

FILE

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BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio for Approval of a Market)
Rate Offer to Conduct a Competitive)
Bidding Process for Standard Service Offer)
Electric Generation Supply, Accounting)
Modifications, and Tariffs for Generation)
Service.)

Case No. 10-2586-EL-SSO

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DIRECT TESTIMONY OF

LOUIS D'ALESSANDRIS

ON BEHALF OF

FIRSTENERGY SOLUTIONS CORP.

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.**

3 A. My name is Louis D'Alessandris. My business address is 341 White Pond Drive,
4 Akron, Ohio 44320. I am employed by FirstEnergy Solutions Corp. ("Solutions") as
5 the Manager of Market Intelligence.

6 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**
7 **PROFESSIONAL QUALIFICATIONS.**

8 A. I have a Bachelors degree in Business Administration from Washington and Jefferson
9 College and a Masters in Business Administration from the University of Cincinnati.
10 I joined Solutions in April 2006. I have been in my current position as Manager of
11 Market Intelligence since January 2010. Prior to that, I was a Senior Analyst in the
12 Market Intelligence Department. From July 1994 to September 1995, I was a
13 contract employee performing load research and evaluation on demand side
14 management lighting programs for Cincinnati Gas & Electric Company ("CG&E").
15 From September 1995 to September 1997, I was a Demand Side Management
16 Analyst for the Ohio Edison Company. From 1997 to 2006, I worked in the
17 marketing department at a chemical company in the Akron area.

18 **Q. WHAT ARE YOUR RESPONSIBILITIES AS MANAGER OF MARKET**
19 **INTELLIGENCE?**

20 A. I am responsible for tracking and interpreting utility tariffs and regulatory filings in
21 the six states where Solutions does business. My group analyzes various regulatory
22 filings and models impacts on the retail business environment. In addition to these
23 matters, my group interacts with regulatory agencies and staff on various regulatory
24 matters. My group is a resource to the sales department in answering day-to-day

1 questions of a regulatory and tariff nature, to management in strategic planning, and
2 to end-use customers in explaining complex regulatory concepts in easy-to-
3 understand language.

4 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

5 A. The purpose of my testimony is to discuss the following aspects of Duke Energy
6 Ohio's ("Duke's") Market Rate Offer ("MRO") plan: (1) proposed Rider RECON
7 and the proposed non-bypassability of generation-related costs; (2) volatility of
8 current rider PTC-FPP, and how this volatility could impact customer prices starting
9 January 1, 2012; and (3) how the partial payment priority employed by Duke harms
10 competition.

11 **II. MODIFICATIONS TO DUKE'S PROPOSED RIDER RECON**

12 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED FUEL AND**
13 **RESERVE CAPACITY RECONCILIATION RIDER ("RIDER RECON")?**

14 A. Rider GEN in the proposed MRO will reflect, as of December 2011, the sum of base
15 generation, and the types of costs currently recovered under Rider PTC-FPP, Rider
16 PTC-AAC, Rider SRA-CD, and Rider SRA-SRT.¹ In the proposed MRO, these
17 "generation-related rates and riders" will be eliminated or zeroed out.² Rider RECON
18 is specifically intended to recover the costs necessary to true up the Fuel and
19 Economy Purchased Power Rider (Rider PTC-FPP) and the System Reliability
20 Tracker (Rider SRA-SRT) to the December 31, 2011 revenue requirements. Duke
21 witness Ziolkowski stated that these two riders in particular are highly unlikely to

¹ Direct Testimony of James E. Ziolkowski on Behalf of Duke Energy Ohio, Inc., page 6, lines 7-10.

² *Id.*, page 10, lines 21-23.

1 have a \$0 balance at the end of the period.³ Duke has proposed that Rider RECON be
2 non-bypassable.⁴ However, it is inappropriate for this charge to be non-bypassable.

3 **Q. DOES MR. ZIOLKOWSKI OR ANY OTHER DUKE WITNESS PROVIDE**
4 **ANY RATIONALE FOR MAKING RIDER RECON NON-BYPASSABLE?**

5 A. No.

6 **Q. WHY SHOULD RIDER RECON BE BYPASSABLE INSTEAD OF NON-**
7 **BYPASSABLE AS DUKE HAS PROPOSED?**

8 A. There are at least four reasons. First, the two riders being reconciled through Rider
9 RECON, Riders PTC-FPP and SRA-SRT, are both generation-related riders. Duke's
10 generation-related costs should not be borne by customers not taking generation
11 service from Duke. Second, both of the components making up Rider RECON are
12 either bypassable now or can be bypassable for customers with a waiver. Rider FPP
13 is currently bypassable. Rider SRA-SRT is bypassable for customers who elect not to
14 receive the service in which Duke is standing ready to serve those customers at the
15 SSO price if they were to choose to return.⁵ Given the relative bypassable nature of
16 the riders from which Rider RECON is derived, Rider RECON should also be
17 bypassable. Third, the rates charged in Rider PTC-FPP are several orders of

³ *Id.*, page 10, line 23 – page 11 line 2.

⁴ *Id.*, page 11, line 4.

⁵ As characterized by the Commission on page 27 of the December 17, 2008 Opinion and Order in Case No. 08-920-EL-SSO. These customers are either residential customers receiving generation service through a governmental aggregator and the aggregator notifies the company properly, or non-residential customers who have signed a contract with either Duke or a supplier or who have signed a release indicating that the customer will remain off Duke's service through the end of the current ESP. In either scenario, in which the SRA-SRT is avoided, customers who return to Duke's service early pay a premium.

1 magnitude larger than those in Rider SRA-SRT.⁶ It is therefore reasonable to assume
2 that any net over- or under-recovery of these two riders will be largely due to Rider
3 PTC-FPP, which is bypassable. Finally, as demonstrated in Exhibit LMD-1, the
4 reconciliation component of Rider PTC-FPP has averaged around 3 mills for the non-
5 residential customer class since the first quarter of 2009. If the reconciliation factor
6 continues this trend, shopping customers will be required to pay for the over-
7 collection of a bypassable item simply because it is more convenient for Duke to treat
8 Rider RECON as non-bypassable.

9 **Q. WHAT DO YOU RECOMMEND REGARDING RIDER RECON?**

10 A. Rider RECON should be bypassable for the reasons listed in the previous answer.

11 **III. MODIFICATIONS TO DUKE'S PROPOSED RIDER GEN**

12 **Q. WHAT ARE THE COMPONENTS OF RIDER GEN?**

13 A. As explained by Mr. Ziolkowski and described in my testimony above, Rider GEN in
14 the proposed MRO will reflect the sum of base generation, and the types of costs
15 currently recovered through Rider PTC-FPP, Rider PTC-AAC, Rider SRA-CD, and
16 Rider SRA-SRT all as of December 2011. The rates for each year of the MRO are a
17 percentage of this sum to achieve the desired level of blending of the most recent
18 SSO with the market bid price.⁷ Given that Rider GEN is proposed to be 90% of the
19 generation price from January 1, 2012 through May 31, 2013 and 80% of the

⁶ As of December 7, 2010, Duke's residential rate for Rider PTC-FPP is 4.2048 cents per kWh, compared to a rate of 0.0929 cents per kWh for Rider SRA-SRT.

⁷ Direct Testimony of James E. Ziolkowski on Behalf of Duke Energy Ohio, Inc., page 6, lines 2-19.

1 generation price from June 1, 2013 through May 31, 2014,⁸ the rates that are in effect
2 in December of 2011 will have a dramatic impact on the rates paid by Duke's
3 customers for years to come.

4 **Q. DO YOU HAVE SPECIFIC CONCERNS ABOUT HOW RIDER GEN WILL**
5 **BE DERIVED?**

6 A. A specific concern is the inclusion of the December 2011 Rider PTC-FPP rate in this
7 methodology. Duke witness Rose states that Rider PTC-FPP charges are the largest
8 portion of the price to compare ("PTC"), making up 44% of the total.⁹ Clearly, this
9 rider will be a major driver of the total Rider GEN rate, and therefore the resulting
10 generation price paid by non-shopping customers.
11 Rider PTC-FPP is extremely volatile, moving as much as 1.656 ¢ per kWh in a single
12 quarter. With this type of volatility, there is no way to guarantee that the rate will not
13 be unusually high or low in December of 2011.¹⁰ An unusually low PTC-FPP rate
14 will lead to a depressed PTC, which decreases the ability of suppliers to offer savings
15 to customers who would otherwise shop. An unusually high PTC-FPP rate will lead
16 to an elevated PTC, which will lead to more shopping opportunities, but will
17 simultaneously result in higher rates for non-shopping customers.

⁸ Direct Testimony of William Don Wathen, Jr. on Behalf of Duke Energy Ohio, Inc.,
page 11, line 2.

⁹ Direct Testimony of Judah L. Rose on Behalf of Duke Energy Ohio, Inc., page 12, line
2.

¹⁰ Although Mr. Judah Rose states on page 13 of his testimony that the estimated PTC-
FPP for 2012-2014 will be 2.97 cents per kWh, there is no support for this value. Exhibit
LMD-1 shows that the average PTC-FPP rate over the last 9 quarters is 3.46 cents per
kWh for Residential customers, 3.74 cents per kWh for Non-Residential customers, and
3.71 cents per kWh for Voltage Reduction customers.

1 **Q. WHAT IS YOUR PROPOSAL REGARDING RIDER GEN?**

2 A. Given the volatility of Rider PTC-FPP and the inability to forecast accurately whether
3 December 2011 rates will reflect unusually high or low rates, it is more appropriate to
4 take the conservative approach and utilize a simple average of the prior 8 quarters to
5 set the FPP component of Rider GEN.

6 **IV. MODIFICATIONS TO DUKE'S PROPOSED PARTIAL**
7 **PAYMENT PRIORITY**
8

9 **Q. WHAT IS THE PARTIAL PAYMENT PRIORITY, AS REQUIRED BY THE**
10 **OHIO ADMINISTRATIVE CODE ("O.A.C.")?**

11 A. Rule 4901:1-21-18(H)(1)(a-d), O.A.C., states that a customer's partial payment shall
12 be credited in the following manner:

13 (a) Billed and past due CRES provider charges, or, if applicable, CRES
14 provider payment arrangement or past due CRES provider budget billing.

15 (b) Billed and past due electric utility distribution, standard offer
16 generation, and transmission charges, or, if applicable, electric utility
17 payment arrangement or past due electric utility budget billing.

18 (c) Billed and due current electric utility distribution and transmission
19 charges or current electric utility budget billing

20 (d) Billed and due current CRES provider charges or current CRES
21 provider budget billing.

22 (e) Other past due and current nonregulated charges, excluding CRES
23 charges.

1 To summarize, the O.A.C. specifies that in the event of a partial payment, the
2 payment priority is (1) supplier arrears, (2) utility arrears, (3) current due for utility,
3 and (4) current due for supplier.

4 **Q. WHAT IS DUKE'S HISTORY WITH PARTIAL PAYMENT PRIORITY?**

5 A. Duke's partial payment priority process was established in Case No. 02-0564-EL-
6 ORD. On June 3, 2003, Cincinnati Gas & Electric Company ("CG&E") requested a
7 waiver from compliance with this rule (at the time numbered O.A.C § 4901:1-10-
8 33(H)(1)). The company gave two reasons for this request:

- 9 1) Because CG&E is a combined gas and electric company, and because the gas
10 partial payment priority is different, the entire billing system would need to be
11 reprogrammed. The exorbitant cost associated with CG&E's compliance with
12 this rule far outweighs any benefit received by customers affected by this rule.
13 2) The purchase of CRES receivables ensures that CRES providers receive
14 payment in a timely manner.

15 On July 1, 2003, the Commission granted this waiver, stating, "One of the
16 Commission's reasons for promulgating the adopted payment priority was to improve
17 the likelihood of CRES providers receiving payment from their customers. Given
18 that CG&E has agreed to purchase the receivables of CRES providers operating in the
19 EDU's service territory, we find CG&E's request for a waiver of the partial payment
20 priority, as adopted at ESSS Rule 33(H)(1), to be reasonable." As a result of this
21 waiver, Duke's current partial payment priority is: (1) utility arrears, (2) current due
22 for utility, (3) supplier arrears, and (4) current due for supplier.
23

1 **Q. DOES DUKE PURCHASE SOLUTIONS' RECEIVABLES?**

2 A. No. Per the terms of Duke's Certified Supplier Tariff, a supplier must sign an
3 Account Receivables Purchase Agreement ("Agreement") with Duke in order to
4 participate in the Purchase of Accounts Receivable ("PAR") Program. Although
5 Solutions has been in discussions with Duke since January of 2010 on this matter, no
6 Agreement has been signed at this time because:

- 7 1) Prior to the effective date of the Agreement, all customers on consolidated
8 billing with arrears of 30 days or more totaling \$50 or more must revert to
9 dual billing, or Duke will return the customer to the utility's Standard Offer
10 Rate; and
11 2) A discount rate of 1.87% is currently applied to the receivables from all rate
12 schedules rather than applying a separate discount rate for receivables from
13 each schedule, resulting in a discount that is simply not competitive for larger
14 customers.

15 **Q. WHY IS THE PAR PROGRAM NOT A VIABLE OPTION FOR**
16 **SOLUTIONS?**

17 A. By opting out of the PAR program, Solutions does not run the risk of having
18 customers with arrears of 30 days or more totaling \$50 or more returned to the
19 Standard Offer Rate, and is not subjected to an uncompetitive discount rate for larger
20 customers. As Solutions described in the July 19, 2010 Comments in Case No. 09-
21 1026-EL-ATA ("PAR Case"), one of the main barriers to Solutions' participation has
22 been the high discount rate for commercial and industrial ("C&I") customers.
23 Solutions is currently dual billing C&I customers in Duke's territory. It has been

1 Solutions' experience that the accounts receivable past due are a very small
2 percentage of the total open accounts receivable from these types of customers. It is
3 therefore reasonable to assume that the high discount rate currently charged by Duke
4 (1.87%) and the even higher rate proposed in the PAR Case (2.02%)¹¹ is mainly due
5 to the residential customer class.

6 Solutions has been monitoring cases relating to purchase of receivables in the
7 territories in which it is a competitive supplier. For those utilities that do offer a PAR
8 program, Duke is in the minority in that it does not offer a separate discount rate for
9 each customer class.¹² For example, in Duquesne Light's POLR V Settlement, the
10 existing program was modified to include medium C&I customers' receivables at a
11 discount percent of 0.28% (compared to 0.52% for residential and small C&I).¹³
12 Similarly, four Maryland utilities recently have received approval for class-
13 differentiated discount rates.¹⁴

14 While the PAR Case could potentially resolve these issues, this proceeding has not
15 progressed. In the June 10, 2010 Entry by the Attorney Examiner, Duke was given
16 until August 9, 2010 to report back to the Commission as to whether the issues raised
17 by the interested parties in the case have been resolved. Duke has filed four 30-day

¹¹ Case No. 09-1026-EL-ATA, Application of Duke Energy Ohio, Inc. to Amend P.U.C.O. Electric No. 20 Tariff to Increase the Discount Rate for Accounts Receivable Purchased from Competitive Retail Electric Service Providers, filed October 30, 2009.

¹² Fifteen utilities have either implemented or received approval for POR programs. Thirteen of the fifteen either offer separate discount rates by class or offer a 0% discount. See Ex. LMD-2 for details.

¹³ *Petition of Duquesne Light Company for Approval of Default Service Plan for the Period January 1, 2011 Through May 31, 2013*, Pennsylvania PUC Case No. P-2009-2135500, Attachment to Opinion and Order at p. 8 (June 21, 2010).

¹⁴ Maryland Public Service Commission, Administrative Docket Rulemaking No. 17, June 10, 2010 Letter Order and ML#119760, ML#124006, ML#124010, ML#123997.

1 extensions (August 9, September 9, October 15, and November 17, 2010). Until there
2 is a resolution in this case, the PAR program is not a viable option for Solutions.

3 **Q. HOW DOES THE CURRENT PAYMENT HIERARCHY HARM**
4 **COMPETITION IN DUKE'S TERRITORY?**

5 A. By implementing a payment hierarchy that differs from the other utilities in the state
6 and that does not ensure that suppliers are paid promptly, Duke is diminishing retail
7 competition in its service territory. Duke's payment hierarchy essentially forces
8 suppliers to choose between waiting an excessive amount of time before receiving
9 payment, or joining a PAR program which may actually be more expensive than the
10 uncollectible expense that would otherwise occur. Either option is unfavorable and is
11 a deterrent to more effective competition in the Duke territory.

12 **Q. WHAT DO YOU RECOMMEND REGARDING DUKE'S PAYMENT**
13 **HIERARCHY?**

14 A. Given that the waiver for Rule 4901:1-21-18(H)(1)(a-d) was granted under the
15 assumption that Duke was providing a PAR service to suppliers, either: 1) the waiver
16 should be revoked and Duke should have to implement the same payment hierarchy
17 as the other Ohio utilities; or 2) Duke should be required to implement a PAR
18 program which does not result in excessive cost to suppliers. Either way, the PAR
19 Case should no longer be delayed.

20 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

21 A. Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to the following by e-mail
this 21st day of December, 2010.

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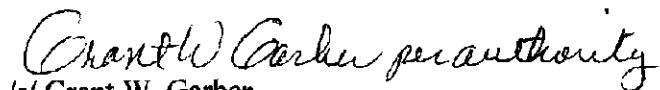
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Line No.		2008				2010				2011			
		1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	1st Qtr.	AVERAGE	(J)	
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)			
1	Residential												
2	Fuel Component (FC)	2.4689	2.4188	3.0195	3.3453	3.2502	3.3908	3.4189	4.0361	2.8460	3.1327	3.1327	
3	Emission Allowances (EA)	0.1281	0.0882	0.1802	0.0746	0.0459	0.0550	0.0648	0.0705	0.0228	0.0811	0.0811	
4	Environmental Reagents (ER)					0.1605	0.1669	0.1728	0.1579	0.1412	0.1599	0.1599	
5	AEPS				0.0632	0.0209	0.0274	0.0264	0.0420	0.0358	0.0360	0.0360	
6	Reconciliation Adjustment (RA)	0.0000	-0.5979	0.0658	0.2847	0.3987	0.2720	0.0451	-0.2919	-0.1057	0.0080	0.0080	
7	System Loss Adjustment (SLA)	0.0710	0.0672	0.1129	0.1377	0.1304	0.1412	0.1434	0.1902	0.0998	0.1215	0.1215	
8	Total	2.6680	1.9763	3.3785	3.9055	4.0076	4.0533	3.8714	4.2048	3.0399	3.4561	3.4561	
9	Non-Residential												
10	Fuel Component (FC)	2.4689	2.4188	3.0195	3.3453	3.2502	3.3908	3.4189	4.0361	2.8460	3.1327	3.1327	
11	Emission Allowances (EA)	0.1281	0.0882	0.1802	0.0746	0.0459	0.0550	0.0648	0.0705	0.0228	0.0811	0.0811	
12	Environmental Reagents (ER)					0.1605	0.1669	0.1728	0.1579	0.1412	0.1599	0.1599	
13	AEPS				0.0632	0.0209	0.0274	0.0264	0.0420	0.0358	0.0360	0.0360	
14	Reconciliation Adjustment (RA)	0.0000	-0.6573	0.0583	0.3619	0.6612	0.4580	0.4537	0.8069	0.5017	0.2938	0.2938	
15	System Loss Adjustment (SLA)	0.0710	0.0672	0.1129	0.1377	0.1304	0.1412	0.1434	0.1902	0.0998	0.1215	0.1215	
16	Total	2.6680	1.9169	3.3709	3.9827	4.2691	4.2393	4.2800	5.3036	3.8473	3.7420	3.7420	
17	Voltage Reduction												
18	Fuel Component (FC)	2.4689	2.4188	3.0195	3.3453	3.2502	3.3908	3.4189	4.0361	2.8460	3.1327	3.1327	
19	Emission Allowances (EA)	0.1281	0.0882	0.1802	0.0746	0.0459	0.0550	0.0648	0.0705	0.0228	0.0811	0.0811	
20	Environmental Reagents (ER)					0.1605	0.1669	0.1728	0.1579	0.1412	0.1599	0.1599	
21	AEPS				0.0632	0.0209	0.0274	0.0264	0.0420	0.0358	0.0360	0.0360	
22	Reconciliation Adjustment (RA)	0.0000	-0.4247	0.0545	0.3619	0.6612	0.4580	0.4537	0.8069	0.5017	0.3192	0.3192	
23	System Loss Adjustment (SLA)	0.0364	0.0344	0.0578	0.0705	0.0667	0.0723	0.0734	0.0974	0.0511	0.0522	0.0522	
	Total	2.6334	2.1167	3.3120	3.9155	4.2054	4.1704	4.2100	5.2108	3.5986	3.7081	3.7081	

STATE	EDC	ONE RATE FOR ALL CLASSES	SEPARATE DISCOUNTS FOR RESIDENTIAL AND C&I	0% DISCOUNT
OHIO	Duke Energy Ohio	X		
	Duquesne Light		X	
PENNSYLVANIA	PPL		X	
	MetEd			X
	Penelec			X
	Penn Power			X
	PECO Energy ¹			X
	Allegheny (West Penn)			X
MARYLAND	Baltimore Gas & Electric		X	
	Allegheny (PotEd)		X	
	Delmarva		X	
	Pepco		X	
ILLINOIS	Ameren Illinois	X		
	ComEd		X	
NEW JERSEY	PSE&G			X

¹ PECO has a temporary 0.2% discount in place to collect implementation costs, but the program will return to a 0% discount once these costs are recovered