

# Public Utilities Commission

Ted Strickland, Governor Alan R. Schriber, Chairman RECEIVED-DOCKETING DIV

ا الحمر العالمية التي المراجع الما الحمرية المعرفينية والمراجع الم

2010 SEP 24 PM 2: 45

PUCO

**Commissioners** 

H

Valerie A. Lemmie Paul A. Centoiella Cheryl Roberto Steven D. Lesser

September 24, 2010

Docketing Division Public Utilities Commission of Ohio 180 East Broad Street Columbus OH 43215

RE: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of a New Rider and Revision of an Existing Rider, Case No. 10-176-EL-ATA

Dear Docketing Division:

Enclosed please find the Staff's Investigation and Report pursuant to the Commission's Finding and Order in Case No. 10-176-EL-ATA.

Sincerely,

Robert B. Fortney

Robert B. Fortney Chief, Rates & Tariffs, Energy & Water Division Public Utilities Commission of Ohio

Enclosure Cc: Parties of Record

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business. Fechnician Date Processed  $\frac{9-24-2-5}{2}$ 

### Staff Investigation and Report Pursuant to the F&O in Case No. 10-176-EL-ATA

### Summary:

On February 12, 2010, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (FirstEnergy or the Companies) filed an application to revise its current tariffs in order to provide rate relief to certain all-electric residential customers. On March 3, 2010, the Commission approved FirstEnergy's application as modified by the Commission. The Commission noted that the rate relief provided by the Finding and Order was not a long-term solution to the substantial public concerns regarding all-electric customers' bills. Therefore, the Commission directed Staff to investigate and file a report on the appropriate long-term rates to be charged to all-electric customers. Subsequently, on April 15, 2010, the Commission issued its Second Entry on Rehearing in which the Commission clarified that the rate relief will remain in effect through the 2010-2011 winter heating season and extended the time for the Staff investigation and report.

As directed by the Commission, Staff has prepared a range of options regarding proposed rates and discounts to be provided to all-electric residential customers. Each option is supported by a statistical analysis, which includes the bill impact upon all-electric customers at various ranges of consumption levels and the number of all-electric customers within each range.

However, Staff believes that further review and hearings are necessary regarding the recovery of any revenue shortfall as a result of the discounts to be provided to all-electric residential customers. With the recent decision by the Geauga County Court of Common Pleas to dismiss the class action lawsuit brought against FirstEnergy by all-electric customers, additional issues may also need to be examined.

### **Background:**

Various residential all-electric rates were implemented and revised over the years in the service territories of FirstEnergy, beginning in January 1974. These bundled rates were declining block structures such that the customer's rate declined with greater electricity usage.

However, on July 6, 1999, Amended Substitute Senate Bill No. 3 (S.B. 3) was enacted, effective October 5, 1999. Among other things, S.B. 3 unbundled generation rates and froze distribution rates at their current levels through the end of the five-year market development period.

Subsequently, on January 4, 2006, the Commission approved FirstEnergy's rate certainty plan, which included a provision that certain all-electric residential rate schedules for FirstEnergy would no longer be available to new customers or new premises beginning January 1, 2007. In response to an application for rehearing filed by Bob Schmitt Homes, Inc., the Commission noted that the purpose of eliminating the all-electric rate schedules was to promote energy conservation by eliminating discounts to customers who used large amounts of electricity. The Commission further noted that there is no guarantee that a rate currently in a utility's tariffs will

remain there forever and that rate schedules are always subject to review and modification. The Commission determined that the elimination of the all-electric rate schedules, with grandfathering provisions for existing customers as of January 1, 2007, instead of April 1, 2006, provided a reasonable balance of promoting conservation while not unduly affecting homebuilders and customers served by a grandfathered rate, and would allow homebuilders adequate time to sell any homes that were being built in reliance on the availability of the all-electric discount.

On January 21, 2009, the Commission issued its Opinion and Order in FirstEnergy's recent distribution rate case. In order to simplify FirstEnergy's existing rate structure consistent with the S.B. 3 mandate to unbundle rates, the Commission approved FirstEnergy's proposed consolidation of 32 different residential distribution rate schedules into a single residential distribution rate schedule for each electric utility. However, in order to mitigate the impact upon residential customers affected by the consolidation of the rate schedules, the Commission approved a residential distribution credit of approximately 1.7 cents per kWh (varies slightly by operating company) for certain residential customers, including customers taking service under all-electric residential rate schedules. These customers had received a substantial discount on their winter rates prior to the rate schedule consolidation and received a discount after the consolidation based upon the Commission's principle of gradualism.

Moreover, on March 25, 2009, the Commission approved FirstEnergy's proposed electric security plan (ESP). Among other terms, the ESP provided that, for the period between June 1, 2009, and May 31, 2011, generation rates would be determined by a competitive bid process (CBP). Further, in order to create a generation rate structure that would be consistent with the distribution rate structure approved in FirstEnergy's distribution rate case, the Commission approved the consolidation of the various residential generation rate schedules into a single residential generation credit of 1.9 cents per kWh (varies for electric water-heating-only customers) for customers who were impacted by the generation rate schedule consolidation in order to mitigate the impact of the consolidation. Again, the impacted customers included those customers taking service under the discounted all-electric residential rate schedules.

The distribution and generation credits provided to customers affected by the rate schedule consolidation in both the distribution rate case and the ESP represent total rate discounts of approximately 3.6 cents per kWh (varies slightly by operating company).

Subsequently, during the 2009-2010 winter heating season, there was substantial public concern expressed regarding all-electric residential customers' bills, notwithstanding the discounts provided to these customers. Therefore, FirstEnergy filed an application to revise its current tariffs in order to provide rate relief to certain all-electric residential customers. On March 3, 2010, the Commission approved FirstEnergy's application as modified by the Commission. The Commission found that, until such time as the Commission determines the best long-term solution to this issue, additional rate relief should be provided for all-electric residential customers. Accordingly, the Commission directed FirstEnergy to file tariffs for the all-electric residential subscribers that would provide bill impacts commensurate with FirstEnergy's December 31, 2008, charges for those customers. The Commission approved riders granting additional generation credits of 4.2 cents per kWh for CEI all-electric customers, 3.9 cents per kWh for kWhs greater than 1250 kWh for OE customers, and 1.8 cents per kWh for kWhs greater than 2000 kWh for TE (for non-apartment all-electric customers). On April 15, 2010, in its Second Entry on Rehearing, the Commission clarified that its previous orders also applied to any residential customer who is the successor account to a customer who had previously qualified. The Commission ordered that the rate relief would remain in place through the next winter heating season (i.e., May 31, 2011).

However, in the March 3, 2010 Finding and Order, the Commission acknowledged that its decision was not a long-term solution to this issue. Therefore, it directed Staff to investigate and file a report in the proceeding regarding the appropriate long-term rates that should be provided to all-electric residential customers of FirstEnergy. In this report, Staff was directed to include a range of options regarding proposed rates and discounts to be provided to all-electric residential customers. Each option was to be supported by a thorough statistical analysis, which includes the bill impact upon all-electric residential customers at various ranges of consumption levels and the number of all-electric residential customers within each range.

Given that, in the ESP, FirstEnergy procures generation through a CBP and that all wholesale generation costs should be recovered through retail rates, the Commission determined that further proceedings regarding the recovery of the revenue shortfall were necessary. In the interim, the Commission authorized FirstEnergy, pursuant to Section 4905.13, Revised Code, to modify its accounting procedures to defer the difference between the rates and charges to be charged to the all-electric residential customers as the result of the Commission's order in this proceeding and the rates and charges that would otherwise be charged to those customers. Further, the Staff report was to include a range of options for the Commission regarding the recovery of the revenue shortfall as a result of the discounts provided to all-electric residential customer classes and rate schedules FirstEnergy should recover the revenue shortfall and the bill impacts on those customers.

In its Second Entry On Rehearing, the Commission determined that the 90-day deadline for the Staff investigation to be completed was not advisable.

### Introduction:

As directed by the Commission, the report includes a range of options regarding proposed rates and discounts to be provided to all electric residential customers, which are supported by an analysis that includes the bill impact upon all-electric residential customers at various ranges of consumption levels and the number of all-electric residential customers on each schedule. This report does not include Staff recommendations regarding the options; nor does it include the rationale as to the perceived or real pros and cons of individual options (except for clarifying explanations). Also, the list of options is not (nor can it be) exhaustive. That is, not every possibility has been included.

# **Range of Options:**

The Commission desires a long-term solution. It is Staff's belief that due to rate restraints, a long-term solution may not be able to be accomplished immediately. The range of options, therefore, may include long-term solutions that need to be phased in, through time. The options are not listed in any order of Staff's preference. The statistical support is presented following the body of the report. Attachment 1 provides a synopsis of the all-electric credits currently in place. Attachment 2 provides the following range of options:

- All-electric customers receive some combination of the discounts previously approved. That is, some combination of the Residential Distribution Credit (RDC), the Residential Non-Standard Credit Provision (RNSCP) as described in each company's Economic Development Rider (EDR), Provision A and the Residential Generation Credit (RGC) remain in place (either in whole or in part)
- Higher fixed distribution charges accompanied with a lower volumetric charge (otherwise known as a Straight Fixed Variable {SFV} rate design). The distribution fixed charge could replace the customer charge and the volumetric distribution charge in total, or there could be some combination of a fixed charge higher than the current customer charge with volumetric rates lower than the current volumetric distribution rate
- Other possible options that are not included on Attachment 2 could include:
  - All- electric customers receiving some % increase over their 2008 rates (e.g., 10% or 20%) up to the current residential rates
  - An increase due to accelerated deferrals and other new distribution related riders.

# Staff Has Reviewed the Following Options for Accomplishing the Desired Results Through Rates:

- kWh credits (current methodology).
- Two-tiered higher fixed charge (i.e., second tier higher for all electric customers) accompanied with a lower volumetric charge.
- Allocation of any distribution deferrals on a basis other than a kWh basis (e.g. fixed or a % of distribution revenues).
- A separate tariff and schedule of rates for all-electric residential customers.
- Demand basis, rather than kWh (would require a demand meter).
- Load management rates for all-electric customers (would require a demand meter).

- Time-of-day, Critical Peak or Real Time Pricing (would require special metering).
- Percent off bill (or some bill portion).

# Staff Has Reviewed the Following Options for Which Customers Should Be Included as All-Electric Customers:

- Current "grandfathered" customers.
- Current "grandfathered" customers excluding those who do not heat with electricity (e.g. load management customers who do not have electric heating).
- Current "grandfathered" customers excluding electric water heating customers who "heat" with other than electricity.
- All all-electric customers, including successor accounts (and how long the "successor" provision should be applicable in the future).
- Some combination of the above.

# **Bill Analysis:**

Staff was directed to provide an analysis that includes the bill impact upon all-electric residential customers at various ranges of consumption levels and the number of all-electric residential customers on each all-electric schedule.

In Attachment 2, Staff has attempted to provide enough information regarding the resulting bill impacts of various options so that the resulting bills provide relevant comparisons rather than a perplexing array of data.

In each scenario, the bill represents what each customer would be paying under Year 1 of the approved ESP (Case No.10-388-EL-SSO) beginning June 1, 2011. For purposes of calculating the scenarios, Staff assumed that the Residential Deferred Distribution (RDD) charges will no longer apply, and that the new auction resulting from the approved ESP will result in the same cost/kWh as the current auction has provided.

The scenarios presented include the following:

- 1. The all-electric customer continues to receive the full RDC and EDR discounts and 50% of the RGC discount.
- 2. The all-electric customer continues to receive the full RDC and EDR discounts and 25% of the RGC discount.

- 3. The all-electric customer continues to receive the full RDC and EDR discounts but no RGC discount.
- 4. All residential customers pay a fixed distribution charge to replace the current service charge and the volumetric distribution charge. All-electric customers continue to receive the EDR discount.
- 5. All residential customers pay a fixed distribution charge to replace the current service charge and the volumetric distribution charge. All-electric customers receive no additional discount. All residential customers pay the same rates.
- 6. All residential customers pay a fixed distribution charge and a variable charge. All-electric customers receive no additional discount. All residential customers pay the same rates. All residential customers pay the same rates.

RDC = Residential Distribution Credit

EDR = Residential Non Standard Credit Provision in the EDR Rider

RGC = Residential Generation Credit

•

Attachment 1

	-	T				<b>T</b>
			Residential Distribution	Non-Standard Generation	Residential Generation	(
			Credit (RDC)	Credit Provision - Res, EDR(a)	Credit (RGC)	Total
EI	Sheet No.	Description	Cents/kWh > 500 kWh	Cents/kWh > 500 kWh	Cents/ail kWh	Customers
	10	Optional Load Management	1.70	1.90	4.20	2,30
	11	Add-On Heat Pump	1.70	1.90	4.20	3,70
	12	Water Heating	1.70	0.50	0.00	22,50
	13	Space Heating	1.70	1.90	4.20	3,50
	14	Water & Space Heating	1.70	1.90	4.20	27,90
	15	Optional Elecrically Heated Apt	1.70	1.90	4.20	2,70
DE	Sheet No.	Description	Cents/kWh > 500 kWh	Cents/kWh > 500 kWh	Cents/kWh > 1250kWh	Customers*
-	11	Space Heating	1.77	1.90	3.90	73,70
	12	Optional Time-of-Day	1.77	1.90	3.90	30
	14	Optional Controlled Heating	1.77	1.90	3.90	22,60
	17	Load Management	1.77	1.90	3.90	144,20
	18	Water Heating	1.77	0.00	0.00	1,00
	19	Optional Electrically Heated Apt	1.77	1.90	3.90	2,80
					Cents/kWh =< 2000 kWh,	
Έ	SheetNo.	Description	Cents/kWh > 500 kWh	Cents/kWh > 500 kWh	Cents/kWh > 2000 kWh	Customers
	11	Add-On Heat Pump R-02	1.76	1.90	0.00, 1.80	10
	13	Space & Water Heating R-06	1.76	1.90	0.00, 1.80	30
	14	Space & Water Heating R-06a	1.76	1.90	0.00, 1.80	<5
	15	Water Heating R-04	1.76	0.50	0.00, 0.00	18,70
	16	Water Heating R-04a	1.76	0.50	0.00, 0.00	70
	17	Space Heating R-07	1.76	1.90	0.00, 1.80	30,30
	18	Space Heating R-07a	1.76	1.90	0.00, 1.80	1,70
	19	Apartment R-09	1.76	1.90	3.10, 0.00	1,50
	20	Apartment R-09a	1.76	1.90	3.10, 0.00	10

. . . . . . . . . .

\_\_\_\_

\_\_\_\_\_

	All-Electric Options													
		Bill Comparison -	CEI	: What an al	<b> -el</b> e	ectric custor	ner	would pay u	ınde	er each scena	ario			
				Winter mo	onth	s (beginning	; Se	pt, 2011)						
	Current	Standard												
	All-Electric	Residential (RS)												
kWh	Bill	Bill		1		2		3		4		5		6
250	\$ 22.84	\$ 32.50	\$	27.25	\$	29.88	\$	32.50	\$	47.25	\$	47.25	\$	38.54
500	\$ 42.67	\$ 61.00	\$	50.50	\$	55.75	\$	61.00	\$	68.38	\$	68.38	\$	64.01
750	\$ 54.33	\$ 89.48	\$	64.73	\$	72.61	\$	80.48	\$	84.73	\$	89.48	\$	89.46
1000	\$ 66.00	\$ 117.99	\$	78.99	\$	89.49	\$	99.99	\$	101.11	\$	110. <b>61</b>	\$	114.95
1500	\$ 89.32	\$ 175.02	\$	107.52	\$	123.27	\$	139.02	\$	133.89	\$	152.89	\$	165.92
2000	\$ 112.62	\$ 231.98	\$	135.98	\$	156.98	\$	177.98	\$	166.59	\$	195.09	\$	216.83
2500	\$ 135.72	\$ 288.76	\$	164.26	\$	190.51	\$	216.76	\$	199.12	\$	237.12	\$	267.55
3000	\$ 158.80	\$ 345.49	\$	192.49	\$	223.99	\$	255.49	\$	231.59	\$	279.09	\$	318.23
3500	\$ 181.91	\$ 402.27	\$	220.77	\$	257.52	\$	294.27	\$	264.12	\$	321.12	\$	368.95
4000	\$ 204.97	\$ 459.04	\$	249.04	\$	291.04	\$	333.04	\$	296.63	\$	363.13	\$	419.67
4500	\$ 228.09	\$ 515.82	\$	277.32	\$	324.57	\$	371.82	\$	329.16	\$	405.16	\$	470.39
5000	\$ 251.18	\$ 572.58	\$	305.58	\$	358.08	\$	410.58	\$	361.66	\$	447.16	\$	521.10
6000	\$ 297.36	\$ 686.10	\$	362.10	\$	425.10	\$	488.10	\$	426.67	\$	531.17	\$	622.51
7000	\$ 343.54	\$ 799.66	\$	418.66	\$	492.16	\$	565.66	\$	491.72	\$	615.22	\$	723.96
8000	\$ 389.71	\$ 913.16	\$	475.16	\$	559.16	\$	643.16	\$	556.71	\$	699.21	\$	825.35
9000	\$ 435.88	\$ 1,026.70	\$	531.70	\$	626.20	\$	720.70	\$	621.74	\$	783.24	\$	926.78
10000	\$ 482.07	\$ 1,140.23	\$	588.23	\$	693.23	\$	798.23	\$	686.76	\$	867.26	\$	1,028.20

Scenario

1 The all-electric customer continues to receive the full RDC & EDR discounts and 50% of the RGC discount.

2 The all-electric customer continues to receive the full RDC & EDR discounts and 25% of the RGC discount.

3 The all-electric customer continues to receive the full RDC and EDR discounts but no RGC discount.

- 4 All residential customers pay a fixed distribution charge of \$26.13 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; plus, all-electric customers continue to receive the EDR discount. The SF charge of \$26.13 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes.
- 5 All residential customers pay a fixed distribution charge of \$26.13 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; All-electric customers receive no additional discount. The SF charge of \$26.13 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.
- 6 All residential customers pay a fixed distribution charge of \$13.065 and a variable charge of \$.0174/kWh. This represents Staff's estimate of a SFV (Straight Fixed Variable) charge that is revenue neutral for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.

	All-Electric Options															
			Bili	Comparisons	- OE	: What an a	ll-el	ectric custo	me	r would pay	und	er each scer	ario	)		
						Winter mo	onth	s (beginning	g Se	pt, 2011)						
	Current			Standard												
	A	ll-Electric	Residential (RS)													
kWh		Bill	Bill			1		2		3		4	5			6
250	\$	32.02	\$	32.69	\$	32 <b>.69</b>	\$	32.69	\$	32.69	\$	48.64	\$	48.64	\$	39.32
500	\$	61.07	\$	61.40	\$	61.40	\$	61.40	\$	61.40	\$	69.37	\$	69.37	\$	64.71
750	\$	82.82	\$	90.09	\$	80.91	\$	80.91	\$	80.91	\$	85.34	\$	90.09	\$	90.07
1000	\$	104.58	\$	118.80	\$	100.45	\$	100.45	\$	100.45	\$	101.32	\$	110.82	\$	115.46
1500	\$	138.35	\$	176.22	\$	134.64	\$	137.08	\$	139.52	\$	133.29	\$	152.29	\$	166.23
2000	\$	162.35	\$	233.62	\$	163.95	\$	171.26	\$	178.57	\$	165.24	\$	193.74	\$	216.98
2500	\$	186.16	\$	290.81	\$	193.04	\$	205.22	\$	217.41	\$	196.99	\$	234.99	\$	267.52
3000	\$	209.95	\$	347.97	\$	222.10	\$	239.16	\$	256.22	\$	228.70	\$	276.20	\$	318.03
3500	\$	233.73	\$	405.14	\$	251.17	\$	273.10	\$	295.04	\$	260.42	\$	317.42	\$	368.56
4000	\$	257.50	\$	462.31	\$	280.24	\$	307.05	\$	333. <b>86</b>	\$	292.14	\$	358.64	\$	419.08
4500	\$	281.29	\$	519.49	\$	309.32	\$	341.00	\$	372.69	\$	323.87	\$	399.87	\$	469.61
5000	\$	305.09	\$	576.67	\$	338.40	\$	374.96	\$	411.52	\$	355.60	\$	441.10	\$	520.14
6000	\$	352.64	\$	691.00	\$	396.53	\$	442.84	\$	489.15	\$	410.03	\$	523.53	\$	621.17
7000	\$	400.22	\$	805.37	\$	454.70	\$	510.76	\$	565.82	\$	482.50	\$	606.00	\$	722.24
8000	\$	447.80	\$	919.70	\$	512.83	\$	578.64	\$	644.45	\$	545.94	\$	688.44	\$	823.27
9000	\$	495.37	\$	1,034.07	\$	571.00	\$	646.5 <del>6</del>	\$	722.12	\$	609.41	\$	770.91	\$	924.35
10000	\$	542.94	\$	1,148.41	\$	629.14	\$	714.45	\$	799.76	\$	672.85	\$	853.35	\$	1,025.39

#### Scenario

- 1 The all-electric customer continues to receive the full RDC & EDR discounts and 50% of the RGC discount.
- 2 The all-electric customer continues to receive the full RDC & EDR discounts and 25% of the RGC discount.
- 3 The all-electric customer continues to receive the full RDC and EDR discounts but no RGC discount.
- 4 All residential customers pay a fixed distribution charge of \$27.92 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; plus, all-electric customers continue to receive the EDR discount. The SF
- charge of \$27.92 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes.
- 5 All residential customers pay a fixed distribution charge of \$27.92 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; All-electric customers receive no additional discount. The SF charge of \$27.92 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.
- 6 All residential customers pay a fixed distribution charge of \$13.96 and a variable charge of \$.0186/kWh. This represents Staff's estimate of a SFV (Straight Fixed Variable) charge that is revenue neutral for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.

	All-Electric Options														
			Bill	Comparisons	- TE	: What an a	ll-el	ectric custo	me	r would pay	und	ler each scen	ario		
						Winter me	onth	s (beginninį	g Se	ept, 2011)					
		Current		Standard											
	All-Electric		Residential (RS)												
kWh	Bill		Bill			1		2		3		4	5		6
250	\$	33.15	\$	33.60	\$	33.60	\$	33.60	\$	33.60	\$	51.40	\$	51.40	\$ 41.18
500	\$	62.34	\$	63.22	\$	63.22	\$	63.22	\$	63.33	\$	72.12	\$	72.12	\$ 67.02
750	\$	82.32	\$	92.79	\$	83.64	\$	83.64	\$	83.64	\$	88.04	\$	<b>92</b> .79	\$ 92.82
1000	\$	102.34	\$	122.40	\$	104.10	\$	104.10	\$	104.10	\$	10 <b>4.01</b>	\$	113.51	\$ 118.66
1500	\$	142.38	\$	181.63	\$	145.03	\$	145.03	\$	145.03	\$	135.94	\$	154.94	\$ 170.34
2000	\$	182.38	\$	240.81	\$	185.91	\$	185.91	\$	185.91	\$	167.82	\$	196.32	\$ 221.97
2500	\$	213.69	\$	299.80	\$	222.10	\$	224.35	\$	226.60	\$	199.51	\$	237.51	\$ 273.41
3000	\$	243.98	\$	358.77	\$	258.27	\$	262.77	\$	267.27	\$	231.19	\$	278.69	\$ 324.84
<b>350</b> 0	\$	274.77	\$	417.74	\$	294.44	\$	301.19	\$	307.94	\$	262.86	\$	319.86	\$ 376.26
4000	\$	305.55	\$	476.71	\$	330.61	\$	339.61	\$	348.61	\$	294.53	\$	361.03	\$ 427.68
4500	\$	336.35	\$	535.69	\$	366.79	\$	378.04	\$	389.29	\$	326.21	\$	402.21	\$ 479.11
5000	\$	367.15	\$	594.68	\$	402.98	\$	416.48	\$	429.98	\$	357.91	\$	443.41	\$ 530.56
6000	\$	428.73	\$	712.64	\$	475.34	\$	493.34	\$	511.34	\$	421.27	\$	525.77	\$ 633.42
7000	\$	490.31	\$	830.59	\$	547.69	\$	570.19	\$	592.69	\$	484.63	\$	608.13	\$ 736.28
8000	\$	551.91	\$	948.55	\$	620.05	\$	647.05	\$	674.05	\$	547.99	\$	690.49	\$ 839.14
9000	\$	613.49	\$	1,066.50	\$	692.40	\$	723.90	\$	755.40	\$	611.35	\$	772.85	\$ 942.00
10000	\$	675.08	\$	1,184.45	\$	764.75	\$	800.75	\$	836.75	\$	674.70	\$	855.20	\$ 1,044.85

#### Scenario

- 1 The all-electric customer continues to receive the full RDC & EDR discounts and 50% of the RGC discount.
- 2 The all-electric customer continues to receive the full RDC & EDR discounts and 25% of the RGC discount.
- 3 The all-electric customer continues to receive the full RDC and EDR discounts but no RGC discount.
- 4 All residential customers pay a fixed distribution charge of \$30.70 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; plus, all-electric customers continue to receive the EDR discount. The SF charge of \$30.70 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes.
- 5 All residential customers pay a fixed distribution charge of \$30.70 (Straight Fixed) to replace the sum of the current service charge plus the volumetric distribution charge; All-electric customers receive no additional discount. The SF charge of \$30.70 reflects Staff's estimate of a revenue neutral charge for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.
- 6 All residential customers pay a fixed distribution charge of \$15.348 and a variable charge of \$.0205/kWh. This represents Staff's estimate of a SFV (Sraight Fixed Variable) charge that is revenue neutral for a customer using 750 kWh. It is not precise in terms of total revenue neutrality. The resulting bills are meant solely for discussion purposes. All residential customers pay the same rates.