9</b> 93	21,710
NOI	36,861	26,262	9539	903	435	-1945	15	-364	424	1,592
Current Rate of Return	2.26%	2.64%	2.20%	1.19%	3.35%	-3.72%	1.54%	-1.47%	3.54%	7.33%
Current ROR Index	1.00	1.17	0.97	0.53	1.48	-1.64	0.68	-0.65	1.56	3.24
NO! Levelizad	36,861	22,496	9,823	1,720	294	1,184	- 22	. 560	272	492
Change in NOI	0	-3,766	284	817	-141	3,129	7	924	-152	-1.100
Change in Current Rev	0	-6,066	457	1,315	-227	5,039	11	1,488	-246	-1,773
Current Tariff Revenue	486,914	308,155	119,322	25,372	5,112	8,945	307	7,835	i 4,134	7,731
Current Rev to Levelize	486,914	302,089	119,779	26,687	4,885	13,984	318	9,323	3,888	5,958
Proposed Rev	646,864	397,677	173,454	33,315	5,358	18,058	398	7,829	4,152	6,624
% Increase	32.85%	29.05%	45.37%	31.31%	4.81%	101.88%	29.64%	-0.08%	0.44%	-14.32%
Applicant Proposed Rev Rev Dist App Proposed Increase Distribution of Pro Incr App Proposed % Increase	646,864 100.0% 159,950 100.00% 32.85%	397,677 61.5% 89,522 55.97% 29.05%	173,454 26.8% 54,132 33.84% 45.37%	33,315 5.2% 7,943 4.97% 31.31%	5,358 0.8% 246 0.15% 4.81%	18,058 2.8% 9,113 5.70% 101.88%	398 0.1% 91 0.06% 29.64%	7,829 1.2% -6 0.00% -0.08%	4,152 0.6% 18 0.01% 0.44%	6,624 1.0% -1,107 -0.69% -14.32%
Staff Proposed Rev Rev Dist Staff Proposed Incr Dist of Staff-proposed Incr Staff Proposed Incr %	646,864 100.00% 159,950 100.00% 32.85%	397,677 61.48% 89,522 55.97% 29.05%	170,685 26.39% 51,363 32.11% 43.05%	i 34,000 5.26% 8,628 5.39% 34.01%	6,000 0.93% 888 0.56% 17.37%	19000 2.94% 10,055 6.29% 112.41%	398 0.06% 91 0.06% 29.64%	7,829 1,21% -6 0.00% -0.08%	4,652 0.72% 518 0.32% 12.53%	6,624 1.02% -1,107 -0.69% -14.32%
NOI Levelized at 8.3630% Curent NOI Change in NOI Change in Rev Levelized Proposed Rev	136,165 36,861 99,304 159,951 646,865	83,100 26,262 56,838 91,550 399,705	36,286 9,539 26,747 43,082 162,404	6,353 903 5,450 8,778 34,150	1,086 435 651 1,048 8,160	4,373 -1,945 6,318 10,176 19,121	82 15 67 107 414	2,068 -364 2,432 3,917 11,752	1,003 424 579 933 5,067	1,816 1,592 224 360 8,091

RS	Residential
GS	General Service Secondary
GP	General Service Primary
GSUB	General Service Subtransmission
GT	General Service Transmission
TL	Traffic Lighting
SL	Street Lighting
POL	Private Outdoor Lighting

#### Staff Recommendation

Applicant is proposing an increase in tariff-related base revenues of approximately \$160,000,000. The analysis, however, is based on the inclusion of Deferred Fuel (per the Rate Certainty Plan, Case No. 05-704-EL-ATA). The Supreme Court has remanded this issue to the Commission. Staff has made adjustments to its revenue distribution recommendations to reflect the exclusion of the deferred fuel component in Table 2.

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	<u>Tot</u>	RS	<u> </u>	<u>GP</u>	<u>GSUB</u>	GT	<u></u>	<u>sl</u>	POL	<u>Con</u>
Fuel def RB NOI at 8.3630% Assoc Rev:	146886 12284 19786	53664 4488 7229	39397 3295 5307	17524 1466 2361	5074 424 683	26962 2255 3632	134 11 18	745 62 100	215 18 29	3170 265 427
Prev Staff Rec Rev.:	646864	397677	170685	34000	6000	19000	398	7 <b>82</b> 9	4652	6624
Adj Staff: Rec Rev: Current Rev: Increase: % Increase:	627078 486914 140164 28.79%	390448 308155 82293 26.71%	165378 119322 46056 38.60%	31639 25372 6267 24.70%	5317 5112 205 4.00%	15368 8945 6423 71.81%	380 307 73 23.76%	7729 7835 -106 -1.36%	4623 4134 489 11.83%	6197 7731 -1534 6-19.84%
Adj Incr.: Adj % of Incr.: Original Staff pro. %:	140164 100.00% 100.00%	82293 58.71% 55.97%	46056 32.86% 32.11%	6267 4.47% 5.39%	205 0.15% 0.56%	6423 4.58% 6.29%	73 0.05% 0.06%	-106 -0.08% 0.00%	489 0.35% 0.32%	-1534 -1.09% -0.69%

RS	Residential
GS	General Service Secondary
GP	General Service Primary
GSUB	General Service Subtransmission
GT	General Service Transmission
TL	Traffic Lighting
SL	Street Lighting
POL	Private Outdoor Lighting
In the event that the deferred fuel component of this case is excluded and/or in the event the Commission authorizes revenues other than the requested revenue, Staff recommends that the increase in tariff-based revenues, to the extent possible, be distributed as follows.

Distribution of Tariff-Related Increases

RS	58.70%
GS	32.84
GP	4.45
GSUB	0.14
GT	4.56
TL	0.05
SL	0.00
POL	0.35
<u>Contract</u>	<u>(1.09)</u>
Total	100.00%

#### Rate Design

Changes have been made in all proposed schedules for "clean-up" purposes (e.g. removing the RTC charges, changing the name of the "customer charge" to "service charge", removing generation charges from the distribution tariffs), for "clarity" purposes and for "consistency" among the three operating companies. Unless otherwise addressed in this section, Staff recommends approval of the changes as proposed.

#### Residential Service Schedule- RS

Applicant proposes to simplify the residential distribution rates from multiple schedules to one uniform tariff design. In doing so, the resulting bills of customers on certain schedules have been rather drastically impacted. To mollify this impact, the Applicant has proposed Rider RDC – Residential Distribution Credit. Staff recommends approval of the uniform tariff and the credit rider.

In Ohio Edison's territory, there appears to be approximately 150,000 residential load meters (customers on current Rate 17 – Load Management). While Staff, at this time, is not recommending that this rate be re-opened or extended in this application for an increase in distribution rates, Staff requests that the Applicant provide an historic analysis of this schedule describing why it should not be continued as a load management tool.

Applicant is proposing a \$4.00 Service Charge and a two-block energy charge. The second energy block (in excess of 500 kWh) is "inverted" (i.e. higher than the first block).

Although traditional Staff analysis supports a higher fixed charge, FE has proposed a \$4.00 Service Charge for each of the operating companies. Given the other complex issues in this case, Staff recommends approval at this time, but puts the industry on notice that, in future proceedings, a higher Service Charge will probably be supported by Staff to better represent the fixed costs of distribution rate schedules.

Staff, however, does not support or recommend the inverted energy block. The appropriate mechanism to promote conservation through rates is not the distribution component. Staff recommends a flat energy rate to best reflect costs.

Applicant has also proposed a special metering provision offering a time-of-day meter option. Staff recommends approval.

#### General Service Schedules – GS, GP, GSUB & GT

Applicant proposes to simplify the general service distribution rates from multiple schedules to a voltage-based concept that better matches how the distribution system is designed and how customers physically take service. In doing so, the resulting bills of customers on certain schedules have been rather drastically impacted. To mollify this impact, the Applicant has proposed Rider BDC – Business Distribution Credit. Staff recommends approval of the uniform tariffs and the credit rider.

For each schedule, Applicant is proposing a service charge and a capacity charge (and a reactive demand charge, if applicable) to reflect the infrastructure-based recovery of general service distribution charges. The GS schedule has a fixed charge for up to 5 kW and a capacity charge for the remaining kW. Staff recommends approval of those structures. Also, for the GS schedule, the Applicant has proposed that for customers not having a demand meter and using over 1000 kWh per month, "measured demand" shall equal the kWh used divided by 200. Customers using under 1000 kWh shall have a 5 kW billing demand. While the factor of "200" appears to be reasonable (27.4% load factor), Staff requests the Applicant to address the rationale supporting this calculation in its testimony filed with its objections to the staff report.

While testimony and Schedule E-3 reflects a two-year minimum contract term for customers on Schedule GT, the tariff sheet in Schedule E-1 reflects only a one-year minimum. This sheet should be corrected.

Applicant has also proposed a special metering provision offering a time-of-day or an interval meter option for the General Service schedules. Staff recommends approval.

Lighting Service Schedules – STL, TRF & POL

The lighting distribution schedules have been modified for consistency and simplicity. The unmetered service usage figures for billing purposes have been standardized. Street Lighting Service (Rate STL) reflects three plans: (1) company owned and maintained; (2) customer owned and maintained; and, (3) customer owned with limited company maintenance. Plan (3) is not available for new installations. Staff recommends approval of the proposed tariff structures, unless otherwise noted

Rate POL indicates that it is available only for units in service as of December 31, 2008. Staff recommends that this provision be held in abeyance pending the outcome of Case No. 07-363-EL-ATA.

There is also proposed language in Case No. 07-915-EL-ATA (regarding optional shielded light offerings), which is still under review, that will have an impact on the street lighting and private outdoor lighting schedules. Some of the language proposed in those schedules, in that case, also is related to the outcome of Case No. 07-363-EL-ATA. Staff recommends that any language related to the withdrawal of Schedule POL for new customers not be included in the tariffs until Case No. 07-363-EL-ATA is resolved.

#### Staff Recommended Rates

For comparative purposes only, Staff recommends the following adjustments to the Applicant's proposed rates. Once again, this does reflect any recommendation as to the total revenue requirement recommended by Staff in other sections of this report. It is only intended to reflect any Staff- recommended changes to the rate design and/or revenue distribution (from Table 1) that the Applicant has proposed at the full amount it has requested in the application. Unless otherwise noted, Staff recommends approval of the Applicant's proposed rates.

Residential:

Applicant Propo	sed:		Staff Proposed:				
First 500 kWh > 500 kWh	\$	0.034000 .040643	All kWh: \$.037203				
General Service	<b>e</b> :						
Applicant Propo	sed	Capacity Charges:	Staff Proposed:				

GS	\$ 6.653	\$ 6.498
GP	3.052	3.154
GSUB	1.218	1.522
GT	0.930	1.014

POL: The POL charges, as proposed by the Applicant would need to be increased by 12.57% to meet the Staff proposed revenue distribution.

#### Miscellaneous Charges

Staff, in general, supports cost-based miscellaneous charges. The customer who causes the cost should pay, to the extent practicable, the cost of the service provided. The Applicant has proposed miscellaneous charges that are consistent across the three operating companies. The results of Staff's investigation are as follows:

FE	FE Proposed Miscellaneous Charges		Applicant		CEI		)E	TE		Staff	
		Pro	posed*	Su	upport	S	upport	S	upport	Pro	posed
1	Same Day Connection Charge	\$	35	\$	35.58	\$	34.58	\$	31.97	\$	35
2	Field Collection Charge	\$	12	\$	12.37	\$	11.26	\$	11.10	\$	12
3	Reconnection Charge										
	Standard	\$	35	\$	35.77	\$	32.04	\$	31.25	\$	35
	Premium										
	Next day	\$	35	\$	35.77	\$	32.04	\$	31.25	\$	35
	Same day	\$	60	\$	61.30	\$	54.92	\$	51.87	\$	60
	Seasonal Reconnect	\$	15	\$	15.84	\$	15.84	\$	14.74	\$	15
4	Returned Payment Charge (including penalty)	\$	15	\$	14.95	\$	14.95	\$	14.95	\$	15
5	Unauthorized Use Investigation Charge	\$	125								
	(minimum)										
6	Meter Test Charge	\$	55							\$	55
	Level 1			\$	51.80	\$	51.79	\$	51.80		
	Level 2			\$	57.08	\$	57.08	\$	57.08		
7	Disconnect/Reconnect For Customer Work Char	ge									
	Residential	\$	0							\$	0
	Non residential		cost	:							cost
8	Temporary Service Drop Charge	\$	200							\$	200
9	Meter Service Charge										
	Replace with Interval Meter and Modern	\$	550	\$	554.00	\$	554.00	\$	554.00	\$	550
	Replace with T-O-D Meter	\$	105	\$	105.00	\$	105.00	\$	105.00	\$	105
	Company Installed Communication Link	\$	50/mo							\$	50/mo
	Site Visit	\$	50							\$	50
10	Annual Escalator Adjustment	CPI	-U index								NO

# 3, Reconnection Charge: This paragraph concerns the cost to the customer who request reconnection of service on the same day and states that if payment is made "Before the time prescribed by Chapter 4901:1-18 of the Ohio Administrative Code then service would be connected by...". The Company should specify the times when the different reconnection charges apply, instead of referencing Chapter 4901:1-18 of the Ohio Administrative Code. Staff recommends the words, "time prescribed by Chapter 4901:1-18 of the Ohio Administrative Code" be replaced with "before 12:30 pm."

# 6, Meter Test Charge: This paragraph concerns the meter test charge and states "The first test within the period specified in Chapter 4901:1-10 Ohio Administrative code shall be at no charge to the customer". The language which reads, "the period specified in Chapter 4901:1-10 of the O.A.C.", would force the customer to look in a different place

to find the time period during which the customer is allowed one free meter test. Staff recommends that the above mentioned language be replaced with: "a 36 month period".

# 8, Temporary Service Drop Connection Charge: This paragraph concerns the charge for a temporary service drop connection charge and states, "When requested by a customer, the Company may provide a Temporary Service Drop Connection for a charge to the customer of \$200". Staff recommends changing the word "may" back to "will", to reflect the fact that if the Company provides a temporary service drop, the charge to the customer will be \$200.

#10, Annual Escalator Adjustment: Staff strongly recommends that the Commission reject this proposed annual adjustment based on the Consumer Price Index to certain miscellaneous charges. These costs do not need to be updated on a more frequent basis than a comprehensive rate proceeding.

#### Staff Observation

From a rates and tariffs standpoint, this is not your typical application to increase rates. The current distribution rates have been in place since the Applicant's last rate case in 1989. At that time, they were embedded in a total rate and, later, were unbundled in the transition plans. This application, therefore, not only updates rates that have been in place for several years, but also modifies some of the oddities resulting from the unbundling process. In addition, the application significantly alters the current tariff structure, the current rate schedule structure and the current rate design. Staff recognizes the effort put into the application. Further, the Company has been extremely cooperative with Staff of Rates & Tariffs in not only providing data, but also providing it in a format requested by Staff. This was not an easy application to prepare, nor an easy one to analyze.

## Typical Bills

In its filings, Applicant has presented a typical bill analysis. It has demonstrated the bill comparisons between the total bill a customer would pay on its current schedule and what it would pay (a) under the proposed schedule; (b) at the proposed rates, including the credit riders; (c) at the fully requested increase; (d) reflecting the elimination of the RTC; and, (e) reflecting "current" transmission and generation rates.

Given the fact that, to most customers, the bottom line question is "how much is my bill going to go up (or down) as a result of this case," Staff believes the typical bill analysis by the Applicant is reasonable for comparison purposes. However, the analysis does make assumptions that may or may not match "reality." Obviously, the Commission may not grant the proposed tariff restructuring and rate design and may approve a different revenue requirement. While Staff knows of no other method of reflecting what transmission and generation rates will be like in 2009, it is quite likely that they will not be the same as the current rates.

While the typical bill analysis has some value as a tool for comparison, it has little or no value as to reflecting the final results of this case until the Commission determines the final revenue requirement, schedule structure and rate design. To that end, Staff recommends that the Commission require the Applicant to provide a typical bill analysis with tariffs to be filed in compliance with the Order in this case.

Nevertheless, Staff has provided, as follows, a typical total bill analysis (in the same format and with the same assumptions as the Applicant's) to reflect its proposed singleblock rate structure for residential customers at the Staff-proposed increase (from Table 1).

Sheet 10	(Residential Se	1 SI	Staff						
Rate)	(Summer)		<u>Pi</u>	roposed	Inc	rease	Increase%		
0	150	\$ 19.8	9 \$	21.04	\$	1.15	5.8%		
0	200	\$ 25.6	7 \$	26.68	\$	1.01	3.9%		
0	250	\$ 31.4	7\$	32.33	\$	0.85	2.7%		
0	300	\$ 37.28	в\$	37.99	\$	0.71	1.9%		
0	350	\$ 43.0	7\$	43.64	\$	0.57	1.3%		
0	400	\$ 48.8	7\$	49.29	\$	0.42	0.9%		
0	450	\$ 54.6	5\$	54.93	\$	0.28	0.5%		
0	500	\$ 60.4	7\$	60.59	\$	0.12	0.2%		
0	550	\$ 66.7	0\$	66.49	(	\$0.21)	-0.3%		
0	600	\$ 72.9	5\$	72.41	(	\$0.54)	-0.7%		
0	650	\$ 79.1	7 \$	78.30	(	\$0.87)	-1.1%		
0	700	\$ 85.4	3\$	84.24	(	\$1.19)	-1.4%		
0	800	\$ 97.8	9\$	96.02	(	(\$1.87)	-1.9%		
0	900	\$110.3	7\$	107.84	(	(\$2.53)	-2.3%		
0	1,000	\$122.8	5\$	119.67	(	(\$3.19)	-2.6%		
0	1,200	\$147.8	1 \$	143.30	(	(\$4.50)	-3.0%		
0	1,500	\$185.2	3\$	178.74	(	\$6.49)	-3.5%		

ī.

Sheet 10 (Residential Service Standard				Staff						
Rate) (Win	ter)			Pro	posed_	Inc	rease	Increase%		
0	150	\$	19.73	\$	20.95	\$	1.23	6.2%		
0	200	\$	25.43	\$	26.54	\$	1.11	4.4%		
0	250	\$	31.19	\$	32.17	\$	0.97	3.1%		
0	300	\$	36.92	\$	37.79	\$	0.87	2.3%		
0	350	\$	42.67	\$	43.41	\$	0.74	1.7%		
0	400	\$	48.40	\$	49.03	\$	0.62	1.3%		
0	450	\$	54.15	\$	54.64	\$	0.50	0.9%		
0	500	\$	59.90	\$	60.27	\$	0.37	0.6%		
0	550	\$	65.64	\$	65.89	\$	0.24	0.4%		
0	600	\$	71.39	\$	71.52	\$	0.13	0.2%		
0	650	\$	77.12	\$	77.12	\$	0.00	0.0%		
0	700	\$	82.83	\$	82.73	(	\$0.11)	-0.1%		
0	800	\$	94.33	\$	93.97	(	\$0.36)	-0.4%		
0	900	\$	105.81	\$	105.21	(	\$0.60)	-0.6%		
0	1,000	\$	117.31	\$	116.46	(	\$0.84)	-0.7%		
0	1,200	\$	140.23	\$	138.91	(	\$1.32)	-0.9%		
0	1,500	\$	174.67	\$	172.62	(	\$2.05)	-1.2%		

Sheet 10 (Residential Service Standard Rate) (Summer)					Staff Proposed Increase Increase%					
0	300	\$	40.18	\$	37.99	(\$	52.18)	-5.4%		
0	400	\$	48.17	\$	47.20	(\$	60.97)	-2.0%		
0	500	\$	52.58	\$	54.31	\$	1.73	3.3%		
0	600	\$	57.01	\$	61.45	\$	4.43	7.8%		
0	700	\$	61.40	\$	68.56	\$	7.16	11.7%		
0	800	\$	73.89	\$	80.38	\$	6.49	8.8%		
0	<b>90</b> 0	\$	86.37	\$	92.19	\$	5.83	6.7%		
0	1,000	\$	98.83	\$	103.99	\$	5.16	5.2%		
0	1,100	\$	111.31	\$	115.81	\$	4.50	4.0%		
0	1,200	\$	123.78	\$	127.63	\$	3.85	3.1%		
0	1,300	\$	136.27	\$	139.45	\$	3.19	2.3%		
0	1,400	\$	148.74	\$	151.26	\$	2.52	1.7%		
0	1,500	\$	161.21	\$	163.07	\$	1.86	1.2%		
0	1,600	\$	173.68	\$	174.87	\$	1.19	0.7%		
0	1,700	\$	186.17	\$	186.71	\$	0.54	0.3%		

Sheet 10 (Resi	dential Servi	ce S	tandard	Staff							
Rate) (Winte	er)			<u>Pro</u>	oposed	Increa	<u>ise</u>	Increase%			
0	300	\$	39.84	\$	37.81	(\$	\$2.03)	-5.1%			
0	400	\$	47.79	\$	46.99	(\$	60.80)	-1.7%			
0	500	\$	52.20	\$	54.10	\$	1.90	3.6%			
0	600	\$	56.63	\$	59.47	\$	2.84	5.0%			
0	700	\$	61.02	\$	64.81	\$	3.7 <del>9</del>	6.2%			
0	800	\$	72.57	\$	74.35	\$	1.78	2.4%			
0	900	\$	84.10	\$	83.86	(5	\$0.24)	-0.3%			
0	1,000	\$	95. <mark>64</mark>	\$	93.39	(\$	62.25)	-2.3%			
0	1, <b>100</b>	\$	107.18	\$	102.92	(\$	64.26)	-4.0%			
0	1,200	\$	118.73	\$	112.46	(\$	6.27)	-5.3%			
0	1,300	\$	130. <b>28</b>	\$	121.99	(\$	\$8.29)	-6.4%			
0	1,400	\$	14 <b>1</b> .81	\$	131.51	(\$*	10.30)	-7.3%			
0	1,500	\$	153.36	\$	141.05	(\$1	12.31)	-8.0%			
0	1,600	\$	164.88	\$	150.55	(\$1	14.32)	-8.7%			
0	1,700	\$	176.44	\$	160.11	(\$ <sup>-</sup>	16.33)	-9.3%			

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Sheet 10(Re Rate) (Sui	sidential Servio mmer)	ce S	standard	Sta Pro	Staff Proposed Increase Increase						
0	300	\$	38.57	\$	37.05	(\$1.52)	-3.9%				
0	400	\$	50.58	\$	48.03	(\$2.55)	-5.0%				
0	500	\$	62.63	\$	59.04	(\$3.59)	-5.7%				
0	700	\$	86.67	\$	<b>8</b> 1.02	(\$5.65)	-6.5%				
0	900	\$	110.72	\$	102.98	(\$7.74)	-7.0%				
0	1,000	\$	123.01	\$	114.11	(\$8.90)	-7.2%				
0	1,200	\$	147.61	\$	136.38	(\$11.22)	-7.6%				
0	1,400	\$	172.20	\$	158.64	<b>(\$13</b> .56)	-7.9%				
0	1,500	\$	184.49	\$	169.78	(\$14.71)	-8.0%				
0	2,000	\$	245.95	\$	225.42	(\$20.53)	-8.3%				
0	2,500	\$	307.20	\$	280.84	(\$26.35)	-8.6%				
0	3,000	\$	368.43	\$	336.26	(\$32.17)	-8.7%				
0	3,500	\$	429.68	\$	391.69	(\$38.00)	-8.8%				



Sheet 10 Rate)	(Residential Serv (Winter)	rice S	standard	Sta Pri	aff oposed	Increase	increase%
0	300	\$	37.05	\$	36.26	(\$0.80)	-2.1%
0	400	\$	48.57	\$	46.97	(\$1.60)	-3.3%
0	500	\$	60.1 <b>1</b>	\$	57.71	(\$2.40)	-4.0%
0	700	\$	83.16	\$	75.62	(\$7.53)	-9.1%
0	900	\$	106.19	\$	93.51	(\$12.67)	-11.9%
0	1,000	\$	110.55	\$	98.71	(\$11.84)	-10.7%
0	1,200	\$	119.29	\$	109.09	(\$10.19)	<b>-8</b> .5%
0	1,400	\$	128.04	\$	119.48	(\$8.57)	-6.7%
0	1,500	\$	132.40	\$	124.67	(\$7.73)	-5.8%
0	2,000	\$	154.23	\$	150.62	(\$3.61)	-2.3%
0	2,500	\$	175.85	\$	176.34	<b>\$0.49</b>	0.3%
0	3,000	\$	197.46	\$	202.06	\$4.61	2.3%
0	3,500	\$	219.08	\$	227.79	\$8.71	4.0%

Sheet 10 Rate)	(Residential Serv (Summer)	rice S	itandard	Sta Pro	aff posed	Incre	ease	Increase%
0	500	\$	65.52	\$	58.95	(\$	6.57)	-10.0%
0	700	\$	78.07	\$	74.86	(\$	3.21)	-4.1%
0	900	\$	86.82	\$	88.79	\$	1.97	2.3%
0	1,000	\$	99.12	\$	99.92	\$	0.81	0.8%
0	1,100	\$	111.42	\$	111.07	(\$	0.34)	-0.3%
0	1,200	\$	123.71	\$	122.20	(\$	1.51)	-1.2%
0	1,300	\$	136.00	\$	133.33	(\$	2.67)	-2.0%
0	1,400	\$	148.30	\$	144.46	(\$	3.84)	-2.6%
0	1,500	\$	160.59	\$	155.60	(\$	5.00)	-3.1%
0	1,600	\$	172.87	\$	166.69	(\$	6.18)	-3.6%
0	1,800	\$	197.47	\$	188.94	(\$	8.53)	-4.3%
0	2,000	\$	222.05	\$	211.15	(\$1	0.91)	-4.9%
0	2,250	\$	252.68	\$	238.81	(\$1	3.87)	-5.5%
0	2,500	\$	283.30	\$	266.48	(\$1	6.82)	-5.9%
0	3,000	\$	344.54	\$	321.81	(\$2	2.73)	-6.6%
0	3,500	\$	405.79	\$	377.14	(\$2	8.65)	-7.1%
0	3,800	\$	442.52	\$	410.33	(\$3	2.19)	-7.3%
0	4,000	\$	467.01	\$	432.45	(\$3	4.56)	-7.4%

Sheet 10	(Residential Serv	esidential Service Standard			Staff				
Rate)	(Winter)	¢	62.01	Pro	posed	In		Increase%	
U	500	Φ	03.01	Φ	57.02		(\$5.59)	-0.570	
0	700	\$	75.28	\$	69.86		(\$5.43)	-7.2%	
0	900	\$	84.04	\$	80.25		(\$3.79)	-4.5%	
0	1,000	\$	88.41	\$	85.45		(\$2.96)	-3.3%	
0	1,100	\$	92.79	\$	90.65		(\$2.14)	-2.3%	
0	1,200	\$	97.14	\$	95.83		<b>(\$1</b> .31)	-1.4%	
0	1,300	\$	101.51	\$	101.02		(\$0.49)	-0.5%	
0	1,400	\$	105.90	\$	106.22	\$	0.33	0.3%	
0	1,500	\$	110.26	\$	111.42	\$	1. <b>1</b> 6	1.1%	
0	1,600	\$	114.60	\$	116.57	\$	1.96	1.7%	
0	1,800	\$	123.35	\$	126.92	\$	3.57	2.9%	
0	2,000	\$	132.08	\$	137.26	\$	5.18	3.9%	
0	2,250	\$	142.90	\$	150.08	\$	7.18	5.0%	
0	2,500	\$	153.7 <b>1</b>	\$	162.89	\$	9.18	6.0%	
0	3,000	\$	175.31	\$	188.52	\$	13.21	7.5%	
0	3,500	\$	196.93	\$	214. <b>1</b> 4	\$	17.21	8.7%	
0	3,800	\$	209.89	\$	229.50	\$	19.62	9.3%	
0	4,000	\$	218.53	\$	239.76	\$	21.23	9.7%	



Sheet 10 (Residential Service Standard						Staff						
Rate)	(Summer)				Pro	posed	<u>Increase</u>	<u>Increase%</u>				
	5	625	\$	84.38	\$	81.50	(\$2.87)	-3.4%				
	5	875	\$	92.10	\$	95.50	\$ 3.40	3.7%				
	5	1,125	\$	99.84	\$	109.51	\$ 9.67	9.7%				
	7	875	\$	114.85	\$	112.45	(\$2.41)	-2.1%				
	7	1,225	\$	125.69	\$	132.07	<b>\$</b> 6.37	5.1%				
	7	1,575	\$	136.50	\$	151.67	\$ 15.16	11.1%				
	8	1,000	\$	130.10	\$	127.92	(\$2.18)	-1.7%				
	8	1,400	\$	142.47	\$	150.32	\$ 7.86	5.5%				
	8	1,800	\$	154.84	\$	172.74	\$ 17.90	11.6%				
	10	1,250	\$	160.60	\$	158.89	<b>(\$1.7</b> 1)	-1.1%				
	10	1,750	\$	176.07	\$	186.91	\$ 10.84	6.2%				
	12	1,500	\$	191.10	\$	189.85	(\$1.25)	-0.7%				

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Sheet 10 (Reside	ential Servi	ice S	Standard	Staff						
Rate) (Winter	)			Pro	posed	Increase	<u>Increase%</u>			
5	625	\$	84.38	\$	81.50	(\$2.87)	-3.4%			
5	875	\$	92.10	\$	95.50	\$ 3.40	3.7%			
5	1,125	\$	99.84	\$	109.51	\$ 9.67	9.7%			
7	875	\$	1 <b>14</b> .85	\$	112.45	(\$2.41)	-2.1%			
7	1,225	\$	125.69	\$	132.07	\$ 6.37	5.1%			
7	1,575	\$	136.50	\$	151.67	\$ 15.16	11.1%			
8	1,000	\$	130.10	\$	127.92	(\$2.18)	-1.7%			
8	1,400	\$	142.47	\$	150.32	\$ 7.86	5.5%			
8	1,800	\$	154.84	\$	172.74	\$ 17.90	11.6%			
10	1,250	\$	160.60	\$	158. <b>89</b>	(\$1.71)	-1.1%			
10	1,750	\$	176.07	\$	186.91	\$ 10.84	6.2%			
12	1,500	\$	191.10	\$	189.85	(\$1.25)	-0.7%			

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(Summer)									
Col (B) includes Waterheating	200 KWH o	f		Staff Proposed Increase Increase%					
								6.29/	
U	350	\$	41.10	\$	43.04	\$	2.54	0.2%	
0	400	\$	46.88	\$	49.29	\$	2.41	5.1%	
0	450	\$	52.68	\$	54.93	\$	2.24	4.3%	
0	500	\$	58.49	\$	60.59	\$	2.10	3.6%	
0	550	\$	64.28	\$	66.49	\$	2.21	3.4%	
0	600	\$	70.08	\$	72.41	\$	2.33	3.3%	
0	650	\$	75.86	\$	78.30	\$	2.44	3.2%	
0	700	\$	81.68	\$	84.24	\$	2.56	3.1%	
0	750	\$	87.91	\$	90.13	\$	2.22	2.5%	
0	800	\$	94.16	\$	96.02	\$	1.86	2.0%	
0	850	\$	100.38	\$	10 <b>1</b> .94	\$	1.56	1.6%	
0	900	\$	106.64	\$	107.84	\$	1.20	1.1%	
0	1,000	\$	119.10	\$	119.67	\$	0.56	0.5%	
0	1,100	\$	131.58	\$	131.48		(\$0.10)	-0.1%	
0	1,200	\$	144.06	\$	143.30		(\$0.76)	-0.5%	
0	1,400	\$	169.02	\$	166.91		(\$2.11)	-1.2%	
0	1,700	\$	206.44	\$	202.39		(\$4.05)	-2.0%	

# Sheet 10 with Sheet 18 (Residential Service Water Heating Service)

Sheet 10 with Sheet 18 (Residential Service Water Heating Service) (Winter)					- · · (			
Col (B) includes Waterheating	200 KWH of			St Pr	aff oposed	Inci	ease	Increase%
0	350	\$	40.94	\$	43.64	\$	2.70	6.6%
0	400	\$	46.64	\$	49.29	\$	2.65	5.7%
0	450	\$	52.40	\$	54.93	\$	2.52	4.8%
0	500	\$	58.13	\$	60.59	\$	2.46	4.2%
0	550	\$	63.88	\$	65.61	\$	1.73	2.7%
0	600	\$	69.61	\$	70.64	\$	1.03	1.5%
0	650	\$	75.36	\$	75.65	\$	0.29	0.4%
0	700	\$	81.11	\$	80.70	(	\$0.41)	-0.5%
0	750	\$	86.85	\$	85.70	(	\$1.16)	-1.3%
0	800	\$	92.60	\$	90.71	(	\$1.88)	-2.0%
0	850	\$	98.33	\$	95.75	(	\$2.58)	-2.6%
0	900	\$	104.05	\$	100.76	(	\$3.28)	-3.2%
0	1,000	\$	115.54	\$	110.82	(	\$4.72)	-4.1%
0	1,100	\$	127.02	\$	120.86	(	\$6.15)	-4.8%
0	1,200	\$	138.52	\$	130.91	(	\$7.60)	-5.5%
0	1,400	\$	161.44	\$	150.98	(\$	10.46)	-6.5%
0	1,700	\$	195.88	\$	181.15	(\$	14.73)	-7.5%

Sheet Manac	Sheet 17 (Residential Service Load					ff	In	crease	Increase%
<u>Ivianaç</u>	<u>5.0</u>	500	\$	66.82	\$	62.15	111	(\$4.66)	-7.0%
	5.0	625	\$	82.31	\$	77.04		(\$5.27)	-6.4%
	5.0	875	\$	91. <b>04</b>	\$	93.52	\$	2.48	2.7%
	6.0	600	\$	79.21	\$	74.06		(\$5.15)	-6.5%
	6.0	750	\$	97.78	\$	91.91		(\$5.88)	-6.0%
	6.0	1,050	\$	108.26	\$	111.68	\$	3.43	3.2%
	7.0	700	\$	91.59	\$	85.96		(\$5.63)	-6.2%
	7.0	875	\$	113.28	\$	106.79		(\$6.48)	-5.7%
	7.0	1,225	\$	125. <b>51</b>	\$	129.88	\$	4.37	3.5%
	10.0	1,000	\$	128.79	\$	121.70		(\$7.08)	-5.5%
	10.0	1,250	\$	159.74	\$	151.45		(\$8.30)	-5.2%
	10.0	1,750	\$	177.23	\$	184.43	\$	7.20	4.1%
	15.0	1,500	\$	190.72	\$	181.21		(\$9.50)	-5.0%
	15.0	1,875	\$	237.17	\$	225.85	(	\$11.32)	-4.8%
	15.0	2,625	\$	263.08	\$	275.01	\$	11.93	4.5%

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Sheet 17 (Res	idential Servi	ce l	_oad	Staff						
Management H	<u> (Winter)</u>	•		<u>P</u>	oposed	Increase	Increase%			
5.0	500	\$	66.23	Ф	01.80	(\$4.43)	-0.1%			
5.0	625	\$	80.48	\$	73.74	(\$6.74)	-8.4%			
5.0	875	\$	89.22	\$	85.80	(\$3.42)	-3.8%			
6.0	600	\$	77.63	\$	71.33	(\$6.29)	-8.1%			
6.0	750	\$	94.73	\$	85.66	(\$9.07)	-9.6%			
6.0	1,050	\$	105.20	\$	100.13	(\$5.07)	-4.8%			
7.0	700	\$	89.01	\$	80.88	(\$8.13)	-9.1%			
7.0	875	\$	108.96	\$	97.58	(\$11.38)	-10.4%			
7.0	1,225	\$	121.19	\$	114.47	(\$6.72)	-5.5%			
10.0	1,000	\$	123.23	\$	109.52	(\$13.70)	-11.1%			
10.0	1,250	\$	15 <b>1</b> .70	\$	133.37	(\$18.33)	<b>-12</b> .1%			
10.0	1,750	\$	169.19	\$	157.51	(\$11.68)	-6.9%			
15.0	1,500	\$	180.19	\$	157.23	(\$22.96)	-12.7%			
15.0	1,875	\$	222.92	\$	193.01	(\$29.91)	-13.4%			
15.0	2,625	\$	248.83	\$	228.90	(\$19.93)	-8.0%			

Sheet 17 (Resid	Sta	ff						
+ Controlled Ele	ectric Wtr. Htg.)	<u>(Su</u>	immer)	Pro	posed	<u>Increase</u>		Increase%
4	400	\$	55.30	\$	50.77		(\$4.53)	-8.2%
4	600	\$	70.31	\$	68.74		(\$1.57)	-2.2%
4	900	\$	80.78	\$	88.52	\$	7.73	9.6%
5	500	\$	66.82	\$	62.15		<b>(\$4</b> .66)	-7.0%
5	750	\$	86.68	\$	85.28		(\$1.40)	-1.6%
5	1,125	\$	99.78	\$	110.02		\$10.23	10.3%
7	700	\$	91.59	\$	85.96		(\$5.63)	-6.2%
7	1,050	\$	119.39	\$	118.33		(\$1.06)	-0.9%
7	1,575	\$	137.73	\$	152.95	\$	15.22	11.1%
10	1,000	\$	128.79	\$	121.70		(\$7.08)	-5.5%
10	1,500	\$	168.49	\$	167.94		(\$0.55)	-0.3%
10	2,250	\$	194.56	\$	217.26	\$	22.70	) 11.7%
15	1,500	\$	190.72	\$	181.21		(\$9.50)	-5.0%
15	2,250	\$	250.16	\$	250.45	\$	0.29	0.1%
<b>1</b> 5	3,375	\$	288.94	\$	324.11	\$	35.17	12.2%

Sheet 17 (Res <u>+ Controlled E</u>	Staff <u>Proposed</u>		Increase		<u>Increase</u> %		
4	400	\$ 54.82	\$	50.47		(\$4.34)	-7.9%
4	600	\$ 69.73	\$	66.62		(\$3.11)	-4.5%
4	900	\$ 80.20	\$	81.09	\$	0.89	1.1%
5	500	\$ 66.23	\$	61.80		(\$4.43)	-6.7%
5	750	\$ 84.86	\$	79.77		(\$5.09)	-6.0%
5	1,125	\$ 97. <b>9</b> 6	\$	97.87		(\$0.09)	-0.1%
7	700	\$ 89.01	\$	80.88		(\$8.13)	-9.1%
7	1,050	\$ 115.07	\$	106.03		(\$9.05)	-7.9%
7	1,575	\$ 133.41	\$	131.34		(\$2.07)	-1.6%
10	1,000	\$ 123.23	\$	109.52		(\$13.70)	-11.1%
10	1,500	\$ 160.45	\$	145.44		(\$15.00)	-9.4%
10	2,250	\$ 186.52	\$	181.49		(\$5.02)	-2.7%
15	1,500	\$ 180.19	\$	157.23		(\$22.96)	-12.7%
15	2,250	\$ 235.90	\$	210.97		(\$24.93)	-10.6%
15	3,375	\$ 274.69	\$	264.71		(\$9.97)	-3.6%

Sheet 19 (Residential Service Optional						Staff						
Electrical	ly He	ated Apartmei	nt Rat	te)	Pre	oposed	<u>Increase</u>	<u>lncrease%</u>				
<u>(Summer</u>	)											
	0	200	\$	26.48	\$	26.34	(\$0.14)	-0.5%				
	0	300	\$	38.46	\$	37.46	(\$1.01)	-2.6%				
	0	400	\$	50.62	\$	48.66	(\$1.96)	-3.9%				
	0	500	\$	62.94	\$	59.97	(\$2.97)	-4.7%				
	0	600	\$	75.26	\$	71.26	(\$4.00)	-5.3%				
	0	700	\$	87.57	\$	82.56	(\$5.01)	-5.7%				
	0	800	\$	99.89	\$	93.86	(\$6.03)	-6.0%				
	0	900	\$	112.20	\$	105.14	(\$7.05)	-6.3%				
	0	1,000	\$	124.52	\$	1 <b>16.46</b>	(\$8.06)	-6.5%				
	0	1 <b>,100</b>	\$	136.82	\$	127.74	(\$9.08)	-6.6%				
	0	1,200	\$	149.14	\$	139.05	(\$10.09)	-6. <b>8</b> %				

Sheet 19 (Residential Service Optional Electrically Heated Apartment Rate) (Winter)				Staff <u>Proposed</u>		Increase		Increase%
0	200	\$	26.25	\$	26.21		(\$0.05)	-0.2%
0	300	\$	38.12	\$	37.28		(\$0.84)	-2.2%
0	400	\$	46.23	\$	46.29		\$0.06	0.1%
0	500	\$	50.59	\$	53.27	\$	2.68	5.3%
0	600	\$	54.93	\$	56.53	\$	1.60	2.9%
0	700	\$	59.29	\$	63.52	\$	4.23	7.1%
0	800	\$	63.65	\$	70.51	\$	6.86	10.8%
0	900	\$	68.00	\$	77.49	\$	9.48	13.9%
0	1,000	\$	72.36	\$	84.47	\$	12.11	16.7%
0	1,100	\$	76.73	\$	93.40	\$	16.67	21.7%
0	1,200	\$	88.06	\$	102.40	\$	14.33	16.3%

## SERVICE MONITORING AND ENFORCEMENT DEPARTMENT

The Service Monitoring and Enforcement Department (SMED), Facilities & Operations Field Division (FOFD), conducted various investigations (corporate office audits and PUCO field Staff site inspections) of the First Energy Service Company (FE), Ohio Edison Company (OE) distribution system, administrative operations, and specific physical facilities. The purpose of the audits was to assess the compliance of (FE) OE's programs to maintain system safety and service reliability with rule 4901:1-10-27, Ohio Administrative Code (O.A.C.), [Inspection, Maintenance, Repair, and Replacement of Transmission and Distribution Facilities (Circuits and Equipment)], and others. Rule 4901:1-10-27 (E)-(2)-(a), O.A.C. requires each electric utility to submit a plan for the inspection, maintenance, repair, and replacement of circuits and equipment, as stated in paragraph (E) (1) of the rule, for review and acceptance by SMED. This report also addresses compliance with rules 4901:1-10-04 (voltage), 05 (metering), 06 (National Electric Safety Code), and 11(distribution circuit performance).

#### O.A.C. 4901:1-10-27 (D) (1) Scheduled Inspections: Circuits & Equipment

Rule 4901:1-10-27 (D) (1), O.A.C. lists inspection requirements for distribution facilities (circuits and equipment) to maintain safe and reliable service on the following scheduled basis:

#### (D) (1) Distribution – at least one-fifth of all distribution circuits and equipment shall be inspected annually. All distribution circuits and equipment shall be inspected at least once every five years.

Staff conducted a baseline audit in 2005 and a follow-up audit in 2006, to determine how OE implements rule 27(D) (1). Specifically, Staff audited OE's overhead distribution circuits & equipment inspection program to review various components of the distribution system: pole leaning or rotted; cross arm damage; transformer; down ground; insulators; conductor condition; conductor slack; twisted loops; guy wires; anchors; tree conditions; vehicular damage; and clearance.

Staff conducted one hundred and nineteen (119) routine field inspections of OE's rule 27 (D) (1), O.A.C., overhead distribution circuits & equipment facilities from April, 2003 to March, 2007: twenty-six (26) circuits (conductor); fourteen (14) recloser; thirty-six (36) capacitor; and, forty-three (43) vegetation control maintenance practices.

## Findings

The audits and field inspections confirmed OE's compliance with its inspection program and with its requirement to annually inspect at least one fifth of all distribution circuits and equipment. It was difficult to confirm OE's compliance with the required 20% yearly 2004 inspection requirement due to OE transitioning its records from the hard copy (spreadsheet) format to an electronic database (SAP) system that had not been fully deployed, leaving some inspections unaccounted for. Upon subsequent auditing Staff was able to confirm compliance for 2005.

#### Recommendations

As a result of the audits, Staff issued recommendations to OE, requesting the Company have all circuit information incorporated into the SAP database and that OE return all spreadsheets, denoting circuit inspection discrepancies and repair items recorded from the actual inspection form, to the central records location for filing with each circuit inspection folder. In addition, it was recommended that OE establish minimum qualifications for their distribution line patrol inspectors. OE instituted these changes and no further recommendations are needed at this time.

## O.A.C 4901:1-10-27 (D) (3) Scheduled Inspections: Substations

Rule 4901:1-10-27 (D) (3), O. A. C., specifies the inspection frequency requirement for substations and equipment to maintain safe and reliable service:

## (D) (3) Substations – all transmission and distribution substation and equipment shall be inspected at least once each month.

Staff conducted baseline audits in 2004 of OE's substation monthly inspection activities. Staff then conducted field verification audits for monthly substations inspections in 2005 for the Ohio Edison/Adron distribution substation region.

Staff conducted seventy-eight (78) routine field inspections of the rule 27 (D) (3), O.A.C., physical condition and security protection of OE substation facilities from April 2003 to March 2007.

#### Findings

OE's Substation Preferred Practices and Methods procedures manual contain the directions for performing substation inspections and maintenance. Staff conducted a random sample survey of OE substations. Monthly inspections are performed by qualified inspectors and recorded electronically with a focus on major substation equipment. Staff also verified maintenance practices for transformers, including frequency, types, methodology, and personnel. The 2006 audit visually verified substation monthly inspections by viewing a Company displayed database program and work papers. Transformer maintenance (major and minor) records were also reviewed. Staff found that the OE records in this area were in order, that there were no discrepancies evident for the samples audited and that the work had been performed by qualified electrician grade personnel.

#### Recommendations

No recommendations are requested at this time with respect to substations.

#### O.A.C 4901:1-10-27 (E) (1) (a), (b), (c), (d), (e), (f), and (g) Distribution Inspection, Maintenance, Repair, and Replacement Programs

Rule 4901:1-10-27 (E) (1) (a), O. A. C. requires each electric utility to:

- (E) (1) Establish and maintain written programs, procedures and schedules for the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:
  - (a) <u>Poles and towers:</u>

Staff conducted initial baseline audits of the OE program for distribution wood pole inspection & maintenance in 2004 with limited success. Further baseline audits were conducted of OE in 2005.

Staff conducted five (5) routine field inspections of poles and towers from April, 2003 to March, 2007 to assess compliance with rule 4901:1-10-27 (E) (1) (a), O.A.C., requirements.

#### Findings

Due to the method of record retention, Staff's assessment of OE's adherence to the pole inspection and maintenance program could not be made on an OE specific level. The 2005 Staff audits confirmed that OE was not following a poles & tower program in accordance with rule 4901:1-10-27 (E) (1) (a), O.A.C., which requires companies to perform an inspection, maintenance, repair, and replacement program for distribution poles. Rather, OE was substituting the visual (only) inspection of distribution circuits and equipment at least once every five (5) years or 20% per year as required by the prior rule section (D) (1). FE conducts annual random sample inspections of its pole population. Its inspection consisted of a visual external examination accompanied, at times, with a hammer sounding to indicate voids in the pole interior. At the time of audit, FE provided Staff data indicating the poles they had examined in the years 2001, 2002, 2003, 2004 among the 3 operating companies (including OE), The volume examined indicates that less than (<) 5% of the pole population was inspected. In addition, Staff believes that OE's visual only and soundings inspections did not meet the requirements of rule 4901:1-10-27 (E) (1) (a), O.A.C..

In response to the Staff's audit findings, the FE (responding for the three operating companies, including OE), developed, and Staff approved, a new Poles & Tower program to commence in the third quarter of 2006 that would meet the requirements of rule 4901:1-10-27 (E) (1) (a), O.A.C.. Staff conducted a follow up audit at OE in the fall of 2006 which disclosed that OE contract personnel had completed 95% of the scheduled pole inspections for 2006.

#### Recommendations

As the required 2006 program was being developed by the FE to resolve the noncompliance, Staff conducted numerous reviews of the proposed program and made constructive recommendations to finalize the plan in accordance with rule requirements, which OE incorporated. To date, OE is following its new program and therefore no further recommendations are necessary at this time.

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#### O.A.C 4901:1-10-27 (E) (1) (a), (b), (c), (d), (e), (f), and (g) Inspection, Maintenance, Repair, and Replacement: Conductors

The O.A.C. requires each electric utility to:

- (E) (1) Establish and maintain written programs, procedures and schedules for the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:
  - (b) Conductors;

Staff conducted baseline and follow-up audits to determine how OE implements the requirements of rule 4901:1-10-27 (E) (1) (b), O.A.C., for conductors. The audits showed that the Company has existing programs and procedures in accordance with the rule. OE utilizes rule 4901:1-10-27 (D) (1), O.A.C., [Overhead Distribution Circuits & Equipment Inspection Program] to implement conductor inspection and maintenance.

In addition to the baseline and follow-up audits, Staff conducted twenty-six (26) routine field inspections of rule 27 (E) (1) (b), O.A.C., for this requirement from April 2003 to March 2007.

## Findings

The findings were the same as the (D) (1) for distribution circuits & equipment portion above as OE uses the same process for both. It was difficult to confirm OE's compliance with a possible noncompliance for not meeting the required 20% yearly 2004 inspection requirement due to the transitioning of records from a hard copy (spreadsheet) format to an electronic database system that had not been fully deployed throughout the OE operating Company's territories, leaving some inspections unaccounted for. A subsequent data response showed compliance with the 20% rule 27 (D) (1) for OE. A 2006 follow-up disclosed OE 20% rule (D) (1) compliance as well.

#### Recommendations

The recommendations were the same as in the section above on (D) (1) for distribution circuits & equipment because OE uses the same process for both inspections. As a result of the findings in the initial audit, staff recommended that the FE (all three operating companies, including OE), should have all circuit information incorporated into the electronic database. The later audit recommended OE return all spreadsheets, denoting circuit inspection discrepancies and repair items recorded from the actual inspection form, to the central records location for filing with each circuit inspection

folder. In addition, all FE (including OE) should establish and implement minimum qualifications for their distribution line patrol inspectors. To date, OE is following its new program and therefore no further recommendations are necessary at this time.

#### O.A.C. 4901:1-10-27 (E) (1) (a), (b), (c), (d), (e), (f), and (g) Inspection, Maintenance, Repair, and Replacement: Pad-Mounted Transformers]

The O.A.C. requires each electric utility to:

(E) (1) Establish and maintain written programs, procedures and schedules for the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:

. . . .

(c) Pad-mounted transformers;

Staff conducted statistical sample audits of OE pad-mount transformer inspections (visual inspections to check the locking mechanism and integrity of the cabinet). Staff's baseline audit conducted in 2006 disclosed that OE's circuit inspections include pad-mounted transformers as well. In verification audit conducted in 2006 Staff confirmed that OE was monitoring circuits using a pad-mounted transformer inspection form which included criteria for: pad-mount identification; locking mechanism; bolt type; cabinet condition (rust); door hinges (condition); pad foundation; tank leakage; accessibility; and physical damage.

Staff revisited the Company in 2007 and conducted a verification audit of OE padmounted transformer inspections.

Staff also conducted twenty-one (21) routine field inspections of rule 27 (E) (1) (c), O.A.C., for pad-mounted transformers from April 2003 to March 2007.

## Findings

Staff field inspections in the fall 2006 found probable non-compliance with the padmounted transformer security inspection program at one of the other FE operating Company's territory (CEI). After discussion with Staff, FE senior management immediately initiated a Special Security Inspection Project (SSIP) to determine the extent of the problem by conducting quality control (QC) inspections in all three (3) FE operating companies in the State of Ohio. Almost immediately, it became apparent that OE had the same types of probable non-compliance(s) within its territory as CEI had. The third FE operating Company (Toledo Edison Company - TE) was not affected. As part of the FE senior management's aggressive corrective action to rectify the noncompliances, OE agreed to completely re-inspect their entire pad-mounted transformer population for security issues by, 09/01/07. Additionally, as part of the remediation agreement, OE was to:

- (1) Modify documentation (procedures for inspection checklists);
- (2) Match work distributed versus work completed;
- (3) Update mapping for more complete location records; and,
- (4) Retrain inspectors to properly secure and inspect pad-mounted transformers.

Staff conducted a follow-up audit in the fall 2007 to verify that OE completed reinspection of their entire pad-mounted transformer population for security issues by the commitment date, 09/01/07. During the audit, OE advised Staff that all pad-mounted transformers in OE territory were re-inspected.

#### Recommendations

In 2006 Staff reviewed the OE practices for QC. In response to a Staff data request, OE affirmed that it was not conducting any random sampling for quality control for padmounted transformer inspections. The practice had been to review completed inspection forms by OE employees for completeness and to check for the inspector's signature prior to accepting and processing inspection data.

Based upon the identified probable noncompliance(s) of 4901:1-10-27 (E) (1) (C), O.A.C., that occurred during the time that OE was not conducting any random QC sampling to assure that pad mounted transformer inspections were being performed properly, Staff recommends that the Commission order OE to:

- (1) Immediately institute a statistically valid random sample QC audit program for pad-mounted transformer inspections whereby trained personnel would re-inspect pad-mounted transformers previously inspected in order to verify original inspection documents as a routine practice, not just for noncompliance corrective action. Records should be kept to verify the QC inspections; and,
- (2) Use random (statistical valid sample) QC audits to examine other activities associated with supporting the pad mounted inspection process to assure accuracy:

- (A) Modify documentation (procedures for inspection checklists);
- (B) Match work distributed versus work completed;
- (C) Update mapping for more complete location records; and,
- (D) Retrain inspectors to properly secure and inspect pad-mounted transformers.

#### O.A.C. 4901:1-10-27 (E) (1) (a), (b), (c), (d), (e), (f), and (g) Inspection, Maintenance, Repair, and Replacement: Line Reclosers/Capacitors

The O.A.C. requires each electric utility to:

(E)(1) <u>Establish and maintain written programs, procedures and schedules for</u> the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:

(e) <u>Line reclosers;</u>

(f) Line capacitors;

Staff conducted statistically valid sample audits of OE's line recloser and line capacitor inspection programs. Line reclosers are visually inspected for any damage along with the counter reading on each device being recorded. Line capacitors get annual inspections divided into two primary parts; a visual inspection (for both fixed and switched banks) and an operational test (for switched banks only). Staff conducted baseline audits in the fall 2005 and early 2006 to determine the specific details of both programs. Maintenance Minimum Practices are used for each: line reclosers (Recloser Maintenance Practice – RMP) and line capacitors (Capacitor Maintenance Practice – CMP). The RMP and CMP are corporate practices maintained by the Energy Delivery Operations Services Department in the FE.

As part of the new audit schedule for 2007-2008, Staff conducted a verification audit of OE line reclosers and line capacitors in 2007.

Staff conducted fifty (50) routine field inspections for rule 27 (E) (1) (d) & (e), O.A.C., for line reclosers and line capacitors from April 2003 to March 2007.

Findings

Staff's 2007 verification audit identified that OE practices were in probable noncompliance with 4901:1-10-27 (E) (1) (d) & (e), O.A.C., for not conducting operational tests on switched capacitor banks (line capacitors) as required by its programs filed in their 2005 and 2006 Rule 26 reports. Specifically, there was insufficient source documentation to demonstrate that operational tests were performed on switched capacitor banks for the years 2005 and 2006.

Staff also reviewed OE's QC practices to assure the 4901:1-10-27(E) (1) (d) & (e), O.A.C., requirements for line reclosers and line capacitors inspection are implemented correctly. Staff discovered that prior to Staff's finding the noncompliance, OE did not perform any QC oversight practices (second level of verification of inspection results) to ensure quality control for inspection, maintenance, repair and replacement for reclosers or capacitors. Rather, OE conducted programmatic reviews of inspection forms to assess whether they were filled out correctly, as was the case in pad-mounted transformers above.

OE responded to Staff's probable noncompliance letter confirming that OE was not following documented maintenance practice for distribution capacitors. OE committed to have every OE switched capacitor bank operationally tested by June 1, 2007. The response also noted that there were no control points for audit or second level verification of inspection results. As preventative action, OE was to develop a review process with audit checkpoints. In-process and completion audits were to be incorporated into the distribution maintenance process and would be the responsibility of the Engineering Supervisor of Distribution Maintenance and Systems Support.

Staff conducted a follow-up audit in the summer 2007 to measure the overall status of the OE corrective and preventative actions for the operational tests on switched capacitor banks that were due to be completed by, 06/01/07. The audit disclosed that sufficient objective evidence existed to conclude that OE performed inspection and testing of switched banks in their territory, as required.

#### Recommendations

Based upon the identified probable noncompliance(s) that occurred while OE was not conducting any quality control random sampling to assure inspections were being performed properly, and their commitment to establish a review process with audit checkpoints for in-process and completion audits, Staff recommends that the Commission order OE to:

(1) Immediately initiate and continue to conduct an independent QC random (statistically valid sample) audit program of line recloser and line capacitor inspections. The program would include a review process with audit checkpoints for both in process and completed work as a regular practice,

not just for corrective action. Records should be kept to verify inspections were conducted; and,

- (2) Assure QC random audits examine other associated activities that support the inspection process to assure accuracy of the inspection records:
  - (A) Train OE operations personnel involved in the administration, execution, and reporting of distribution inspection programs (line reclosers and line capacitors) on OE's Preferred Practices (Recloser Maintenance Practice – RMP) and line capacitors (Capacitor Maintenance Practice- CMP) to assure understanding; clearly communicated requirements, and define accountability; and,
  - (B) The Manager of Engineering Services, the Directors of Operations Services & Support Services and the Region President will verify that the necessary actions are taken to ensure compliance.

#### O.A.C. 4901:1-10-27 (E) (1) (a), (b), (c), (d), (e), (f), and (g) Inspection, Maintenance, Repair, and Replacement: Right-of-Way Vegetation

The O.A.C. requires each electric utility to:

- (E)(1) Establish and maintain written programs, procedures and schedules for the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:
  - (g) Right-of-way vegetation control;

In 2004, Staff conducted baseline audits to determine OE's right-of-way vegetation control – distribution circuit program practices. The purpose of the audits was to check documentation of circuit work and that the chosen circuits had indeed been trimmed pursuant to OE's stated (4-year cycle) program. In the fall of 2004 and 2005, Staff conducted audits of OE to verify objective evidence of program activity for the 2004 Annual Work Plan (schedule).

As continued follow-up, in 2007, Staff initiated a desk audit of OE's right-of-way vegetation control – distribution circuit practices (tree trimming). The purpose of the desk audit was to verify that records were available, as objective evidence, to confirm that the 4-year cycle vegetation management program had been adhered to by OE using the years 2003 – 2006 as the sample 4-year cycle. OE's rule 26 reports stated the 4-year cycles had been met. In response to Staff's initial data request OE only provided

a last maintained year (e.g., 2006) notation for tree trimming conducted on circuits during the years 2003 – 2006. In particular, OE explained that, "If completion of annual work carried into the following year (e.g., due to circumstances such as refusals, crew availability, etc.), the circuits "planned maintenance year" was not changed. Completed carry-over miles are counted in the originally scheduled year's total." Therefore, OE did not provide the specific time periods (start date/end date) to show when the tree trimming process was actually conducted in each calendar year. Compounding Staff's verification of a 4-year cycle OE also explained that, "For the purposes of data retention, tree trimming records are maintained for one cycle or three years, whichever is the longer duration. In addition, the IVMS [Integrated Vegetation Management System] was implemented in 2003. As such, the records for 2000, 2001, and 2002 are no longer available."

As a result, it was difficult for Staff to determine the specific time periods (start date/end date) in which all applicable circuits were actually trimmed. Only the date when a circuit was scheduled to be trimmed or when partial work had begun on the circuit was available. Also, since records could no longer be produced going back a full trim cycle (2003-2006), records no longer existed to demonstrate that OE was implementing a four-year trimming cycle. After further research, OE provided Staff with additional data. Staff then proceeded to complete the audit to measure the 4-year cycle commitment for the years 2003 – 2006.

Staff conducted another verification audit of OE's right-of-way vegetation control – distribution circuit program in 2007.

In addition to the audits noted above, Staff also conducted forty-three (43) routine field inspections for rule 27 (E) (1) (f), O.A.C., vegetation control requirements from April 2003 to March 2007.

Lastly, Staff conducted a complete process review of OE right-of-way vegetation control – distribution circuit program requirements for Circuit #3 (Trimble Road Substation – Mansfield). Under this audit, Staff on-site monitored the process of inspecting and remediating this circuit including observing the initial planning phase; contacting the customers; tagging notification if customers were not home; marking of trees; updating the circuit map; actual tree trimming in-process; and, the Forester's review of contractor work activity.

#### Findings

Staff's review of the OE data for 2003 – 2006 start date/end date disclosed the following areas of concern:

(1) Missing records prevented a full verification of a 4-year trimming cycle Maintenance program:
- The start date/end date data for a total population of 2,170 FE (OE, TE, and CEI) distribution circuits was requested. The provided data covered only 29.68% circuits, leaving 70.32% FE (OE, TE, and CEI) circuits without records and Staff unable to verify actual start date/end date data or compliance with the 4-Year cycle requirement for the sample period.
- Of the FE total, OE could not provide start date/end date data records for 71.09% circuits.
- (2) Inaccurate data was reported; e.g., completion of a 4-year tree trimming cycle circuit when in fact the time was extended to additional years:
  - 20.49% FE (OE, TE, and CEI) circuits had inaccurate timeline data listed in the start date/end date fields; e.g., no data listed (blank) or data showed time periods longer than 4 years for tree trimming. For example, data showed a start date in late December, 2006 with end dates extended to the first quarter 2007. However, OE's responses to Staff data requests stated that the circuits were last maintained in the prior calendar year (e.g., 2006).
  - Of the FE total questionable data, 06.23% of that total was OE's inaccurate data.

#### Recommendations

Staff believes OE has violated rule 4901:1-10-03 O.A.C. requirements for failure to maintain three (3) years of records (2004, 2005, and 2006) calendar years to verify achievement of the 4-year (2003 - 2006) tree trimming cycle.

- (1) Staff also believes OE has violated its own commitments to the Staff for rule 4901:1-10-27 (E) (1) (f) O.A.C. to maintain tree trimming records for one cycle or three years, whichever is the longer duration; i.e., 4-years (2003 – 2006).
- (2) Staff recommends that the Commission order OE to:
  - (A) Maintain accurate and complete (start date/end date) records of objective evidence within the IVMS [Integrated Vegetation Management System] computer database format for at least 4-years and additional cycles. In addition, a hard copy backup of the records should also be maintained;

- (B) Review the hard copy timesheet records (or other contractor records) for calendar years 2003 – 2006 to ascertain the start date/end date data for the missing 632 of 889 (71.09%) circuits and input the dates into IVMS. This would provide at least one full 4-year cycle of records and OE should provide Staff with a copy of the data;
- (C) Conduct the same input review (as in B above) for any missing 2007 circuit data and take action to assure future years (2008, etc.) going forward have the same data included; and,
- (D) Maintain 4-year cycle tree trimming vegetation management records (items A-C above) for two (2) complete IVMS tree trimming cycles (8 years) since actual time periods to get the work done have extended beyond 4-Years.

#### O.A.C. 4901:1-10-27 (E) (1) (a) to (g) Inspection, Maintenance, Repair, and Replacement

The O.A.C. requires each electric utility to:

(E)(1) Establish and maintain written programs, procedures and schedules for the inspection, maintenance, repair, and replacement of its transmission and distribution circuits and equipment. These programs shall establish preventative requirements for the electric utility to maintain safe and reliable service. Programs shall include, but are not limited to, the following facilities:

#### (g) Substations

Staff conducted baseline audits in 2004 of OE's substation inspection activities in order to determine the details of OE's equipment maintenance, scheduling, and tracking program practices. Staff then conducted a field verification audit of OE practices in 2004 to review transformer maintenance activities according to OE's Preferred Practices Power Transformers Manual for 2004 calendar year activities. In the verification audit, Staff reviewed various tests including Dissolved Gas Analysis (DGA), Total Combustible Gas (TCG), and Power Factor Test (Doble). A 2006 verification audit reviewed OE practices for the 2005 calendar year for maintenance on transformer components. In 2007, Staff conducted a substation maintenance program audit focusing upon maintenance activities of four (4) major components (breakers, transformers, relays, and voltage regulators) in the three operating companies of the FE, including OE. The goal was to examine the records of selected equipment prior to failure to see if the FE companies (including OE) were performing inspections, testing and maintenance (ITM) in accordance with National Electric Safety Standards (NESC), the Company practices, and, the Commission's Electric Service and Safety Standards (ESSS). FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR, et al.

Staff conducted seventy-eight (78) routine field inspections of OE substation facilities for rule 27 (E) (1) (g), O.A.C., requirements examining physical condition and security protection from April 2003 to March 2007.

#### Findings

Staff found the OE records in this area to be in order with no noncompliances for the samples audited, and the work was performed by qualified electrician grade personnel.

#### Recommendations

Staff recommends the Commission order OE to utilize more computer database records for the substation ITM practices that are currently mostly kept in hard copy format. The computerized data base would provide access to vital data almost instantaneously, the capability to gather statistics expeditiously, and an improved capability to analyze equipment performance.

### O.A.C. 4901:1-10-04 Equipment for Voltage Measurements

These portions of the O.A.C. require that:

Portable indicating instruments (e.g., electro-mechanical indicating, electronic indicating, and electronic indicating and recording) used to test or record service voltage at the customer's premises in response to a customer inquiry or complaint shall be checked for accuracy against a recognized standard. Accuracy checks shall be conducted as recommended by the manufacturer or annually if no period is specified. The most recent accuracy test record shall be kept with each such instrument, or at a central location for the electric industry.

Staff verified that OE has a methodology (calibration program) for assuring that its equipment used for voltage measurement was checked for accuracy against a recognized standard with accuracy checks conducted as recommended by the manufacturer or annually if no period is specified, with test records kept.

Staff performed a desk review in 2001 of this process. In 2006, Staff conducted a verification audit of the Central Electric Laboratory and examined voltage meter calibration practices as part of the O.A.C. rule 4901:1-10-05 [Metering] review – see next topic below.

#### Findings

Staff found that the calibration of the voltage measuring equipment is traceable to the National Institute of Standards and Traceability (NIST). The Central Electric Laboratory met the ANSI C12.1 as well as nuclear and International Standards Organization (ISO) standards. No noncompliances were noted.

#### Recommendations

No recommendations are requested in this area at this time.

#### O.A.C. 4901:1-10-05 Metering

This rule requires that:

<u>A customer's electric usage shall be metered by commercially acceptable</u> measuring devices that comply with "American National Standards Institute" (ANSI) standards. Meter accuracy shall comply with the 2001 ANSI C12.1 standards. No metering device shall be placed in service or knowingly allowed to remain in service if it violates these standards.

In 2006, Staff conducted a verification audit of the FE Central Electric Laboratory in Akron, OH used for calibration of meter equipment for customers of all three operating companies.

In 2006, as part of the voltage audit, Staff conducted a review of OE's practices with respect to metering rule compliance to verify that OE has an ANSI C12.1 standard methodology, as required, for assuring that a customer's electric usage shall be metered by commercially acceptable measuring devices Staff examined calibration procedures, practices, and records control.

#### Findings

Staff found that the meters and other equipment examined had traceability to the National Institute of Standards and Traceability (NIST). The laboratory met ANSI C12.1 as well as other (including nuclear and ISO Standards) requirements. The laboratory not only performs the calibration process for meters used to report customer electric usage but supplies the calibration process for FE as well. No noncompliances were noted.

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#### Recommendations

No recommendations are requested in this area at this time.

#### O.A.C. 4901:1-10-06 National Electrical Safety Code

This rule requires that:

Each electric utility shall comply with the 2002 edition of the American National Standard Institute's, "National Electrical Safety Code". The provisions in "session Order No. 285, "December 1, 1949, referring to the designation of the medium loading district for a part of Ohio remain in effect.

Staff conducted various inspections of OE facilities for compliance with the National Electric Safety Code (NESC) requirements during the past four (4) years from April 2003 to March 2007. A total of two-hundred seventy six (276) inspections evaluated compliance with rule 4901:1-10-06 O.A.C. requirements for substations; pad-mounted transformers; switch gear; and, other (pole or vegetation Issue) topics.

For example, Substation requirements include a need for rooms and spaces; installations require supply conductors or cables rising from the trench to transformers; switchgear, or other equipment mounted on pads shall be so placed and arranged that they will not bear on the edges of holes through the pad nor the edges of bends or other duct work below the pad. Pad-mounted equipment shall have an enclosure that is either locked or otherwise secured against unauthorized entry.

#### Findings

The following is a list of the routine field inspections Staff conducted by NESC topic and the number of violations of the NESC that were found.

Торіс	Inspections	Exceptions
Substations	36	4
Pad-Mount Transformers	182	138
Switch Gear	35	2
Other (Pole/Vegetation)	23	_42
Tota	276	186

#### O.A.C. 4901:1-10-11 Distribution Circuit Performance

Rule portions 11(B) (1) and 11(C) require, among other things, that each EDU:

Set forth a method for determining the performance of each EDU's (Electric Distribution Utility) distribution circuits. Each EDU shall submit, no later than ninety days after each reporting period ending on December thirty-first, a report to the director of the consumer services department now the Service Monitoring & Enforcement Department or the director's designee that identifies the lowest performing eight percent (8%) of the EDU's distribution circuits for the previous twelve-month reporting period.

Since 2001, Staff reviewed OE reports which identified the lowest performing eight percent (8%) of distribution circuits for the previous twelve-month reporting period. Circuits were selected and inspected by field Staff in order to verify that OE had met its corrective and/or preventative actions commitments.

Staff conducted forty-three (43) routine field inspections to measure circuit performance during the past four (4) years from April 2003 to March 2007 of OE facilities.

#### Findings

No noncompliances were noted during these inspections.

#### Recommendations

No recommendations relating to carrying out designated remedial activity are necessary at this time.

#### Two-Pole Conditions

As a result of Staff inspections revealing an increase in the number of two-pole conditions, Staff surveyed the regulated electric and telephone companies, (including Time Warner in a voluntary role), in an attempt to reveal what was causing or contributing to the problem. A two-pole condition is a situation where electric service has been removed from one pole and placed on a new pole, yet the old pole remains in place for several months to several years after the transfer of the electric service. The survey revealed that the level of communication between companies varied, and that the Joint Service Agreement requirements (responsible for who will remove & when) also varied between companies.

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Staff then sought to identify the reason(s) for protracted pole transfer activity and old pole removal; develop measurements for such activity; facilitate solution(s) for the root cause(s); eliminate old (pre 2006) two-pole conditions by 2010; and, resolve all future two-pole conditions within 12 months of their creation.

To date FE has indicated that it does not know how many two-pole conditions currently exist, and that a systematic tracking system for identification and remediation has not been developed.

#### Recommendations

Staff recommends that OE develop a systematic means of tracking all two-pole conditions in its service territory including: location of poles; date of transfer of electric service; and, date of pole removal.

Also, Staff recommends OE develop a process whereby it either retains the right of pole removal or simply executes the removal of the old pole, including if necessary a charge back of costs to other pole attaching companies as a result of inactivity of the attaching parties.

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#### ELECTRIC SERVICE PERFORMANCE RELIABILITY ASSESSMENT

The Reliability and Service Analysis Division (RSAD) develops, analyzes, and enforces reliability and service quality policies and rules for utilities. RSAD examined the Electric Service and Safety Standards, Rule 4901:1-10-10, O.A.C. (ESSS Rule 10) which requires each electric distribution utility (EDU) to provide Staff an annual report of its system-wide performance against a set of reliability targets.<sup>1</sup> These targets relate to the average frequency and duration of service interruptions as well as the average availability of service. In monitoring each EDU's system reliability performance, Staff tracks two primary measures of interruption frequency and duration.

One of these measures is the system average interruption frequency index (SAIFI), which measures the average number of service interruptions per customer. Chart 1 depicts the Applicant's SAIFI performance<sup>2</sup> in relation to its target since the initiation of annual reporting required be ESSS Rule 10. Chart 1 indicates that OE missed its SAIFI target during each of the past three years (2004 through 2006) by generating an average interruption frequency that exceeds its target level.

<sup>&</sup>lt;sup>1</sup> OE submitted its targets in 1999 to comply with Rule 4901:1-10-10 (B)(2), O.A.C. OE's target levels are based on its performance during the 10-year period 1989 through 1998.

<sup>&</sup>lt;sup>2</sup> Both performance and targets reflect the exclusion of major storm data as required by Rule 4901:1-10-10 (B)(3), O.A.C.

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The other primary reliability measure Staff tracks is the customer average interruption duration index (CAIDI), which indicates the average time it takes the utility to restore service to those customers who experience outages. Chart 2 depicts the Applicant's CAIDI performance in relation to its target since the initiation of annual reporting required be ESSS Rule 10. As Chart 2 indicates, OE has met its CAIDI target during all but one of the past seven years (2000 through 2007) by generating an average restoration time that is less than or equal to its target level.



Although Staff is generally satisfied with the Company's CAIDI performance, Staff is concerned about the fact that OE has missed its SAIFI target over several reporting periods. Staff analyzed the Company's outage data during the period 2004 through 2006 to determine the causes of OE's below-target adverse performance and identified the following primary causes:

- Equipment failures on the distribution system and within the substations
- Unknown causes on the distribution system
- Line failures on both the distribution and the sub-transmission systems
- Trees/not preventable-caused outages on the distribution system
- · Vehicle accidents affecting the distribution system
- Animal-caused outages on the distribution system and within the substations
- Lightning on both the distribution and the sub-transmission systems and within the substations

Staff performed further analysis on those causes where the Company may assert some control by performing additional maintenance or initiating replacement programs to reduce or prevent customer service outages. This analysis enabled Staff to identify specific root causes of sustained outages. Staff further analyzed the following causes.

#### Equipment Failures

The leading cause of equipment failures was substation breakers failing to operate properly, which was caused by the failure of breaker controls followed closely by the failure of a high number of porcelain cutouts. Other causes of equipment failures were insulators within the substation and on the distribution and sub-transmission systems, and failures of substation transformers and distribution overhead transformers.

Substation breakers – The Company reported that bad static relay controls caused the breakers not to operate properly at certain substations. The Company is replacing these static relay controls with more reliable microprocessor type controls. The Company is also upgrading select relaying schemes with adaptive relaying. (With these focuses on station relaying, substation coded outages have been reduced in 2007 year-to-date, compared to 2006.)

*Porcelain cutouts* – Premature failure of porcelain cutouts caused outages on the Company's distribution system. The Company reports that it is addressing these failures in the following ways: purchasing only polymer cutouts; replacing porcelain cutouts in locations experiencing multiple interruptions; and instituting a program in 2007, which identifies all porcelain cutouts on capacitor banks and starting in 2008, the Company will implement a program to replace these cutouts.

*Insulators* – Insulator failures have occurred in substations and on the transmission system. There has been select rebuilding of poor performing transmission lines, which included the replacement of porcelain insulators with polymer insulators. The insulator failures that occurred in substations were typically on the bus supports. As part of the monthly inspection of substations, the Company is closely inspecting the bus support insulators.

*Transformers* – The majority of the customers affected by transformer failures have been due to failure of distribution substation transformers. Although the failure rate of a substation transformer is low, a single event can have a large impact on customer service. The Company's monthly substation inspection program collects load information on transformers and the Company uses this information to predict loads and avoid or reduce future transformer failures.

#### Unknown Causes

Beginning in 2005, the Company began coding more outages as "Unknown". Prior to 2005, there were a higher number of outage events being coded as caused by animal, bird, lightning, and wind. When the Company analyzed these outage events, it discovered that line and/or substation personnel responding to these outages did not always find definite signs of animals, birds, lightning or wind exceeding sixty mile-perhour (MPH) or 40 miles-per-hour with half-inch ice in the areas of fault locations. The

National Electric Safety Code (NESC) requires that overhead distribution infrastructure be designed to withstand winds up to about 40 MPH with half-inch of ice.

If there were no definite signs of animals, birds, lightning or strong winds, then some other factor caused the outage. If a cause cannot be determined, then the Company's current policy is to code the outage "Unknown". The Company's rationale is that it would be better to code the outage as "Unknown" than to misspend or misdirect remedial activities. When the dispatchers code outages as "Unknown", they also record the weather conditions at the time of the outage. The Company uses the weather condition information when it performs a detailed study as part of the circuit review process.

Once the Company restores service after a distribution outage, it requires the troublemen to perform patrols to try and determine the outage cause as long as the patrol does not delay the restoration of service to other customers. In areas of repeated unknown outages, the Company reported that it uses faulted circuit indicators and additional patrols to help identify the outage cause.

The Company reported that it conducted a protection study targeting distribution circuits with concentrated areas of outages. That study included searching for expulsion arresters, which the Company found to be a major factor in unknown outages. When the Company finds one of these arresters it schedules the arrester to be fused off or replaced.

The Company also reported that after each sub-transmission and transmission outage, it performs a patrol to try and determine the outage cause, and some lines receive a helicopter patrol if no cause can be found.

Staff commends the Company for its detailed focus on determining the root cause of outages. In recognition of the "black box" aspect of the unknown code, and a desire to identify as much as possible the cause of an outage and therefore its appropriate remediation, each usage of the Unknown code should be tracked and trended for patterns. The Company should be required to maintain records documenting its implementation of Staff's recommendation and provide Staff with a yearly report that meaningfully examines the pattern of unknown causes to determine any similarities in its usage (i.e. geographic, facility specific, technology specific, etc.). All remedial activity done on a circuit outage coded "unknown" should be provided to Staff in a Staff designated format. Lastly, efforts to find the root cause of an outage coded as "Unknown" should not hinder the restoration of service to customers.

#### Line Failures

The leading cause of line failures was the failure of bare overhead conductor on the distribution and sub-transmission systems, followed by failures of underground direct buried conductor on the distribution system. Other causes of line failures were failures

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of bare overhead conductor on the sub-transmission system, failures of substation reclosers, and failures of jumpers on the distribution and sub-transmission systems.

Bare overhead distribution conductor, underground direct buried distribution conductor, bare overhead transmission/sub-transmission conductor, and jumpers – The Company reported that the failures of these types of conductor were due to breakage, splice failures, and jumper failures. In 2006, the Company implemented a periodic program for the infrared scanning of its distribution system to detect conductor hot spots. The Company began by scanning its worst performing circuits followed by evaluating circuits with the highest number of line failures. The Company also performs distribution circuit inspections on a five-year and on a spot inspection (of poor performing circuits) basis.

Substation recloser – Jumpers (line conductors) have failed because substation breakers did not trip properly. The conductor failure was the result of excessive current flow due to improper operation of the substation breaker (Substation recloser). See discussion of substation breakers in the Equipment Failures section for corrective actions.

#### Trees/Not Preventable

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The Company reported that the increase in the number of outages coded "Trees/not preventable" was due to storms being responsible for causing more trees located outside of its tree trimming right-of-way to fall into its distribution facilities. The Company reported that beginning in 2008 it would be utilizing additional resources to seek out and remove danger and weak trees located outside of its rights-of-ways.

Staff recommends that the Company also perform enhanced vegetation clearance within the first protection zone on the backbone or mainline of its distribution circuits. This enhanced vegetation clearance requires the removal of any overhang that is up to six inches in diameter that contains a heavy canopy of vegetation extending out to the end of the branches and/or limbs even if these branches/limbs are located outside of the Company's tree trimming rights-of-ways. Where there are vegetation clearance barriers such as community or customer prevention, Staff recommends that the Company work with these communities and customers in order to achieve the recommended clearance.

#### Vehicle

The Company's outage data reveals a continual increase in the number of vehicle caused outage events on the distribution system. The Company has no control over preventing or reducing the number of vehicle caused outage events.

However, Staff believes that the Company should always look for ways to reduce its customer's exposure to outages. In this case, possible ways to reduce exposure may include improved sectionalizing, fusing, and circuit networking.

#### Animal

The Company continues to experience animal-caused outages both on its distribution lines and inside its substations. Preventing animals from accessing and coming in contact with energized components has always been a struggle with the electric industry. One way the animals access electric distribution lines and get into substations is by way of vegetation. However, based on the Company's outage data, trees located inside the Company's rights-of-ways and around the perimeter of its substations currently do not seem to be an issue.

Staff recommends that the Company continue to install animal guarding on all overhead line equipment and substation equipment protecting all exposed energized components from animal contact. The Company reported that whenever it plans substation maintenance and it installs a mobile substation, it then will animal guard the substation. The Company is encouraged to install animal guarding solutions around the substation perimeter fencing because if animals are unable to enter into a substation they will not be able to cause substation outages.

#### Lightning

The Company's outage data shows a significant drop in the number of lightning caused outages during 2006 for all parts of the Company's system (Distribution, Substation, Sub-transmission, and Transmission). A lightning damage cause code is only used where lightning damage, such as: a flashed insulator, lightning damaged conductor, blown surge arrester, blown transformer showing lightning damage, or lightning damaged pole are found to be a contributor of the outage event.

The more strict use of the lightning damage cause code supports the Company's initiative to code outages as accurately as possible as was discussed in the aforementioned "Unknown Causes" section. Although this initiative currently reduces the number of outages coded "Lightning", the Company should continue to install lightning protection to mitigate lightning caused outages on its overhead lines and within its substations.

All of the actions that the Company is taking or plans to take along with the actions that the Staff is recommending will help in reducing customer exposure to sustained outages, therefore improving system SAIFI. Other unforeseen factors may offset some of the expected improvement. Most of the improvement should be realized over the next five years with some actions showing immediate improvement while other actions that will take time to complete may not recognize the full impact until the end of the fiveyear period. The Company reported that it has realized benefits from some of the actions that it has already implemented such as the upgrading of circuit relaying schemes that has shown a reduction in substation-coded outages during 2007 as compared to 2006. Other actions such as the replacement of porcelain cutouts and the completion of the first cycle of enhanced vegetation clearance may take most of the five-year period to realize the full impact of the improvement.

#### Customer Service Audit

The Service Monitoring and Enforcement Department's Investigation and Audit Division (IAD) educates customers about utility issues, mediates disputes, and audits utilities' customer service practices. Staff receives complaints and inquiries through letters, referrals, and calls to its toll-free hotline.

IAD performs audits of regulated utility companies in order to ensure compliance with current rules and regulations. Overall, Staff found that the customer service practices and policies of the Company, as reviewed and observed by the team, comply with the applicable rules and regulations set forth by the Commission. However, the Company does not provide all service establishment information on its website. Due to the requirement that customers be given all options regarding the establishment of service, Staff recommends that the Company add details to the deposit information on the website regarding the alternatives to establish credit, including the option of providing a guarantor or payment record for history with another electric utility.

Subsequent to the customer service audit, the Company made several changes in their disconnection policies. Among these is a reduction in the hours that customers can make a payment and have service restored the same day. While the new policy is still in compliance with the disconnection rules, it has engendered many customer complaints.

#### Customer Service Assessment

Staff reviewed the contacts made by Company customers to the Commission's call center for the period of January 1, 2005 through October 15, 2007. Overall, 11,206 contacts were made during this period, with 3,422 in 2005, 3,826 in 2006 and 3,958 in 2007 to date.

Contacts about disconnection issues or payment arrangements prompted the largest number of contacts, with 4,389 for the three year period Two thousand twenty-two customers called IAD before calling the Company. Most of these customers were seeking account information and were directed back to the Company to give the Company the first opportunity to respond to their customers. Next were billing issues with 2,299 contacts.

Service issues, including new service, comprised the next category with 1,576 contacts, including 88 customers who voiced their concerns about the quality of the Company's customer service. Sixty-one customers contacted the Commission's call center over the three year period because they had difficulty reaching the Company. Issues relating to competition including government aggregation accounted for 370 contacts. One hundred eight customers had comments on the Company's policies, while 92 had comments on the Commission. The other 289 were miscellaneous contacts, such as questions about utility easements.

Contact numbers for each category remained relatively consistent each year with the exception of the disconnection category. These contacts increased from 1,286 in 2005 to 1,773 in 2007 to date. These contacts have increased as the Company has tightened its policies on disconnections, while reducing the numbers of customers that can have their service reconnected the same day as they make their restoral payment.

Staff found during customer contacts that when a customer requests to be placed on the Commission-ordered one-third payment plan, the Company does so but then encourages the customer to agree to be placed on the one-sixth payment plan for the remaining balance. If the customer does not agree, then the Company will allow the customer to pay the one-third amount during the winter heating season. However, since the Company's computers are not programmed to accept the one-third plan, the customer must call in each month with a receipt number for the one-third plan amount and state to the representative that he/she wishes to be placed (again) on the one-third plan. The customer should not be subject to a disconnection notice monthly, when he/she is paying on the Commission-ordered one-third payment plan during the winter heating season. The Company needs to allow customers to use the one-third plan without putting the burden on customers to set up the plan monthly. Staff recommends that the Company update the computer system to permit customers to use the one-third plan without burdening customers with extra monthly requirements in order to avoid disconnection of service.

## MANAGEMENT AND OPERATIONS REVIEW

Section 4909.154 of the Ohio Revised Code states that the Public Utilities Commission shall consider the management policies, practices, and organization of public utilities in fixing the just, reasonable, and compensatory rates, joint rates, tolls, classification, charges or rentals to be observed and charged for service of any public utility.

In 1985, the Commission approved an amendment to the Standard Filing Requirements. This amendment (4901-7-01) requires medium and large utilities to include in their rate filings a concisely written summary of their management policies, practices, and organization. Among other things, the summary is to include a discussion of policy and goal setting, strategic and long range planning, organization structure, decision making and controlling, and communications for the company's executive management process (Schedule S-4.1) as well as for forty-five functional areas common to most electric utility companies (Schedule S-4.2).

Staff routinely reviews the S-4.1 and S-4.2 schedules, applicant performance, and various events relating to the applicant's management. As a result of these review activities, the Staff selects certain management topics for rate case reporting. In the current rate case, the Staff reports on FirstEnergy's (FE) Programs for Energy Conservation and Demand-Side Management and Corporate Affiliated Transactions.

#### ENERGY CONSERVATION & DEMAND-SIDE MANAGEMENT

Energy conservation and demand-side management, as a tool of utility company strategy and as a public policy direction has had a spotty history in Ohio over the last twenty years. Demand-side management (DSM) programs are organized utility activities that are intended to affect the amount and timing of customer electricity usage. DSM programs include peak clipping, strategic conservation, load shifting, valley filling, and strategic load growth options. A DSM program is a series of measures intended to encourage specific groups of customers to modify their energy usage patterns in a manner consistent with the utility's objectives while maintaining customer satisfaction.

In the early 1990's, the Commission required electric companies to develop and present integrated resource plans in their Long-Term Forecast Reports to the Commission. Integrated resource planning used both supply-side and demand-side approaches to produce a least-cost plan that met a utility's and its customers' future electric requirements.

In 1999, the passage of Senate Bill 3 restructured the Ohio electric utility industry. The vertically integrated utility industry was split into transmission, generation, and

FIRSTENERGY OHIO EDISON COMPANY Case Nos. 07-551-EL-AIR, et al.

distribution sectors. Only the distribution sector remained under State (P.U.C.O.) regulation. Since an unregulated market would be responsible for future electric generation, investments by the distribution sector into DSM programs waned.

On January 4, 2006, the Commission issued an Opinion and Order in Case No. 05-1125-EL-ATA, et. al., accepting a stipulation entered into by the majority of parties to the case. In the stipulation, FE agreed to implement DSM programs for the years 2006 through 2008 with a budget of \$25 million.

To review FE's conservation and Demand-Side Management programs, Staff developed an encompassing data request to gather the significant information related to each energy conservation and demand-side management program. In response, FE supplied a narrative of their current energy conservation and demand-side management programs including the budget and the method(s) for evaluating each program. This narrative is supplied in part below.

#### FIRSTENERGY'S COMMUNITY CONNECTIONS PROGRAM

FE's Community Connections Program provides traditional energy efficiency and weatherization improvements as well as a partnership with Habitat for Humanity to build Energy Star-rated homes, both for low income residential customers. The Community Connections program piggybacks funds on existing state and federal energy assistance programs that are administered by various groups, such as local community action agencies and county departments of development.

The Ohio Partners for Affordable Energy (OPAE) currently administers FE's energy efficiency program. Roof repair and replacement and electrical upgrades are included as part of the program even though these items are generally not considered to be weatherization or traditional energy efficiency measures. Habitat for Humanity Ohio currently administers FE's Habitat for Humanity Energy Star program. Customers of the Community Connections Program are typically at or below 150% of the federal poverty income level.

The initial funding for the program was for five (5) years (2001-2005) as stated in FE's Electric Restructuring Plan. The current funding for the program is for three (3) years (2006-2008) as stated in FE's Rate Stabilization Plan. The expenses associated with the program are not included in the current rate case.

#### FIRSTENERGY'S DEMAND-SIDE MANAGEMENT PROGRAMS

FE's (FE) DSM program for the Ohio distribution utilities for the 2006-2008 time-period consists of two separate programs:

- 1. Home Performance with Energy Star (HPwES), and
- 2. Air Conditioning Direct Load Control (DLC).

#### Evaluation

The Supplemental Stipulation included a provision for the evaluation of both DSM programs. The continuation of either of program will be subject to the program passing a Total Resource Cost (TRC) Test, which compares program benefits to program costs.

#### Objective

Both programs are designed to pass the TRC Test as well as be cost-effective. The HPwES program should create a market for home improvement contracting that targets a whole house approach to energy efficiency improvements. As a result, comprehensive home energy assessments and energy efficiency improvements should be implemented in customers' homes. The DLC program will be implemented in a way that the cumulative effect of devices in the field can be activated so that load can be reduced during critical times. To accomplish this objective, FE must be able to attain verifiable and reliable results of the devices in the field.

#### Program Availability

The HPwES program will be available to residential homeowners of existing one-to-four family homes. To achieve the desired load reduction results, the DLC program will be available to residential homeowners who have a central air conditioning system and meet summer usage criteria.

#### Funding, Budget, & the Rate Case

The company has requested in its current distribution rate case that all costs to conduct the DSM programs be deferred and recovered through a semi-annual reconcilable rider, including carrying costs. The deferred costs will include administrative costs and any lost distribution revenue resulting from the implementation of the DSM programs. The proposed DSM rider included in the current rate case is designed to collect all DSM costs incurred from residential customers over a three-year period beginning in 2009.

The Supplemental Stipulation set the budget at \$10 million for the HPwES program and \$15 million for the DLC program, initially to be spent over the three-year time frame. However, any funding not spent during 2006-2008 rolls over for one year, thereby potentially extending the programs through 2009.

#### Home Performance with Energy Star

The HPwES program offers customers a comprehensive home energy assessment performed by an independent contractor who has been trained and certified by the Building Performance Institute (BPI). The contractor will perform diagnostic tests and review the customer's home for energy efficiency improvement opportunities. Following completion of the home energy assessment, the contractor will provide the customer a description of the recommended measures the customer could implement to improve the energy efficiency of their home, specifically targeting areas for electricity savings. Customers will then decide which measures to complete to improve the energy efficiency of their home.

To initiate a robust market for the HPwES program, incentives will be offered to participating contractors and customers. For participating contractors there will be incentives for BPI training and certification, diagnostic equipment, and comprehensive jobs completed. For participating customers, a portion of the home energy assessment will be paid for by FE (paid directly to the contractor). In addition, FE will reimburse the customer for a portion of the cost of qualifying improvements, up to a maximum of \$1,250 per customer as determined in the Supplemental Stipulation.

#### Program Administration

In May 2007, FE awarded a contract to ICF Consulting to administer all aspects of the HPwES program. ICF's scope of work includes assisting FE in program design and research, contractor training and recruitment, marketing, quality assurance and control, and continuing program review.

A separate contract was awarded to PA Consulting for evaluation of all aspects of the HPwES program in May 2007. PA Consulting's scope of work includes customer and contractor baseline surveys to measure the interest and awareness for home performance contracting, program evaluation of ICF (tracking systems, contractor enrollment, and quality control), and a final program evaluation and impact report.

#### Air Conditioning Direct Load Control

The DLC program offers customers a Carrier programmable thermostat where both the unit and the installation are at no cost to the customer. As a participant in the DLC program, customers agree to let FE increase their thermostat setting by up to four (4) degrees Fahrenheit for up to a four-hour time period during days of high demand for electricity. FE will not adjust customers' thermostats more than 20 times per year, which is below the limit of 30 times per year set forth in the Supplemental Stipulation.

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The Carrier thermostat has wireless two-way communications capability. The thermostat adjustment is initiated by FE through an internet-based software. The software sends a wireless signal to all participating households through a SkyTel paging system. Following the curtailment event, the thermostat will automatically reset to the customer's previous programmed setting.

The customer has the ability to override the temperature adjustment by pressing a button on the thermostat control panel. The two-way communications feature of the Carrier thermostat allows FE to verify which customers overrode an event and at what time. FE can verify if a household did not receive the signal because of a communications problem. As an incentive to participate, customers receive a gift card upon installation of the thermostat as well as the opportunity to participate in an annual drawing for Energy Star rated appliances.

#### Program Administration

In May 2007 FE awarded a contract to Carrier to procure the thermostat and communications device for the DLC program. A separate contract was awarded to GoodCents for the administration of all aspects of the DLC program in May 2007. GoodCents' scope of work for the DLC program includes thermostat installation using their technician staff, marketing, contact center staffing, scheduling, and continuing program review.

#### Conclusion:

Staff concludes that FE is making strides in meeting the objectives of the Supplemental Stipulation in FE's Rate Certainty Plan (RCP). The current DSM program offerings appear to be well designed and conservative in nature in that they are designed to pass the TRC Test as well as be cost-effective. As of the date of FE's rate case filing, the Company had projected (through February 2008) the deferral of \$2.49 million for the Toledo Edison service territory, \$4.47 million for the Cleveland Electric Illuminating Company service territory, and \$5.41 million for the Ohio Edison Company service territory.

As of the preparation of this Staff Report, FE's programs are still in their infancy and therefore premature to consider evaluating for their effectiveness in meeting the Company's objectives as well their respective cost vs. benefit values.

#### Recommendation:

It is not yet apparent what new state laws, policy initiatives, or regulations might impact conservation and demand-side management efforts. It is clear that conservation and DSM programs make more sense with a vertically integrated utility structure. Under the current electric utility and market structure, DSM may have a role in assisting Regional Transmission Operators (RTO's) in maximizing the efficiency in their mix of generating options to electricity demands in the regional or local system, but the manner in which these DSM costs may best be recovered are not yet clear. Nevertheless, on a national scale, environmental concerns associated with coal fired generating facilities, uncertainty about the future role of nuclear power, and the resulting increased use of natural gas to fuel electric generation, have all combined to put upward pressure on energy prices. Given this environment, conservation and energy efficiency have a positive role to play in controlling energy costs.

Until such State laws, initiatives, or regulations for restructuring the utility industry are forthcoming, Staff has no specific recommendations regarding FE's Energy Conservation and Demand-Side Management Programs. However, as FE's DSM programs mature, it is recommended that these programs be evaluated for their costs and benefits. At that point in time, perhaps a framework will be in place to better identify the true costs and benefits while assuring that the benefits, like the costs, can be shared by the ratepayers funding the programs.

Staff supports FE's proposal for a DSM Rider to track the costs of the Company's DSM programs. The proposed DSM Rider should be exclusive of any DSM costs included in base rates. The DSM Rider would allow the flexibility for interim changes in FE's DSM programs as the situation merits while also providing an audit trail for Staff and the Company to track the costs of the DSM programs. Staff recommends that FE's DSM Rider be reviewed semi-annually, as proposed, and include an evaluation of the Company's DSM programs to that date when each program includes enough data to perform an analysis.

#### CORPORATE AFFILIATED TRANSACTIONS

#### Objective

The objective of the investigation was to determine the appropriateness of the type, and cost of the transactions between CEI, OE and TE (the operating companies) and their affiliates, including First Energy Services (FES).

#### **Corporate Structure**

FirstEnergy Corporation is a diversified energy company headquartered in Akron, Ohio. Its subsidiaries and affiliates are involved in the generation, transmission and distribution of electricity as well as energy management and other energy-related services. The Company operates primarily through two core business segments: Regulated Services, which provides transmission and distribution services, and Power Supply Management Services. The Regulated Services segment is comprised of seven

electric utility operating companies, including Ohio Edison Co., The Cleveland Electric Illuminating Co., The Toledo Edison Co., Jersey Central Power and Light Co., Pennsylvania Electric Co., Penn Power and Metropolitan Edison Company, and American Transmission Systems Incorporated, which operates the Company's transmission assets. The Power Supply Management Services segment owns and operates most of the Company's generation assets, and is also responsible for wholesale purchase of electricity, energy management and other energy-related services. The primary subsidiaries in this business segment are FirstEnergy Nuclear Operating Company and FirstEnergy Solutions Corporation (formerly FirstEnergy Services Corporation).

#### Analysis

As part of the investigation Staff reviewed various documents and conducted multiple interviews. The document review included:

- The Service Company Agreement
- A detailed list of all goods and services provided First Energy Solutions (FES) and the operating companies
- The Social Club dues being allocated by FES to the operating companies
- The factors used to allocate cost between FES and its affiliated companies
- 24 months of pre test year data from service company, which is allocated to the operating companies account (923 outside services)

Staff's review of the charges from FES to the operating companies initially encountered inappropriate social club costs being allocated to the operating companies, the company explained that this was an oversight and those costs were removed from the revenue requirement calculation in the supplemental filing. In addition the Staff found that the Service Company Agreement had not been updated since the repeal of the 1935 SEC Act. The Service Company Agreement mentions the Act as a guiding principal and, Staff believes the Service Company Agreement should be amended to reflect the Act's repeal.

Staff typically performs simple linear regression analysis on the labor portion of the service company cost being charged to the operating companies to test the reasonableness of the budgeted portion of the test year fees. However, due to the relatively low R-squared value<sup>1</sup>, Staff instead used a moving average of the previous 24 months of charges from FES to the operating companies in account 923 (account 923 captures the largest percentage of charges from FES to the operating companies). Staff found that for CEI, OE and TE the charges, which total \$17,197,919 (CEI), \$22,315,066 (OE), and \$10,165,081 (TE) were within a reasonable range and conclude that no adjustment was necessary.

<sup>&</sup>lt;sup>1</sup> Percentage of change explained by movement in a benchmark index-in this case time (months)

#### Findings

Staff found that the Service Company Agreement had not been updated since the repeal of the 1935 SEC Act. The Service Company Agreement mentions the Act as a guiding principal and Staff believes the Service Company Agreement should be amended to reflect the Act's repeal.

# AMI/SMART METERING/MODERN GRID

#### Background

As a part of fulfilling the Energy Policy Act of 2005 the states were charged to investigate whether or not it is appropriate that the First Energy Operating companies provide and install time-based meters and communications devices for each of their customers which enable them to participate in time-based pricing rate schedules and other demand response programs. The Commission initiated such a proceeding, first in case No. 05-1500-EL-COI and then in subsequent Case No. 07-646-EL-UNC through informal workshops held at the Commission to evaluate these issues. The First Energy Operating companies are expected to file with the Staff their initial cost-benefit analysis of an AMI deployment utilizing the McKinsey model on December 13, 2007. The Companies are also expected to file the societal and customer benefits associated with their proposed AMI deployment as well. If such a deployment is determined to be cost-effective, it is expected that the First Energy Operating companies would have a timeline for its deployment.

In addition to an advanced meter infrastructure deployment, parties have also discussed the potential deployment of advanced and automated distribution technologies as a complement to smart meters. Typically, both of these systems would work together and would rely on a common communication network to achieve a larger set of benefits. The AMI benefits alone include increased operating efficiencies, enhanced customer and utility information and communications, demand response savings, and other potential benefits and innovative services (e.g. HAN or Home Area Network).

AMI lays the groundwork for a wide range of operational utility benefits. These benefits include:

- reduced meter reading costs,
- fewer meter-reading errors,
- fewer estimated meter readings,
- fewer billing adjustments,
- reduced need to enter customers' homes to read inside meters
- credit and collection savings
- reduced uncollectible expense
- call center savings
- complaint reduction
- revenue enhancement due to:
  - o improved theft detection
  - o increased meter accuracy
- remote system monitoring savings

- meter inventory operational savings
- distribution asset management savings

AMI will likely also provide for other, more difficult to quantify benefits including:

- avoided capacity costs due to demand reductions during high price peak periods,
- environmental cost savings,
- additional consumer surplus value from reduced outage times,
- quicker adoption of eCommerce by customers to make payments and understand their consumption patterns

Staff believes that the potential benefits of AMI to First Energy's retail customers justify adopting Rider AMI/Modern Grid as a place-holder. Staff therefore recommends the Commission approve this rider for the Company's operating companies and order the Company to maintain this Rider at a zero-dollar balance until the Staff and the Commission have an opportunity to assess the costs and benefits associated with a FirstEnergy AMI/Modern Grid rollout project as a whole. The Staff recommends that the recovery of such costs through this Rider be net of those utility benefits associated with an AMI/Modern Grid deployment.



Overall Financial Summary weive Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedules B-1, C-1, C-10, D-1, E-4 and WPA-1.0a-b and Staff's Schedules B-1, C-1, & Rate of Return Section

Schedule A-t Page 1 of 1

		Supporting		Staff	
Line No.	Description	Schedule Reference	Applicant	Lower Bound	Upper Bound
-	Rate base as of date certain	B-1	\$1,590,780,196	1,279,063,285	1,279,063,285
2	Current operating income	5 C	\$40,000,444	<b>364,176,53</b> 6	\$64,176,536
E)	Earned rate of return (2 / 1)		2.51%	5.02%	5.02%
4	Requested rate of return	Rate of Return Section	6.06%	7.90%	8.35%
s	Rate base associated with RCP deferrals (Reg. Asset and DIT Balance)	Вé	\$272,988,462	\$68,331,530	\$68,331,530
ę	Requested rate of return on RCP deferrals	Rate of Return Section	6.47%	6.22%	6.22%
7	Required operating income [(1 - 5) x 4] + (5 x 6)		\$137,054,285	899,898,030	\$105,346,323
05	Operating income deficiency (7 - 2)		\$97,053,841	<b>\$35,721,494</b>	\$41,169,787
6	Gross revenue conversion factor	A-1.1	1.6107185	1.5939732	1.5939732
10	Revenue deficiency (8 x 9)		\$156,326,420	\$\$6,939,104	\$65,623,537
11	Reveaue increase requested	4 1	160,762,886	56,939,104	65,623,537
12	Adjusted operating revenues	Ċ	517,745,537	508,354,717	508,354,717
13	Revenue requirements (11 + 12)		\$678,508,424	\$565,293,821	\$573,978,254
4	Increase Over Current Revenue (11/12)		31.05%	11.20%	12.91%

The Ohio Edison Company Case No. 07-551-EL-AIR Computation of Gross Revenue Conversion Factor For the Twelve Months Ended February 29, 2008

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Data: 3 Months Actual & 9 Months Estimated Work Paper Reference No(s).: Applicant's Schedule WPC-10a-d, and Staff's Schedule C-3.12

Schedule A-1.1 Page 1 of 1

Line No.	Description	% of Incremental Gross Revenues
-	Operating Revenues	100.000%
7	Less:	
÷	Uncollectible Accounts	0.7585%
4	PUCO Annual Assessment	0.0000%
ŝ	OCC Annual Assessment	0.0000%
9	CATT Tax	0.1560%
7	Income Before Federal Income Tax = $(1) - (3 \text{ through } 6)$	99.0855%
8	State and Municipal Income Tax 2.5918% x (7)	2.5681%
6	Income Before Federal Income Tax	96.5174%
10	Federal Income Tax (9) x 35%	33.7811%
11	Operating Income Percentage (9 - 10)	62.7363%
12	Gross Revenue Conversion Factor 100.000% / (11)	1.5939732

Ohio Edison Company Case No. 07-551-EL-AIR Jurisdictional Rate Base Summary As of May 31, 2007

> Data: X Actual Estimated Reference No(s).: Schedules B-2, B-3, B-4, B-5 & B-6

Schedule B-1 Page 1 of 1

Line No.	Rate Base Component	Supporting Schedule Reference	Applicant	Staff
. <b>.</b>	Plant in service	B-2	\$2,159,098,222	2,066,056,863
7	Reserve for accumulated depreciation	B-3	(803,376,400)	(803,030,498)
m	Net Plant in service (1 + 2)		1,355,721,822	1,263,026,365
4	Construction work in progress 75% complete	B-4	o	0
s	Working capital allowance	B-5	o	0
9	Contributions in aid of construction*	B-6	0	0
۲	Other rate base items	B-6	235,058,375	16,036,921
œ	Jurisdictional rate base (3) thru (7)		\$1,590,780,197	\$1,279,063,285

\* Contributions in Aid of Construction are netted against gross plant.

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Ohio Edison Company Case No. 07-551-EL-AIR Plant in Service by Major Groupings As of May 31, 2007

> Data: X Actual \_\_\_\_ Estimated Reference No(s).: Applicant's Schedule B-2 & Staff's Schedule B-2.1

Schedule B-2 Page 1 of 1

Line No.	Major Property Groupings	Applicant	Staff
-	Production	80	20
2	Transmission	262,556,468	169,322,455
m	Distribution	1,766,447,944	1,766,447,944
4	General · ·	101,739,371	101,932,025
Ś	Соптов	0	0
\$	Completed construction not classified	0	0
٢	Other (specify) Intangible	28,354,439	28,354,439
<b>00</b>	TOTAL	\$2,159,098,222	\$2,066,056,863

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Ohio Edison Company Case No. 07-551-EL-AIR Plant in Service by Accounts and Subaccounts As of May 31, 2007

Data: X Actual \_\_\_\_ Estimated Reference No(s):: Applicant's Schedule B-2.3, Staff's Schedule B-2.2

Schedule B-2.1 Page 1 of 5

Line	Account		Total	Allocation	Allocated	Adjustments	Adjusted
No.	No.	Account Title	Company	9%e	Total	See Schedule B-2.2	Jurísdiction
		PRODUCTION PLANT					
	317	Asset Retirement Costs for Steam Production Plant	\$8,366,002	0.0000%			
4	321	Structures & Improvements	94,566,235	%000000			
5	322	Reactor Plant Equipment	88.403,127	%000000			
4	323	Turbogenerator Units	9,824,411	0.0000%			
Ś	324	Accessory Electric Equipment	60,737,621	0.00000%			
6	325	Miscellaneous Power Plant Equipment	20,724,255	%000000			
*	326	Asset Retirement Costs for Nuclear Production Plant	8,739,145	0.00000%			
ø		Total Production	\$291,360,795	0.00000%			

Ohio Edison Company	riant in service by Accounts and Supaccount
Case No. 07-551-EL-AIR	As of May 31, 2007

Data: X Actual Estimated Reference No(s): Applicant's Schedule B-2.3, Staff's Schedule B-7, and Staff's Schedule B-2.2

Schedule B-2.1 Page 2 of 5

Line	Account		Total	Allocation	Allocated	Adjustments	Adjusted
No.	No.	Account Title	Company	<u>%</u>	Total	See Schedule B-2.2	Jurisdiction
		TRANSMISSION PLANT	i				
6	350	Land & Land Rights	\$93,234,013	100.0000%	\$93,234,013	(893,234,013)	<b>\$</b> 0
0	352	Structures & Improvements	10,607,156	%00000001	10,607,156		10,607,156
П	353	Station Equipment	93,637,505	100.00000%	93,637,505		93,637,505
12	354	Towers & Fixtures	277,504	%00000.001	277,504		277,504
<u> </u>	355	Poles & Fixtures	22,306,699	100.00000%	22,306,699		22,306,699
14	356	Overhead Conductors & Devices	28.870,699	100.0000%	28,870,699		28,870,699
15	357	Underground Conduit	1,503,635	100.0000%	1,503,635		1,503,635
16	358	Underground Conductors & Devices	12,119,257	100.00000%	12,119,257		12,119,257
17	359	Roads & Trails	0	100.00000%	0		0
18		Total Transmission	\$262,556,468	100.00000%	\$262,556,468	(\$93,234,013)	\$169,322,455

Data: Referent	X Actual ce No(s).: A	Estimated pplicant's Schedule B-7, and Staff's Schedu	le B-2.2				Schedule B-2.1 Page 3 of 5
Line No.	Account No.	Account Title	Total Company	Allocation %	Ailocated Total	Adjustments See Schedule B-2.2	Adjusted Jurisdiction
	Į	DISTRIBUTION PLANT	•				
19	360	Land & Land Rights	S12,174,020	100.00000%	\$12,174,020		\$12,174,020
20	361	Structures & Improvements	6,383,647	100.0000%	6,383,647		6,383,647
21	362	Station Equipment	168,236,190	100.00000%	168,236,190		168,236,190
22	364	Poles, Towers & Fixtures	340,631,625	100.00000%	340,631,625		340,631,625
23	365	Overhead Conductors & Devices	355,958,429	100.0000%	355,958,429		355,958,429
24	366	Underground Conduit	60,680,779	100.0000%	60,680,779		60,680,779
25	367	Underground Conductors & Devices	204,426,636	100.0000%	204,426,636		204,426,636
26	368	Line Transformers	324,630,524	100.0000%	324,630,524		324,630,524
27	369	Services	113,225,719	100.0000%	113,225,719		113,225,719
28	370	Meters	109.504,022	100.0000%	109,504,022		109,504,022
29	371	Installation on Customer Premises	19,676,615	100.0000%	19,676,615		19,676,615
30	373	Street Lighting & Signal Systems	50,897,466	100.0000%	50,897,466		50,897,466
31	374	Asset Retirement Costs for Distribution Plant	22,272	100.00000%	22,272	•	22,272
32		Total Distribution	<b>\$</b> 1,766,447,944	100.00000%	\$1,766,447,944		\$1,766,447,944

Ohio Edison Company Case No. 07-551-EL-AIR Plant in Service by Accounts and Subaccounts As of May 31, 2007

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Ohio Edison Company Case No. 07-551-EL-AIR Plant in Service by Accounts and Subaccounts As of May 31, 2007

Data: X Actual Estimated Reference No(s):: Applicant's Schedule B-2.3, Staff's Schedule B-7, and Staff's Schedule B-2.2

Schedule B-2.1 Page 5 of 5

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Adjusted Jurisdiction		\$89,746 28,264,693	28,354,439	\$2,066,056,863
Adjustments See Schedule B-2.2				(\$93,041,359)
Allocated Total		\$89,746 28,264,693	28,354,439	\$2,159,098,222
Allocation %		%000000001 %000000001		88.087181%
Total Company		\$89,746 28,264, <b>6</b> 93	28,354,439	\$2,451,092,422
Account Title	<b>OTHER PLANT</b>	Organization Intangible	Total Other	GRAND TOTAL PLANT
Account No.		301 303		
Line No.		46 47	48	49

Ohio Edison Company Case No. 07-551-FI A R	Adjustments to Plant In Service	As of Mav 31, 2007
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Data: X Actual Estimated Reference No(s).: Staff's Schedules B-2.2a-c

Schedule B-2.2 Page 1 of 5

l ine	Account		Tenemineiru	Vatiola	Vatials	T. 64-1
No.	No.	Account Title	Land & Land Rights	v curcic Exclusions	v cucre Reclassifications	Adjustments
		PRODUCTION				
	310	Land & Land Rights				
6	311	Structures & Improvements				
'n	312	Boiler Plant Equipment				
4	314	Turbogenerator Units				
ŝ	315	Accessory Electric Equipment				
ę	316	Miscellancous Power Plant Equipment				
5	317	Asset Retirement Costs for Steam Production Plant				
œ		Total Production				

Schedule B-2.2 Page 2 of 5	Total Adjustments		(\$93,234,013)	(\$93.234,013)
	Vehicle Reclassifications			
	Vehicle Exclusions			
	Transmission Land & Land Rights		(\$93,234,013)	(\$93,234,013)
As of May 31, 2007				
Estimated ff's Schedules B-2.2a-c	Account Title	<b>TRANSMISSION PLANT</b>	Land & Land Rights Structures & Improvements Station Equipment Towers & Fixtures Poles & Fixtures Overhead Conductors & Devices Underground Conduit Underground Conductors & Devices Roads & Trails Capital Lease	Total Transmission
ć Actuale No(s).: Staf	Account No.		350 1 355 1	ſ
Data: 2 Referenc	Line No.		or 0 = 1 = 2 = 2 = 2 = 2 = 2 = 2 = 2 = 2 = 2	19

Ohio Edison Company Case No. 07-551-EL-AIR Adjustments to Plant In Service As of May 31, 2007

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Ohio Edison Company Case No. 07-551-EL-AIR Adjustments to Plant In Service As of May 31, 2007

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> Data: X Actual Estimated Reference No(s).: Staff's Schedules B-2.2a-c

> Schedule B-2.2 Page 3 of 5

Line No.	Account No.	Account Title	Transmission Land & Land Rights	Vehicle Exclusions	Vehicle Reclassifications	Total Adiustments
		DISTRIBUTION PLANT				
20	360	Land & Land Rights				
21	361	Structures & Improvements				
22	362	Station Equipment				
23	364	Poles, Towers & Fixtures				
24	365	Overhead Conductors & Devices				
25	366	Underground Conduit				
26	367	Underground Conductors & Devices				
27	368	Line Transformers				
28	369	Services				
29	370	Meters				
30	371	Installation on Customer Premises				
E	373	Street Lighting & Signal Systems				
32	374	Asset Retirement Costs for Distribution Plant				
33		Total Distribution				

Data: X Actual \_\_\_\_\_ Estimated Reference No(s).: Staff's Schedules B-2.2a-c

Schedule B-2.2 Page 4 of 5

Line No.	Account No.	Account Title	Transmission Land & Land Rights	Vehicle Exclusions	Vehicle Reclassifications	Total Adjustments
		GENERAL PLANT				
¥	389	Land & Land Rights				
35	390	Structures & Improvements				
36	390.3	Leasehold Improvements				
33	391	Office Furniture & Equipment				
38	392	Transportation Equipment		(\$82,380)	\$105,480	\$23,100
66	393	Stores Equipment				
ŧ	394	Tools, Shop & Garage Equipment				
41	395	Laboratory Equipment				
42	396	Power Operated Equipment		(61,079)	236,633	169,554
43	397	Communication Equipment				X
<del>4</del>	398	Miscellaneous Equipment				
45	1.995.1	Asset Retirement Costs for General Plant				
46	<b>06E</b>	Capital Lease				
47		Total General		(\$149.459)	\$342,113	\$192,654

Ohio Edison Company Case No. 07-551-EL-AIR Adjustments to Plant In Service As of May 31, 2007

> Data: X Actual Estimated Reference No(s).: Staffs Schedules B-2.2a-e

> Schedule B-2.2 Page 5 of 5

Line No.	Account No.	Account Title	Transmission Land & Land Rights	Vehicle Exclusions	Vehicle Reclassifications	Total Adjustments
		OTHER PLANT				
48	303	Intangible				
49		GRAND TOTAL PLANT	(\$93,234,013)	(5149,459)	\$342,113	(\$93,041,359)

Ohio Edison Company Case No. 07-551-EL-AfR Transmission Land Plant Adjustment As of May 31, 2007

Data: X Actual Estimated Reference No(s):: Applicant's Schedule B-2.1

Schedule B-2.2a

Line Account No. No. Account Title

Schedule B-2.2b		(582,380)	(67,079)	(\$149,459)			
Ohio Edison Company Case No. 07-551-EL-AIR Vehicle Plant Adjustment As of May 31, 2007 As Data Request 88	Account Title	n Equipment	od Equipment				
d Estimated Derived From Sta	It	Transportation	Power Operate	Adjustment			
X Actua loe No(s).:	Accoun No.	392	396				
Data: Referen	Line No.	-	7	£			

Ohio Edison Company Case No. 07-551-EL-AIR Vchicle Plant Reclassifications As of May 31, 2007

Data: X Actual \_\_\_\_ Estimated Reference No(s).: Derived From Staff's Data Request 88

Schedule B-2.2c

Line No.	Account No.	Account Title
-	392	Vehicles Transferred to CEI (\$21,399)
•	392	Vehicles Transferred to Ohio Edison from CEI 81,698
m	392	Vehicles Transferred to Ohio Edsion from Tolcdo Edison
ব		Adjustment S105,480
Ś	396	Vehicles Transferred to Toledo Edison (\$110,956)
9	396	Vehicles Transferred to Ohio Edison from CEI
٢	396	Vehicles Transferred to Ohio Edison from Toledo Edison
8		S236,633

Ohio Edison Company Case No. 07-551-EL-AIR Reserve for Accumulated Depreciation As of May 31, 2007

Data: X Actual \_\_\_\_\_ Estimated Reference No(s):: Applicant's Schedules B-2.1 & B-3.1, Staff's Schedule B-7 & B-3.1

Schedule B-3 Page 1 of 5

			Total			Reserve Rala	seuu	
Line	Account	Maior Promerty Grounnings	Company Plant	Total	Allocation	Allocated		
No.	No.	& Account Titles	Investment	Company	%	Total	See Schedule B-3.1	Jurisdiction
		PRODUCTION PLANT						
	317	Asset Retirement Costs for Steam Production	\$8,366,002	\$8,366,002	%0	05		05
7	321	Structures & Improvements	94,566,235	77,629,117	%0	0		<b>,</b> 0
m	322.	Reactor Plant Equipment	88,403,127	(6.285.851)	%0	0		
4	323	Turbogenerator Units	9,824,411	240,288	%0	0		
ŝ	324	Accessory Electric Equipment	60,737,621	(525,888)	%0	0		0
Ŷ	325	Miscellaneous Power Plant Equipment	20,724,255	(207,565)	%0	0		0
~	326	Asset Retirement Costs for Nuclear Producti	8,739,145	6,291,821	- %0	0		0
8		Total Production	\$291,360,795	\$85,507,924	%0	8	0\$	<b>9</b>

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Data: Refere	X Actus nce No(s).:	al	Schedule B-7 & B-3.1 Total			Reserve Balt	ur ces	Schedule B-3 Page 2 of 5
Line No.	Account No.	Major Property Groupings & Account Titles	Company Plant Investment	Total Company	Allocation %	Allocated Total	Adjustments See Schedule B-3.1	Adjusted Jurisdiction
		TRANSMISSION PLANT						
6	350	Land & Land Rights	\$93,234,013	\$462,130	%001	\$462,130	(\$462,130)	20
01	352	Structures & Improvements	10,607,156	6,090,569	%001	6,090,569		6,090,569
11	353	Station Equipment	93,637,505	42,631,610	100%	42,631,610	:	42,631,610
12	354	Towers & Fixtures	277,504	285.463	100%	285,463		285,463
[]	355	Poles & Fixtures	22,306,699	16,286,884	%001	16,286,884		16,286,884
4	356	Overhead Conductors & Devices	28,870,699	14,018,328	100%	14,018,328		14.018.328
15	357	Underground Conduit	1,503,635	687,849	100%	687 849		687,849
91	358	Underground Conductors & Devices	12,119,257	2,607,334	100%	2,607,334		2,607,334
17	359	Roads & Trails	0	0	100%	0		0
18		Total Transmission	\$262,556,468	\$83,070,167	100%	\$83,070,167	(\$462,130)	\$82,608,037

Othio Edison Company Case No. 07-551-EL-AfR Reserve for Accumulated Depreciation As of May 31, 2007

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Refere	nce No(s).	: Applicant's Schedules B-2.1 & B-3.1, Staff's S.	chedulc B-7 & B-3.1					Page 3 of 5
			Total			Reserve Bala	inces	
Line No.	Account No.	Major Property Groupings & Account Titles	Company Plant Investment	Total Company	Allocation %	Allocated Total	Adjustments See Schedule B-3.1	Adjusted Jurisdiction
		DISTRIBUTION PLANT						
61	360	Land & Land Rights	\$12,174,020	(S32,005)	100%	(\$32,005)		(\$32.005)
ន	361	Structures & Improvements	6,383,647	3,734,533	%001	3,734,533		3.734.533
21	362	Station Equipment	168,236,190	65,941,402	100%	65,941,402		65.941.402
22	364	Poles, Towers & Fixtures	340,631,625	159,043,261	100%	159,043,261		159,043,261
33	365	<b>Overhead Conductors &amp; Devices</b>	355,958,429	122,780,938	100%	122,780,938		122,780,938
24	366	Underground Conduit	60,680,779	16,029,946	100%	16,029,946		16,029,946
25	367	Underground Conductors & Devices	204,426,636	43,072,757	100%	43,072,757		43,072,757
26	368	Line Transformers	324,630,524	114,951,989	100%	114,951,989		114,951,989
27	36 <del>9</del>	Services	113,225,719	55,992,281	100%	55,992,281		55,992,281
28	370	Meters	109,504,022	46,040,009	100%	46,040,009		46,040,009
50	371	Installation on Customer Premises	19,676,615	8,552,838	100%	8,552,838		8,552,838
06	373	Street Lighting & Signal Systems	50,897,466	27,805,918	100%	27,805,918		27,805,918
31	374	Asset Retirement Costs for Distribution Plan	22,272	9,097	100%	60,97		9,097
32		Total Distribution	\$1,766,447,944	\$663,922,963	100.0000%	\$663,922,963	8	\$663,922,963

Ohio Edison Company Case No. 07-551-EL-AIR Reserve for Accumulated Depreciation As of May 31, 2007

Estimated Data: X Actual

Schedule B-3

Ohio Edison Company	Reserve for Accumulated Deprectation
Case No. 07-551-EL-AIR	As of May 31, 2007

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Data: X Actual \_\_\_\_ Estimated Reference No(s).: Applicants Schedules B-2.1 & B-3.1, Staff's Schedule B-7 & B-3.1

Schedule B-3 Page 4 of 5

			Total			Reserve Bala	nces	
Line No.	Account No.	Major Property Groupings & Account Titles	Company Plant Investment	Total Company	Allocation %	Allocated Total	Adjustments See Schedule B-3.1	Adjusted Jurisdiction
		GENERAL PLANT						
33	389	Land & Land Rights	\$3,118,757	\$26,231	%001	\$26,231		\$26.231
<del>2</del>	390	Structures & Improvements	65,123,867	24,496,239	%001	24,496,239		24.496.239
35	390.3	Leasehold Improvements	108,959	89,625	%001	89,625		89.625
36	391	Office Furniture & Equipment	12,151,136	2,204,550	%001	2,204,550		2.204.550
37	392	Transportation Equipment	1,336,977	(642,403)	%001	(642,403)	\$16,055	(626,349)
38	393	Stores Equipment	1,463,783	676,231	100%	676,231	•	676.231
39	394	Tools, Shop & Garage Equipment	8,588,052	1,917,243	100%	1,917,243		1.917.243
40	395	Laboratory Equipment	6,580,082	2,377,572	%001.	2,377,572		2,377,572
41	396	Power Operated Equipment	1,701,437	2,590,342	100%	2,590,342	100,173	2,690,515
4	397	Communication Equipment	293,037	395,160	%001	395,160	×	395,160
43	398	Miscellaneous Equipment	969,874	509,244	100%	509,244		509.244
4	399	Asset Retirement Costs for General Plant	303,410	126,280	%001	126,280		126,280
45	390	Capital Lease	633,405	0	9%0	0		0
46		Total General Plant	\$102,372,775	\$34,766,313	100.0000%	\$34,766,313	\$116,228	\$34,882,541

Ohio Edison Company Case No. 07-551-EL-AIR Reserve for Accumulated Depreciation As of May 31, 2007

Data: X Actual Estimated Reference No(s).: Applicant's Schedules B-2.1 & B-3.1, Staff's Schedule B-7 & B-3.1

Schedule B-3 Page 5 of 5

			<b>\$0</b>	498
	Adjusted Jurisdiction		21,616	\$803,030
nces	Adjustments See Schedule B-3.1			(\$345,902)
Reserve Bala	Allocated Total		\$0 21,616,957	\$803,376,400
	Allocation %		100% 100%	90.38031%
	Total Company		21.616,957	\$888,884,324
Total	Company Plant Investment		\$\$9,746 28,264,693	\$2,451,092,422
	Major Property Groupings & Account Titles	OTHER PLANT	Organization Intangible	GRAND TOTAL PLANT
	Account No.		301 303	
	Line No.		47 48	<del>4</del>

## Ohio Edison Company Case No. 07-551-EL-AIR Adjustments to Depreciation Reserve As of May 31, 2007

Data: X Actual Estimated Reference No(s).: Staff's Schodules B-3.1a-c

Schedule B-3.1 Page 1 of 5

Line	Account		Transmission	Vchicle	Vehicle	Total
No.	No.	Account Title	Land & Land Rights	Exclusions	Reclassifications	Adjustments
		PRODUCTION				
1	310	Land & Land Rights				
6	IIE	Structures & Improvements				
ŝ	312	Boiler Plant Equipment				
4	314	Turbogenerator Units				
۴'n	315	Accessory Electric Equipment				
9	316	Miscellancous Power Plant Equipment				
r~	317	Asset Retirement Costs for Steam Production Plant		• :		
90		Total Production				

Data: X Actual \_\_\_\_\_ Estimated Reference No(s).: Staff's Schedules B-3.1a-c

Schedule B-3.1 Page 2 of 5

Line No.	Account No.	Account Title	Transmission Land & Land Rights	Vehicle Exclusions	Vehicle Reclassifications	Total Adjustments
		TRANSMISSION PLANT				
6	350	Land & Land Rights	(\$462,130)			(\$462.130)
10	352	Structures & Improvements				
=	353	Station Equipment				
2	354	Towers & Fixtures				
13	355	Poles & Fixtures				
14	356	Overhead Conductors & Devices				
15	357	Underground Conduit				
91	358	Underground Conductors & Devrees				
11	359	Roads & Trails				
18	356	Capital Lease				
61		Total Transmission	(\$462,130)			(\$462,130)

## Adjustments to Depreciation Reserve As of May 31, 2007 Ohio Edison Company Case No. 07-551-EL-AIR

Reference No(s).: Staffs Schedules B-3.1a-c Estimated Data: X Actual

Schedule B-3.1 Page 3 of 5

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Line	Account		Transmission	Vehicle	Vehicle	Total
No.	No.	Account Title	Land & Land Rights	Exclusions	<b>Reclassifications</b>	Adjustments

## DISTRIBUTION PLANT

- Land & Land Rights
- Structures & Improvements
  - Station Equipment
- Poles, Towers & Fixtures
- Overhead Conductors & Devices
- Underground Conduit Underground Conductors & Devices Line Transformers
- Services
- Meters
- Installation on Customer Premises
- Street Lighting & Signal Systems Asset Retirement Costs for Distribution Plant

**Total Distribution** 

Data: X Actual \_\_\_\_\_ Estimated Reference No(s).: Staff's Schedules B-3.1a-c

Schedule B-3.1 Page 4 of 5

Line No.	Account No.	Account Title	Transmission Land & Land Rights	Vehicle Exclusions	Vehicle Reclassifications	Total Adjustments
		GENERAL PLANT				
34	389	Land & Land Rights				
35	390	Structures & Improvements				
36	390.3	Leasehold Improvements				
37	391	Office Furniture & Equipment				
38	392	Transportation Equipment		(\$82,380)	\$98,435	\$16.055
39	393	Stores Equipment		,		•
40	394	Tools, Shop & Garage Equipment				
41	395	Laboratory Equipment				
42	396	Power Operated Equipment		(080)	167.253	100.173
43	397	Communication Equipment				
44	398	Miscellaneous Equipment				
45	1.995	Asset Redirement Costs for General Plant				
46	390	Capital Lease				
-						
4		l oral Archetal		(2149,460)	\$265,688	<b>\$116,</b> 228

## Ohio Edison Company Case No. 07-551-EL-AIR Adjustments to Depreciation Reserve As of May 31, 2007

Data: X Actual \_\_\_\_\_ Estimated Reference No(s).: Staffs Schedules B-3.1 a-c

Schedule B-3.1 Page 5 of 5

Line Accou	tt Account Title	Transmission	Vehicle	Vehicle	Total
No. No.	OTHER PLANT	Land & Land Rights	Exclusions	Reclassifications	Adjustments
48 49	3 Intangible GRAND TOTAL PLANT	(\$462,130)	(\$149,460)	\$265,688	(\$345,902)

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Oltio Edison Company Case No. 07-551-EL-AIR Transmission Land & Land Rights Reserve Adjustment As of May 31, 2007

Data: X Actual Estimated Reference No(s).: Applicant's Schedule B-3

Schedule B-3.1a

Linc No.	Account No.	ount o.	
-	350	50 Land & Land Rights Transmission Plant	(\$462,130)

Land & Land Rights Transmission Plant 350 \_

Ohio Edison Company Case No. 07-551-EL-AIR Vehcile Reserve Adjustment	As of May 31, 2007
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Data: X Actual Estimated Reference No(s).: Staff's Schedule WPB-3.1bc

Schedule B-3.1b

	(582,380) (\$67,080)	(\$149,460)	
	- %0000000001 %000000001	- 	
	(\$82,380) (\$67,080)	(\$149,460)	
	I	I	
Account Title	Transportation Equipment Power Operated Equipment	Adjustment	
Account No.	392 396		
Line No.	- ~	r.	

Line No.	Account No.	Account Title	
_	392	Vehicles Transferred to CEI	(821,399)
ы	392	Vehicles Transferred to Ohio Edison from CEI	74,741
Ē	392	Vehicles Transferred to Ohio Edsion from Toledo Edison	45,093
4		Adjustment	\$98,435
٩	396	Vehicles Transferred to Toledo Edison	(\$110,956)
9	396	Vehicles Transferred to Ohio Edison from CEI	231,610
~	396	Vehicles Transferred to Ohio Edison from Toledo Edison	46,599
		Adjustment	\$167,253

Ohio Edison Company Case No. 07-551-EL-AIR Vehicle Reserve Reclassifications As of May 31, 2007

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Schedule B-3.1c

Data: Referer	X Actual ke No(s).:	Estimated Staff's Schedules B-2.1, B-3, B-3.2a, & WPB-3.2a-c				Schedule B-3.2 Page 1 of 4
			Adjusted Jur	tisdiction		
A) No.	Account No. (B)	Account Title (C)	Plant Investment (D)	Reserve Balance (E)	Current Accrual Rate (F)	Calculated Depr. Expense (G=DxF)
		TRANSMISSION PLANT				
	350	Land & Land Rights	\$0	80	0.00%	80
6	352	Structures & Improvements	10,607,156	6,090,569	2.06%	218,507
m	353	Station Equipment	93,637,505	42,631,610	2.20%	2,060,025
4	354	Towers & Fixtures	277,504	285,463	1.82%	5,051
Ś	355	Poles & Fixtures	22,306,699	16,286,884	2.98%	664,740
9	356	Overhead Conductors & Devices	28,870,699	14,018,328	2.55%	736,203
Ľ	357	Underground Conduit	1,503,635	687,849	1.67%	25,111
90	358	Underground Conductors & Devices	12,119,257	2,607,334	2.00%	242,385
6	359	Roads & Trails	0	0	0.00%	
10		Total Transmission	\$169,322,455	\$82,608,037		\$3,952,022

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Ohio Edison Company Case No. 07-551-EL-AIR Depreciation Accrual Rates and Jurisdictional Reserve Balances by Accounts As of May 31, 2007

	Schedule B-3.2 Page 2 of 4		Current Calculated	Accrual Depr.	Kate Expense	(r) (u=uxr)		105) 0.00% \$0	(33 2.45% 156,399	102 2.55% 4,290,023	i61 2.93% 9,980,507	138 2.70% 9,610,878	46 1.50% 910,212	157 2.07% 4,231,631	<b>189 3.50% 11,362,068</b>	3.13% 3.543,965	09 3.24% 3,547,930	38 4.44% 873,642	018 4.20% 2,137,694	97 0.00% 0.00%	<b>\$50,644,949</b>
		d Inrichion		Keserve	Balance	(a)		(\$32,0	3,734,5	65,941,4	159,043,2	122,780,9	16,029,9	43,072,7	114,951,9	55,992,2	46,040,0	8,552,8	27,805,9	<u>6</u>	\$663,922,9
Ohio Edison Company Case No. 07-551-EL-AIR Depreciation Accrual Rates and Jurisdictional Reserve Balances by Accounts As of May 31, 2007	2a-c	Adinetes		Plant	Investment	(m)	N	\$12,174,020	6,383,647	168,236,190	340,631,625	355,958,429	60,680,779	204,426,636	324,630,524	113,225,719	109,504,022	19,676,615	50,897,466	22,272	\$1,766,447,944
	ial Estimated :: Staff's Schedules B-2.1, B-3, B-3.2a, & WPB-3.2			i	Account Title		DISTRIBUTION PLAI	Land & Land Rights	Structures & Improvements	Station Equipment	Poles, Towers & Fixtures	Overhead Conductors & Devices	Underground Conduit	Underground Conductors & Devices	Line Transformers	Services	Meters (See Note 2)	Installation on Customer Premises (See Note 3)	Street Lighting & Signal Systems	Asset Retirement Costs for Distribution Plant	Total Distribution
	: X Actui rence No(s).			Account	No.	(a)		360	361	362	364	365	366	367	368	369	370	371	373	374	
	Data Refe		;	Fine	Ś	3		11	12	11	4	15	16	17	8	19	ຊ	21	22	53	24

Schedule B-3.2 Page 3 of 4	Adjusted Jurisdiction	Current Calculated Plant Reserve Accrual Depr. Investment Balance Rate Expense (D) (E) (F) (G=DxF)	N	\$3,118,757 \$26,231 0.00% \$0	65,123,867 24,496,239 2.50% 1,628,097	108,959 89,625 20.78% 4,018	5,001,774 1,843,308 3,80% 190,067	7,149,362 361,242 17.00% 1,215,392	1,360,077 (626,349) 7.31% 99,422	1,463,783 676,231 2.56% 37,473	8,588,052 1,917,243 3.17% 272,241	6,580,082 2,377,572 3.80% 250,043	1,870,991 2,690,515 3.48% 65,110	293,037 395,160 5.00% 14,652	969,874 509,244 4.00% 38,795	303,410 126,280 0.00% 0	\$101.932.025 \$34.882.541 \$33.815.310
ь, & WPB-3.2а-с	Adju	Plant count Title Investment (C) (D)	KAL PLANT	\$3,118.7 <sup>7</sup>	65,123,80	108,9	5,001,7	7,149,3	1,360,0	1,463,71	8,588,0	6,580,01	1,870,99	293,02	.8'696	al Plant 303,4	\$101,932,0
Estimated Staff's Schedules B-2.1, B-3, B-3.2a		Acc	GENE	Land & Land Rights	Structures & Improvements	Leasehold Improvements	Office Furniture & Equipment	Data Processing Equipment	Transportation Equipment	Stores Equipment	Tools, Shop & Garage Equipment	Laboratory Equipment	Power Operated Equipment	Communication Equipment	Miscellaneous Equipment	Asset Retirement Costs for Genera	Total General
X Actual tee No(s).: 5		Account No. (B)		389	390	390.3	391.1	391.2	392	393	394	395	396	197	398	399	
Data: Referer		Line No.		25	26	27	28	29	30	31	32	33	34	35	36	37	80 11

Ohio Edison Company Case No. 07-551-EL-AIR Depreciation Accrual Rates and Jurisdictional Reserve Balances by Accounts As of May 31, 2007

	Schedule B-3.2 Page 4 of 4		Calculated	Lepr. Expense (G=DxF)			<b>\$</b> 0	3,494,961	47,099	46,001	7,590	3,595,651	\$62,007,932
			Current	Actrial Rate (F)			0.00%	14.29%	2.33%	2.89%	3.87%		
		risdiction		keserve Balance (E)	-		\$0	19,640,977	604,019	1,221,150	150,811	21,616,957	\$803,030,498
ompany -EL-AIR al Rates and ances by Accounts , 2007		Adjusted Ju	Ĩ	riant Investment (D)			\$89,746	24,457,389	2,017,955	1,593,381	195,968	28,354,439	\$2,066,056,863
Ohio Edison C Case No. 07-551 Depreciation Accru Jurisdictional Reserve Bal As of May 31.	Estimated Staff's Schedules B-2.1, B-3, B-3.2a, & WPB-3.2a-c			Account Title (C)		OTHERPANI	Organization	Intangible Software	Intangible FAS 109 Transmission	Intangible FAS 109 Distribution	Intangible FAS 109 General	Total Other	CURRENT RATES GRAND TOTAL PLANT
	X Actual nce No(s).:			Account No.			301	303	303	303	303		
	Data: Refere		,	S No.			39	4	41	42	43	4	45

Ohio Edison Company Case No. 07-551-EL-AIR Accrual Rate Comparison

FERC			Current			Staff Proposed	
Acct.		Avg. Svc. 1 :F.	Net Salv 96	Accrual Bate 02	Avg. Svc. 1 :6-	Net S	Accrual Pate %
.02	1748110not	2	1214. /0	(a)	212	10141	( <b>þ</b> )
	Transmission Plant:			× •			
350	Land and Land Rights						
352	Structures & Improvements	51	(2)	2.06	51	<u>(</u> হ)	2.06
353	Station Equipment	50	(01)	2.20	50	(0 <b>1</b> )	2.20
354	Towers & Fixtures	51	(6)	2.14	60	6)	1.82
355	Poles & Fixtures	48	(69)	2.98	48	(43)	2.98
356	Overhead conductors & Devices	55	(40)	2.55	55	(40)	2.55
357	Underground Conduit	66	0	1.52	60	•	1.67
358	Underground Conductors & Devices	45	10	2.00	45	01	2.00
359	Roads & Trails						
	Distribution Plant:						
360	Land and Land Rights						
361	Structures & Improvements	51	(25)	2.45	51	(25)	2.45
362	Station Equipment	49	(25)	2.55	49	(25)	2.55
364	Poles, Towers, & Fixtures	42	(25)	2.98	46	(35)	2.93
365	Overhead Conductors and Devices	45	(20)	2.67	50	(35)	2.70
366	Underground Conduit	66	(2)	1.59	70	(2)	1.50
367	Underground Conductors and Devices	4	6	2.07	44	¢	2.07
368	Line Transformers	41	(0)	3.41	40	(90)	<b>3.5</b> 0
369	Services	40	(25)	3.13	04	(25)	3.13
370	Meters	34	(01)	3.24	34	(01)	3.24
371	Installation on Customer Premises	22.5	0	4.44	22.5	0	4.44
372	Leased Property on Customer Premises						
373	Street Lighting & Signal Systems	25	(2)	4.20	25	(2)	4.20
374	Asset Retirement Costs for Distribution Plant						

					3:26 PM	Page 7	2 af 2
		Ohio Edison Compar Case No. 07-551-EL., <u>Accrual Rate Compar</u> i	uy A I R ison				
FERC			Силтепt			Staff Proposed	
Acct. No.	Description	Avg. Svc. Life	Net Salv. %	Accrual Rate %	Avg. Svc. Life	Net Salv. %	Accrual Rate %
	General Plant:						
389	Land and Land Rights						
390	Structures & Improvements	4	(01)	2.50	44	(01)	2.50
391.1	Office Furniture and Equipment	30	5	3.17	33	ŝ	3.80
391.2	Computer Equipment	ŝ	25	15.00	s	15	17.00
392	Transportation Equipment	13	ŝ	16.7	13	5	7.31
393	Stores Equipment	39	0	2.56	39	Ð	2.56
394	Tools, Shop & Garage Equipment	30	5	3.17	8	ŝ	3.17
395	Laboratory Equipment	36	<b>s</b> .	2.64	52	Š	3.80
38	Power Operated Equipment	61	8	4.21	23	20	3.48
397	Communication Equipment	17	0	5.88	20	0	5.00
398	Misceltaneous Equipment	25	0	4.00	25	0	4.00
399.1	Asset Retirement Costs for General Plant						
	Other Plant:						
303	Intangible				7.0	0.0	14.29
(R) (R)	Case No. 92-1424-EL-AAM See Text						

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SCHEDULE B-3.2a

10/29/07

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Data: X Actual Estimated Reference No(s).: NONE

Schedule B-4 Page 1 of 1

Estimated	rnysical Percent	Completion	Ð	
Total	Jurisoncuonal Cost at	Date Certain	(H)	
	Allocation	%	(G)	
	Total	Cast	(E=D+E)	
	AFDC	Capitalized	(E)	
	Construc.	Dollars	ê	
		Description of Project	, (C)	
	Project	No.	(B)	
	Line	No.	(Y)	

The Company has requested no CWIP in this filing.

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Ohio Edison Company Case No. 07-551-EL-AIR Allowance for Working Capital As of Twelve Months Ending February 29, 2008

> Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedule B-5.1 & Staff's Schedule B-5.1 & B-7

> Schedule B-5 Page 1 of 1

Line No.	Working Capital Component	Description of Methodology Used to Determine Jurisdictional Requirement	Working Pap <del>er</del> Reference No.	Total Company	Allocation %	Jurisdiction
-	Cash Working Capital	Lcad-Lag Study	B-5.1	(\$60,763,011)	100.00000%	(110'290'2001)
~	Fuel Stock	13 Month Average for Test Year	B-5.1	0	0.0000%	0
m	Material & Supplies	13 Month Average for Test Year	B-5.1	11,063,199	77.93718%	8,622,346
4	Customers' Deposits	13 Month Average for Test Year	B-5.1	(11,320,834)	0.0000%	0
¥1	PIP Uncollectibles Balance	13 Month Average for Test Year	<b>B-5.</b> 1	194,091,705	0.0000%	0
9	Total			\$133,071,060		(\$52,140,665)
7	Effective Allowance for Working Capital					80

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### Ohio Edison Company Case No. 07-551-EL-AIR Cash Working Capital For the Twelve Months Ended February 29, 2008

### Data: 3 Months Actual & 9 Months Estimated

Reference No(s).: Applicant's Schedule WPB-5.0a & Staff's Schedule C-3, Staff's Workpapers

Line No.	Description	Jurisdictional 2/29/2008 Amount	Adjustment Amount	Adjusted Jurisdictional Amount	Lead/Lag Days	Weighted Dollar Days	Cash Working Capital
	(Å)	(B)	(C)	(D) = (B)+(C)	(E)	(F) = (D) * (E)	(G) = (F) / 365
-							
1	Operating Revenues	810/ (88 185		A (03 733 710	77.0	611 169 933 963	£10 660 106
2	Electric Revenues	\$486,620,488	\$1,112,830	5487,755,518	104.0	311,157,725,763	\$30,509,100 \$ 029 \$25
د	Other Revenues	30,967,029	(10,345,630)	20,621,399	106.9	2,204,003,173	0,038-202
4	Revenue Lag Allowance	\$\$17 587 517	(\$9.232.808)	\$508 354 717	26.3	\$13,361,788,936	\$36.607.641
6	Revenue Dag / Howanoo	0011,001,011	(97,252,000)	1000,001,001,000	2010	010,001,100,000	
7	Operation & Maintenance Expenses						
8	Purchased Power	(\$57.939.654)	\$57 939 654	<b>\$</b> 0	30.5	\$8	<b>S</b> 0
9	Payroll	82.606.482	2.879.450	85,485,932	76.3	6,522,576,608	17,870,073
10	Employee Benefits	1,929,275	18.770.382	20,699,657	22.7	469,142,798	1,285,323
11	Other O&M:			- / .		0	0
12	Tree Trimming Contracting Fees	15,338,156	0	15,338,156	45.2	693,284,651	1,899,410
13	Outside Services Employed - FE Service	11,993,723	0	11,993,723	26.6	319,033,032	874,063
4	Uncollectibles	\$15,634,832	(11,778,880)	3,855,952	24.4	94,085,220	257,768
15	Other		(5,131,692)	44,873,851	52.3	2,346,902,390	6,429,870
16							
17	Total O&M Expense	119,568,357	62,678,914	182,247,271	57.3	10,445,024,707	28,616,507
18			4 · · · ·				
19	Depreciation and Amortization						-
20	Depreciation Expense	57,092,241	4,915,691	62,007,932	0.0	0	0
21	Amortization of Limited-Term Electric Plant	3,338,635	0	3,338,635	0.0	Ű	0
22	Regulatory Debits / Credits	(83,496,227)	111,956,487	28,460,260	0.0	<u> </u>	0
23						•	
24	Total Depreciation and Amortization	(23,065,351)	116,872,178	93,806,827	0.0	U	U
25	T Od T						
40 77	Laxes Other Fran Income Taxes	6 310 067	17.001	4 242 039	2 4	18 700 633	51 235
27	Chie CAT Tax	2,219,921	23,081	703 013	883	70 074 846	101 840
∠e 20		000,000 07 000 541	17,573) 74 716 8463	07 760 795	35.7	7 247 882 704	8 898 309
20	Obio Respectu Tax	57 964 243	(4,720,040) (5 721 716)	55 133 176	309.0	17 036 135 909	46 674 349
30	PA Emphise Tax	27,001,242	(2,751,210)	778 672	30.0	23 358 660	63,996
12	Ohio Sales & Use Tax	71.090	0	71,090	19.8	1.407.582	3.856
33	Other Taxes	9.807	3.140.701	3,150,503	(95.3)	(300.242.916)	(822.583)
34					<b>、</b> ,		
35	Total Taxes Other Than Income Taxes	161.844.660	(4,305,853)	157,538,807	127.6	20,097,267,418	55,061,007
36							
37	Income Taxes						
38	Federal Income Taxes	18,489,697	(1,076,801)	17,412,896	37.5	652,983,606	1,788,996
39	Ohio State Income Tax	1,630,682	(798,447)	832,235	274.3	228,281,979	625,430
40	PA State Income Tax	524,804	(365,706)	159,098	30.0	4,772,949	13,077
41	Municipal	510,542	(178,116)	332,426	\$7.8	29,187,006	79,964
42	Provision for Deferred Income Taxes	52,223,565	(59,085,763)	(6,862,198)	0.0	0	0
43	Investment Tax Credit	(1,289,181)	0	(1,289,181)	0.0	0	0
44							
45	Total Income Taxes	72,090,109	(61,504,833)	10,585,276	86.5	915,225,540	2,507,467
46							
47	Net Operating Income	187,149,742	(122,973,206)	64,176,536			
48				** 9(9.0) 6	61.7	4 000 000 000	12.100.074
49	Interest on Long-Term Debt	61,145,527	(16,378,312)	44,767,215	91.2	4,082,770,008	11,180,871
50	Return on Common Equity	126,004,214	(106,594,893)	19,409,321	0.0	<u> </u>	
51		\$\$13 COT \$17	100 033 0000	\$408 364 717	40.4	\$35 540 797 472	<b>67 378 657</b>
52	Expense cag Anowance	\$317,387,917	(07,202,000)	3309,334,117	09.9	1010102001010	200000
55 54	Working Capital						(\$60,763,011)

Uhuo Edison Company Case No. 07-551-EL-AIR Other Rate Base facms Summary As of May 31, 2007

> Dans: X Actual \_\_\_\_ Estimated Work Paper Reference No(5): Applicant's Schedules WPB-6.0a-b & Schedules B-6.1A-V

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Schedule B-6 Page I of 5

Line	Account		Total	Allocation	Allocated		Adjusted
No.	No	Description	Company (1)	¥ 8	Total ()	Adju <del>smue</del> nts (4)	Jurisdiction (5)
-		Other Regulatory Assets:					
7	182.3	Customer Receivables for Future to Eax	S121.862,262	%0000000000	5121,862,262		S121,862,262
÷	182.3	T & D PostrationMont Benefits	•	79.70607%	•		0
4	182.3	Regulatory Transition Charge	152,900,324	0.00000%	e		o
<b>4</b> 0	182.3	Nuclear Decontamination/Decontruits/staning	(26.192)	0.0000%	•		e
v	182.3	Deferred Shopping Incentive:	141,664,518	9%0000070	¢		•
2	182.3	M(SO Transmission Service Costs	50,182,947	2,00000,0	0		•
90	182.3	Municipal Distribution Tax Deferral	(5.768,798)	%00000000001	(\$768.798)		(5,768,798)
<b>o</b> ,	182.3	R.C.P Fuel Deferral	22.117,649	100.0000%	72, 117, 649	(32,117,649) (8)	•
9	182.3	RCP - Distribution O&M Deferral	107.556,500	300000.001	102,356,500		107,556,500
Ξ	152.3	Cittie Liate Extension	11,330,466	100.00000%	334,0CE, 11	(4,771,620) (b)	6,558,846
12	182.3	Transition Tax Deferrel	98,292,740	%000000001	98,292,740		98,292,740
6	182.3	RCP - Demond Side Management	C12.0K	100.0000%	20,513		20,513
Ŧ	<b>(8</b> 2.3	Ohio Rate Case • Incremental Expenses	39.012	100.0000%	39,012	(39,012) (a)	•
5		TUTAL Account 182.3	751,171,942		405,450,344	(182'926'94)	328,522,063
16	189	Unamortized Loss on Reacquired Debt	33 <b>,62</b> 8,861	100.0000%	23,628,861	(23,628,861) (8)	9
17	222	Quativersi' Advances for Construction	(1,069,854)	100.000004	(1,669,854)		(1587,694),1)
90		Constitutions in Aid of Construction (Netted against Gross Plant)	¢	100.00000%	a		G
61		Other Deferred Debils:					
70	26	Obio Transhe Fees - Admin. Fees for Ohio CBP	520,443	100.000%	520,443	(920,443) (s)	•
21	8	Reserve For Uncertain Tax Positions	29.378,993	200000000000000000000000000000000000000	29,378,993	(29,378,993) (a)	Đ
ដ ដ	ž ž	CH Real & Personal Property Tax - Ner A & Other TBT 1954	60,052,664 58,512	97.69610% 21.45398%	58,669,114 12,553		58,669,114 12,553
24		TOTAL Account 186	590,410,612		588,981,103	(359,999,436)	538,681,667

Ohto Edison Company Case No 07-551-EU-AIR Other Rate Base Iterns Summary As of May 31, 2007

> Data: X. Actual \_\_\_\_\_ Gatimated Work Paper Reference No(s): Applicant's Scienciales WPB-6.0n-b & Schedulte B-6.1A-V

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Lúne	Account		Total	Allocation	Allocated		Adjusted
No.	Ň	Description	Сотрату (1)	* @	Total	Adjustneents (4)	Jurisdiction (5)
r 1		Other Defaned Credits:			5		
92	544	Line Project Coffering Reventate	(\$\$31,575)	1.00.00000%	(283) 275)		(\$831,575)
2	52	Salet (resecteds) - Deferred Rent OE01	(134,713,492)	0.0000%	e		•
82	2.53	OH Real & Personal Property Tax - Net	(60,052.664)	%01969766	(58,c69,114)		158.669,114)
5	253	AC'85 Fax BEN TRSFR - 1981	(\$,996,000)	21.45398%	(1,286,381)		(15):58271)
8	253	ACES Tax BEN TRSFR - 1982	(1.100,432)	3486559712	(236.097)		(136,097)
E	253	ACRS Tax BEN TRSFR - 1981 INDEM PMT	067,844	21.45398%	203,755		203,755
32	253	McChoneid LP 1998	(404,580)	0,0000%	0		ð
33	253	Boston Cup XVII - LIH	(21)76,115)	%D0D0070	0		0
R	233	Down Payraems SD - Contra	(2,212,389)	100.00000%	(2,212,389)		(43, 212-2)
35	253	Energy For Education (E4E2)	(71,015,014)	100.0000%	(71,015,014)	71,015,014 (a)	\$
36		TOTAL Account 253	(277,552,550)		(114,046,815)	71,015,014	(166'160'19)
37		Other Regul surry Lindviltötes:					
<b>3</b> E	5 <b>2</b>	Asset Removal Cost	(1,563,638)	100.000%	(859'895'11		(\$£9'£95'1)
£	254	Custamer Receivables for Future Inc Tax	(44,365,669)	, %000000000	(499)3987443	I	(41,365,669)
4		TOTAL Account 254	(45,929,207)		(45,929,307)	0	(45,929,307)
ŧ		investment Tax Credits:					
7	722	Pre-1971 3% Credit	(51)	98.52124%	(151		(11)
<b>5</b>	255	1971 4% Crealit	(108,141)	98.52124%	(106,543)	2,395 (a)	1111 1111
4	255	1975 6% AddRI Credit	0	0.00000%	¢		•
Ş	255	1981 10% Credit on Recovery Property	(14,853,798)	%0000070	0		••
¥ 7	<u>n</u> n	ITC lax Benefits Sold Other	(150005677) (14,785)	%0000070	• •		• •
8		TOTAL Investment Tax Credits	(17,926,766)		(106,357)	2,395	(104,161)
49	52	Unamortized Gain on Rauzquired Debt	(152'6)	100.0000%	(192,6)	(e) 162°6	æ
50		Deferred lastmas Taxes:					
2 G B	8 8 8	Demaad Stule Management Reserve for Envertory Obsolatorico Obbert Taxes	389,147 4,575,147 \$3,287,805	100.00000% 86.78241% 86.78241%	389,147 3,970,423 \$2,853,236		389,147 3,970,423 \$2,853,236

Uhio Edison Company Case No. 07-551-EL-AIR Other Rate Base Items Summary As of May 31, 2007

> Data: X. Actual \_\_\_\_\_Estimated Werk Paper Reference No(s);: Applicant's Schedules WPB-6.0=b & Schedules B-6.1A-V

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Schedule B-6 Page 3 of 5

Line	Account	2	Total	Allocation	Allocated		Adjusted
No.	No.	Desaription	Company	*	Total	Adjustments	Junischiction
			(1)	(3)	(3)	(4)	(2)
ł,	R		610'5'5'5	12110001.2	100,176		
22	190	Post Retixement Benefits	76,493,877	79.70607%	60,9770,262		60,970,262
56	<u>8</u>	Banked and Accrued Varation	0.62,716.2	79.70607%	4,238,155		4,238,155
23	8	FAS 109	5,528,291	\$400:000.001	5,528,291		162,822,5
8	<u>18</u>	kuvestment Tax Credits	6,838,947	0.72975%	49,907		199,907
65	8	Injuries & Damages	2,572,366	79.70607%	2,050,332		2,050,332
60	<b>8</b> 51	Regulatory Transition Charge - CTC	37,716,354	0.00000%	e		•
19	061	Emission Allowarce	1,404,277	000007	•		c
62	<u>R</u>	Marger Tennsaction Costs	287,974	86.78241%	249,911		116'672
63	861	Tax Benefit Transfer - Net	10,178,926	21.45398%	2,183,785		2,183,785
2	8	BV2 SaleT.caseback Defenced Rems	45,686,649	*40000010	•		•
65	<u>8</u>	ESIP Sueed Lighting	1,677,603	9600000000	1,677,603		1,677,603
<b>9</b> 9	8	Nuclear Refueling Outses	20,321	%0000000	e		0
61	06]	Organization Cost	18.7	86.78241%	<b>79</b> 1		162
8	6	Sumsfield Electric Contract	204,210	100.0000%	204,210		204,210
6	190	State NOL	1,875,344	\$40000010	•		•
2	190	Такая & Ргорсилу Тах Ясманис	48,364,800	67.34657%	32,556,871		32,556,871
11	8	Trensmission Substation Sites	266,992	0.0000%	e		•
5	6	Tree Trituming	2,557,739	%00000*001	2,557,739		2.557.739
2	8	Cuprintifized Repairs	710,950	86 7R241%	616,980		616,980
¥	8	Ezeoutive Deferred Compensation	6,393,513	%10901-64	5,096,018		5,096,018
ъ	061	Exerencive Deferred Compensation Interest	4,025,189	29.70607%	3,208,320		3,208,320
<b>9</b> 2	<u>8</u>	ESOP - Compensation Expense	18,696,093	79.70607%	126,100,61		14,901,921
F	<b>0</b> 51	GB Settlement	918,107	100:00000%	918,107		918,107
R	<b>05</b> 1	Asset Reditertent Obligation	e	%0000001	•		•
R	8	Gain/Lass on Sale of Securities	1,721,689	100.00000%	1,721,689	(1.721,689) (a)	e
8	8	Ohio Line Extension	506,419	100.00000%	506,419	(506,419) (a)	•
18	8	Restricted Slock Units	26.242	79.70607%	20,916		20,916
5	8	Extraordinary Gain FIN 47	9,238,389	7600006.001	9,258,389		9,258,389
58	<b>86</b>	Defined Tax Balances - OE Subs.	786, 164	0.0000%	•		•
2	<u>86</u>	Bavinommental Projects - Other Inc.	0	100.00000%	Q		•
5	<u>8</u>	FAS 123R - Stock Options	012,31	79.70607%	64,801		[4,80]
9 <b>8</b>	<b>0</b> 61	Munic. Distr. Tex Deferrel	1,294,147	100.0000%	3,284,147		3,284,147
6	<b>0</b> 61	Lmte Protection - Deferred Revenues	344,946	100.0000%	384.996		384,996
8		TOTAL Account 190	302,006,533		159,439,741	(301,352.2)	157,211,633
8	Ř	Pollmion Control Facilities	(2.248.776)	0.00000%	¢		•
8	8	Accreterated vs Book Depretication	(3214,736,245)	%56152'%6	(612,300,49ES)		(5197,064,719)

Ohio Edison Cumpany Case No. 07-551- EL-AIR Other Rate Base Items Summary As of May 31, 2007

> Dara: X Actual \_\_\_\_\_Eurimated Work Paper Reference Na(s): Applicant's Schedules WPD-6 00-b & Schedules B-6.1A-V

Schedule B-6 Page 4 of 5

Line	Account	-	Total	Allocation	Allocated		Adjusted
Ne	ź	Description	Company	~	Total	Adjustments	Jurisdiction
			Ξ	(2)	(3)	(†)	6)
					100 000 test		100 000 CLA
7	697	Fersion Expense	1216,000,1641	19.100075	(000° 600° 01 61 61		(
5	283	Incentive Compensation	(48K,877)	79.70687%	(110,285)		(ITU, A8E)
65	223	Nuclear Fuel Disposal	(20£'995)	0.0000094	e		Ċ
<b>5</b>	283	Bad Debts	(145,541)	\$400000.001	(1425,542)		(1157,135)
<b>3</b> 6	283	Savings Plan Minimum Contribution	(349°475)	79,70607%	(238,553)		278,5531
8	283	Shopping Credit Incentive Defemal	(615'683'210)	0.00000%	e		0
16	283	Perry Audit Contingeney-OH Property	(294,612)	0.00000%	Ð		Ð
36	282	f masidon Tax Defeme	(39,940,205)	100.0000%	(39,940,205)		(302,044,95)
8	283	Rescquined Deht Expense	(1)5'045'8)	108.00000%	(\$1390,514)	8,390,514 (a)	0
90¥	<b>E</b> 87	Defined intercompany Gain - ATS!	(33,986,713)	9,00000%	•		o
101	2233	FICA Tax an Reg. & Bustled Vzzation	(32806011)	X420902.61	(069,158)		(821.630)
102	283	Mark to Market Other inc.	0	%000007001	a		0
<b>:</b> 01	283	Customer Receivable	(36,930,832)	100.0000%	(558,088,055)		(36.950,332)
101	283	Provision for Unclassified Operations	(8,955,122)	86.78241%	(1/25*11/2/2)		17,231,471)
501	283	Pre-Operational Costs & Lesse	(5,808,438)	%0000000	0		•
106	283	Reserve Premining	(83,827)	100.00000%	(\$3.827)		(128,68)
101	283	ACRS - TBT - Book Amontization	(4,057,660)	21.45398%	(870,529)		(870,529)
10	283	Nuclear Fuel Deferred Gain	(4,385,666)	0.00000%	•		•
601	283	IRS Agait Interest	(817,398)	100.00000%	(8)17,398)		1866*1183
821	283	PA Public Utility Really	(652,162.1)	86 78241%	(£665'S29'I)		[1,675,993]
Ξ	283	Thomas Strip Steel	(435,707)	100.00000%	(101,254)		(435.707)
11	283	Investment Hedging Transactions - Other Inc.	0	100.00000%	9		0
113	283	Terminated construction Projects - Other Inc.	0	%000000001	c		0
114	283	Nuclear Decommissioning	(67,133,794)	0.00000%	a		•
115	283	Tax Depletion	(38,292)	100.00000%	(J.K. 242)		(260'86)
116	283	Nausiens Forei (n. Processa Nausiens Forei (n. Processa	(2,240,425)	0.00000%	e		•
117	283	Limited Partnerships - Other hac.	Ð	0.00000%	0		•
118	283	Asset Retirement Obligation	(3,638,421)	100.0000%	(3,638,421)		(125/36976)
611	283	Litte Kind Exchange - Scrap Cable	(751,754)	100.00000%	(\$417.137)		(LEI'Li>S)

# Ohio Eduson Company Case No. 07:551-EL-AIR Other Rate Base (terns Summary As of May 31, 2007

Dato: X Actual \_\_\_\_ Estimated Work Paper Reference No(6): Applicant's Schedules B.5, WPP-6.04-b, and Schedules B.6, IA-V

Schedule B-6 Page 5 of 5

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N N N	Account No.	Description	Toml Company (1)	Allecation % (2)	Allocated Fote (3)	A djustments (1)	Adjusted Jurisdiction (5)
8	ESE	Truusmission & Distribution Deferrals - MISO	5	0.00000	\$		5
121	283	MISO Transmission Deferrat	(18.172,601)	0.0000%	0		-
17	283	Rossid Defended Gain	(238,030,223)	0,0000%	6		0
5	233	FAS 123R - Restricted Stock	(285,197)	79,70607%	(977.479)		(322,479)
27	181	FAS 123R - Performance Shares	(62,490)	79.70607%	(808,903)		(40,803)
2	<b>6</b> 83	RCP - Fuel Deferral	(26,115,748)	100.00000%	(26.115.74K)	26,115,748 (a)	0
921	<b>ER</b> 2	RCP - Diatribution O&M Defetral	(39,238,055)	100.0000%	[39,238,055]		(550'867'60)
127	R	OH Litte Extresson	0	100.0000%	0	(2)375,134) (c)	(2, 775, 134)
82 T	283	VEBA	(341.979)	79.70607%	(192.872)		(192.872)
<u>8</u>	6	RCP - Demand Side Management	(1,428)	%000000001	(7,42%)		(7.428)
<u>8</u>	8	FIN 48 RECLASS ENTRY	(32,386,378)	\$46966598	(51,194,972)	279.492,66	0
131	ñ	PUCO Defenal - 2007 Rate Case	(14,127)	400000001	(14,127)	14,127	0
132		TOT AL Account 283	(216/008/962)		G 75, 195,991	65,540,227	(209.855,766)
133		TOTAL Deferred fncome Taxes	(641,779,403)		(126,220,510)	61,2,1,9	(249,710,852)
. 134		Customers' Deposits	(11,120,634)	100.0000%	(1120.830)		(11,520,834)
201		FOTAL Other Rate Base factors	(\$130,376,620)	-	512,554,679	\$3,482,242	\$16,036,921

(a) Applicant's Schedule. B.-6
(b) Staffe Line Extension Workpaper
(c) Derived from Staff Adjusted Date Certain Balance and Applicant's Toni Deferred Tax Rate on Schedule WPC-4. (a)

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Ohio Edison Company Case No. 07-551-EL-AIR Jurisdictional Allocation Statistics

Data: 3 Months Actual & 9 Months Estimated Work Paper Reference No(s).: Applicant's Schedule WPB-7,1a-s

Schedule B-7 Page 1 of 2

			Statistic	Adjustment	Adjusted	Statistic	Allocation
y Line	Eactor		Гоны	fo   0tal	Statistic Ext Total	ror Rate Area	Factor
			frinkring	Statistic	Company		
(V)	(B)		(c)	(D)	(E=C+D)	(F)	(G=F/E)
-	411 DIGT	1.0001. Liverioritoriana literato					
• •	NODIST	Non-Jurisdictional terms					0.00000%
۳ı	AMORI	Arrortization Expense Jurisdictional Allocation	\$5,762,615	50	\$5,762,615	\$3,338,635	57.93610%
4	BKDEP	Book Depreciation Jurisdictional Allocation	62,654,021	8	62,654,021	60,430,876	96.45171%
ŝ	DEPI	Depreciation Expense Jurisdictional Allocation	56,891,406	8	56,891,406	57,092,241	100.35301%
ý	DEP2	Accel, vs. Book Depreciation Jurisdictional Allocation	132,560,418	50	132,560,418	127,594,636	96.25395%
٢	FIN48	FIN 48 furisdictional Allocation	(38.386,378)	8	(38,386,378)	(33,394,972)	86.99693%
<b>0</b> 0	ITCI	Investment Tax Credit Jurisdictional Allocation	(1,308,531)	50	(1.308,531)	(1,289,181)	98.52124%
6	ITC2	Account 190 ITC furiadictional Allocation	4,682,461	50	4,682,461	34,170	0.72975%
01	M&SI	Materials & Supplies furisdictional Allocation	5,268,76 <u>2,602</u>	8	6,268,762,602	4,885,696,840	77.93718%
Π	PAYROLL	Labor Jurisdictional Allocation	103,638,886	<b>S</b> 0	103,638,886	82,606,482	79.70607%
12	REVENUE	Total Revenue furisdictional Allocation	2,174,334,305	8	2,174,334,305	517,587,512	23.80441%
<u>5</u>	PLT1	Net Plant Jurisdictional Allocation	1,562,208,098	<b>SO</b>	1,562,208,098	1,355,721,821	86.78241%
14	PRODI	A&G Jurisdictional Allocation	22,315,066	\$0	22,315,066	19,955,010	89.42394%
15	PROD1a	A&G Jurisdictional Allocation	25,390,095	\$0	25,390,095	22,122,748	87.13141%
16	PROD2	A&G Jurisdictional Altocation	(6,216,851)	50	(6.216,851)	(6,837,156)	%08776-001
1	PROD2a	A&G furisdictional Allocation	(2, 450, 026)	SO	(2,450,026)	(3,432,957)	140.11920%
18	PROD3	A&G Jurisdictional Allocation	14,280	<b>S</b> 0	14,280	0	%0000070
ŝ	PROD3a	A&G Jurisdictional Allocation	9,398,164	SO	9,398,164	3,119,335	33.19090%
30	PROD4	A&G Jurisdictional Allocation	970,636	<b>S</b> 0	970,636	967,525	%9561926%
21	PROD4a	A&G Jurisdictional Allocation	3,507,342	SO	3,507,342	3,503,289	99.88445%
ដ	PROD5	O&M Juriscitctional Allocation	16,243	SO	16,243	39	0.23765%
ส	PROD5a	O&M Jurisdictional Allocation	272,277	<b>S</b> 0	272,277	252,151	92.60811%
2	PROPTAX	Property Tax Jurisdictional Allocation	59,529,095	<b>S</b> 0	59,529,095	58,157.607	97.69610%
ม	PROPTAX2	Account 190 Prop Tax Jurisdictional Allocation	48.342,286	8	48,342,286	32,556,871	67.34657%
ጽ	REGI	Regulatory Credits/Debits Jurisdictional Allocation	209,977,619	20	209,977,619	9,010,823	4.29133%
27	REG2	Regulatory Credits/Debits Jurisdictional Allocation	(105.814,560)	8	(105,814,560)	(921,326)	65.16242%
ង	REG3	Regulatory Credits/Debits Jurisdictional Allocation	(34,044,043)	8	(34,044,043)	(23.555,724)	%16161.69
67	OTHERREV	Other Electric Revenue Jurisdictional Allocation	23,838,689	8	23,838,689	13,539,159	56.79490%
8	REV451&456	Other Revenue (A/C 451 & 456 Whtd Avg.) Jurisdictional Allocation	1,681,358	8	\$1,681.358	954,809	56.78797%

## Ohio Edison Company Case No. 07-551-EL-AIR Jurisdictional Allocation Statistics

Data: 3 Months Actual & 9 Months Estimated Work Paper Reference No(s).: Applicant's Schedule WPB-7.1a-s

Schedule B-7 Page 2 of 2

(A) No.	e Allocation Factor (B)		Statistic Total Company (C)	Adjustment to Total Company Statistic (D)	Adjusted Statistic For Total Company (E=C+D)	Statistic For Rate Area (F)	Allocation Factor (G=F/E)
	TAXI TAX2 TAX3 TAX4 TBT VEHI	Current Income Tax Jursidictional Allocation Deferred Income Tax Jursidictional Allocation Tax Other than Income Jursidictional Allocation Tax Accelerand Depreciation Jurisdictional Allocation Tax Benefit Transfer Jurisdictional Allocation Vehicle Lease Jurisdictional Allocation	\$2,315,717 20,327,107) 68,159,395 70,186,527 26,211,998 38,536,758	\$ \$ 8 8 8 5 8	\$\$2,315,717 (22,327,107) 168,159,395 76,186,527 16,211,998 \$38,556,758	\$21,155,725 \$2,223,565 161,844,660 161,844,660 771,14,895 27,017,495 \$33,901,474	25.70071% -256.91388% 96.24479% 96.24479% 21.45398% 87.97179%

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Ohio Edison Company Case No. 07 -551 - EL - AIR Jurisdictional Proforma Income Statement

> Data: 3 Months Actual & 9 Months Estimated Reference No(s):: Applicants Schedule C-1, and Staff's Schedules B-1, C-1.1, & C-2

Schedule C-1 Page 1 of 1

1					Ric	lers	Staff Proforma	Applicant Proforma
No. No.	Description	Adjusted Revenue & Expenses	Proposed Increase	Proforma Revenue & Expenses	Rider DSM Demand-Side Management	Rider SKT State k Wh Tax	Base Distribution Rev. & Exp.	Base Distribution Rev. & Exp.
-	Operating Revenues	\$508,354,717	\$160,762,886	\$669,117,603	\$1,808,138	\$92,413,560	\$574,895,905	\$584,286,725
~ ~	Operating Expenses				ć		V43 777 601	
শাৰণ	Operation of Maintenance Depreciation	182,247,275 62,007,932	085,617,1	183,400,032 62,007,932	-		62,007,932	64,054.337
ŝ	Regulatory Credits/Debits	28,460,260		28,460,260	1,804,471		26,655,789	56,041,993
ę	Other Amortization	3,338,635		3,338,635			3,338,635	3,338,635
Ŀ	Taxes Other Than Income Taxes	157,538,807	250,790	157,789,597	2,821	92,413,560	65,373,216	72,528,955
<b>6</b> 0	Operating Expenses Before Income Taxes	433,592,906	1,470,176	435,063,082	1,807,292	92,413,560	340,842,230	401,652,035
ø	Income Taxes	10,585,274	58,436,005	69,021,279	0		69,021,279	(1,289,181)
01	Total Operating Expenses and Taxes	444,178,180	59,906,181	504,084,361	1,807,292	92,413,560	409,863,509	444,478,868
11	Net Operating Income	\$64,176,536	\$100,856,705	5165,033,241	\$846	<b>0</b> 4	\$165,032,395	\$139,807,857
12	Rate Base	\$1,279,063,285		\$1,279,063,285	\$13,085	80	\$1,279,050,200	\$1,590,767,111
13	Rate of Return	5.02%		12.90%	6.47%	%00.0	12.90%	8.79%
Ohio Edison Company Case No. 07-551-EL-AIR Proforma Adjustments For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedule A-1 and Staff's Schedules C-3.10b & C-3.12

Schedule C-1.1 Page 1 of 1

Line No.	Description		
-	Total Proposed Revenue Increase	\$ \$160,762,8	386
7	Uncollectible Accounts Expense (1) x 0.758500%	\$ 1,219,3	386
ŝ	CAT Tax (1) x 0.156000%	\$ 250,7	8
4	Federal Income Tax (1 x 35%)	\$ 58,436,0	50

Schedule C-2 Page 1 of 1

Ohio Edison Company Case No. 07:551-EL-AIR Adjusted Test Year Operating Income For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s):: Applicant's Schedule C.2-1, & Staff's Schedule C-3

Staff (9,390,821) (9,390,821) (18,202,846) (18,202,846) (29,386,204) 8 (2,046.405) (7,155.738) Q 23,224,283 Adjustments Incremental 30,012,219 517,745,537 200,450,119 200,450,119 (12,639,009) 0 64,054,337 \$487,733,318 3,338,635 57,846,464 164 694 546 Adjusted Revenue & Expenses (<del>954,**8**09)</del> 158,021 22,942,106 80,881,760 (84,729.118) \$1.112,830 2,849,885 57,939,634 6,962,096 141,342,691 Adjustments Applicant (57,939,654) 177,508,012 119,568,358 30,967,029 3.338,635 (722,3645,68) \$486,620,488 161,844,660 72,090,109 57,097,241 Unadjusted Revenue & Expenses OPERATING EXPENSES Operation & Mainteramore Expense Paul Defermal (Croth) Other Operation and Mainterance Total Operation & Mainterance Expense Amortization of Limited-Term Electric Plant Taxes Other Than Income Taxes Other Operating Revenue Total Operating Revenues Regulatory Credits/Debits OPERATING REVENUE Depreciation Expense Generation Transition (RTC) Transmission Distribution Income Taxes Description Line No. ○四川口当林53日前かぬれごおがあがあめ。

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182,247,272 182,247,273 0

62,007,932 3,338,635 28,460,260 157,538,807 10,585,274 444,178,180 \$64,176,536

(33.566,911)

477,745,091

147,307,315

330,437,776 S187,149,740

Total Operating Expenses and Taxes

Net Operating Income

(\$147.149,294

\$40,000,446

\$24,176,090

20,621,399 508,354,717

\$487,733,318

Adjusted Revenue & Expenses Ohio Edison Company Case No. 07-551-EL-AIR Summary of Jurisdictional Adjustments to Operating Income For the Twelve Months Ended February 29, 2008

> Data: 3 Months Actual & 9 Months Estimated Work Paper Reference No(s).: C-3.1 - C-3.19

> Schedule C-3 Page 1 of 2

Schedule Reference	Account Nos.	Tide of Adjustment	Staff	Applicant	Incremental
C-3.1	440-444	Operating Revenue Adjustments Retail Sales Reconciliation between E-4 and C-2 for rate schedule revenue Distribution Revenues	\$1,112,830	\$1,112,830	80
с-3.15 С-3.17 С-3.17	456 450	<u>Other Operating Revenues</u> Other Electric Revenue Adjustment Forfeited Discounts Revenue Adjustment Corporate Budget Revenue Adjustment	(10,364,970) 19,340	(954,809)	(10,364,970) 19,340 954,809
		Total Operating Revenue Adjustments	(9,232,800)	158,021	(9,390,821)
C-3.5	555	<u>Operating Expense Adjustments</u> Fuel Deferral (Credit) Other Operating Expense Adjustments	57,939,654	57,939,654	٥
C-3.2		Labor Wage Annualization Miscellaneous O&M Exmense	2,879,450	3,531,196	(651,746) 72 334 901)
C-3.6		Pension & OPEB Adjustment Social and Service Club Dues Adjustment	18,770,382 (15,637)	18,769,000 (15,637)	1,382 0
C-3.9		PUCO & OCC Reclassification	(3,140,701)		(3,140,701)
C-3.12	904	Vurtue cease con Uncollectible Expense Adjustment	(11,778,880)	0	(11.778,880)
C-3.14		Advertising Expense Adjustment	(890,170)	(890,170) 336,735	•
C-3.18 C-3.18		interest Expense on Customers' Deposits Rate Case Expense Adjustment	000,950 149,000	447,000	0 (298,000)
		Total Other Operating Expense Total Operating Expense Adjustments	4,739,260 \$62,678,914	22,942,106 \$80,881,760	(18,202,846) (\$18,202,846)

Ohio Edison Company Case No. 07-551-EL-AIR marv of Iuridictional Adjustments to Operating Incom	For the Twelve Months Ended February 29, 2008
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Data: 3 Months Actual & 9 Months Estimated

Schedule C-3 Page 2 of 2

Schedule Reference	Account Numbers	t s Title of Adjustment	Staff	Applicant	Incremental
		Depreciation/Amortization Expense Adjustments			
C-3.4 C-3.5 C-3.13	403 407	Depreciation Expense Annualization Adjustment for Amortization of Regulatory Assets Amortization Associated with Deferred Tax Balance True-up	\$4,915,691 106,852,709 5,103,778	\$6,962,096 136,040,282 5,302,409	(\$2.046,405) (29,187,573) (198,631)
		Total Depreciation/Amortization Expense Adjustments	116,872,178	148,304,787	(31,432,609)
C-3.10		Taxes Other Than Income Taxes Adjustments	(4,305,853)	2,849,885	(7,155,738)
		Income Taxes Adjustments			
C-3.8	409	Federal, State and Local Income Tax Adjustment	(61,504,833)	(84,729,116)	23,224,283
		TOTAL EXPENSE ADJUSTMENTS	113,740,405	147,307,316	(33,566,911)
		NET OPERATING INCOME ADJUSTMENT	(5122,973,205)	(\$147,149,296)	\$24,176,090

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Ohio Edison Company Case No. 07-551-EL-AIR Adjustment for Labor Expense Annualization For the Twelve Months Ended February 29, 2008

Reference No(s).: Staff's Schedules WPC-3.2a & WPC-3.2b Data: 3 Months Actual & 9 Months Estimated

Schedule C-3.2 Page 1 of 1

\$2,879,450 Jurisdictional Amount 100.00000% Allocation Factor\* To adjust test year labor expenses to reflect annualized staffing levels and wages as of the end of the test year. Adjustment \$2,879,450 Total Labor Expense Adjustment Purpose and Description

\* Amounts in "Total Adjustment" column have already been jurisdictionalized. Please see Staff's Schedule WPC-3.2a

Miscellaneous Operation and Maintenance Expense Adjustment For the Twelve Months Ended February 29, 2008 Ohio Edison Company Case No. 07-551-EL-AIR

Schedule C-3.3 Page 1 of 1

Data: 3 Months Actual & 9 Months Estimated Reference No(s) .: See Footnotes

Purpos	e and Description	Total Company	Allocation Factor		Jurisdictional Amount
<del>~~</del>	Customer Record and Collection Expense - Account 903 (b)	(\$250,000)	100.000%	(a)	(\$250,000)
N	Stearn-Maintenance Misc Steam Plant - Account 514 (c)	(375,080)	100.000%	(a)	(375,080)
ŝ	Sporting Events Expense (d)	(137,961)	100.000%	(a)	(137,961)
4	Outside Services Employed - Account 923 (e)	(1,803,684)	87.131%	(a)	(1.571,575)
5	General Advertising Expense - Account 930 (e)	(285)	100.000%	(a)	(285)
9	Total (1 thru 5)	(\$2,567,010)		H	(\$2,334,901)

Staff's Schedule B-7 

Derived From Applicant's Schedule C-2.1

Derived From Applicant's Schedule C-2.1 and Applicant's Exhibit 9-A - Update Testimony of T. Fernandez Derived From Applicant's Schedule C-2.1 and Staff's Data Request 89

Applicant's Workpaper WPC-3.14

Schedule C-3.4 Page 1 of 1 Jurisdictional \$62,007,932 57,092,241 \$4,915,691 Amount 100.00000% Allocation Factor \$62,007,932 Adjustment Total To adjust test year depreciation expense to reflect annualized amounts based on the proposed depreciation For the Twelve Months Ended February 29, 2008 Depreciation Expense Adjustment Case No. 07-551-EL-AIR Ohio Edison Company accrual rates in this case and balances as of February 29, 2008 Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedule B-3.2 & C-2 2 Test Year Depreciation Expense 1 Depreciation Expense Purpose and Description 3 Adjustment

Ohio Edison Company Case No. 07-551-EL-AIR Adjustment for Amortization of Regulatory Assets For the Twelve Months Ended February 29, 2008 Schedulc C-3.5 Page 1 of 1

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Data: 3 Months Actual & 9 Months Estimated Reference No(s):: Applicant's Schedule C-2.1 and Staff's Schedules WPC-3.5a & b

	Eliminate Test	Annual	Total C-3	Allocation	Adj. Jurisdictional
Purpose and Description	Year Activity	Amortization	Adjustment	Factor	Amount

To eliminate the test year impact of the regulatory asset deferrals and recognize the annual amortization of those regulatory assets:

O & M Adjustment (Acct. 555)

57,939,654 100.00000% <u>\$57,939,654</u> <u>\$57,939,654</u>		\$5,506,075 100.00000% \$5,506,075	78,892,620 100.00000% 78,892,620	31,922,253 100.00000% 31,922,253	(6.087,502) 100.00000% (6,087.502)	5,472,247 100.00000% 5,472,247	157,839 100.00000% 157,839	(9,010,823) 100.00000% (9,010,823)	
5			S4,302,260	19,658,548	(1,922,933)	1,311,769	6,838		
\$57,939,654	0	\$5,506,075	74,590,360	12,263,705	(4,164,569)	4,160,478	100'151	(9,010,823)	
Fuel Deferral Total O&M Adjustment	Amortization Expense Adjustment (Acct. 407	Fuel Defetral	Distribution Deferral	Transition Tax Deferral	Muni Tax Rider	Ohio Line Extension	DSM Deferral	FAS 109 Amortization	

# Ohio Edison Company Case No. 07-551-EL-AIR Adjustment for Pension and OPEB Expense For the Twelve Months Ended February 29, 2008

Schedule C-3.6 Page 1 of 1

> Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staffs Schedule WPC-3.6

Purpose and Description	Total Adjustment	Allocation Factor*	Jurisdictional Amount
To adjust test year pension expense to reflect the estimated scrvice cost during the test year.			
Pension Expense Adjustment (WPC-3.6, Row 11, Column E)	\$12,919,667	100.00000%	\$12,919,667
To adjust test year OPEB expense to reflect the estimated service cost during the test period.			
OPEB Expense Adjustment (WPC-3.6, Row 22, Column E)	5,850,715	100.00000%	5,850,715
Total Pension and OPEB Adjustment	<b>\$18,</b> 770,382	H	\$18,770,382

\* Amounts in "Total Adjustment" column have already been juridictionalized.

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Schedule C-3.7 Page 1 of 1 (\$15,637) Jurisdictional Amount 87.13141% Allocation Factor **Total Company** (\$17,946) Adjustment For the Twelve Months Ended February 29, 2008 Social and Service Club Dues Adjustment Case No. 07-551-EL-AIR **Ohio Edison Company O&M Expense Adjustment** Reference No(s).: Applicant's Schedule C-5, and Staff's Schedule B-7 To remove Social and Service Club dues from O&M expense Data: 3 Months Actual & 9 Months Estimated **Purpose and Description** 

For the Twelve Months Ended February 29, 2008			
Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedule C-4			Schedule C-3.8 Page 1 of 1
Purpose and Description	Total Company Adjustment	Allocation Factor	Jurisdictional Amount
To reflect Federal, State and Local income taxes on adjusted jurisdictional net income before income tax, and to annualize the Ohio State income tax rate.			
Deferred Income Taxes Federal State - OH Store - DA			(\$56,219,472) 0 /1.416.201)
Municipal (Local)			(1,450,000) (1,450,000) (59,085,763)
Current Income Taxes Federal			(1,076,801)
State - OH State - PA Municipal (Local)			(798,447) (365,706) (178,116) (2,419,070)
Total Adjustment			(\$61,504,833)

Ohio Edison Company Case No. 07-551-EL-AIR Federal, State & Local Income Tax Adjustment For the Twelve Months Ended February 29, 2008

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Schedule C-3.9 Page 1 of 1

> Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Data Request 49 and Staff's Schedule B-7

Jurisdictions	Amount
Allocation	Factor
Total Company	
	Purpose and Description

To reclassify test year PUCO and OCC assessments from operation and maintenance expense to taxes other than income

	(S2,921,145)	(219,556)	(\$3,140,701)	
	100.000%	33.1909%		
	(\$2,921,145)	(661,494)	(53.582,639)	
Test Year Maintenance Assessments	1 PUCO	2 OCC	3 Total	

### Ohio Edison Company Case No. 07-551-EL-AIR Taxes Other Than Income Adjustment For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedules C-3.22a-h Schedule C-3.10 Page 1 of 1

Line No.	Description	Supporting Schedule	Jurisdictional Amount
l	Property Taxes	C-3.10a	<b>\$55,</b> 133,126
2	Commercial Activity Tax	С-3.10ь	793,033
3	KWH Tax	C-3.10c	<b>92,269,3</b> 95
4	FICA Taxes	C-3.10d	<b>5,225,8</b> 86
5	Federal Unemployment Taxes	C-3.10e	59,641
6	State Unemployment Taxes	C-3.10f	57,511
7	PUCO and OCC Assessments	C-3.10g	3,140,701
8	Miscellaneous Taxes	C-3.10h	<b>859,5</b> 14
9	Total		157,538,807
10	Test Year Taxes Other Than Income		161,844,660
п	Adjustment (9 - 10)		<b>(\$4,305,8</b> 53)

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#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Property Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedules C-3.22a1&2 Schedule C-3.10a Page 1 of 1

Linc No.	Description	Jurisdictional Amount
l	Personal Property Taxes	<b>\$54,239,4</b> 40
2	Real Property Taxes	893,686
3	Total Property Taxes (1 + 2)	<b>\$55</b> ,133,126

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Personal Property Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: See Footnotes Schedule C-3.10a1 Page 1 of 1

Line No.	Description		Jurisdictional Amoun	it
		Transmission <u>Plant</u>	Distribution <u>Plant</u>	General <u>Plant</u>
1	Jurisdictional Plant in Service (a)	\$169,322,455	\$1,766,447,944	\$101,932,025
2	Jurisdictional Real Property (b)	10,607,156	18,557,667	68,351,583
3	Jurisdictional Personal Property (1 - 2)	158,715,299	1,747,890,277	33,580,442
	Exclusions and Exemptions			
4	Capitalized Asset Retirement Costs (a)	0	22.272	303,410
5	Exempt Facilities (c)	358.567	2,770,294	0
6	Licensed Motor Vehicles (c)	0	0	626,559
7	Capitalized Interest (c)	6,683,671	108,535,628	0
8	Total Exclusions and Exemptions (4 thru 7)	7,042,238	111,328,193	929,969
9	Net Cost of Taxable Personal Property (3 - 8)	\$151,673,061	\$1,636,562,084	\$32,650,473
10	True Value Percentage (c)	39.87%_	45.52%	25.55%
11	True Value of Taxable Personal Property (9 x 10)	\$60,478,217	\$744,901,608	<b>\$8,3</b> 43,056
12	Assessment Percentage (d)	85.00%	85.00%	24,00%
13	Assessment Value (11 x 12)	\$51,406,485	\$633,166,367	\$2,002,333
14	Personal Property Tax Rate (e)	7.90%	7.90%	7.90%
15	Personal Property Tax (13 x 14)	\$4,061,112	\$50,020,143	158,184
16	Total Personal Property Tax (15)			\$54,239,440

(a) Staff's Schedule B-2.1

(b) Staff's Schedule B-2.1, Accounts 310, 311, 350, 352, 360, 361, 389, 390 and 390.3

(c) Derived from Applicant's Workpapers WPC-3.3c2 thru WPC-3.3f

(d) Applicant's Workpaper WPC-3.3h

(e) Applicant's Workpaper WPC-3.3g

(c) Derived from Applicant's Workpapers WPC-3.3c2 thru WPC-3.3f

(d) Applicant's Workpaper WPC-3.3h

(e) Applicant's Workpaper WPC-3.3g

### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Real Property Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: See Footnotes Schedule C-3.10a2 Page 1 of 1

Line No.	Description		Jurisdictional Amount	
		Transmission <u>Plant</u>	Distribution <u>Plant</u>	General <u>Plant</u>
1	Jurisdictional Real Property (a)	\$10,607,156	\$18,557,667	\$68,351,583
2	True Value Percentage (b)	43,35%	43.35%	43,35%
3	True Value of Taxable Real Property (1 x 2)	\$4,598,343	\$8,044,996	<b>\$29,631,32</b> 1
4	Assessment Percentage (d)	35.00%	35.00%	35,00%
5	Assessment Value (3 x 4)	\$1,609,420	\$2,815,749	<b>\$10,370</b> ,962
6	Real Property Tax Rate (e)	6.04%	6.04%	6.04%
7	Real Property Tax (5 x 6)	\$97,209	\$170,071	<b>626,</b> 406
8	Total Real Property Tax (7)		_	\$893,686

(a)	Staff's Schedule C-3.10a1	
(b)	Calculated as follows:	
	(1) Real Property Assessed Value (c)	\$40,630,670
	(2) Assessment Percentage (d)	35.00%
	(3) Real Property True Value (1 / 2)	116,087,629
	(4) Real Property Capitalized Cost (e)	\$267,783,306
	(5) Real Property True Value Percentage (3 / 4)	43.35%
(c)	Applicant's Supplemental Information C-43	
(d)	Statutory Assessment for Real Property	
(e)	Applicant's Supplemental Information C-4	

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#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Commercial Activity Tax For the Twelve Months Ended February 29, 2008

### Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedule C-2 and Applicant's Schedule C-3.9

Schedule C-3.10b Page 1 of 1

Line No.	Description	Jurisdictional Amount
1	Jurisdictional Operating Revenues (a)	\$508,354,717
2	Commercial Activities Tax Rate (b)	0.1560%
3	Commercial Activities Tax (1 x 2)	<b>\$793,</b> 033
(a)	Staff's Schedule C-2	

I.

(b) Applicant's Schedule C-3.9

### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of KWH Tax For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedule C-3.10

Line Jurisdictional No. Description Amount

I Jurisdictional Kwh Tax Rider Revenues

Schedule C-3.10c Page 1 of 1

\$92,269,395

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of FICA Tax For the Twelve Months Ended February 29, 2008

#### Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedule C-3.2 and Staff's Data Request 69

Line **Jur**isdictional No. Description Amount 1 Annualized O&M Labor Expense (Staff's Schedule C-3.2) \$85,485,932 2 Percentage of OASDI Taxable Wages (Staff's Data Reques 69) **97.1**9% 3 83,083,777 OASDI Taxable Wages (1 x 2) 4 Effective Tax Rate 6.20%5 Old Age, Survivors and Disability Insurance (OASDI)Portion of FICA Tax (3 x 4) 5,151,194 6 Medicare Effective Tax Rate 1,45% 7 74,692 Medicare Expense Portion of FICA Tax (5 x 6) 8 Test-year FICA Tax Expense (5 + 7) \$5,225,886

Schedule C-3.10d Page 1 of 1

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Federal Unemployment Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: See Footnotes Schedule C-3.10e Page 1 of 1

Line No.	Description	Jurisdictional Amount
l	Number of Employees (a)	1,263
2	Federal Unemployment Tax Base (b)	\$7,000
3	Total Taxable Wages (1 x 2)	8,841,000
4	Federal Unemployment Tax Rate (c)	0.80%
5	Federal Unemployment Tax (3 x 4)	\$70,728
б	O&M Percentage (d)	58.64%
7	Federal Unemployment Tax (5 x 6)	\$41,475
В	Jurisdictional Allocation Factor (e)	87.97%
9	Jurisdictional Federal Unemployment Tax (7 x 8)	\$36,486
10	Federal Unemployment Tax Allocated From FE Service Co. (f)	23,155
11	Total Company Federal Unemployment Tax (9 + 10)	\$59,641

(a) Derived from Applicant's Response to Staff's Data Request 51. Six-Month Average Ended August 2007

(b) 2008 FUTA Earnings Base

(c) Staff's Data Request 68

(d) Applicant's Workpaper WPC-3.2m

(e) Applicant's Workpaper WPC-3,20

(f) Staff's Schedule WPC-3.10e

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of State Unemployment Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: See Footnotes Schedule C-3.10f Page 1 of 1

Line No.	Description	Jurisdictional Amount
	Number of Employees (a)	1,253
2	State Unemployment Tax Base (b)	\$9,000
3	Total Taxable Wages (1 x 2)	11,367,000
4	State Unemployment Tax Rate (c)	0.60%
5	State Unemployment Tax (3 x 4)	<b>\$6</b> 8,202
б	O&M Percentage (d)	58.64%
7	State Unemployment Tax Expense (5 x 6)	\$39,994
8	Jurisdictional Allocation Factor (e)	87.97%
9	Jurisdictional State Unemployment Tax Expense (7 x 8)	\$35,183
10	State Unemployment Tax Expense Allocated From FE Service Co. (f)	22,328
п	Total Company State Unemployment Tax Expense (9 + 10)	\$57,511

(a) Derived From Applicant's Response to Staff's Data Request 51. Six-Month Average Ended August 2007

(b) 2008 FUTA Earnings Base

(c) Staff's Data Request 68

(d) Applicant's Workpaper C-3.2m

(e) Applicant's Workpaper WPC-3.20

(f) Staff's Schedule WPC-3.23f

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of PUCO & OCC Assessments For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Data Request 49 and Staff's Schedule B-7

Jurisdictional Line Amount No. Description \$2,921,145 t PUCO Maintenance Assessment 100.0000% 2 Jurisdictional Allocation Factor \$2,921,145 3 Jurisdictional PUCO Assessment (1 x 2) \$661,494 4 OCC Funding Assessment 33.1909% 5 Jurisdictional Allocation Factor 219,556 6 Jurisdictional OCC Assessment (4 x 5) \$3,140,701 7 Total PUCO & OCC Assessments (3 + 6)

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Schedule C-3.10g Page 1 of 1

#### Ohio Edison Company Case No. 07-551-EL-AIR Calculation of Miscellaneous Taxes For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedule WPB-7.1f Schedule C-3.10h Page 1 of 1

Line No.	Description	Jurisdictional Amount
1	Pennsylvania Capital Stock Tax	\$778,622
2	Ohio Sales and Use Tax	71,090
3	Federal Motor Fuel Tax	1,282
4	Federal Highway Use Tax	8,520
5	Total Miscellaneous Taxes (1 thru 4)	\$859,514

Ohio Edison Company Case No. 07-551-EL-AIR Vehicle Lease Costs For the Twelve Months Ended February 29, 2008

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Schedule C-3.11 Page 1 of 1

> Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedute WPC-3.1 la-d

Purpose and Description	Total Company	Allocation	Jurisdictional
	O&M Lease Costs	Factor	Amount
To adjust test year vehicle lease costs to reflect an annualized increase.	\$865,155	87.97179%	\$761,092

	Uncollectible Expense Adjustment For the Twelve Months Ended February 2	, 2008
Data: Refer	ata: 3 Months Actual & 9 Months Estimated eference No(s).: See Footnotes	Schedule C-3.12 Page I of 1
Purpo	rpose and Description	Jurisdictional Amount
<del>~-</del>	1 Adjusted Total Operating Revenue (a)	\$508,354,717
2	2 Uncollectable Rate (b)	0.7585%
Ś	3 Adjusted Uncollectable Expense (1 x 2)	\$3,855,952
4	4 Test Year Uncollectable Expense (c)	15,634,832
ŝ	5 Adjustment (3 - 4)	(\$11,778,880)

Ohio Edison Company Case No. 07-551-EL-AIR

(a) Staff's Schedule C-2(b) Staff's Schedule WPC-3.12a(c) Applicant's Schedule C-2.1

		Schedule C-3.13 Page 1 of 1
Ohio Edison Company	Amortization associated with Deferred Tax Balance True-up	Data: 3 Months Actual & 9 Months Estimated
Case No. 07-551-EL-AIR	For the Twelve Months Ended February 29, 2008	Reference No(s).: Applicant's Schedule C-3.13 and Staff's Schedule B-7

Purpose and Description	Total Adjustment	Allocation Factor	Jurisdictional Amount
To adjust amortization of Account 407 to reflect current estimate of FAS 109			
Adjustment to FERC Account 407 - Regulatory Debits/Credits	\$5,302,409	96.25395% =	\$5,103,778

	Schedule C-3.14 Page 1 of 1	Jurisdictional Amount		(\$\$90,170)
		Allocation Factor		100.0000%
Advertising Expense Adjustment For the Twelve Months Ended February 29, 2008	Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Applicant's Schedule WPC-3.14	Total Company Purpose and Description Adjustment	To remove expenses from the test-year related to promotional advertising. Informational and conservational advertising remains in test-year income.	O&M Expense Adjustm (\$890,170)

Ohio Edison Company Case No. 07-551-EL-AIR

Ohio Edison Compa Case No. 07-551-EL	ny AIR		
Other Electric Revenue Ad For the Twelve Months Ended Fe	justment bruary 29, 2008		
Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staffs Schedule WPC-3.16			Schedule C-3.15 Page 1 of 1
	Total	Allocation	Jurisdictional
Purpose and Description	Adjustment	Factor	Amount
To remove ASTI Lease Revenues From Account 456, Other Electric Reven Associated With Related Plant Exclusion	nes		
FERC 456 - Other Electric Revenue	(\$10,364,970)	100.0000%	(\$10,364,970)

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	Schedule C-3.16 Page 1 of 1	Allocation Jurisdictional Factor Amount		100.00000% \$339,625
Company 51-EL-AIR mers' Deposits nded February 29, 2008		Total Adjustment	the Company's working capita to operating expenses.	\$339,625
Ohio Edison Case No. 07-5 Interest on Custor For the Twelve Months Er	lated PB-5.1a		omers' deposits as an offset to with these deposits is added	sits (13-month average)
	Data: 3 Months Actual & 9 Months Estim Reference No(s).: Applicant's Schedule WF	Purpose and Description	To be consistent with the treatment of custo allowances, the interest expense associated	Interest Expense on Customers' Depos

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Ohio Edison Company	Forficited Discounts Revenue Adjustment
Case No. 07-551-EL-AIR	For the Twelve Months Ended February 29, 2008

Data: 3 Months Actual & 9 Months Estimated Reference No(s).: Staff's Schedule C-2 and Applicant's Schedule C-2.1

Schedule C-3.17 Page 1 of 1

	lotal	Allocation	Jurisdictional
Purpose and Description	Adjustment	Factor	Amount
To adjust annual test year forfeited discounts revenues to reflect changes in base revenues			

18	2%	50	69	40 100.0000% \$19,340
1 Adjusted Base Revenue (Staff's Schedule C-2)	2 Forfeited Discount Rate (Applicant's Schedule C-2.1, \$8,516,969 / \$486,620,488)	3 Adjusted Forfeited Discounts (1 x 2) \$8,536,3	4 Test Year Forfeited Discounts (Applicant's Schedule C-2.1)	5 Adjustment (3 - 4) \$19,3

	Ohio Edison Company Case No. 07-551-EL-AIR Rate Case Expense Adjustment For the Twelve Months Ended February 29	2008		
Data: Refer	3 Months Actual & 9 Months Estimated ence No(s).: Applicant's Schedules C-8 & WPC-8, and Staff's Text			Schedule C-3.18 Page 1 of 1
Purpo	se and Description	Total Adjustment	Allocation Factor	Jurisdictional Amount
To ad costs	just test year expense to reflect estimates of incremental associated with filing Case No. 07-551-EL-AIR. (Not in budget)			
1	Adjustment to O&M Expense	\$447,000		
7	Amortization Period - Years	3		
ŝ	Net Adjustment to O&M Expense (1 / 2)	\$149,000	100.00000%	\$149,000

### Obio Edison Company Case No. 07-551-ELA(R Adjusted Parisdictional Income Taxes For the Twelve Morths Ended Fobruary 29, 2008

Data 3 Months Actual & 9 Months Estimated Reference No (s) \* Applicant's Schedules C+3 21, C-4.1, WPC-3.8d, WPC-4 1f & WPC-4a-g, and Staff's Schedule C+1

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Schedule C-4 Page 1 of 5

			At Current Rates		At Propose	NA RAIGE
Litte No	Description	Unadjusted (1)	Schedule C-3 Adjustments (2)	A djusted (3)	Proforma Adjustments (4)	Proforma (3)
I.	Operating Income Before Income Tax	\$259,239,849	(\$1+1,47\$,938)	\$74,761,811	\$159,292,710	\$234,034,521
5	Reconciling Beins					
÷	Interest Charges (Sch. B-1, Rate Base & Weighted Cost of Debt)	(61.145,527)	16.378.312	(44,767,215)		(44,767,815)
4	Tax Accelerated Depreciation	(67.114.395)	(3,651,234)	(70,266,126)		(70.266,1.26)
5	Brick Depreciation	60,430,875	4,915,692	65,346,567		63,346,367
٠	Exects of Tax Over Book Depr.	(6,634,620)	1.764,461	(4,419,559)		(4.419,559)
7	Offer Reconciling Rems					
x	CONTRIBUTION IN AD	9,351,417		9,351,417		9,351,417
10 10	THE LEASE EXPENSE	(3,003,557)		(3,003,557)		(3,003,557)
11	TRT-HOUSE DEPRECIATION	2,143,398		2,143,398		4,143,3%# •
12	LINE PROTECTION REVENUES	(63.158)		(63.156)		(63,158)
13	SEVERANCE	Ď		0		0
15	NURIES & DAMAGES	0 (19) 7995		191.7651		(191,295)
16	PROF UNCLASS OPER.EXP. (Short-term Incentive Comp.)	(937,170)		(937,170)		(937,170)
17	DEMAND SIDE MANAGEMENT	(115,468)	122,306	6,838		5,838
18	ACCRUED & BANKED VACATION	0		0		
30	DOE-DECONTAMINATION DONE - CYNMBRIGER HAN ROEDLING	0		0 1.461.636		2403.075
21	LONG TERM INCENTIVE	2,002,075		2,002.0/5		1
22	RESTRICTED STOCK UNITS EXPENSE	48.327		48,327		48,327
23	STOCK OPTION EXPRISE	5,779		5,779		5,779
24	STUKIK OPTION EXERCISE	(84.639)		(86,659)		(85,659)
26	PERMITER AND A DATES	37,903		57,905		816.23
27	EXECTION COMPENSATION PLAN	2,575,583	,	2,575,583		2,575,583
29	EXEC DEF. COMPENSATION PLAN - INTEREST	907,381		907,381		907,381
29	DECUMMISSIONING INTEREST NON QUAL	0		0		6
31	NON OUAL TRUST GAIN DECOMBA	U		U 0		6
32	DEF GAIN - OF NUCLEAR SUB	ů.		0		0
33	MACRNACES RETIRED PROPERTY	(173 565)		(173,565)		(173,565)
.34	DED ERRED GAIN ON SALE - FONSEL	n		0		0
36	DEFERRED GAIN ON SALE TO A IN DONOS - LOSS ON RETIDEMENT	1 765 875		1 365 875		1.365.475
37	BAD DESTN - PROVISION	(263.506)		(263.596)		(2(3,306)
38	PERKY ACONT DOM TRAGENCY	a		0		0
30	FICA ON REGULAR & BANKED VACATION	44.455		44,455		44,455
40 21	APPI ALIZED- INTEREST APPIDE - CROSS	461,910		461,910		461,910 (330,349)
42	PENSION EXPENSE	(4,752,819)		(4,752,819)		(4,752,619)
43	PEYSION EXPENSE PAYMENT	¢		0		0
44	PUNTRETIREMENT BENEPIT - EXP.	(2,739,354)		(2,739,354)		(2,739,354)
45 46	PONTRET;REMENT BENEFIT- DEFERRAL	730,708		730,708		7,50,708
47	SAVINGS PLAN MINIMUM CONTRIBUTION	()-107.643)		(),10,201		0
48	LIMITED TERM LEASES AMORTIZATION	a		Ö		0
49	UOST OF REMOVAL, BOOK DEPR.	٩		0		0
50	COST OF REMOVAL DEDUCTION	(4.323.404)		(4,123,404)		[4,123,904)
52	ACCHETION EXPENSE ARO	a		0		é
53	FAS ION ADRISTMENT-#/# 464	Q		0		0
54	FAS IN ADJUSTMENT-a/c 407	13,563,484	(8, 159, 706)	5,103,778		5,103,778
53	LIKE KIND EXCHANGE - SCRAP CABLE PV1. BV3 SAI E/I BACKBACK NEE OF MT	(\$7,911)		(37,916)		(67,916)
57	TAX LAW CHANGES SE3 DEFERRAL	(14,521,463)	30,180,013	19.638.348		19,658,548
58	CTC REGULATORY ASSET AMORTIZATION	0		0		0
59	SHOPPING CREDIT INCENTIVE DEFERRAL	0		0		Ð
60 51	IN VESTIMENT DELEMENT OF ANNALTIONS	L,012,635	81 GD# 0A5	1,012,635		1,012,635
61	RCF-FUEL DEFERAL	(74,293,743) (50,688,445)	0,58 <b>0</b> 445	4,394,200 D		1,346,670 A
63	MINIC DINTE TAX DESERRAL	4,114,473	(n.037,44M)	(1,972,983)		(1,922,933)
64	LISO TRANSMISSION DEFERRAL	Q		ú		0
6. KA	OHIO LINE EXTENSION # - DEP CAP COSTS	(1,779,485)	4,091,754	1,311.769		1,311,769
65	UEAL ALLOWANCE (PERMANENT)	(39,012) 96,840	(234.988)	(1996,000) 96,860		(
Бà	MEDIC ARE PRENC DRIIG SUBSIDY (PERMANENT)	226,771		226,771		226.771
ñŸ	MANUFALTURING DEDUCTION (PERMANENT)	o		0		0
70	AUGRAVIE DEVENSE SALAS (PERMANENT)	<u> </u>		0		0
71	Total Other Reconciling Items	(135.916,568)	161,916,422	25,999,854	0	23,999,854
71	rowr weensthing thems	(203,746,116)	180,059,195	(23,646,920)	0 1140 305 354	(23.046.928) talo act cou
<i>*</i> *	E MARCELE CONSULTA	\$33,495,734	5 3/4 (4 1 4 (5 1 5 1	331,014,891	3639 496, 180	[[[[]]] م د ۲۵، ۲۵ م د

### Ohio Edisen Company Case No. 070331-EE-AIR Adjusted Jurischeticaal Income Taxes For the Twelve Months Ended February 29, 2008

Data 3 Maniha Actual & 9 Months Estimated Reference No. (4) Schodule C-4.1, Applicant's Schedules WPC-3.8d, WPC-4.1d & WPC-4a-g

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			At Current Rate	83	А і Ргоро	and Rates
Line No	Description	Usadjutted	Schedule C-J Adjustments (2)	Adjusted	Proforma Adjustments (4)	Professea (5)
1	Operating Income Before F.I T. and Sine & Local Income Tax	\$259,239,849	(\$154.478,0381	\$74,761,811	\$159,292,710	\$234,054.521
2	Reconciling items:	(20),746,116)	180,059,195	(23,6%6,936)	ø	(21.656,920)
3	Vederal Taxable Income before State & Lousi Income Tax to page )	55,493,734	r4,418,747)	51,074,891	159,292,710	210,367,601
4	Ohio Siste Taxable Income	55,493,734	( <del>4</del> ,418,843)	51,074,891	159,292,710	210,367,601
٩	Tintal Ohio Current Income Tax Expense 2,938	50% (\$1,630,682)	\$798,447	1.62944%(\$832,335)	(\$2,593,479)	(\$1,627,813)
ń	Munkipal Taxable Income	\$55,493,734	(\$4,418,843)	\$51,074,891	\$159,292,710	\$210,367,601
7	Current Municipal Income Tax 0.9	20% (\$510,542)	\$178,116	0.65086% (\$312.426)	(\$1,016,773)	(\$1,369,199)
x	PA Taxable Income	\$55,493,734	( <b>\$4,</b> 418.843)	\$51,074,891	\$159,292.710	\$210,367,601
9	Curreni PA State Informe Tex 0.94	\$7% (\$524,804)	\$365,706	0.31150% (\$159,098)	(\$496,197)	(\$655,295)
τu	Fotal State and Local Income tax expense	(\$2,664,028)	\$1,342,269	(\$1.323,759)	(\$4,3,29,548)	(\$3,432,307)



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## Ohio Edison Company Case No. (77-53) - EL-A IR Adjusted Jurisdictional Income Taxes For the Twelve Months Ended February 29, 2008

Daur 3 Meeths Actual & 9 Months Estimated Reference No.(s) : Schedule C-4 1, Applicant's Schedules WPC-3.84, WPC-4.1d & WPC-4arg

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Page 3 of 5

and the second s

		-		At Current Rates		At Propose	d Rates
Line No	Description		Unadjusted	Schedule C-3 Adjustments (2)	Adjusted	Proforma Adjustments (d)	Proforma (S)
110	Federal Taxable Income before State	·					
1	& Local Income Tax		\$55,493,734	(\$4,418,843)	\$51,074,891	\$159,292,710	\$210,367,601
2	State & Local income Tax Deductible		12.666,0281	1,142,269	(1,323,759)	(4,128,543)	(5,452.397)
٦	Federal Taxable Income		52,827,705	(3,076,574)	49,751,132	155,154,161	204,915,293
4	rederal Jacome Tax Liability @ 35%		(18,459,697)	1,076,801	(17,012,696)	(34,307,437)	(71,720,353)
16	Investment Tax Credits		1 789 481		1.289.181	٥	1.289.181
,	Vedend Income Texas, Convert		M 10 400 4144	11 017 UB1	(91613) 710	1654 107 4571	/870 A11 1294
,	) ynniae (nywrife zanao - wlarolu Dafwynd Goderal Inaama Daver	-	(317,200,516)	31.076.001	<u> </u>	(394)0(7451)	(and a city)
-	Env. A contracted Dennacion	14 142004	1805 At 1 (12)	(FE 067 363)	4934 134 30C)		/F24 + 14 1043
2		34.3410%	(2-3,001,003)	138,002.3375	10.11.1.1.1.1		55 444 654
		34.3470%	20,736,192	1,688,195	25444,585		£2,444,565
4	Excess of Tax Over Book Depr.		(2.293.360)	606,039	(1.689,721)		(1 689,721)
TÜ	Other Deferred Income Tax:	34.3470%					
11	CONTRIBUTION IN ALD		3,211,931	0	3.211.931		3,211,931
13	DELLAND REPORT		11.034,632)	a n	(1.031,0.12)		(1,031,032)
14	ERE-HOUDE DEPRICTATION		4	6	0		0
15	LINE PROTECTION REVENUES		(01.693)	0	(21.693)		(21,693)
16	SPURANCE		Q	0	0		0
17	STATE AR HEFT, DEPOSAL COST		Û	4	0		0
19	PROVIDED & DADGEGEN PROVIDENCEASS OPER EXP. (Short-term incentive Comm.)		(65,204)	U A	(105,704) (32) sites)		105, 741) 7311,80m
20	DEMAND SIDE MANAGEMENT		139.668	42,008	2.349		2.349
21	ACCRIED & BANKED YACATION		0	à	0		a
22	DUF DECONTAMINATION		Q	G	D		° a
23	ESOP - COMPENSATION EXPENSE		893,735	0	893,735		893.735
25	LUND VERM DREEN LIVE RENTRICTED STOCK UNITS EXPENSE		14 500	4	16 599		16.199
26	STROK OPTION EXPENSE		1,985	ů.	1,985		1.985
27	NEWSCH OPTION EXERCISE		(29,765)	6	(29.765)		(24.765)
25	RESTRICTED STOCK UNITS		19,888	0	19,688		19,288
29	PERPORMANCE SHARES		22,332	0	22,132		22.332
31	EXECTER COMPENSATION PLAN - INTEREST		311 659	0	31,658		311.658
32	DECOMMISSIONING INTEREST NON QUAL		0	ŏ	0		0
33	DECOMMISSIONING INTEREST QUAL ARO		0	0	9		0
34	NON QUAL TRUST GAIN DECOMM		0	0	0		0
35	MACKSALCHS & ECORED PROPERTY		0 (50 614)	U 8	0 250 A (4)		9 149.6141
17	DEPERRED GAIN ON SALE - FOSSIL		0	ò	0		0
38	DEFERRED GAIN ON SALE TO ATSI		0	0	0		0
39	RONDS - LOSS ON RETIREMENT		469,137	0	469,137		469,137
417 41	HAD DERTS - PROVISION		(90,505)	0	(90,500)		(0) C, UPS
42	FICA ON REGULAR & BANKHO VACATION		15 269	ő	15.269		15.269
43	CAPITALIZED: INTEREST		158,652	0	158,652		158,652
44	AFLIDT - GROSS		(113.434)	0	(113,434)		(113,434)
45	PENNION EXPENSE		(1.632.451)	0	(1.632,451)		(1,632,451)
4b #3	PENNICIN EXPENSE PAYMENT BUNTD ETIDEMENT DEMENT CV0		9 - 1940 - 99 c h	0	-146 884)		0 Mile Stee
414	POSTRETIREMENT BENEFIT- DEFEURAL		750 976	ů Ú	250 976		250.976
49	POSTRETIREMENT BENEPIT- PAYMENT		(2,441.330)	0	(2,141,340)		(2.141,330)
50	SAVINGS PLAN MINIMUM CONTRIBUTION		0	0	0		D
51	LINGTED TERM LEASES-AMORTIZATION		0	0	Û		0
34	CONTONERMONAL BOOK DEPR.		9 (* 114 346.	0 A	U (446-944)		U (2017-2012-11)
54	DECIMMISSION RG DEDUCTION		(1,410.200) Å	9	(1.410.200) Ø		(1.4.00,300) D
55	ACCRETION EXPENSE ARO		9	0	0		D
56	FASTOVAD///STMENT-MC404		0	D	0		Û
37	FASTD9 ADJUSTINENT-MC407		4,658,650	(2.903.655)	1.752.995		1,752,995
5M KU	LINE KINDERA UGNUE - SCENE LAPILE PYLINYI SALELEASEBACK DEF RENT		t 90, 1973	D	((()))		(39,197) Ú
60	TAN I AW CHANGES SED DEFERRAL.		(3,613,805)	10.365.929	6,752,111		6,752,121
61	CTC RECOLATORY ASSET AMORTIZATION		D	D	0		0
62	SHOWPING CREDIT INCENTIVE DEFERRAL		0	0	6		0
163 164	35 VESTMENT HERGING TRANSACTIONS RCP. 112 M DESERBAL		347,810	0 78 (134 444	347,810		347,810 1 477 663
63	RCP FUEL DEFERRAL		(20.841.912)	20,841.912	(*// <i>ar/</i> 0		0
66	MUNIC DISTR. TAX DEFERRAL		1,413,198	(2.073.orf#)	(See 1,470)		(600,470)
67	MISU TRANSMISSION DEFERRAL		•	0	0		0
66 164	DIGULUSE EXTENSIONS - DEF CAP COSTS PLUCTDERE RADIA 2007 CASE		(9:4.841) (1.1.005	1,405,395	450,553		459,553
70	Total Federal Jacome Tax Deferred	-	(+9.090.181)	56,219,472	7.129.291	÷	7,129.291
71	Kaderal IEC		(443 784)		14.17 7061	۵	(141,706)
72	Trual Federal Income Tax	-	(\$66,733,492)	\$57,296,273	(\$9,437,219)	(\$54,307,457)	(\$53,744,67n)

## Ohio Edison Company Case No. 07-531 IEL-AIR Adjustod Juriscictional Jacome Taxes For the Twelve Montha Ended February 29, 2008

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Lista 3 Menily Actuel & 9 Monila Estimated Reference No. (1) \* Schedule C-4 1, Applicant's Schedules WPC-3.8d, WPC-4,1d & WPC-44-g

			AI Current Rates				At Proposed Rates	
Line No	Deconston	-	Unadjusted	Schedule C-3 Adjustments (2)		Adjusted (3)	Profemas Adjustments (4)	Proforma
150	Description			(2)				
1	Municipal Deferred Tax Tex Accelerated Depreciation	0.920%	(\$\$17,457)	\$160,123	D.650 <b>860</b> %	(\$457,334)		(\$657,134)
3	Book Depreciation	0.920%	555,964	(139,649)	0.650860%	425,315		425,315
ł	tweess of Tax Over Book Dept.		(61,493)	29,474		(11,019)		(12.019)
4	Other Municipal Deferred Tax;	0.920%			0.650860%			
5	CONTRIBUTION IN AND		<b>B6,</b> 033	(25,168)		60,865		60,863
ń	TRT-LEASE EXPENSE		(27,633)	8,084		(19,549)		(19.549)
1	TRT-4NTHREST INCOME		19,738	(5.774)		13,564		13,994
ŝ	LINE PROTECTION REVENCES		15811	170		(41))		(411)
10	SEVERANCE.		0	ą		0		0
a -	NUCLEAR PAREL DISPOSAL COST		0	0		0		0
12	INJURIES & DAMAGES		(1.760)	513		(1,245)		(1,245)
13	PROVINCE ASS. OPER EXP. (Short-teen Lacontive Comp.)		(8,622)	2,522		(6,100)		(6,100)
14	ACTRIMENT & BANKED VACATION		(1,062)	1,01,1		43		•3
16	DHE DECONTAMINATION		ő	0		a a		9
17	SDF COMPENSATION EXPENSE		23,939	(7,003)		16,936		16,936
3 M	JUNG LERM INCENTIVE		0	Ď		0		0
19	RENTRICTED STOCK UNITS EXPENSE		445	(130)		315		315
20	STICK OPTION EXPENSE		33	(10)		36 (564)		(564)
22	RESTRICTED STOCK UNITS		533	(156)		377		377
23	PERFORMANCE SHARES		598	(175)		423		423
24	EXECOBE COMPENSATION PLAN		23,695	(6,932)		16,763		(6,763
25	EXEC DEF. COMPENSATION PLAN - INTEREST		3,346	(2.412)		5.906		5,906
26	DECOMMISSIONING INTEREST NON QUAL		D	D		9		0
27	DECOMMENSIONING INTEREST QUAL ARD NON OFAL TRUST CAM DECOMM		D	D		å		0
29	DEFIGATE OF NUCLEAR SUB		D	Ď		ā		6
30	MACKS/ACKS RETIRED PROPERTY		(1,597)	467		(1,130)		(1.130)
31	DEFERRED GAIN ON RALE - FOSSIL		0	Ď		0		0
3	DEFERRED GAIN ON SALE TO A ISI		0	D		0		-0 
- 33 14	BUTYUS - LUEN ON RETREMENT BAD DEBRITS - DROMANIAN		12,360	(3.8/5)		41.7151		0.715
24	PERKY AVORT CONTINGENCY		L=1-4-1-4-1 D	, D		D		6
36	HEA UN REQUERE & BANKED VACATION		409	(120)		289		289
37	CATHALIZED-INTEREST		4,250	11.243}		3,006		3,006
38	AF0.00 - GROSS		(3,038)	889		(2,150)		(2.1%)
39	FENSION EXPENSE		(43,726)	12,792		(10.934)		(10(9:4)
40	EDAILA FAFENSE FAFARENT NISTRETIREMENT BENEFIT - EYA		225.202	7 173		(17.829)		1(7,829)
42	NINTRETIREMENT BENEFIT- DEPERTAL		6.723	(1,967)		4.756		4,756
43	N BUREAR MENT DENERT- PAYMENT		(65, 197)	19,13D		(46,362)		(46.362)
44	SAVINGS PLAN MINIMUM CONTRIBUTION	÷	D	۵		0		0
45	LUMITED TERM LEASES AMORTIZATION		D	0		0		9
45	CONTINE REMOVAL-BOOK DEPK.		(17 015	11 60-6		C (A 315)		(******* (******
an	DECOMMISSIONING DEDUCTION		0	0		0		0
49	ACCRETION EXPENSE AND		D	D		٥		0
50	FA\$ 109 ADJUSTMENT-2/c 404		٥	0		Q		0
51	EAS 109 ADJUSTMENT-2/; 401		124,784	(91,366)		33,218		33,218
52	LIKE KIND EXCHANGE - SCRAP CABLE		(809)	237		(372)		(372)
54	PT 1-B VZ SALEVENSESACK DEF RENT TAX 1 AM CHANCES SER DESTRICAT		196 797 1	774.747		177 950		127.950
55	("IC REGULATORY ASSET AMORTIZATION		0			đ		0
56	SHOPING CREDIT INCENTIVE DEFERRAL		â	Û		0		0
57	INVESTMENT REDGING TRANSACTIONS		9,316	(2.725)		6,391		6,591
58	RCP CARM DEPERRAL		G11.121)	739,123		28,002		38,002
59	KUP - FIJEL DEFERRAL		(558,256))	538,260		10 (12,116)		9 41 - 10 - 11
60 61	MISTORANSMISSION DEFERRAL		37,633 B	(340,500) Đ		0		,,sity 0
62	OHIO LINE EXTENSIONS - DEP CAP LEININ		(25,576)	34,114		8,538		8,53B
63	PUCI DEFERRAL - 2007 CASE		(359)	[i, 581]	-	(1,940)	<u> </u>	1,9401
64	Total Numerpal Deferred Taxes		(1,314,903)	1,450,000		135,097	¢	135,097
65	Nue ropal ITC		<u>( 1,860)</u>			(11,850)	<u></u>	(11,860)
66	Tosal Muni, Current & Deferred Income Tax		(\$1,837,306)	\$1,628,116		(\$209,190)	(\$1,036,773)	(\$1,245.962)

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# Ükive Edisons Company Case: No. 07-551-EL-AIR Adjusted Amisdictioned Income Taxes For the Twelive Munchs Ended February 29, 2008

Dala - 3 Months Actual & - 9 Months Estimated Helference No. (4) : Schedule C-4. 1, Applicant's Schedules WPC-3.84, WPC-4.14 & WPC-4a-g

		At Current Roles		AI Propo	eod Rates
Line Description	Unadjusted	Sohadule C-3 Adjuaimenta (2)	Adjusted	Proforms Adjustments (4)	Proforms (5)

PA Deferred Tax

ł	Tax Accelerated Depreciation	0.94570%	(\$634.706)	\$415,827	0.31150%	(\$218,879)	50	(5218,879)
2	Sook Depreciation	0 94570%	571,495	(167,940)	0.31150%	203.555		203,555
٦	Excess of Tax Over Book Dopt		(63.211)	47,886		(15,324)	Ð	(15,324)
4	Other PA Deferred Tax:	0.94570%			0.31150%			
5	CONTRIBUTION IN AID		88,436	(59,307)		29.130	Ģ	29,130
6	TBT-LEASE EXPENSE		(28.40*)	19,049		(9,356)	0	19,356)
7	(BT-INTEREST INCOME		20,289	(13,0061		6,683	0	6,683
×	101-BOOK DEPRECIATION		Ð	D		0	ą	Ð
ч	LOW PROTECTION REVENUES		(597)	401		:197)	6	1197)
1l)	SPYFRANCE		Ø	۵		ø	0	0
11	NUCLEAR FUEL DISPOSAL COST		0	0		0	0	
12	NURIFS & DAMAGES		(L.3091	1,213		(596)	Q	[596)
10	PROV UNCLASS OPER EXP (Switterm Incentive Comp.)		(8,853)	5,944		(2.919)	0	(70/6)
15	ACTING TO A DAMAGEMENT		(1.092)	1,113		21	•	-1
1.7	DOF DECEMBER TON					6	0	
10	HAR-USUTAL ANIMA COM		-	0.000		0.00	0	9 10 r
18	ONCOMPENSATION EAFENSE		24.048	([6,505]		a, i u s	v	8,143
10	REALERCHED STOCK UNITE EXPENSE		457	(2006)			0	111
-0	STAX & OPTION EVENDER		101	(27)		131	4	10
21	STER'S OPTION EXENCISE		(830)	500		16 (730)	×	(27)
12	HENTHER STORY INTO		(620)	2847)		100	v A	12/01
21	PERFORMANCE SHARPS		2960 41 5	(1945) (1845)		107	Ň	261
24	EXECTIFY COMPENSATION FLAN		24 357	(16.3b)		203	0	8 60 1
<b>75</b>	EXECTORY COMPARING THE NEW CONTRACTORY		24,307 C 001	25 755		7 074	Ň	2,524
26	DECOMMISSIONING INTEREST NON OLIAI		0,001	(3.1.1)		4.039	,	
27	DECOMMISSIONING INTEREST OVAL ABO					Å	0	Д
28	YON OUAL TRUST CARL DECOMM		Å			å	0	8
-9	DEF GAIN - OF NUCLEAR SUB			ě.			0	ő
<u>ъ</u> 0	MACKNACKS RETIRED PROPERTY		41.641)	1.101		1541)	0	13415
31	DEFENRED GAIN ON SALE - POSSIL		0	0		0	ō	0
12	DEFERRED GAIN ON SALE TO ATSI		Ŭ	0		Ď	ð	ō
13	BONDS - LUISS ON RETUREMENT		12,917	(6,662)		4.255	Ð	4.255
34	BAD DERTH - PROVISION		(2.492)	1,671		(821)	0	(21)
14	PERKY AUDIT CONTINGENCY		o o	, U		ø.	0	0
36	FALS ON RECULAR & BANKED VACATION		420	(282)		138	D	138
17	CAPITALIZED-INTEREST		4,368	(2,9.39)		1,439	Ď	1,439
14	AFUDA - CINDAR		(3,123)	2,095		(1.029)	0	(1.029)
î NÎ	PHNNION EXPENSE		{44,947}	30,142		(14,805)	0	114,805}
-44	PENRION EXPENSE PAYMENT		a	0		û	6	õ
41	POSTRETIREMENT BENEFIT - EXP.		(25,906)	17,373		(8,537)	Û	(8,533)
4	PONTRET REMENT RENEFT- DEFERRAL		6,910	(4,634)		2,276	a	2,276
43	POSTREUREMENT BENEFIT- PAYMENT		(67.519)	45,078		(22,14)	0	(22,141)
44	S VVISGS PLAN MINIMUM CONTRIBUTION		Û	0		0	0	0
4	IMITED TERM LEASES-AMORTIZATION		0	0		0	0	٥
46	COST DE REMOVAL-BOOK DEPR		0	0		0	0	Ċ.
47	COST OF REMOVAL-DEDIDCTION		(36.95)	26.131		( <b>i</b> ? <b>64</b> 4)	0	(12,844)
48	DECOMMISSION DEDUCTION		0	0		0	D	0
19	NULAE JOON EXPENSE ARC		0					0
347	FASTINE ADRUSTMENT-428 400		0	9		0	0	17 Dag
-2	FON UP A DAUSTMENT-AC 407		128,279	(112,372)		15,898	0	10,698
34	UNY NUMPERLANUES SUBAR DOMES		(631)	538		(2/4)		14741
24	TAX LAN CHANGER OF ACTION AND		10 10 10 10	U 4/6 778		D		61 776
	(TO REGULT TONY FORT A HORT A TON		(aa'ont i	1004,738		01.238		0(2,10
55	SHORPING ORDER DOCTOR DOCTOR TON		0	0		U A	U 0	0 A
57	INVERTMENT HERVING TRANSACTIONS		0.576	16 4733		116		3154
53	RCF . CHEMING THE DURING THE MENT		770.0963	744 281		12,400	л л	13 492
54	KCP - FUEL DEPENDEN		(\$73,855)	573 \$55		12,402	ň	
50	MINIC DISTR. TAN DEFERRAL		38.911	144,901)		(5.990)	0	(5,990)
61	MISCO TRANSMISSION DEFERRAL		0	0		a	ġ	8
62	OHIO LINE EXTENSIONS - DEF CAP COSTS		(26,290)	30,376		4,086	ā	4,086
63	PUCO DEFERRAL - 2007 CASE	_	(369)	(359)		(928)		(928)
64	Yotal PA State Deformed		(1,351.634)	1,416,291		64,657	6	64,657
65	РАПС	_	(12,192)	0		(12,192)	Q_	(13,192)
66	Total PA Income Tax		(\$1.888,634)	\$1,781,997		(\$106,433)	(\$496,197)	(5612,830)

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# Rate of Return Summary First Energy Corporation (Consolidated) <u>Capital Structure as of May 31, 2007</u>

	Amount	% of Total	% Cost	Weighted Cost %
Long Term Debt	\$10,920,839,629	56.25%	6.22%	3.50%
Preferred Stock	0	0.00%	0.00%	0.00%
Common Equity	8,493,079,313	43.75%	10.06% -11.09%	4.40% -4.85%
Total Capital	\$19,413,918,942	100.00%		7.90% -8.35%

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#### Schedule D-1.1

# Equity Issuance Cost Adjustment First Energy Corporation (Consolidated) <u>May 31, 2007</u>

(1) Retained Earnings <sup>1</sup>	\$3 134 658 315
(2) Total Common Equity <sup>2</sup>	W3,134,000,010
(3) Ratio of (1) to (2)	\$8,493,079,313
(4) Generic Issuance Cost f	0.68833
(f) Enternal English Datia and [1.0. (2)]	3.50%
(5) External Equity Ratio, w [1.0 - (5)]	0.63092
(6) Net Adjustment Factor, $(w/(1 - f)) + (1 - w)$	1.02288
(7) Low End Equity Cost [9.84% x (6)]	10.06%
(8) High End Equity Cost [10.84% x (6)]	11.09%
	* 1.0 5 / 0

Sources:

- 1 First Energy Corporation Consolidated Balance Sheet as of May 31, 2007
- 2 Applicant's Schedule D-1A

DCF Cost of Equity Estimate

Weekly Stock Prices1 (5):

ATO	27.9600	28.5500	28.9800	29.6500	30,1900	30.6600	31.0000	31.7400	32.6200	32.6000	32.7500	31.8400	32.2500	31.8400	31.9100	31,6000	31.3000	31.4200	31.2300	31.5000	32.2300	32.8700	32.3600	31.2800	31.1800	31.7400	31,1500	31.2800	31.6200	32,4500	32,2000	32,0100	32.0600	32.0700	32.8200	31.8700	32,4800	30.6600	30.5600	29,8300	30.0600	30.2900
<u>WGL</u>	30.6000	31.3400	31.4700	32.0300	32.4800	32.4700	32.2500	32.5000	33.1700	33.2700	32.9100	32.9200	33,3000	32.5500	32.5800	31.7100	31.9200	31.7000	31.4100	31.5600	31.9800	32.0900	32.5400	31.1100	30.7800	312600	33,3800	31.9800	32.1500	32.5400	32.7100	34,3200	34.6400	34,7500	35.1400	34.4100	35.4600	33.4200	33.7500	32.0900	32.6400	32.5600
YNA	24.9400	25.3100	25,9300	26.5700	26.7809	26.9200	26.4800	Z7.0700	27.8700	27.7500	27.6700	27.7900	27.8600	26.9200	26,7500	26.0900	26.5700	26,4200	26.2400	26.2100	26.4600	26.4300	26.2300	25.2000	25,6100	26.3200	26,8000	26.3800	26.6100	27.0900	27.1400	27.1500	26.8900	26.5800	26.7800	25.9200	26.5900	25.9100	26.9000	24.9000	24.6500	24.7600
<u>ATG</u>	35.7300	36,5000	36.5600	37.1300	37.5500	37,4500	37.6100	37.7500	37,9300	37,7400	38.5600	<b>00</b> 0E.9E	39.4400	38.9200	38.9100	38.8000	39.0000	38.6800	38.7900	41.1500	41.1000	42.0400	42.2300	40.6000	40.0000	40.3400	42,2000	42.7200	43.3500	44,0500	43.3400	44.1200	43.6200	43,4600	43,4500	41.8000	42,5400	40.5300	40.5800	39,8400	10.4800	40.8309
NFO	36.2600	36,3500	35.5900	36.4100	36.8000	37.6900	38.1200	38.0300	37,7300	37.1300	38.4100	39.5300	40.0200	39.3100	38.5400	31,2600	37.9900	38.8100	9078.96	41.0400	43.0100	42.1000	42.1800	41.4100	41,2300	41.1700	43.2100	43.2600	45.6000	46.0700	46.1900	47.7600	47.4900	46.2900	46.2500	45.2200	45,6400	43.9500	45,6000	44.5600	13.3100	43.6600
STR	39,5350	40.8850	40.4350	40.9050	41.7850	41,4650	41.1650	42,0000	40.7050	42.4450	43.4900	43.8100	43.9750	41.6150	41.5250	38,6900	39.0350	39.2400	0559.95	40.3650	41.0100	39,9400	40.6200	41.2300	42.2750	42.9250	45.1400	44.6050	46.4100	46.8850	46.9500	49.6500	49.4950	49.3650	50.6500	51.8850	53.8250	52.8150	\$5.4200	53.8400	52.8500	53, 1900
EGN	41.2000	41.8700	<b>39.9700</b>	40.1000	40.2100	42.3600	43.0600	44.1800	43.6200	44.9300	45.5100	45.9700	47.3100	46.7700	46.9400	(13, 9900	45,9500	46.4900	46.0400	46.0400	17.7300	46.4600	47.6900	47.5700	47.7500	48.0100	50.5000	50.8900	53.4200	53.9300	54,5900	56.0800	57,7500	57.9600	58.3400	57,7500	58.6000	\$5.2100	57,0000	55.0B00	25.5	56.7100
2	34.2700	34,4600	34.7700	35.0900	35.7800	36.0300	35.7700	36.0700	36.1800	36.1400	36.3400	36.4600	36.9700	36,8800	36.8600	36.4400	36.2500	36.7300	36.3900	36.3000	36.3900	36.4200	36.2100	35.4000	35.2500	35.3900	36.8500	36.6500	37.2000	37.4500	38.1800	38.1700	37.6100	36.9800	37,3300	35.4700	35.8700	34,6000	35.6100	33.9500	34,1900	34.0800
ETR	71.0100	78.2300	80.6300	81.2000	85.3000	86.4500	84.2600	86.7300	89.3500	89.3100	90.8300	91,2300	92,6000	92,8000	92.3200	91.7600	90,4600	91.0300	0088716	95.1300	98.1200	0099766	100.9500	9057.96	97.8300	99.7800	104.0600	104.9200	109.3000	109.7400	00067011	14.1200	117.2700	118.3700	118.2700	0016/011	112.2700	106,8000	112.3400	105.1800	107.3500	107.2500
EXC	59.5300	60.5400	60.4700	60.6400	62.3100	62.4000	60.9500	60.0500	58.5900	59.6500	61.3900	61.4500	62,6000	61.4300	61.8900	60.3900	59.6500	60.2600	59.1800	60.7500	64.0600	63.1900	66.9300	64.2200	64,4900	65.7800	67.7200	68.7100	71.7000	70.9200	73.2808	76.2300	76.5000	76.5300	78.4500	71.2500	76.6100	70,6600	74.4800	70.0300	72,6000	76.4100
믭	46.0200	46.2000	46.4300	46,7400	47.8900	48.2300	48.0200	48.3000	47.9900	47.8500	48.2200	47.8300	48.6700	47.7600	48.0700	47.6300	47.3600	47.7400	48,1000	48.4600	49.0300	48.7200	49.3300	48.0800	48,4000	48.6100	50.4200	51,0600	52.0500	51.7900	52.0000	51.8000	51.4200	50.9700	50.9500	48.1200	48,4800	46.5900	47.3700	45.2000	45.1200	45.2100
IJ	20.6700	20.6500	20.7300	20.8900	21.8500	21.8800	21.9400	22.2300	22.6300	22.6900	22.8500	22.8200	23.3200	23.2200	23.0600	22.9800	22.8700	22.9700	23.1700	23.5500	24.0000	24.2600	24.1800	23.2900	23.4300	23.5100	24.5500	24.6900	24.6700	24.5000	24.6600	24.3900	24.1300	23.6700	24.2100	22.9200	22.7600	21.5000	21.8500	20.8000	20.4700	20.4700
<u>IPL</u>	44,4600	45.0000	46.3200	46,4300	47.9000	49.9200	50.9800	52.9900	52.6800	52.8100	53.1600	53.3400	54.9400	54.6600	54.4200	54.3300	53.8500	54,7300	56.0000	S7.6500	58.9500	59.2400	59,6400	57.9500	58.0000	59.6000	61.6900	61.1700	61.4000	60.4760	62.2500	63.9000	63.9600	64.5900	65.0700	62.5800	63,3400	58.5100	61.3000	57.9800	56.7400	56.5000
PEC	60.9500	0061.13	59.6800	60.7000	0060719	60.8500	61.3000	63,4400	65.2500	65.3900	672000	66.1200	67,3000	66.4200	66.3800	64.9600	65.4600	66.0000	67.4000	68.1300	11.0900	73.6900	75,1500	73.8700	75.0000	77,5600	81.3400	\$3.0400	85.1500	86.7600	88.9800	87.4300	89.7500	89.9700	92.1700	\$6.3900	\$8.8100	\$3.2900	\$8.8300	84.5900	\$7,7800	90.3800
DTE	40.3600	41.5100	41.9200	43.1900	45.2800	45.1700	45.7100	46.1600	46.9500	46.7400	47.3100	47.2200	48.7200	48.3000	48.4100	47.6700	45.9500	46.0500	46.0400	46.9400	47.3200	47,9900	47.7500	46,6400	46.4800	46.3100	47,7500	47.9000	48,4100	48.7000	49.6900	50.9800	51.3900	52.0000	52.9200	52.2100	52.7100	50.0600	51.3800	48,4600	48.2200	48.6200
MM	44,7300	45.0500	45.9000	45.8700	47,9000	48.0800	47.5600	47.8000	48.1000	47.9400	49.3900	49.0600	50.3000	\$0.2800	\$0.6900	50.4600	49.8400	50.4500	50.5900	48.7000	48.2000	48.1500	48.0200	47,3300	46.8200	47.0000	48.3200	48.2500	49.5000	49.1200	49.3500	49,1000	48.9900	48,7500	48,4800	45,4400	46.3000	43.1700	44,0100	41,2400	39.8500	39.9400
WEC	42.2500	43.1400	44.0600	44.6200	45,5900	46.0100	45.4500	45.7200	46.5900	46,4700	46.9500	47.8300	48.5700	47,4700	47.4600	46.9500	46.6500	46.5300	45.9700	47,0900	48.0500	48,3300	48.9500	47.7600	47.8900	47.8000	49.1500	48.5209	49,4000	49,7000	49.7000	49.3700	49.1200	48.4000	49,4300	47.1900	48.4000	45.3700	45.5800	44.2600	44.2300	43.8808
S S	13.8600	14.3200	14.3900	14.7300	15.2600	15.4100	15.6100	16.0800	16.0000	16.1000	16.2600	16,1800	16,5400	16,4900	16.5800	16.7900	16.8400	16.7200	17,4900	17.5000	17.9500	18,1600	18.2300	17.5000	0069711	17,4600	18.2000	17,9400	18.4900	18.2700	18.8600	19.0600	19.5700	19.8700	19.3600	18.7100	18.7100	17.5600	18.0600	16.9009	17,4000	17,7900
CEG	59.3000	59.2000	59.5600	59.7200	61.7600	61.7400	62.9000	65.8500	66.3900	66.9800	69,0000	68.0400	68,7400	69.1500	68.8700	70.0200	70.1400	71.2400	71.9200	74.0700	74.1800	75.3100	76.0800	77.8100	80.5000	83.5800	87.6500	86.9500	\$\$.0000	87.2500	90.5000	90.1000	92.9000	94.2300	94.9700	87.6400	90.4500	83.9200	90.0300	85.9400	87.1700	87.8400
<u>F</u>	26.9700	Z7.1200	27.3500	27.8900	28,2400	28.5200	27.6300	27.9200	28.1040	006612	28.0900	27.8700	006672	27.6600	27.7800	27.5700	28.1600	28.1200	28.6200	29.0700	29.9200	30.6600	30.6000	30.2000	30.2000	0066.62	30.9100	31.0900	31.3400	31.2700	31.4600	31.7600	31.5000	31.1100	30.7000	30.3500	30.7300	28.9700	29.4500	28,0800	28.3400	28.7600
80	35.3000	36.1100	36.6000	37.6900	37.8400	38.5800	38.2000	39.6400	39.3500	39.5500	39.2800	39.2100	40.2400	39,4800	40.0000	39.4900	38.5800	38.2200	38.0400	39.3600	40.8400	40,1400	40.1300	37.8300	37.4600	37.4500	38, 7100	38.8000	39.0300	38.7400	39.1400	38.5100	38.8400	38,8900	38.2000	36.2900	37.0200	34,4400	34.9200	33,7000	36.6500	35.9800
NDM	22.6000	22.3400	22.9300	23.0300	23.7300	25.4700	25.6900	26.1900	25,9908	25,8500	26.5500	26.1600	26.1400	25,4400	25,6400	25.2400	Z5.0100	25.3000	25.3000	26,2400	26.2100	26,0900	27.1000	26.1500	26.0300	26.1700	21.9900	28.7400	29.2100	29.7200	30.9700	30.8900	30.4300	0060.05	30,6500	8023 82	36.3700	28,6300	20,1700	9061-82	10 M 00	0010.62
된	55.0500	55.8600	57.1200	57.9800	58,8100	59.5300	57.8800	59.0000	58,6400	58.9700	60.5300	60.1800	60.8500	60,6800	60.3000	59.1100	D066725	58.5700	58.9000	60.8400	63.1500	63.0700	63.5100	61.6500	62.2700	63.1100	66.0500	66.2400	68.0500	66.9900	68.8500	69.8300	69.8300	70.8300	71.1800	68.5400	69.3400	65.5300	66.9000	63.5700	PM 7300	65.5800
	90/81/60	09/25/06	10/02/06	10/09/06	10/16/06	10/23/06	10/30/06	90/90/11	11/13/06	11/20/06	11/27/06	12/04/06	12/11/06	12/18/06	12/25/06	01/01/02	70/80/10	01/15/07	01/22/10	01/29/07	02/05/07	02/12/07	02/19/07	07/26/07	03/05/07	03/12/07	03/19/07	03/26/07	04/02/07	10/60/#0	04/16/07	04/23/07	04/30/07	02/07/07	05/14/07	05/21/07	05/28/07	06/04/07	04/11/07	20/81/90	06/25/07	07/02/07

 $(1,\ldots,n_{n}) \in \mathbb{R}^{n}$ 

Schedule D-1 2 Page 1 of 2

DCF Cost of Equity Estimate (Continued)

ck Prices<sup>1</sup> (\$). Weekly S

5					17	78						-	ç		5	¢	Ň
/eekly Stock Prices' (.	10;60(10 20;6107 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10 20;62(10) 20;62(10	AVERAGE (5)	QUARTERLY DIV <sup>2</sup> (\$)	ANNUAL DIVIDEND (5)	VIELD	REUTERS	<b>W</b> SN <sub>1</sub>	YAHOO"	VALUE LINE: V7 EARNINGS (5) '11 EARNINGS (5)	VALUE LINE, BOXED'	VALUE LINE	DCP GROWTH ESTIMATE	COST OF EQUITY ESTIMAT	DCF AVERAGE	PM COST OF EQUITY ESTIM.	OST OF EQUITY ESTIMATE	NITECES: 1 menocentral men
E 2	57.4500 56.5400 56.5400 59.8900 50.2800 52.7500 51.4400 61.6800 62.7300 62.7300	62.7338	0.4500 0.5000 0.5000 0.5000	1,9500	3.11%	8.00%	7.60%	<b>%</b> 578	4.25 5.25 5.28%	%00'6	7.14%	7.76%	%57*01		LATE		
NDM	29.8000 29.6000 26.7600 26.7600 26.4500 26.4500 26.4500 26.4500 26.4500 26.4500 26.4500 26.4500 26.4500	26.983	0.1350 0.1350 0.1350 0.1450	0.5500	2.04%	7.30%	7.70%	7.35%	1.70 2.60 4.06%	5.00%	4.53%	6.72%	\$,93%				
OGE	36,5700 36,0000 33,4700 32,1500 32,1500 32,1500 32,2000 33,5100 33,5300 33,5300 32,5600 33,5300	37.2573	0.3330 0.3400 0.3400 0.3400	1,3530	3.63%	3.33%	4,50%	4.00%	2.30 2.75 4.47%	5.50%	4.98%	4.20%	69%	10.29%	%6001	10.34%	
DPL	29.3600 28.3900 26.9600 26.4300 27.2500 26.7500 26.5100 26.5100 26.3500 26.3500	28.7896	0.2500 0.2600 0.2600 0.2600	00601	3,58%	%00'6	8.70%	6.33%	1.70 1.90 2.78%	7.00%	4.89%	7.23%	10.78%				
CEC	94.2100 96.2200 82.5000 80.5500 80.5500 83.45000 83.45000 83.63000 83.63000 83.63000 83.63000	78.4273	0.3780 0.4350 0.4350 0.4350	002971	2.15%	13.00%	12.30%	% <u>7</u> 3.E1	4.65 7.75 12.77%	14.50%	13.64%	13.15%	11,21%				
<u>er</u>	17.3300 17.2300 16.4600 16.4000 16.1700 15.9700 17.0400 17.0400 16.0000 16.1400	17.0412	0.1500 0.1700 0.1700 0.1700	0.6600	3.87%	10.00%	16.50%	16.33%	1.10 1.50 7.75%	\$405.6	8,63%	12.86%	%#6"ET				
WEC	44.3708 45.0800 42.9200 42.9500 42.8900 42.8900 44.1800 44.1500 44.1500	46.3510	0.2300 0.2500 0.2500 0.2500	0.9800	2.11%	%20%	%0E-6	9.04%	2.65 3.50 6.96%	7.00%	6.98%	8.66%	¥05.9				
MNd	40,6700 39,7800 38,2700 37,1000 40,6300 40,6300 40,6300 39,9900 39,9900 39,5400 39,5400 39,5400	45.9771	0.5250 0.5250 0.5250 0.5250	2.1000	4.57%	4.65%	5.30%	5.73%	2.55 2.90 3.22%	1.50%	2.36%	4.51%	N69701				
DTE	50,9000 50,8900 46,3509 46,2200 48,2200 47,6900 47,6900 47,7300 47,7300 48,7600	47.7488	0.5150 0.5300 0.5300 0.5300	2.1050	4.41%	6.00%	5.70%	5.75%	2.14 2.40 2.87%	4.00%	3.43%	5.22%	10.78%				
<u>980</u>	92,5000 90,4100 81,4200 82,5900 82,5900 84,9900 83,3100 83,3100	76.5658	0.5700 0.5850 0.5850 0.5850	2.3250	3.04%	12.40%	12.80%	17.33%	5.10 6.20 4.88%	11.50%	8.19%	12.68%	12.51%				
EPL	57,4600 58,6200 54,9200 57,1100 60,2000 60,2000 60,2000 60,2000 61,3900 58,8400 58,8400 58,8400	56.8948	0.3750 0.4100 0.4100 0.4100	1.6050	2.82%	9:00%	10:30%	%LE 6	3.45 4.35 5.80%	8.50%	%51'2	8.95%	10.57%				
XEL	20.9800 20.8700 19.8000 20.9100 20.9100 20.9100 20.9100 20.9300 20.7700 20.7700 20.7700	22.4398	0.2230 0.2230 0.2230 0.2300	0:8990	4.01%	5.29%	4,80%	5.67%	1.40 1.75 5.58%	5.50%	5.54%	5,32%	10.44%				
8	46.0900 45.5700 43.5700 43.5700 47.4300 45.9500 45.9400 45.5400 45.5400 45.5400	47.9065	0.5750 0.5800 0.5800 0.5800	2,3150	4.83%	3.95%	3.50%	3.45%	3.20 3.40 1.52%	3.50%	2.51%	3.35%	%86'01				
EXC	78.1600 78.8900 69.5200 71.0900 72.8500 72.8500 73.1400 73.1400 73.609 73.609 73.700 73.700 73.700	67.5450	0.4000 0.4400 0.4400 0.4400	1.7200	2.55%	9.52%	10.50%	9.70%	3.90 3.75 9.71%	10.50%	%01.01	3,96%	10.58%				
ETR	110.2500 97.8400 97.9400 97.9900 99.8400 99.8400 105.1100 103.6200 104.4400 105.7900	99.1012	0.5400 0.5400 0.5400 0.5400 0.7500	00/272	2.39%	9.50%	12.20%	10.40%	5.55 7.00 5.80%	7.50%	6.65%	9.69%	10.27%				
<u>8</u>	34,8700 33,7500 33,75200 36,5600 36,5600 36,5000 36,4000 35,4000 35,4000	35.9246	0.3880 0.3880 0.4030 0.4030	1.5820	4.40%	4.69%	4.40%	5.02%	2.25 2.50 2.63%	3.00%	2.82%	4.23%	%76.01				
NDE	58,6000 56,4300 51,6300 51,6300 53,1200 53,10000 53,1000000000000000000000000000000000000	50.0154	0.1100 0.1150 0.1150 0.1150	0.4550	%16 <sup>.</sup> 0	8.00%	12.00%	5.75%	0.46 0.60 6.54%	5.50%	6.07%	7.96%	7.88%				
SIR	56.0500 57.8000 49.5700 49.5700 50.7700 41.9200 47.9200 49.9700 49.3600 50.7100 49.3600 50.7100	45.8821	0.1180 0.1180 0.1230 0.1230	0.4820	1.05%	8.67%	8.90%	8.62%	0.49 0.45 2.89%	5.00%	3.94%	7.53%	7.99%				
- UIN	44,7500 46,0000 43,59000 43,59000 44,2300 44,2300 44,2300 44,3400 44,3400 44,1000	41,9027	0.3000 0.3000 0.3000 0.3100	1,2100	2.89%	5.94%	6.70%	5.17%	2.40 2.70 2.94%	1.50%	2.22%	\$.01%	9.29%				
ATG	41.3000 37,9000 37,9000 37,7900 37,7900 39,500 39,5100 39,5100 39,5100	39,9708	0.3700 0.4100 0.4100 0.4100	1.6000	4.00%	5.00%	4.50%	4.87%	2.80 3.10 2.54%	3.50%	3.02%	4.35%	10.06%				
1 XNA	25 25 2500 23 4900 23 4900 23 4900 26 400 26 400 27 26 9100 27 28 9900 27 29 900 27 29 900 27 29 900 27 29 900 27 29 900 27 29 100 27 20 27 20 20 27 20 27 20 20 20 27 20 20 20 20 20 20 20 20 20 20 20 20 20 2	56.2675	0.2400 0.2400 0.2500 0.2500	0.9800	3.73%	4.65%	5.30%	4.50%	1.45 1.70 3.98%	4.50%	4.24%	4.67%	9,94%				
⊼ VGL ≥	23,2600 23,2600 23,27000 23,27000 23,2900 23,1900 23,1900 23,1900 23,5500 23,5500 23,5500 23,25900 22,55000 22,55000 22,5500 22,5500 22,550000 22,550000 22,550000 22,550000 22,550000 22,550000 22,550000 22,550000 22,5500000 22,5500000 22,5500000 22,5500000 22,5500000 22,5500000 22,5500000 22,5500000 22,5500000 22,55000000 22,550000000000	32.5517 3	0.3380 0.3380 0.3430 0.3430	1.3620	4.18%	%60.6	3,00%	3.33%	2.05 2.30 2.88%	2.00%	2,44%	%Z0'E	9.74%				
2	0.6400 9.8500 7.3100 7.2300 7.8400 7.8400 8.1100 7.5900 7.5900 7.5900	0.7504	0.3200 0.3200 0.3200 0.3200	1.2800	4,16%	5.36%	5,30%	5.62%	1.90 2.45 6.36%	5.50%	¥£6.5	5.55%	(0.69%				

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### CAPM Cost of Equity Estimate

Date	Close 10Yr Yld (%)	<u>Close 30Yr Yld (%)</u>
09/18/06	4.6000	4.7400
09/25/06	4.6300	4.7700
10/02/06	4.7000	4.8400
10/09/06	4.8100	4.9400
10/16/06	4.7800	4.9000
10/23/06	4.6800	4.8000
10/30/06	4.7200	4.8100
11/06/06	4.5900	4,6900
11/13/06	4.6100	4.6900
11/20/06	4.5500	4.6300
11/27/06	4.4300	4.5400
12/04/06	4.5500	4.6600
12/11/06	4.6000	4.7200
12/18/06	4.6200	4.7600
12/25/06	4.7100	4.8200
01/01/07	4.6500	4.7400
01/08/07	4.7700	4.8600
01/15/07	4.7700	4.8600
01/22/07	4.8800	4.9800
01/29/07	4.8300	4.9300
02/05/07	4.7800	4.8600
02/12/07	4.6900	4.7900
02/19/07	4.6800	4.7800
02/26/07	4.5100	4.6500
03/05/07	4.5900	4.7200
03/12/07	4.5500	4.7000
03/19/07	4.6100	4.8000
03/26/07	4.6500	4.8500
04/02/07	4.6700	4.8700
04/09/07	4.7600	4.9300
04/16/07	4.6700	4.8400
04/23/07	4.7000	4.8900

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Date	<u>Close 10Yr Yld (%)</u>	<u>Close 30Yr Yld (%)</u>
04/30/07	4.6400	4.8000
05/07/07	4.6700	4.8500
05/14/07	4.8000	4.9600
05/21/07	4.8600	5.0100
05/28/07	4.9600	5.0600
06/04/07	5.1200	5.2200
06/11/07	5.1700	5.2600
06/18/07	5.1400	5.2600
06/25/07	5.0300	5.1300
07/02/07	5.2000	5.2800
07/09/07	5.1100	5.1900
07/16/07	4.9600	5.0600
07/23/07	4.7900	4.9500
07/30/07	4.7000	4.8700
08/06/07	4.7800	5.0100
08/13/07	4.6700	5.0000
08/20/07	4.6300	4.9000
08/27/07	4.5400	4.8300
09/03/07	4.3700	4.6900
09/10/07	4.3200	4.6400
Averages:		
Last13 weeks	4.7877	4.9854
Last 26 weeks	4.7892	4.9673
Last 39 weeks	4.7577	4.9128
Last 52 weeks	4.7269	4.8717
	4.7654	4.9343

#### CAPM Cost of Equity Estimate (Continued)

#### 10.3890

4.8498

#### CAPM = risk free return + $\beta$ ( large company total return - risk free return) = 4.92% + .7625(6.6%)

Source: Yahoo.com

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	GNP	Change	Growth%
	(\$billion) (	(\$billion)	
1929	104.4		
1930	<b>9</b> 1. <b>9</b> 0	-12.70	-12.32%
1 <b>931</b>	77.00	-14.60	-16.15%
1932	59.10	-17.80	-23.48%
1933	56.70	-2.40	-4.14%
1934	66.30	9.50	17.09%
1935	73.60	7.10	10.91%
1936	84.00	10.30	14.27%
1937	92.20	7.90	9.58%
1 <b>93</b> 8	86.50	-5.70	-6.31%
1939	92.50	6.60	7.79%
1940	101.70	9.10	9.97%
1941	127.20	25.10	25.00%
1942	162.30	33.50	26.69%
1943	198.90	33.70	21.19%
1944	220.10	18.70	9.70%
1945	223.40	2.00	0.95%
1946	222.90	-1.00	-0.47%
1947	245.30	22.80	10.73%
1948	270.60	26.40	11.22%
1949	268.60	-1.20	-0.46%
1 <b>95</b> 0	295.20	27.90	10.71%
1951	341.20	45.10	15.64%
1952	360.30	18.20	5.46%
1953	381.30	20.00	5.69%
1954	382.50	0.90	0.24%
1955	417.20	33.40	8.97%
1956	440.30	22.30	5.49%
1957	464.10	22.80	5.32%
1958	469.80	5.80	1.29%

### Growth in U.S. Gross National Product, 1929 to 2005

Year

	GNP	Change	Growth%
	(\$billion)	(\$billion)	
1959	509.30	53.50	11.71%
1960	529.50	20.30	3.98%
1961	548.20	18.70	3.52%
1962	589.70	41.40	7.54%
1963	622.20	32.50	5.50%
1964	668,50	46.20	7.41%
1965	724,40	56.10	8.38%
1966	792.90	69.00	9.51%
1967	838,00	45.00	5.66%
1 <b>9</b> 68	916.10	78.10	9.30%
1969	<del>9</del> 90,70	73.90	8.05%
<b>197</b> 0	1 <b>,044</b> ,90	54.60	5.51%
1971	1,134.70	90.10	8.61%
1972	1,246.80	112.90	9.94%
1973	1,395,30	149.10	11.94%
1974	1,515.50	118.50	8.48%
1975	1,651.30	131.70	8.68%
1976	1,842.10	192.60	11.68%
1977	2,051.20	211.10	11.47%
1 <b>97</b> 8	2,316.30	265.90	12.96%
1979	2,595.30	281.30	12.14%
1980	2,823.70	231.50	8.91%
1981	3,161.40	335.30	11.84%
1982	3,291,50	129.60	4.09%
1983	3,573.80	276.10	8.38%
1984	3,969.50	396.30	11.10%
1985	4,246.80	270.30	6.81%
1986	4,480.60	229.90	5.42%
1987	4,757.40	287.90	6.44%
1988	5,127,40	370.60	7.79%

# Growth in U.S. Gross National Product, 1929 to 2005

Year

	GNP	Change	Growth%
	(\$billion)	(\$billion)	
1989	5,510,60	382.60	7.46%
1990	5.837.90	322.80	5.86%
1991	6.026.30	178.70	3.06%
1992	6,367.40	331.40	5.51%
1993	6,689.30	324.40	5.11%
1994	7,098.40	404.40	6.07%
1995	7,433.40	349.80	4.95%
1996	7,851.90	410.30	5.53%
1997	8,337.30	473.80	6.05%
1 <b>9</b> 98	8,768.30	445.00	5.36%
1999	9,302.20	486.20	5.56%
2000	9,855.90	553.70	5.95%
2001	10,171.60	315.70	3.20%
2002	10,514.10	342.50	3.37%
2003	11,059.20	545.10	5.18%
2004	11,778.90	719.70	6.51%
2005	12,520.80	741.90	6.30%
Average			6.77%

Growth in U.S. Gross National Product, 1929 to 2005

Year

Sources: (1) National Income and Product Accounts (NIPA) from the U.S. Bureau of Economic Analysis and Econostats; BEA Data; NIPA Index; Section 1. Domestic Product and Income Table 1.7.5 Relation of Gross Domestic Product, Gross National Product, Ne