

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review)
of Chapter 4901:1-19 of the Ohio) Case No. 17-1945-GA-ORD
Administrative Code.)

**APPLICATION FOR REHEARING
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

In the periodic review of the PUCO's rules changes are often made to existing rules for a variety of reasons. In this situation, the PUCO modified its rules involving natural gas competitive auctions. These rules have demonstrated for a number of years that the competitive auctions have helped to protect consumers and keep their natural gas commodity charges low.

The Office of the Ohio Consumers' Counsel ("OCC") files this application for rehearing of the Order entered by the Public Utilities' Commission of Ohio ("PUCO") that changed certain provisions of Ohio Adm. Code Chapter 4901:1-19 in a manner that could harm consumers. OCC takes issue with paragraphs 20 and 26 of the Order where the PUCO either deleted the term "competitive retail auction" in Ohio Adm. Code 4901:1-19-01(G), or changed references to the term in Ohio Adm. Code 4901:1-19-01(K), 4901:1-19-05(D)(1), 4901:1-19-09(A), and 4901:1-19-03(C)(2) to a "competitive procurement process."¹ This change was made without evidentiary support, in violation of R.C. 4903.09.

This portion of the Order is unreasonable and unlawful for two reasons. First, the revised rule that substitutes "procurement" for "auction" is bad public policy because it uses

¹ *In the Matter of the Commission's Review of Chapter 4901:1-19 of the Ohio Administrative Code*, Case No. 17-1945-GA-ORD, Finding and Order (December 12, 2018) at 8-10.

an ambiguous term that may result in a procurement process that relies on procedures other than competitive retail auctions which historically have resulted in natural gas being supplied at lower costs for Ohio consumers. Second, the language change to “competitive procurement process” violates R.C. 4903.09 because this language is beyond what any party to the proceeding recommended and the PUCO does not explain why it chose the language.

The Order is unlawful and unreasonable in the following respect:

1. The Order is unlawful and unreasonable under R.C. 4903.09 because there is no evidentiary basis for broadening the scope of competitive procurement options beyond competitive retail auctions for choice-eligible customers as competitive retail auctions have resulted in natural gas being supplied at lower costs for Ohio consumers.

The grounds for this Application for Rehearing are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

Bruce Weston (0016973)
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/s/ Terry L. Etter
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THE PUBLIC UTILITIES COMMISSION OF OHIO**

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of Chapter 4901:1-19 of the Ohio) Case No. 17-1945-GA-ORD
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MEMORANDUM IN SUPPORT

I. INTRODUCTION

The PUCO’s Order deletes the definition of “competitive retail auction” found in Ohio Adm. Code 4901:1-19-01(G) and changes the “competitive retail auction” reference in Ohio Adm. Code 4901:1-19-01(K) and 4901:1-19-05(D)(1) to “competitive procurement process.” OCC opposes this portion of the Order because there exists no reason or record evidence to broaden the definitional scope of competitive retail auctions. The record is devoid of any reasons why it is necessary or beneficial to broaden the scope of competitive procurement options beyond the current practice of competitive retail auctions.

The PUCO’s Order unlawfully and unreasonably introduced the term “competitive procurement process” in place of competitive retail auctions. Under the existing rule, “Competitive Retail Auction” was a defined term and the term replacing it in the proposed rule “Competitive Procurement Process” is undefined. The PUCO has inadvertently created ambiguity where none previously existed. The PUCO should grant rehearing and return to the existing rule.

In a more tangible way, the proposed rule modifying the rules governing competitive auctions could harm customers. The competitive auctions have historically resulted in natural gas being supplied at lower costs for Ohio consumers, and there is no

record support for the replacement term, “competitive procurement process” And there is no way to know how this change might undue the benefits achieved by competitive retail auctions. The PUCO should abrogate this portion of its Order and return the rule to its original language.

II. STANDARD OF REVIEW

After an order is entered, intervenors in a PUCO proceeding have a statutory right to apply for rehearing “in respect to any matters determined in the proceeding.”² An application for rehearing must “set forth specifically the ground or grounds on which the applicant considers the order to be unreasonable or unlawful.”³

In considering an application for rehearing, R.C. 4903.10 provides that the PUCO may grant and hold rehearing if there is “sufficient reason” to do so. After such rehearing, the PUCO may “abrogate or modify” the order in question if the PUCO “is of the opinion that the original order or any part thereof is in any respect unjust or unwarranted.”⁴

In this case, the standard for rehearing under R.C. 4903.10 is met. The PUCO should grant OCC’s application for rehearing and abrogate the Order as OCC recommends.

² R.C. 4903.10.

³ R.C. 4903.10(B). *See also* Ohio Adm. Code 4901-1-35(A).

⁴ R.C. 4903.10(B).

III. ASSIGNMENT OF ERROR

The Order is unlawful and unreasonable under R.C. 4903.09 because there is no evidentiary basis supporting the PUCO's decision to broaden the scope of competitive procurement options beyond competitive retail auctions for choice-eligible customers as competitive retail auctions have resulted in natural gas being supplied at lower costs for Ohio consumers.

Sound public policy exists for retaining the definition and concept of competitive retail auctions in the PUCO's rules. A competitive retail auction, as the only gas commodity procurement option, has served choice-eligible customers well as a low-priced option for receiving default natural gas service. There is no reason or record evidence to believe that other procurement options will yield lower prices or improve the gas commodity procurement process. There is no reason to change an existing process that is working well for customers. No procurement options, other than the competitive retail auction, should be included in the rules.

The term "competitive procurement process" could allow gas companies to obtain gas for their standard offers through another means that diminishes the competitiveness experienced with the descending clock standard choice offer auctions overseen by the PUCO now. The outcome of a less competitive procurement process would be that marketers could garner customers while bidding higher prices thus raising the price of commodity gas for customers served under the standard offer.

As an example, the standard choice offer of Columbia Gas of Ohio ("Columbia") is competitively bid and the standard choice offer rate is typically lower than marketers' rates. Shadow billing compares Columbia's historical standard offer to marketers' rates for customers who have switched suppliers through the Choice program. Shadow billing data confirm that customers have spent at least \$1.6 billion more on natural gas through marketers' unbid rates than they would have spent on the competitively bid Columbia's

standard offer.⁵ Shadow billing is a beneficial consumer protection that should be required for all natural gas and electric companies that have choice programs.

Shadow billing gives a good historical perspective, but the PUCO's own Apples-to-Apples chart demonstrates the significant number of Columbia and Vectren marketer offers that are above the standard offer rates. Columbia has a total of 66 marketer offers, with 54 of the offers *above* Columbia's current standard choice offer rate. Vectren has a total of 38 marketer offers, with 33 of the offers *above* Vectren's current standard choice offer rate.⁶

Not only is public policy violated by removing the term "competitive retail auction" from the rules, but in using the term "competitive procurement process" the PUCO went beyond the language suggested by the Retail Energy Supply Association ("RESA"). RESA suggested use of the term "competitive bidding process," which has the same connotation as a competitive auction. The PUCO did not explain or define in the rule its use of "competitive procurement process."

This violates R.C. 4903.09, which requires the PUCO to explain its decisions. Those decisions must be based on the factual record of the case. By expanding the language in the rule beyond RESA's proposed "competitive bidding process" without explanation, the PUCO has violated R.C. 4903.09. The PUCO's Order is unlawful and should be abrogated, thus retaining the term "competitive retail auction" in the rules.

⁵ See Attachment A (Columbia Shadow Billing Data).

⁶ <http://www.energychoice.ohio.gov/ApplesToApplesComparision.aspx?Category=NaturalGas&TerritoryId=8&RateCode=1>; <http://www.energychoice.ohio.gov/ApplesToApplesComparision.aspx?Category=NaturalGas&TerritoryId=11&RateCode=1>. (Last reviewed January 10, 2019).

IV. CONCLUSION

The purpose of competitive retail auctions is to safeguard that consumers' energy charges are not inflated but instead are based on market rates. By using the undefined term "competitive procurement process," the PUCO's Order could undermine the move to market-based rates. And the change was made without explanation, in violation of R.C. 4903.09.

To protect consumers, the PUCO should abrogate the portion of its order where "competitive retail auction" is replaced with "competitive procurement process." The reference to "competitive retail auction" in Ohio Adm. Code 4901:1-19-01(K) and 4901:1-19-05(D)(1) should remain and not be changed to "competitive procurement process." In addition, the reference to "an auction or a public request for proposal" in Ohio Adm. Code 4901:1-19-09(A) should be retained and not changed to "a competitive procurement process." The PUCO should grant OCC's application for rehearing.

Respectfully submitted,

Bruce Weston (0016973)
Ohio Consumers' Counsel

/s/ Terry L. Etter
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Application for Rehearing was served on the persons stated below via electronic transmission, this 11th day of January 2019.

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Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-97	\$425,351	\$43,275	\$0			\$468,626	\$335,000	\$803,626	\$335,000	\$803,626	\$468,626
May-97	\$342,846	\$39,215	\$0			\$382,061	\$305,627	\$687,688	\$640,627	\$1,491,314	\$850,687
Jun-97	\$195,327	\$28,158	\$0			\$223,485	\$59,826	\$283,311	\$700,453	\$1,774,625	\$1,074,172
Jul-97	\$87,295	\$19,242	\$0			\$106,537	\$57,698	\$164,235	\$758,151	\$1,938,860	\$1,180,709
Aug-97	\$76,251	\$11,529	\$0			\$87,780	\$49,657	\$137,437	\$807,808	\$2,076,297	\$1,268,489
Sep-97	\$83,182	\$12,863	\$0			\$96,045	\$47,863	\$143,908	\$855,671	\$2,220,205	\$1,364,534
Oct-97	\$128,462	\$13,284	\$0			\$141,746	\$68,492	\$210,238	\$924,163	\$2,430,443	\$1,506,280
Nov-97	\$395,185	\$39,517	\$0			\$434,702	\$238,592	\$673,294	\$1,162,755	\$3,103,737	\$1,940,982
Dec-97	\$579,381	\$123,876	\$0			\$703,257	\$351,824	\$1,055,081	\$1,514,579	\$4,158,818	\$2,644,239
Jan-98	\$824,159	\$263,876	\$0			\$1,088,035	\$488,246	\$1,576,281	\$2,002,825	\$5,735,099	\$3,732,274
Feb-98	\$682,159	\$154,769	\$0			\$836,928	\$539,537	\$1,376,465	\$2,542,362	\$7,111,564	\$4,569,202
Mar-98	\$595,217	\$114,732	\$0			\$709,949	\$516,279	\$1,226,228	\$3,058,641	\$8,337,792	\$5,279,151
Apr-98	\$462,581	\$80,935	\$0			\$543,516	\$405,279	\$948,795	\$3,463,920	\$9,286,587	\$5,822,667
May-98	\$374,279	\$43,982	\$0			\$418,261	\$269,582	\$687,843	\$3,733,502	\$9,974,430	\$6,240,928
Jun-98	\$197,956	\$20,984	\$0			\$218,940	\$125,985	\$344,925	\$3,859,487	\$10,319,355	\$6,459,868
Jul-98	\$93,579	\$14,839	\$0			\$108,418	\$89,153	\$197,571	\$3,948,640	\$10,516,926	\$6,568,286
Aug-98	\$86,279	\$9,524	\$0			\$95,803	\$58,426	\$154,229	\$4,007,066	\$10,671,155	\$6,664,089
Sep-98	\$83,279	\$16,842	\$0			\$100,121	\$67,518	\$167,639	\$4,074,584	\$10,838,794	\$6,764,210
Oct-98	\$154,283	\$123,849	\$0			\$278,132	\$84,159	\$362,291	\$4,158,743	\$11,201,085	\$7,042,342
Nov-98	\$786,924	\$459,627	\$0			\$1,246,551	\$241,897	\$1,488,448	\$4,400,640	\$12,689,533	\$8,288,893
Dec-98	\$1,248,953	\$815,476	\$0			\$2,064,429	\$386,295	\$2,450,724	\$4,786,935	\$15,140,257	\$10,353,322
Jan-99	\$2,841,953	\$1,524,869	\$0			\$4,366,822	\$595,015	\$4,961,837	\$5,381,950	\$20,102,094	\$14,720,144
Feb-99	\$2,692,746	\$1,362,745	\$0			\$4,055,491	\$428,931	\$4,484,422	\$5,810,881	\$24,586,516	\$18,775,635
Mar-99	\$1,792,549	\$1,198,257	\$0			\$2,990,806	\$491,930	\$3,482,736	\$6,302,810	\$28,069,251	\$21,766,441
Apr-99	\$1,295,736	\$992,843	\$0			\$2,288,579	\$420,001	\$2,708,580	\$6,722,811	\$30,777,831	\$24,055,020
May-99	\$35,928	\$305,672	\$0			\$341,600	\$171,237	\$512,837	\$6,894,048	\$31,290,668	\$24,396,620
Jun-99	-\$6,482	\$274,958	\$0			\$268,476	\$94,756	\$363,232	\$6,988,804	\$31,653,900	\$24,665,096
Jul-99	-\$5,169	\$128,965	\$0			\$123,796	\$67,171	\$190,967	\$7,055,974	\$31,844,866	\$24,788,892
Aug-99	\$323,859	\$216,852	\$0			\$540,711	\$62,777	\$603,488	\$7,118,752	\$32,448,355	\$25,329,603
Sep-99	\$301,528	\$287,495	\$0			\$589,023	\$55,638	\$644,661	\$7,174,390	\$33,093,016	\$25,918,626
Oct-99	\$547,523	\$437,053	\$0			\$984,576	\$113,827	\$1,098,403	\$7,288,217	\$34,191,419	\$26,903,202
Nov-99	\$2,924,475	\$1,350,835	\$0			\$4,275,310	\$269,173	\$4,544,483	\$7,557,390	\$38,735,902	\$31,178,512
Dec-99	\$4,287,950	\$2,184,202	\$0			\$6,472,152	\$438,838	\$6,910,990	\$7,996,228	\$45,646,892	\$37,650,664
Jan-00	\$5,411,314	\$2,833,574	\$24,986			\$8,269,874	\$696,339	\$8,966,213	\$8,692,566	\$54,613,105	\$45,920,538
Feb-00	\$2,147,364	\$1,606,382	\$0			\$3,753,746	\$699,457	\$4,453,203	\$9,392,023	\$59,066,307	\$49,674,284
Mar-00	\$2,227,071	\$1,501,788	\$0			\$3,728,859	\$457,115	\$4,185,974	\$9,849,138	\$63,252,281	\$53,403,143
Apr-00	\$1,650,460	\$866,914	\$11,678			\$2,529,053	\$120,373	\$2,649,425	\$9,969,510	\$65,901,706	\$55,932,196
May-00	\$2,044,089	\$1,000,117	\$13,276			\$3,057,481	\$150,316	\$3,207,797	\$10,119,826	\$69,109,503	\$58,989,677
Jun-00	\$1,004,800	\$554,738	\$14,060			\$1,573,599	\$68,996	\$1,642,595	\$10,188,822	\$70,752,098	\$60,563,276
Jul-00	\$710,130	\$432,868	\$11,315			\$1,154,313	\$46,821	\$1,201,134	\$10,235,643	\$71,953,232	\$61,717,589
Aug-00	\$1,567,967	\$623,002	\$20,452			\$2,211,421	\$58,508	\$2,269,929	\$10,294,151	\$74,223,161	\$63,929,009
Sep-00	\$1,549,256	\$748,851	\$17,637			\$2,315,744	\$51,350	\$2,367,095	\$10,345,502	\$76,590,255	\$66,244,753
Oct-00	\$2,706,833	\$1,056,352	\$13,042			\$3,776,227	\$121,841	\$3,898,068	\$10,467,343	\$80,488,323	\$70,020,980
Nov-00	\$6,178,117	\$2,092,866	\$38,268			\$8,309,251	\$208,106	\$8,517,357	\$10,675,449	\$89,005,680	\$78,330,231

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-00	\$13,810,672	\$4,534,145	\$45,946			\$18,390,763	\$538,633	\$18,929,396	\$11,214,082	\$107,935,076	\$96,720,994
Jan-01	\$14,432,877	\$3,812,320	\$0			\$18,245,197	\$752,288	\$18,997,484	\$11,966,369	\$126,932,560	\$114,966,191
Feb-01	\$17,203,007	\$4,588,353	\$0			\$21,791,360	\$723,181	\$22,514,541	\$12,689,551	\$149,447,101	\$136,757,550
Mar-01	\$14,710,273	\$4,050,611	\$0			\$18,760,884	\$693,255	\$19,454,138	\$13,382,805	\$168,901,239	\$155,518,434
Apr-01	\$9,859,471	\$2,860,423	\$0			\$12,719,894	\$571,992	\$13,291,885	\$13,954,797	\$182,193,125	\$168,238,328
May-01	\$3,855,778	\$1,247,301	\$18,417			\$5,121,496	\$155,768	\$5,277,264	\$14,110,565	\$187,470,389	\$173,359,824
Jun-01	\$2,754,276	\$997,069	\$9,968			\$3,761,313	\$114,641	\$3,875,954	\$14,225,206	\$191,346,342	\$177,121,136
Jul-01	\$1,598,501	\$603,386	\$8,469			\$2,210,356	\$69,621	\$2,279,976	\$14,294,827	\$193,626,319	\$179,331,492
Aug-01	-\$387,396	-\$36,966	\$3,322			-\$421,041	\$48,501	-\$372,539	\$14,343,328	\$193,253,779	\$178,910,452
Sep-01	-\$541,007	-\$101,867	\$214			-\$642,660	\$44,301	-\$598,359	\$14,387,629	\$192,655,420	\$178,267,791
Oct-01	-\$903,224	-\$246,449	\$1,115			-\$1,148,558	\$95,536	-\$1,053,022	\$14,483,165	\$191,602,398	\$177,119,233
Nov-01	-\$4,785,389	-\$1,519,422	\$0			-\$6,304,811	\$166,584	-\$6,138,228	\$14,649,748	\$185,464,170	\$170,814,422
Dec-01	-\$6,417,765	-\$2,190,879	\$0			-\$8,608,644	\$241,333	-\$8,367,311	\$14,891,081	\$177,096,859	\$162,205,778
Jan-02	-\$11,213,067	-\$4,009,360	-\$24,850			-\$15,247,278	\$456,852	-\$14,790,425	\$15,347,933	\$162,306,434	\$146,958,501
Feb-02	-\$8,931,637	-\$3,242,954	-\$16,811			-\$12,191,402	\$342,231	-\$11,849,171	\$15,690,165	\$150,457,263	\$134,767,098
Mar-02	-\$6,934,816	-\$2,364,856	-\$15,592			-\$9,315,264	\$355,597	-\$8,959,667	\$16,045,761	\$141,497,596	\$125,451,834
Apr-02	-\$5,332,798	-\$1,839,321	\$0			-\$7,172,119	\$295,298	-\$6,876,821	\$16,341,060	\$134,620,775	\$118,279,715
May-02	-\$3,351,622	-\$1,404,541	-\$8,027			-\$4,764,190	\$158,107	-\$4,606,083	\$16,499,167	\$130,014,691	\$113,515,525
Jun-02	-\$2,013,498	-\$738,132	-\$5,322			-\$2,756,952	\$94,387	-\$2,662,565	\$16,593,553	\$127,352,126	\$110,758,573
Jul-02	-\$1,101,529	-\$456,628	-\$3,312			-\$1,561,469	\$50,750	-\$1,510,718	\$16,644,304	\$125,841,408	\$109,197,104
Aug-02	\$236,023	\$130,777	\$675			\$367,475	\$44,089	\$411,564	\$16,688,393	\$126,252,972	\$109,564,579
Sep-02	\$135,406	\$121,064	-\$9			\$256,461	\$41,585	\$298,046	\$16,729,978	\$126,551,017	\$109,821,040
Oct-02	\$156,437	\$113,894	-\$197			\$270,134	\$62,349	\$332,483	\$16,792,327	\$126,883,501	\$110,091,174
Nov-02	\$771,332	\$309,783	\$1,902			\$1,083,017	\$217,814	\$1,300,831	\$17,010,141	\$128,184,332	\$111,174,191
Dec-02	\$726,676	-\$6,217	\$1,461			\$721,920	\$392,134	\$1,114,055	\$17,402,276	\$129,298,386	\$111,896,111
Jan-03	\$1,102,780	-\$1,000,067	\$0			\$102,713	\$519,274	\$621,987	\$17,921,549	\$129,920,374	\$111,998,824
Feb-03	\$5,523,850	\$1,167,509	\$8,870			\$6,700,229	\$655,759	\$7,355,988	\$18,577,309	\$137,276,361	\$118,699,053
Mar-03	\$4,199,337	\$509,070	\$2,948			\$4,711,356	\$601,685	\$5,313,041	\$19,178,994	\$142,589,403	\$123,410,409
Apr-03	\$5,673,189	\$1,770,099	\$7,841			\$7,451,129	\$236,472	\$7,687,601	\$19,415,466	\$150,277,004	\$130,861,538
May-03	\$4,007,475	\$1,296,707	\$8,797			\$5,312,980	\$124,194	\$5,437,173	\$19,539,660	\$155,714,177	\$136,174,517
Jun-03	\$2,563,180	\$1,013,374	\$5,887			\$3,582,441	\$84,048	\$3,666,490	\$19,623,708	\$159,380,667	\$139,756,959
Jul-03	\$1,385,724	\$674,473	\$3,314			\$2,063,510	\$44,755	\$2,108,266	\$19,668,464	\$161,488,933	\$141,820,469
Aug-03	-\$199,255	-\$82,351	-\$218			-\$281,823	\$38,953	-\$242,870	\$19,707,417	\$161,246,063	\$141,538,646
Sep-03	-\$122,424	\$3,139	-\$212			-\$119,498	\$38,189	-\$81,310	\$19,745,605	\$161,164,753	\$141,419,148
Oct-03	-\$192,077	\$100,989	-\$697			-\$91,785	\$87,000	-\$4,785	\$19,832,605	\$161,159,968	\$141,327,363
Nov-03	-2,676,204	-\$786,416	-\$9,233			-\$3,471,853	\$130,215	-\$3,341,638	\$19,962,820	\$157,818,330	\$137,855,510
Dec-03	-\$5,412,084	-\$2,327,899	-\$14,949			-\$7,754,932	\$251,134	-\$7,503,798	\$20,213,955	\$150,314,533	\$130,100,578
Jan-04	-\$11,732,403	-\$4,826,612	-\$27,265			-\$16,586,279	\$369,962	-\$16,216,317	\$20,583,916	\$134,098,215	\$113,514,299
Feb-04	-\$10,668,507	-\$4,004,885	-\$17,696			-\$14,691,088	\$447,855	-\$14,243,234	\$21,031,771	\$119,854,982	\$98,823,211
Mar-04	-\$7,356,309	-\$2,355,718	-\$10,959			-\$9,722,986	\$334,371	-\$9,388,615	\$21,366,142	\$110,466,366	\$89,100,225
Apr-04	-\$5,408,848	-\$1,596,368	-\$7,561			-\$7,012,777	\$0	-\$7,012,777	\$21,366,142	\$103,453,590	\$82,087,448
May-04	-\$1,849,168	-\$361,959	-\$2,501			-\$2,213,629	\$0	-\$2,213,629	\$21,366,142	\$101,239,961	\$79,873,819
Jun-04	-\$973,902	-\$145,292	-\$1,036			-\$1,120,230	\$0	-\$1,120,230	\$21,366,142	\$100,119,732	\$78,753,590
Jul-04	-\$913,368	-\$223,736	-\$114,560			-\$1,251,664	\$0	-\$1,251,664	\$21,366,142	\$98,868,068	\$77,501,926

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Aug-04	-\$116,386	\$54,895	\$0			-\$61,491	\$0	-\$61,491	\$21,366,142	\$98,806,577	\$77,440,435
Sep-04	\$10,843	\$67,262	\$1,170			\$79,275	\$0	\$79,275	\$21,366,142	\$98,885,852	\$77,519,710
Oct-04	-\$42,681	\$137,841	\$1,460			\$96,620	\$0	\$96,620	\$21,366,142	\$98,982,472	\$77,616,330
Nov-04	-\$1,538,128	-\$436,246	-\$3,391			-\$1,977,765	\$0	-\$1,977,765	\$21,366,142	\$97,004,707	\$75,638,565
Dec-04	-\$1,502,379	-\$806,935	-\$4,559			-\$2,313,873	\$0	-\$2,313,873	\$21,366,142	\$94,690,834	\$73,324,692
Jan-05	-\$1,578,126	-\$1,005,151	-\$2,823			-\$2,586,099	\$0	-\$2,586,099	\$21,366,142	\$92,104,734	\$70,738,593
Feb-05	-\$7,501,073	-\$2,234,889	-\$14,464			-\$9,750,426	\$0	-\$9,750,426	\$21,366,142	\$82,354,308	\$60,988,166
Mar-05	-\$7,712,573	-\$2,518,040	-\$18,620			-\$10,249,233	\$0	-\$10,249,233	\$21,366,142	\$72,105,075	\$50,738,933
Apr-05	-\$1,844,632	-\$704,283	-\$5,848			-\$2,554,763	\$0	-\$2,554,763	\$21,366,142	\$69,550,312	\$48,184,170
May-05	-\$1,616,796	-\$210,553	-\$2,467			-\$1,829,816	\$0	-\$1,829,816	\$21,366,142	\$67,720,496	\$46,354,354
Jun-05	-\$845,291	-\$44,472	-\$4,230			-\$893,993	\$0	-\$893,993	\$21,366,142	\$66,826,503	\$45,460,361
Jul-05	-\$739,294	-\$31,196	-\$621			-\$771,110	\$0	-\$771,110	\$21,366,142	\$66,055,392	\$44,689,251
Aug-05	-\$78,266	\$70,916	\$0			-\$7,350	\$0	-\$7,350	\$21,366,142	\$66,048,042	\$44,681,901
Sep-05	\$210,761	\$100,586	\$1,038			\$312,384	\$0	\$312,384	\$21,366,142	\$66,360,427	\$44,994,285
Oct-05	\$847,001	-\$135,534	\$4,638			\$716,106	\$0	\$716,106	\$21,366,142	\$67,076,533	\$45,710,391
Nov-05	\$184,914	-\$1,283,433	\$10,074			-\$1,088,445	\$0	-\$1,088,445	\$21,366,142	\$65,988,088	\$44,621,946
Dec-05	\$185,165	-\$1,358,303	\$1,942			-\$1,171,195	\$0	-\$1,171,195	\$21,366,142	\$64,816,892	\$43,450,750
Jan-06	-\$961,598	-\$2,941,083	-\$150,058			-\$4,052,738	\$0	-\$4,052,738	\$21,366,142	\$60,764,154	\$39,398,012
Feb-06	-\$5,604,909	-\$3,093,449	-\$32,232			-\$8,730,590	\$0	-\$8,730,590	\$21,366,142	\$52,033,564	\$30,667,422
Mar-06	-\$11,177,508	-\$4,065,279	-\$42,318			-\$15,285,104	\$0	-\$15,285,104	\$21,366,142	\$36,748,459	\$15,382,317
Apr-06	-\$7,293,950	-\$2,287,715	-\$24,904			-\$9,606,569	\$53,181	-\$9,553,388	\$21,419,323	\$27,195,071	\$5,775,748
May-06	-\$3,926,951	-\$1,116,790	-\$12,355			-\$5,056,096	\$26,802	-\$5,029,294	\$21,446,125	\$22,165,777	\$719,652
Jun-06	-\$2,704,723	-\$598,065	-\$9,368			-\$3,312,155	\$14,795	-\$3,297,361	\$21,460,920	\$18,868,417	-\$2,592,503
Jul-06	-\$1,975,016	-\$494,379	-\$8,324			-\$2,477,718	\$8,309	-\$2,469,409	\$21,469,229	\$16,399,008	-\$5,070,221
Aug-06	-\$2,101,535	-\$420,782	-\$11,119			-\$2,533,436	\$8,075	-\$2,525,361	\$21,477,304	\$13,873,646	-\$7,603,658
Sep-06	-\$1,571,928	-\$516,412	-\$12,047			-\$2,100,387	\$8,066	-\$2,092,321	\$21,485,370	\$11,781,325	-\$9,704,045
Oct-06	-\$5,152,570	-\$1,734,363	-\$33,089			-\$6,920,021	\$17,003	-\$6,903,018	\$21,502,373	\$4,878,307	-\$16,624,066
Nov-06	-\$9,020,018	-\$2,654,434	-\$49,911			-\$11,724,363	\$40,939	-\$11,683,424	\$21,543,312	-\$6,805,117	-\$28,348,429
Dec-06	-\$12,714,226	-\$3,707,906	-\$75,247			-\$16,497,380	\$59,733	-\$16,437,647	\$21,603,046	-\$23,242,764	-\$44,845,809
Jan-07	-\$14,772,242	-\$5,844,496	-\$82,866			-\$20,699,603	\$71,970	-\$20,627,633	\$21,675,016	-\$43,870,396	-\$65,545,412
Feb-07	-\$21,638,440	-\$6,425,648	-\$62,487			-\$28,126,575	\$105,900	-\$28,020,675	\$21,780,916	-\$71,891,071	-\$93,671,988
Mar-07	-\$15,335,851	-\$5,020,217	-\$41,454			-\$20,397,523	\$91,869	-\$20,305,654	\$21,872,785	-\$92,196,725	-\$114,069,510
Apr-07	-\$13,730,839	-\$4,746,463	-\$38,360			-\$18,515,663	\$77,960	-\$18,437,702	\$21,950,745	-\$110,634,428	-\$132,585,173
May-07	-\$4,045,124	-\$1,461,868	-\$24,204			-\$5,531,196	\$41,549	-\$5,489,647	\$21,992,294	-\$116,124,075	-\$138,116,369
Jun-07	-\$1,824,264	-\$756,525	-\$6,479			-\$2,587,269	\$18,743	-\$2,568,525	\$22,011,037	-\$118,692,601	-\$140,703,638
Jul-07	-\$1,575,114	-\$666,103	-\$11,375			-\$2,252,592	\$13,759	-\$2,238,833	\$22,024,796	-\$120,931,434	-\$142,956,230
Aug-07	-\$1,548,150	-\$648,202	-\$9,630			-\$2,205,982	\$11,085	-\$2,194,897	\$22,035,882	-\$123,126,330	-\$145,162,212
Sep-07	-\$1,483,832	-\$600,649	-\$7,762			-\$2,092,243	\$11,445	-\$2,080,798	\$22,047,327	-\$125,207,128	-\$147,254,455
Oct-07	-\$2,044,185	-\$731,511	-\$6,280			-\$2,781,976	\$14,771	-\$2,767,205	\$22,062,098	-\$127,974,333	-\$150,036,431
Nov-07	-\$4,561,749	-\$1,277,436	-\$4,391			-\$5,843,575	\$49,773	-\$5,793,803	\$22,111,871	-\$133,768,135	-\$155,880,006
Dec-07	-\$8,568,268	-\$2,599,283	-\$27,095			-\$11,194,646	\$104,032	-\$11,090,614	\$22,215,903	-\$144,858,749	-\$167,074,653
Jan-08	-\$10,096,120	-\$2,931,314	-\$24,470			-\$13,051,903	\$131,676	-\$12,920,228	\$22,347,579	-\$157,778,977	-\$180,126,556
Feb-08	-\$7,024,941	-\$1,824,434	-\$10,632			-\$8,860,007	\$141,785	-\$8,718,221	\$22,489,365	-\$166,497,198	-\$188,986,563
Mar-08	-\$7,533,256	-\$2,519,223	-\$13,759			-\$10,066,238	\$142,920	-\$9,923,318	\$22,632,284	-\$176,420,516	-\$199,052,801

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Apr-08	-\$2,506,939	-\$950,180	\$2,713			-\$3,454,406	\$73,436	-\$3,380,970	\$22,705,720	-\$179,801,486	-\$202,507,206
May-08	-\$1,179,307	-\$749,652	\$856			-\$1,928,103	\$31,482	-\$1,896,621	\$22,737,202	-\$181,698,107	-\$204,435,310
Jun-08	-\$603,512	-\$565,362	-\$1,217			-\$1,170,091	\$20,328	-\$1,149,763	\$22,757,530	-\$182,847,870	-\$205,605,401
Jul-08	-\$121,880	-\$668,469	\$304			-\$790,044	\$11,537	-\$778,508	\$22,769,066	-\$183,626,378	-\$206,395,445
Aug-08	-\$920,216	-\$692,303	-\$1,841			-\$1,614,359	\$9,710	-\$1,604,649	\$22,778,777	-\$185,231,027	-\$208,009,805
Sep-08	-\$1,587,392	-\$1,011,676	-\$3,722			-\$2,602,790	\$8,792	-\$2,593,998	\$22,787,569	-\$187,825,025	-\$210,612,595
Oct-08	-\$2,969,271	-\$977,128	-\$6,760			-\$3,953,159	\$14,224	-\$3,938,935	\$22,801,793	-\$191,763,960	-\$214,565,754
Nov-08	-\$4,157,953	-\$925,308	\$4,846			-\$5,078,415	\$43,070	-\$5,035,346	\$22,844,862	-\$196,799,305	-\$219,644,169
Dec-08	-\$3,814,931	\$332,636	\$22,238			-\$3,460,056	\$92,916	-\$3,367,141	\$22,937,778	-\$200,166,446	-\$223,104,225
Jan-09	-\$28,681,170	-\$9,070,920	-\$72,169			-\$37,824,259	\$124,409	-\$37,699,849	\$23,062,188	-\$237,866,295	-\$260,928,484
Feb-09	-\$22,216,722	-\$6,779,101	-\$58,538			-\$29,054,361	\$125,729	-\$28,928,632	\$23,187,917	-\$266,794,927	-\$289,982,845
Mar-09	-\$14,231,242	-\$3,873,959	-\$28,150			-\$18,133,351	\$95,546	-\$18,037,806	\$23,283,463	-\$284,832,732	-\$308,116,196
Apr-09	-\$14,866,518	-\$4,294,526	-\$35,204			-\$19,196,248	\$14,350	-\$19,181,898	\$23,297,813	-\$304,014,630	-\$327,312,444
May-09	-\$8,101,872	-\$2,856,819	-\$18,422			-\$10,977,112	\$6,975	-\$10,970,138	\$23,304,788	-\$314,984,768	-\$338,289,557
Jun-09	-\$3,431,341	-\$1,247,366	-\$6,467			-\$4,685,174	\$3,592	-\$4,681,582	\$23,308,381	-\$319,666,350	-\$342,974,731
Jul-09	-\$2,737,380	-\$1,060,690	-\$5,052			-\$3,803,121	\$2,223	-\$3,800,898	\$23,310,604	-\$323,467,248	-\$346,777,852
Aug-09	-\$3,552,993	-\$1,512,985	-\$20,633			-\$5,086,611	\$2,092	-\$5,084,519	\$23,312,696	-\$328,551,766	-\$351,864,463
Sep-09	-\$3,368,242	-\$1,428,350	-\$19,836			-\$4,816,429	\$1,949	-\$4,814,479	\$23,314,646	-\$333,366,245	-\$356,680,892
Oct-09	-\$7,246,610	-\$2,384,038	-\$36,028			-\$9,666,676	\$4,560	-\$9,662,116	\$23,319,206	-\$343,028,362	-\$366,347,568
Nov-09	-\$11,737,467	-\$4,226,695	-\$54,205			-\$16,018,366	\$8,603	-\$16,009,764	\$23,327,808	-\$359,038,125	-\$382,365,935
Dec-09	-\$21,782,094	-\$7,865,117	-\$109,853			-\$29,757,064	\$14,783	-\$29,742,282	\$23,342,591	-\$388,780,407	-\$412,122,999
Jan-10	-\$40,572,070	-\$17,771,809	-\$190,682			-\$58,534,561	\$25,333	-\$58,509,229	\$23,367,923	-\$447,289,636	-\$470,657,560
Feb-10	-\$37,456,299	-\$17,263,379	-\$166,964			-\$54,886,642	\$23,999	-\$54,862,644	\$23,391,922	-\$502,152,279	-\$525,544,202
Mar-10	-\$29,544,799	-\$12,895,726	-\$125,155			-\$42,565,680	\$20,305	-\$42,545,375	\$23,412,227	-\$544,697,654	-\$568,109,882
Apr-10	-\$10,205,850	-\$5,302,857	-\$44,161			-\$15,552,868	\$0	-\$15,552,868	\$23,412,227	-\$560,250,522	-\$583,662,750
May-10	-\$5,030,596	-\$1,850,366	-\$11,344			-\$6,892,306	\$0	-\$6,892,306	\$23,412,227	-\$567,142,828	-\$590,555,056
Jun-10	-\$3,111,808	-\$1,367,655	-\$10,126			-\$4,489,589	\$0	-\$4,489,589	\$23,412,227	-\$571,632,417	-\$595,044,645
Jul-10	-\$2,355,905	-\$929,182	-\$4,453			-\$3,289,540	\$0	-\$3,289,540	\$23,412,227	-\$574,921,957	-\$598,334,185
Aug-10	-\$1,906,242	-\$750,001	-\$3,512			-\$2,659,755	\$0	-\$2,659,755	\$23,412,227	-\$577,581,712	-\$600,993,940
Sep-10	-\$2,515,082	-\$1,055,284	-\$11,219			-\$3,581,584	\$0	-\$3,581,584	\$23,412,227	-\$581,163,296	-\$604,575,524
Oct-10	-\$3,682,710	-\$1,296,045	-\$13,255			-\$4,992,010	\$0	-\$4,992,010	\$23,412,227	-\$586,155,306	-\$609,567,534
Nov-10	-\$8,929,195	-\$2,980,686	-\$36,259			-\$11,946,139	\$0	-\$11,946,139	\$23,412,227	-\$598,101,446	-\$621,513,674
Dec-10	-\$14,247,734	-\$4,376,832	-\$31,214			-\$18,655,779	\$0	-\$18,655,779	\$23,412,227	-\$616,757,225	-\$640,169,453
Jan-11	-\$20,178,145	-\$7,226,845	-\$66,450			-\$27,471,440	\$0	-\$27,471,440	\$23,412,227	-\$644,228,665	-\$667,640,894
Feb-11	-\$17,503,090	-\$6,663,572	-\$57,222			-\$24,223,884	\$0	-\$24,223,884	\$23,412,227	-\$668,452,549	-\$691,864,778
Mar-11	-\$15,140,570	-\$5,431,256	-\$49,063			-\$20,620,889	\$0	-\$20,620,889	\$23,412,227	-\$689,073,439	-\$712,485,667
Apr-11	-\$9,382,832	-\$2,899,984	-\$22,843			-\$12,305,658	\$0	-\$12,305,658	\$23,412,227	-\$701,379,096	-\$724,791,324
May-11	-\$5,043,450	-\$1,581,832	-\$15,485			-\$6,640,768	\$0	-\$6,640,768	\$23,412,227	-\$708,019,864	-\$731,432,092
Jun-11	-\$2,526,502	-\$908,185	-\$7,605			-\$3,442,292	\$0	-\$3,442,292	\$23,412,227	-\$711,462,156	-\$734,874,384
Jul-11	-\$1,869,945	-\$802,740	-\$6,252			-\$2,678,937	\$0	-\$2,678,937	\$23,412,227	-\$714,141,094	-\$737,553,322
Aug-11	-\$1,695,636	-\$671,399	-\$4,174			-\$2,371,209	\$0	-\$2,371,209	\$23,412,227	-\$716,512,303	-\$739,924,531
Sep-11	-\$2,030,481	-\$881,393	-\$7,308			-\$2,919,182	\$0	-\$2,919,182	\$23,412,227	-\$719,431,485	-\$742,843,713
Oct-11	-\$3,140,807	-\$1,164,355	-\$10,329			-\$4,315,491	\$0	-\$4,315,491	\$23,412,227	-\$723,746,976	-\$747,159,204
Nov-11	-\$6,997,438	-\$2,263,598	-\$34,310			-\$9,295,346	\$0	-\$9,295,346	\$23,412,227	-\$733,042,322	-\$756,454,550

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Dec-11	-\$12,557,750	-\$3,945,419	-\$64,240			-\$16,567,409	\$0	-\$16,567,409	\$23,412,227	-\$749,609,731	-\$773,021,959
Jan-12	-\$18,651,178	-\$5,916,444	-\$76,824			-\$24,644,446	\$0	-\$24,644,446	\$23,412,227	-\$774,254,177	-\$797,666,405
Feb-12	-\$20,382,726	-\$6,813,519	-\$80,778			-\$27,277,024	\$0	-\$27,277,024	\$23,412,227	-\$801,531,201	-\$824,943,429
Mar-12	-\$16,793,300	-\$5,589,328	-\$60,396			-\$22,443,024	\$0	-\$22,443,024	\$23,412,227	-\$823,974,225	-\$847,386,453
Apr-12	-\$9,349,064	-\$3,600,962	-\$45,096			-\$12,995,122	\$0	-\$12,995,122	\$23,412,227	-\$836,969,347	-\$860,381,575
May-12	-\$7,406,658	-\$2,572,108	-\$29,530			-\$10,008,296	\$0	-\$10,008,296	\$23,412,227	-\$846,977,643	-\$870,389,871
Jun-12	-\$3,202,658	-\$1,327,809	-\$13,942			-\$4,544,409	\$0	-\$4,544,409	\$23,412,227	-\$851,522,052	-\$874,934,280
Jul-12	-\$2,380,923	-\$1,043,505	-\$7,700			-\$3,432,128	\$0	-\$3,432,128	\$23,412,227	-\$854,954,180	-\$878,366,408
Aug-12	-\$1,986,608	-\$848,902	-\$8,092			-\$2,843,602	\$0	-\$2,843,602	\$23,412,227	-\$857,797,782	-\$881,210,010
Sep-12	-\$2,321,318	-\$1,044,077	-\$11,926			-\$3,377,321	\$0	-\$3,377,321	\$23,412,227	-\$861,175,104	-\$884,587,332
Oct-12	-\$3,653,559	-\$1,102,057	-\$11,358			-\$4,766,974	\$0	-\$4,766,974	\$23,412,227	-\$865,942,077	-\$889,354,306
Nov-12	-\$7,303,123	-\$2,016,031	-\$30,021			-\$9,349,175	\$0	-\$9,349,175	\$23,412,227	-\$875,291,253	-\$898,703,481
Dec-12	-\$10,718,224	-\$3,009,674	-\$34,951			-\$13,762,849	\$0	-\$13,762,849	\$23,412,227	-\$889,054,102	-\$912,466,330
Jan-13	-\$17,561,829	-\$5,237,632	-\$51,727			-\$22,851,187	\$0	-\$22,851,187	\$23,412,227	-\$911,905,289	-\$935,317,517
Feb-13	-\$18,925,582	-\$5,598,939	-\$45,406			-\$24,569,927	\$0	-\$24,569,927	\$23,412,227	-\$936,475,216	-\$959,887,444
Mar-13	-\$16,218,739	-\$4,350,721	-\$28,889			-\$20,598,350	\$0	-\$20,598,350	\$23,412,227	-\$957,073,565	-\$980,485,793
Apr-13	-\$9,824,400	-\$2,408,704	-\$10,098			-\$12,243,202	\$0	-\$12,243,202	\$23,412,227	-\$969,316,767	-\$992,728,995
May-13	-\$3,969,390	-\$1,005,427	-\$8,133			-\$4,982,951	\$0	-\$4,982,951	\$23,412,227	-\$974,299,717	-\$997,711,946
Jun-13	-\$2,415,361	-\$657,077	-\$4,765			-\$3,077,203	\$0	-\$3,077,203	\$23,412,227	-\$977,376,921	-\$1,000,789,149
Jul-13	-\$2,215,582	-\$723,016	-\$6,497			-\$2,945,095	\$0	-\$2,945,095	\$23,412,227	-\$980,322,016	-\$1,003,734,244
Aug-13	-\$2,138,758	-\$765,977	-\$8,254			-\$2,912,988	\$0	-\$2,912,988	\$23,412,227	-\$983,235,004	-\$1,006,647,232
Sep-13	-\$2,047,364	-\$639,512	-\$6,073			-\$2,692,950	\$0	-\$2,692,950	\$23,412,227	-\$985,927,954	-\$1,009,340,182
Oct-13	-\$2,815,864	-\$818,831	-\$16,192			-\$3,650,886	\$0	-\$3,650,886	\$23,412,227	-\$989,578,840	-\$1,012,991,068
Nov-13	-\$7,562,682	-\$2,155,379	-\$62,083			-\$9,780,144	\$0	-\$9,780,144	\$23,412,227	-\$999,358,984	-\$1,022,771,212
Dec-13	-\$13,763,019	-\$3,797,676	-\$51,496			-\$17,612,191	\$0	-\$17,612,191	\$23,412,227	-\$1,016,971,175	-\$1,040,383,403
Jan-14	-\$15,981,935	-\$4,344,835	-\$46,431			-\$20,373,200	\$0	-\$20,373,200	\$23,412,227	-\$1,037,344,376	-\$1,060,756,604
Feb-14	-\$8,748,912	-\$792,898	\$6,411			-\$9,535,399	\$0	-\$9,535,399	\$23,412,227	-\$1,046,879,775	-\$1,070,292,003
Mar-14	-\$15,113,887	-\$4,423,825	-\$45,744			-\$19,583,455	\$0	-\$19,583,455	\$23,412,227	-\$1,066,463,230	-\$1,089,875,458
Apr-14	-\$9,661,541	-\$2,203,349	-\$20,533			-\$11,885,423	\$0	-\$11,885,423	\$23,412,227	-\$1,078,348,653	-\$1,101,760,881
May-14	-\$4,308,980	-\$879,750	-\$7,338	\$38,047	\$34,335	-\$5,123,687	\$0	-\$5,123,687	\$23,412,227	-\$1,083,472,340	-\$1,106,884,568
Jun-14	-\$2,499,474	-\$638,593	-\$5,820	-\$5,630	\$61,031	-\$3,088,486	\$0	-\$3,088,486	\$23,412,227	-\$1,086,560,826	-\$1,109,973,054
Jul-14	-\$2,327,035	-\$625,615	-\$6,631	-\$42,096	\$59,117	-\$2,942,259	\$0	-\$2,942,259	\$23,412,227	-\$1,089,503,084	-\$1,112,915,312
Aug-14	-\$2,581,985	-\$750,265	-\$8,389	-\$63,833	\$77,033	-\$3,327,439	\$0	-\$3,327,439	\$23,412,227	-\$1,092,830,524	-\$1,116,242,752
Sep-14	-\$2,569,170	-\$632,911	-\$6,336	-\$17,212	\$67,644	-\$3,157,984	\$0	-\$3,157,984	\$23,412,227	-\$1,095,988,508	-\$1,119,400,736
Oct-14	-\$3,731,082	-\$814,930	-\$12,555	\$37,077	\$73,254	-\$4,448,236	\$0	-\$4,448,236	\$23,412,227	-\$1,100,436,744	-\$1,123,848,972
Nov-14	-\$8,519,324	-\$1,952,682	-\$35,137	\$30,825	\$67,232	-\$10,409,087	\$0	-\$10,409,087	\$23,412,227	-\$1,110,845,831	-\$1,134,258,059
Dec-14	-\$12,884,435	-\$3,090,609	-\$61,504	\$47,032	\$48,796	-\$15,940,721	\$0	-\$15,940,721	\$23,412,227	-\$1,126,786,552	-\$1,150,198,780
Jan-15	-\$24,103,802	-\$6,731,228	-\$96,765	\$101,261	\$40,306	-\$30,790,227	\$0	-\$30,790,227	\$23,412,227	-\$1,157,576,779	-\$1,180,989,007
Feb-15	-\$27,342,772	-\$7,357,262	-\$106,216	\$169,688	\$18,540	-\$34,618,022	\$0	-\$34,618,022	\$23,412,227	-\$1,192,194,801	-\$1,215,607,029

Month	Res. Savings	Com. Savings CAB	Ind. Savings CAB	Com. Savings GAS	Ind. Savings GAS	Total Monthly Choice Savings	Monthly PIPP Savings	Monthly Savings Including PIPP	Cumulative PIPP Savings	Cumulative Savings (Incl PIPP)	Cumulative Savings (Excl PIPP)
Mar-15	-\$23,346,881	-\$6,432,525	-\$96,751	\$245,073	\$25,336	-\$29,605,747	\$0	-\$29,605,747	\$23,412,227	-\$1,221,800,548	-\$1,245,212,776
Apr-15	-\$13,206,425	-\$3,819,985	-\$60,265	\$73,304	\$18,404	-\$16,994,968	\$0	-\$16,994,968	\$23,412,227	-\$1,238,795,516	-\$1,262,207,744
May-15	-\$5,874,990	-\$1,659,536	-\$24,504	\$63,709	\$19,577	-\$7,475,743	\$0	-\$7,475,743	\$23,412,227	-\$1,246,271,259	-\$1,269,683,488
Jun-15	-\$3,022,034	-\$953,870	-\$14,081	\$6,185	\$31,353	-\$3,952,446	\$0	-\$3,952,446	\$23,412,227	-\$1,250,223,705	-\$1,273,635,933
Jul-15	-\$2,517,799	-\$838,616	-\$11,460	\$13,055	\$35,924	-\$3,318,895	\$0	-\$3,318,895	\$23,412,227	-\$1,253,542,601	-\$1,276,954,829
Aug-15	-\$2,236,562	-\$706,709	-\$12,089	-\$34,315	\$82,867	-\$2,906,808	\$0	-\$2,906,808	\$23,412,227	-\$1,256,449,408	-\$1,279,861,636
Sep-15	-\$2,421,039	-\$776,506	-\$12,446	\$3,354	\$49,646	-\$3,156,991	\$0	-\$3,156,991	\$23,412,227	-\$1,259,606,399	-\$1,283,018,627
Oct-15	-\$3,143,346	-\$990,394	-\$20,122	\$11,751	\$64,692	-\$4,077,419	\$0	-\$4,077,419	\$23,412,227	-\$1,263,683,818	-\$1,287,096,046
Nov-15	-\$6,647,549	-\$2,120,236	-\$42,765	\$32,806	\$78,831	-\$8,698,913	\$0	-\$8,698,913	\$23,412,227	-\$1,272,382,731	-\$1,295,794,959
Dec-15	-\$11,434,927	-\$3,771,764	-\$60,957	\$8,563	\$72,641	-\$15,186,444	\$0	-\$15,186,444	\$23,412,227	-\$1,287,569,175	-\$1,310,981,403
Jan-16	-\$16,112,731	-\$5,678,615	-\$94,065	-\$34,989	\$9,775	-\$21,910,625	\$0	-\$21,910,625	\$23,412,227	-\$1,309,479,800	-\$1,332,892,028
Feb-16	-\$18,597,905	-\$6,753,189	-\$119,339	-\$1,951	\$18,368	-\$25,454,015	\$0	-\$25,454,015	\$23,412,227	-\$1,334,933,815	-\$1,358,346,043
Mar-16	-\$15,872,469	-\$5,580,592	-\$102,175	\$7,502	\$13,209	-\$21,534,525	\$0	-\$21,534,525	\$23,412,227	-\$1,356,468,340	-\$1,379,880,568
Apr-16	-\$10,415,718	-\$3,156,401	-\$49,603	\$10,821	\$6,722	-\$13,604,179	\$0	-\$13,604,179	\$23,412,227	-\$1,370,072,519	-\$1,393,484,747
May-16	-\$5,964,571	-\$1,727,504	-\$24,245	-\$11,723	\$44,730	-\$7,683,313	\$0	-\$7,683,313	\$23,412,227	-\$1,377,755,832	-\$1,401,168,060
Jun-16	-\$3,487,938	-\$1,055,352	-\$14,102	-\$24,004	\$55,326	-\$4,526,070	\$0	-\$4,526,070	\$23,412,227	-\$1,382,281,902	-\$1,405,694,130
Jul-16	-\$1,991,284	-\$607,071	-\$6,338	-\$29,412	\$71,233	-\$2,562,872	\$0	-\$2,562,872	\$23,412,227	-\$1,384,844,774	-\$1,408,257,002
Aug-16	-\$2,033,848	-\$612,147	-\$6,595	-\$31,069	\$86,108	-\$2,597,551	\$0	-\$2,597,551	\$23,412,227	-\$1,387,442,325	-\$1,410,854,553
Sep-16	-\$2,009,458	-\$597,987	-\$7,340	-\$6,580	\$55,578	-\$2,565,788	\$0	-\$2,565,788	\$23,412,227	-\$1,390,008,113	-\$1,413,420,341
Oct-16	-\$2,257,699	-\$619,928	-\$10,332	\$67,158	\$80,285	-\$2,740,516	\$0	-\$2,740,516	\$23,412,227	-\$1,392,748,629	-\$1,416,160,857
Nov-16	-\$5,015,771	-\$1,363,107	-\$32,609	-\$46,694	\$1,689	-\$6,456,492	\$0	-\$6,456,492	\$23,412,227	-\$1,399,205,120	-\$1,422,617,349
Dec-16	-\$8,848,222	-\$2,602,060	-\$39,483	-\$52,895	\$77,846	-\$11,464,815	\$0	-\$11,464,815	\$23,412,227	-\$1,410,669,935	-\$1,434,082,163
Jan-17	-\$8,602,412	-\$1,932,895	-\$23,094	-\$197,580	\$16,657	-\$10,739,324	\$0	-\$10,739,324	\$23,412,227	-\$1,421,409,259	-\$1,444,821,488
Feb-17	-\$10,479,905	-\$3,212,465	-\$45,344	-\$189,553	\$20,621	-\$13,906,646	\$0	-\$13,906,646	\$23,412,227	-\$1,435,315,906	-\$1,458,728,134
Mar-17	-\$12,403,111	-\$3,981,768	-\$66,462	-\$14,808	\$13,044	-\$16,453,105	\$0	-\$16,453,105	\$23,412,227	-\$1,451,769,011	-\$1,475,181,239
Apr-17	-\$7,152,840	-\$2,079,943	-\$33,637	-\$44,992	\$20,985	-\$9,290,427	\$0	-\$9,290,427	\$23,412,227	-\$1,461,059,438	-\$1,484,471,666
May-17	-\$4,249,551	-\$1,084,496	-\$16,756	-\$19,605	\$51,743	-\$5,318,664	\$0	-\$5,318,664	\$23,412,227	-\$1,466,378,103	-\$1,489,790,331
Jun-17	-\$2,846,544	-\$749,126	-\$12,220	-\$29,457	\$67,299	-\$3,570,047	\$0	-\$3,570,047	\$23,412,227	-\$1,469,948,150	-\$1,493,360,378
Jul-17	-\$2,432,674	-\$673,504	-\$11,964	\$17,247	\$53,984	-\$3,046,912	\$0	-\$3,046,912	\$23,412,227	-\$1,472,995,062	-\$1,496,407,290
Aug-17	-\$2,371,761	-\$675,104	-\$12,487	\$2,572	\$16	-\$3,056,763	\$0	-\$3,056,763	\$23,412,227	-\$1,476,051,825	-\$1,499,464,053
Sep-17	-\$2,539,390	-\$714,249	-\$12,382	\$5,325	\$60,276	-\$3,200,419	\$0	-\$3,200,419	\$23,412,227	-\$1,479,252,244	-\$1,502,664,472
Oct-17	-\$2,648,172	-\$744,642	-\$15,885	\$22,212	\$43,730	-\$3,342,756	\$0	-\$3,342,756	\$23,412,227	-\$1,482,595,000	-\$1,506,007,228
Nov-17	-\$7,587,488	-\$1,966,136	-\$50,909	\$30,457	\$50,781	-\$9,523,295	\$0	-\$9,523,295	\$23,412,227	-\$1,492,118,295	-\$1,515,530,523
Dec-17	-\$12,595,841	-\$3,405,446	-\$73,570	-\$42,110	\$70,159	-\$16,046,808	\$0	-\$16,046,808	\$23,412,227	-\$1,508,165,103	-\$1,531,577,331
Jan-18	-\$22,918,445	-\$6,713,323	-\$115,325	\$16,576	\$56,107	-\$29,674,409	\$0	-\$29,674,409	\$23,412,227	-\$1,537,839,513	-\$1,561,251,741
Feb-18	-\$11,398,416	-\$2,573,054	-\$37,638	\$32,141	\$35,553	-\$13,941,414	\$0	-\$13,941,414	\$23,412,227	-\$1,551,780,927	-\$1,575,193,155
Mar-18	-\$13,701,257	-\$4,102,488	-\$71,874	\$97,706	\$23,532	-\$17,754,381	\$0	-\$17,754,381	\$23,412,227	-\$1,569,535,308	-\$1,592,947,536
Apr-18	-\$14,252,376	-\$4,362,801	-\$80,331	\$48,637	\$20,711	-\$18,626,161	\$0	-\$18,626,161	\$23,412,227	-\$1,588,161,468	-\$1,611,573,696
May-18	-\$6,279,749	-\$1,859,047	-\$35,776	\$20,324	\$15,933	-\$8,138,314	\$0	-\$8,138,314	\$23,412,227	-\$1,596,299,783	-\$1,619,712,011
Jun-18	-\$2,785,837	-\$866,876	-\$13,609	\$15,332	\$43,914	-\$3,607,076	\$0	-\$3,607,076	\$23,412,227	-\$1,599,906,859	-\$1,623,319,087
Jul-18	-\$2,391,788	-\$728,416	-\$12,355	\$17,243	\$71,279	-\$3,044,037	\$0	-\$3,044,037	\$23,412,227	-\$1,602,950,896	-\$1,626,363,124
Aug-18	-\$2,370,543	-\$763,545	-\$11,058	-\$8,968	\$73,229	-\$3,080,885	\$0	-\$3,080,885	\$23,412,227	-\$1,606,031,780	-\$1,629,444,009

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in

Case No(s). 17-1945-GA-ORD

Summary: App for Rehearing Application for Rehearing by The Office of the Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of Etter, Terry Mr.