

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)	
Energy Ohio, Inc., to Adjust and Set its)	Case No. 18-1043-EL-UEX
Electric Uncollectible Recovery Rate)	
Under Rider UE-ED.)	

**APPLICATION OF DUKE ENERGY OHIO
TO SET THE RATE FOR
ELECTRIC UNCOLLECTIBLE RIDER UE-ED**

Pursuant to R.C. 4909.18, Duke Energy Ohio, Inc., (Duke Energy Ohio or the Company) requests approval to adjust the rate for its electric uncollectible rider, Rider UE-ED, and continued authority to defer uncollectible expense for subsequent recovery.

Duke Energy Ohio is an Ohio corporation engaged in the business of supplying electric transmission, distribution, and generation service to customers in southwestern Ohio, all of whom will be affected by this Application, and is a public utility as defined by R.C. 4905.02 and 4905.03. Duke Energy Ohio serves incorporated communities and unincorporated territory within its entire service area, which includes all or parts of Adams, Brown, Butler, Clinton, Clermont, Hamilton, Montgomery, and Warren Counties in Ohio.

In support of its Application, Duke Energy Ohio states as follows:

1. This Application is made pursuant to the Opinion and Order of the Public Utilities Commission of Ohio (Commission), issued July 8, 2009, in Case Nos. 08-709-EL-AIR, *et al.* (Opinion and Order).¹ In its Opinion and Order, the Commission approved a stipulation in which the signatory parties agreed, among other things, that Duke Energy Ohio would implement an electric uncollectible expense rider (Rider UE-ED) to recover incremental net

¹ *In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Rates*, Case No. 08-709-EL-AIR, Opinion and Order, at pp. 10-11, 19 (July 8, 2009).

uncollectible expense above the baseline established in the test period in the Company's most recent electric distribution rate case.² Rider UE-ED is subject to an annual review and adjustment initiated through a filing made by Duke Energy Ohio.³

2. Pursuant to the Commission's Opinion and Order, in addition to the recovery of net uncollectible expense related to the provision of electric distribution service, Rider UE-ED is intended to recover all percentage of income payment plan (PIPP) installment payments that are not recovered through the universal service fund rider (USR).⁴ The Company is permitted to recover any PIPP installment amounts that are not recovered through the USR or from the customer, where the Company demonstrates reasonable attempts to collect said payments from customers.⁵ Finally, if the Commission determines to use an independent third-party auditor to review the Company's Rider UE-ED filing, the costs of the auditor will also be recovered through Rider UE-ED.⁶

3. Pursuant to the terms of the stipulation approved in the Opinion and Order, the amounts included in Rider UE-ED, exclusive of PIPP, are collected only from the class of customers that created the bad debt expense. Bad debt expense associated with PIPP is allocated in the manner of the USR.⁷

4. Rider UE-ED currently has a monthly charge of \$0.000458 per kWh for residential customers and \$0.16 per bill for non-residential customers, which rates were approved in Case No. 17-1439-EL-UEx.⁸

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ *Id.*

⁸ *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust and Set its Electric Uncollectible Recovery Rate for Rider UE-ED*, Case Nos. 17-1439-EL-UEx, Finding and Order (December 20, 2017).

5. Pursuant to the terms of the stipulation referenced above and the Opinion and Order, Duke Energy Ohio now applies to the Commission to modify the rate under Rider UE-ED. The total incremental unrecovered balance as of March 31, 2019, is projected to be approximately \$3,778,461 for residential and \$29,577 for non-residential rate classes (exclusive of any fees for any third-party audit that the Commission may determine is required). The Company proposes Rider UE-ED monthly charges of \$0.000519 per kWh for residential customers and \$0.03 per bill for non-residential customers. Attachment 1 provides the calculation of proposed rates for Rider UE-ED. Attachments 2 and 3 are copies of the tariff for Rider UE-ED, showing tracked changes and final language, respectively.

6. As directed by the Commission's Opinion and Order, the uncollectible expenses eligible for recovery through Rider UE-ED are those expenses generated by the class of customers paying the uncollectible expense rider.

7. In addition, Duke Energy Ohio notes that the Commission has previously authorized the Company to create a regulatory asset to defer variances in uncollectible expense in future periods for recovery or refund in further proceedings to adjust Rider UE-ED. As such authority was not limited in duration, Duke Energy Ohio respectfully requests that the Commission clarify that the Company's authority to create regulatory assets continues.

8. WHEREFORE, Duke Energy Ohio respectfully requests that the Commission approve this Application, subject to the terms outlined herein and in the testimony filed contemporaneously herewith.

Respectfully submitted,

Duke Energy Ohio, Inc.

/s/ Jeanne W. Kingery

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel (Counsel of Record)

Jeanne W. Kingery (0012172)

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Duke Energy Business Services LLC

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Duke Energy Ohio
139 East Fourth Street
Cincinnati, Ohio 45202

P.U.C.O. Electric No. 19
Sheet No. 108.98
Cancels and Supersedes
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RIDER UE-ED

UNCOLLECTIBLE EXPENSE – ELECTRIC DISTRIBUTION RIDER

APPLICABILITY

Applicable to all retail jurisdictional customers in the Company's electric service areas.

DESCRIPTION

This rider enables the recovery of uncollectible accounts expense and includes Percentage of Income Payment ("PIPP") customer installments not collected through the Universal Service Fund Rider. Also, to the extent that less than \$40,000 per month has not been credited to customers through electric Rate RSLI, any shortfall will be used to reduce collections in Rider UE-ED. The amounts in the Rider, exclusive of uncollectible PIPP installments, will only be collected from the class (residential or non-residential) that created the uncollectible accounts expense. Uncollectible accounts expense associated with PIPP will be allocated in the manner consistent with the Universal Service Fund Rider.

CHARGE

A charge of \$0.000519458 per kWh shall be applied to all kWh delivered to residential customers. A charge of \$0.0346 per bill shall be applied to each non-residential customer.

Filed pursuant to an Order dated ~~December 20, 2017~~ in Case No. 187-1439-EL-UEx before the Public Utilities Commission of Ohio.

Issued: ~~December 21, 2017~~
2018

Effective: ~~January 2,~~

Issued by ~~James P. Henning~~ Amy B. Spiller, President

Duke Energy Ohio
139 East Fourth Street
Cincinnati, Ohio 45202

P.U.C.O. Electric No. 19
Sheet No. 108.9
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RIDER UE-ED

UNCOLLECTIBLE EXPENSE – ELECTRIC DISTRIBUTION RIDER

APPLICABILITY

Applicable to all retail jurisdictional customers in the Company's electric service areas.

DESCRIPTION

This rider enables the recovery of uncollectible accounts expense and includes Percentage of Income Payment ("PIPP") customer installments not collected through the Universal Service Fund Rider. Also, to the extent that less than \$40,000 per month has not been credited to customers through electric Rate RSLI, any shortfall will be used to reduce collections in Rider UE-ED. The amounts in the Rider, exclusive of uncollectible PIPP installments, will only be collected from the class (residential or non-residential) that created the uncollectible accounts expense. Uncollectible accounts expense associated with PIPP will be allocated in the manner consistent with the Universal Service Fund Rider.

CHARGE

A charge of \$0.000519 per kWh shall be applied to all kWh delivered to residential customers. A charge of \$0.03 per bill shall be applied to each non-residential customer.

Filed pursuant to an Order dated ____ in Case No.18- ____-EL-UEx before the Public Utilities Commission of Ohio.

Issued: ____

Effective: ____

Issued by Amy B. Spiller, President

Line	Description	Source	Residential	Non-Residential
1	Total Unrecovered Balance at March 31, 2019	Page 3	\$3,778,461	\$29,577
2	Projected Billing Determinants 12 months ended March 31, 2019	Page 5	<u>7,293,336,085</u> kWh	<u>871,720</u> Bills
3	Rider UE-ED Rate		\$0.000518 per kWh	\$0.03 per bill
4	Rider UE-ED Rate including CAT tax		\$0.000519 per kWh	\$0.03 per bill

Line		Actual											
		Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18
Residential Under- /(Over-) Recovery													
1	Unrecovered Balance - Beginning of Month	\$655,242	\$604,008	\$680,242	\$764,907	\$815,135	\$838,653	\$1,001,334	\$1,092,784	\$1,252,696	\$1,229,480	\$1,136,381	\$962,065
2	Total Residential Bad Debt to be Recovered (Page 4 - 5)	(\$51,234)	\$76,234	\$84,665	\$50,228	\$23,518	\$162,681	\$91,450	\$159,912	(\$23,216)	(\$93,099)	(\$174,316)	(\$155,935)
3	Unrecovered Balance - End of Month	\$604,008	\$680,242	\$764,907	\$815,135	\$838,653	\$1,001,334	\$1,092,784	\$1,252,696	\$1,229,480	\$1,136,381	\$962,065	\$806,130
Total Non-Residential Under- /(Over-) Recovery													
4	Unrecovered Balance - Beginning of Month	(\$32,969)	(\$52,369)	(\$64,492)	(\$71,825)	(\$77,014)	(\$84,432)	(\$86,409)	(\$95,447)	(\$100,892)	(\$113,209)	(\$105,563)	(\$109,110)
5	Total Residential Bad Debt to be Recovered (Page 4 - 5)	(\$19,400)	(\$12,123)	(\$7,333)	(\$5,189)	(\$7,418)	(\$1,977)	(\$9,038)	(\$5,445)	(\$12,317)	\$7,646	(\$3,547)	(\$51,037)
6	Unrecovered Balance - End of Month	(\$52,369)	(\$64,492)	(\$71,825)	(\$77,014)	(\$84,432)	(\$86,409)	(\$95,447)	(\$100,892)	(\$113,209)	(\$105,563)	(\$109,110)	(\$160,147)

Line		Projected											
		Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19
	Residential Under- /(Over-) Recovery												
1	Unrecovered Balance - Beginning of Month	\$806,130	\$963,306	\$1,211,108	\$1,507,777	\$1,825,686	\$2,115,999	\$2,464,843	\$2,738,480	\$3,060,752	\$3,297,801	\$3,561,742	\$3,681,748
2	Total Residential Bad Debt to be Recovered (Page 4 - 5)	\$157,176	\$247,802	\$296,669	\$317,909	\$290,313	\$348,844	\$273,637	\$322,272	\$237,049	\$263,941	\$120,006	\$96,713
3	Unrecovered Balance - End of Month	\$963,306	\$1,211,108	\$1,507,777	\$1,825,686	\$2,115,999	\$2,464,843	\$2,738,480	\$3,060,752	\$3,297,801	\$3,561,742	\$3,681,748	\$3,778,461
	Total Non-Residential Under- /(Over-) Recovery												
4	Unrecovered Balance - Beginning of Month	(\$160,147)	(\$150,114)	(\$134,297)	(\$115,361)	(\$95,069)	(\$76,538)	(\$54,271)	(\$36,805)	(\$16,234)	(\$1,103)	\$15,744	\$23,404
5	Total Residential Bad Debt to be Recovered (Page 4 - 5)	\$10,033	\$15,817	\$18,936	\$20,292	\$18,531	\$22,267	\$17,466	\$20,571	\$15,131	\$16,847	\$7,660	\$6,173
6	Unrecovered Balance - End of Month	(\$150,114)	(\$134,297)	(\$115,361)	(\$95,069)	(\$76,538)	(\$54,271)	(\$36,805)	(\$16,234)	(\$1,103)	\$15,744	\$23,404	\$29,577

Line	Description	Actual											
		Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18
	Residential												
1	kWh Sales	235,908,509	219,141,569	245,200,479	292,716,982	282,652,892	237,413,369	208,893,276	209,630,992	285,967,403	398,612,329	292,412,361	249,216,330
2	Net Charge Offs for Month (pages 6-7)	\$201,636	\$316,995	\$390,025	\$424,606	\$389,514	\$474,525	\$365,755	\$422,749	\$314,383	\$331,389	\$155,016	\$122,239
3	Shortfall of Customers using Rate RSLI	4,014	4,091	4,163	4,261	4,339	4,397	4,397	4,563	4,568	4,624	4,673	4,732
4	Customer Charge Monthly Credit	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4
5	LESS: Unused RSLI Funds (Reduction to Bad Debts) (a)	\$16,056	\$16,364	\$16,652	\$17,044	\$17,356	\$17,588	\$17,588	\$18,252	\$18,272	\$18,496	\$18,692	\$18,928
6	Recovery from Uncollectible Rider	\$237,431	\$224,982	\$289,460	\$358,266	\$349,549	\$295,023	\$257,386	\$245,223	\$320,159	\$407,050	\$311,450	\$259,921
7	CAT Tax (b)	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068
8	LESS: Recovery from Uncollectible Rider less CAT TAX	\$236,814	\$224,397	\$288,708	\$357,334	\$348,640	\$294,256	\$256,717	\$244,585	\$319,327	\$405,992	\$310,640	\$259,246
9	Total Residential Bad Debt to be Recovered (Line 2 - Line 5 - Line 8)	(\$51,234)	\$76,234	\$84,665	\$50,228	\$23,518	\$162,681	\$91,450	\$159,912	(\$23,216)	(\$93,099)	(\$174,316)	(\$155,935)
	Non-Residential												
10	Number of Bills	72,457	72,622	72,426	72,464	72,486	72,434	72,698	72,706	72,714	72,830	72,825	72,806
11	Net Charge Offs for Month (pages 6-7)	\$12,870	\$20,234	\$24,895	\$27,102	\$24,863	\$30,289	\$23,346	\$26,984	\$20,067	\$21,152	\$9,895	\$7,802
12	Recovery from Uncollectible Rider	\$32,354	\$32,441	\$32,312	\$32,375	\$32,365	\$32,350	\$32,468	\$32,514	\$32,468	\$13,541	\$13,477	\$58,992
13	CAT Tax (b)	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068	1.0026068
14	LESS: Recovery from Uncollectible Rider less CAT TAX	\$32,270	\$32,357	\$32,228	\$32,291	\$32,281	\$32,266	\$32,384	\$32,429	\$32,384	\$13,506	\$13,442	\$58,839
15	Total Non-Residential Bad Debt to be Recovered (Line 11 - Line 14)	(\$19,400)	(\$12,123)	(\$7,333)	(\$5,189)	(\$7,418)	(\$1,977)	(\$9,038)	(\$5,445)	(\$12,317)	\$7,646	(\$3,547)	(\$51,037)
16	Total Bad Debt (Residential + Non-residential)	(\$70,634)	\$64,111	\$77,332	\$45,039	\$16,100	\$160,704	\$82,412	\$154,467	(\$35,533)	(\$85,453)	(\$177,863)	(\$206,972)

(a) Per item #14 of the Stipulation in Case No. 08-709-EL-AIR, the parties agreed that up to 10,000 customers may participate in Rate RSLI and receive a \$4 credit per month. To the extent less than \$40,000 is credited to customers during each month, the deficit shall be used to reduce amounts collected through Rider UE-ED

(b) CAT tax was intergrated into calculation in Case No. 12-1948-EL-UEX, effective September 28, 2012

Line	Description	Projected												Total
		Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	
	<u>Residential</u>													
1	kWh Sales	503,910,503	426,396,487	530,351,234	705,398,262	731,618,793	670,375,802	485,166,334	448,319,947	628,469,776	792,025,024	754,283,989	617,019,934	7,293,336,085
2	Net Charge Offs for Month (pages 6-7)	\$157,176	\$247,802	\$296,669	\$317,909	\$290,313	\$348,844	\$273,637	\$322,272	\$237,049	\$263,941	\$120,006	\$96,713	
3	Shortfall of Customers using Rate RSLI	0	0	0	0	0	0	0	0	0	0	0	0	
4	Customer Charge Monthly Credit	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	\$4	
5	LESS: Unused RSLI Funds (Reduction to Bad Debts) (a)		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
6	Recovery from Uncollectible Rider	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
7	CAT Tax (b)													
8	LESS: Recovery from Uncollectible Rider less CAT TAX	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
9	Total Residential Bad Debt to be Recovered (Line 2 - Line 5 - Line 8)	\$157,176	\$247,802	\$296,669	\$317,909	\$290,313	\$348,844	\$273,637	\$322,272	\$237,049	\$263,941	\$120,006	\$96,713	
	<u>Non-Residential</u>													
10	Number of Bills	72,478	72,643	72,447	72,485	72,507	72,455	72,719	72,727	72,735	72,851	72,846	72,827	871,720
11	Net Charge Offs for Month (pages 6-7)	\$10,033	\$15,817	\$18,936	\$20,292	\$18,531	\$22,267	\$17,466	\$20,571	\$15,131	\$16,847	\$7,660	\$6,173	
12	Recovery from Uncollectible Rider	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
13	CAT Tax (b)													
14	LESS: Recovery from Uncollectible Rider less CAT TAX													
15	Total Non-Residential Bad Debt to be Recovered (Line 11 - Line 14)	\$10,033	\$15,817	\$18,936	\$20,292	\$18,531	\$22,267	\$17,466	\$20,571	\$15,131	\$16,847	\$7,660	\$6,173	
16	Total Bad Debt (Residential + Non-residential)	\$167,209	\$263,619	\$315,605	\$338,201	\$308,844	\$371,111	\$291,103	\$342,843	\$252,180	\$280,788	\$127,666	\$102,886	

(a) Per item #14 of the Stipulation in Case No. 08-709-EL-AIR, the parties agreed that up to 10,000 customers may participate in Rate RSLI and receive a \$4 credit per month. To the extent less than \$40,000 is credited to customers during each month, the deficit shall be used to reduce amounts collected through Rider UE-ED

(b) CAT tax was intergrated into calculation in Case No. 12-1948-EL-UEX, effective September 28, 2012

Line	Description	Actual											
		Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18
1	Net Charge Offs for Month - Residential	\$ 275,982	\$ 430,349	\$ 524,742	\$ 576,660	\$ 528,789	\$ 631,774	\$ 481,015	\$ 557,197	\$ 424,943	\$ 452,831	\$ 205,449	\$ 162,034
2	Net Charge Offs for Month - Non - Residential	\$ 17,616	\$ 27,469	\$ 33,494	\$ 36,808	\$ 33,752	\$ 40,326	\$ 30,703	\$ 35,566	\$ 27,124	\$ 28,904	\$ 13,114	\$ 10,343
3	Net Charge Offs for Month - Total	\$ 293,598	\$ 457,818	\$ 558,236	\$ 613,468	\$ 562,541	\$ 672,100	\$ 511,718	\$ 592,763	\$ 452,067	\$ 481,735	\$ 218,563	\$ 172,376
4	Electric Regulated Distribution Revenue (a)	\$ 53,477,162	\$ 52,681,765	\$ 59,163,209	\$ 66,172,950	\$ 65,505,294	\$ 60,023,139	\$ 54,707,000	\$ 53,029,156	\$ 59,942,048	\$ 72,544,183	\$ 62,572,514	\$ 57,351,404
5	Electric Retail Revenue (b)	\$ 73,195,094	\$ 71,520,093	\$ 79,598,536	\$ 89,869,948	\$ 88,927,338	\$ 79,913,688	\$ 71,946,846	\$ 69,894,115	\$ 81,022,003	\$ 99,128,947	\$ 82,929,668	\$ 76,022,538
6	Distribution Revenue as a % of Electric Retail Revenue	73.06110%	73.66010%	74.32700%	73.63190%	73.66160%	75.11000%	76.03810%	75.87070%	73.98240%	73.18160%	75.45250%	75.44000%
7	Net Charge Offs for Month Allocated to Distribution	\$ 214,506	\$ 337,229	\$ 414,920	\$ 451,708	\$ 414,377	\$ 504,814	\$ 389,101	\$ 449,733	\$ 334,450	\$ 352,541	\$ 164,911	\$ 130,041
8	<u>Residential</u> Net Charge Offs for Month	\$ 201,636	\$ 316,995	\$ 390,025	\$ 424,606	\$ 389,514	\$ 474,525	\$ 365,755	\$ 422,749	\$ 314,383	\$ 331,389	\$ 155,016	\$ 122,239
9	<u>Non-Residential</u> Net Charge Offs for Month	\$ 12,870	\$ 20,234	\$ 24,895	\$ 27,102	\$ 24,863	\$ 30,289	\$ 23,346	\$ 26,984	\$ 20,067	\$ 21,152	\$ 9,895	\$ 7,802

(a) Total Regulated Retail Sales (billed) excluding interdepartmental
(b) Total Retail Sales (billed) excluding interdepartmental

Line	Description	Projected											
		Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19
1	Net Charge Offs for Month - Residential	\$ 216,998	\$ 338,210	\$ 412,400	\$ 453,152	\$ 415,535	\$ 496,691	\$ 377,918	\$ 437,827	\$ 334,030	\$ 379,281	\$ 172,041	\$ 135,961
2	Net Charge Offs for Month - Non - Residential	\$ 13,851	\$ 21,588	\$ 26,323	\$ 28,925	\$ 26,523	\$ 31,704	\$ 24,122	\$ 27,946	\$ 21,321	\$ 24,209	\$ 10,981	\$ 8,678
3	Net Charge Offs for Month - Total	\$ 230,849	\$ 359,798	\$ 438,723	\$ 482,077	\$ 442,058	\$ 528,395	\$ 402,040	\$ 465,773	\$ 355,351	\$ 403,490	\$ 183,022	\$ 144,639
4	Electric Regulated Distribution Revenue (a)	\$ 56,471,700	\$ 53,233,333	\$ 59,185,899	\$ 67,096,167	\$ 67,569,349	\$ 66,605,540	\$ 59,750,608	\$ 55,441,847	\$ 63,685,946	\$ 69,369,820	\$ 67,795,902	\$ 62,370,380
5	Electric Retail Revenue (b)	\$ 77,965,175	\$ 72,655,186	\$ 82,274,453	\$ 95,639,827	\$ 96,714,088	\$ 94,834,112	\$ 82,521,018	\$ 75,321,166	\$ 89,740,934	\$ 99,683,914	\$ 97,191,885	\$ 87,681,249
6	Distribution Revenue as a % of Electric Retail Revenue	72.43200%	73.26850%	71.93720%	70.15500%	69.86510%	70.23370%	72.40650%	73.60730%	70.96640%	69.58980%	69.75470%	71.13310%
7	Net Charge Offs for Month Allocated to Distribution	\$ 167,209	\$ 263,619	\$ 315,605	\$ 338,201	\$ 308,844	\$ 371,111	\$ 291,103	\$ 342,843	\$ 252,180	\$ 280,788	\$ 127,666	\$ 102,886
8	<u>Residential</u> Net Charge Offs for Month	\$ 157,176	\$ 247,802	\$ 296,669	\$ 317,909	\$ 290,313	\$ 348,844	\$ 273,637	\$ 322,272	\$ 237,049	\$ 263,941	\$ 120,006	\$ 96,713
9	<u>Non-Residential</u> Net Charge Offs for Month	\$ 10,033	\$ 15,817	\$ 18,936	\$ 20,292	\$ 18,531	\$ 22,267	\$ 17,466	\$ 20,571	\$ 15,131	\$ 16,847	\$ 7,660	\$ 6,173

(a) Total Regulated Retail Sales (billed) excluding interdepartmental
(b) Total Retail Sales (billed) excluding interdepartmental