## BEFORE <br> THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of the Ohio Department of Development for an Order Approving Adjustments to the Case No. 08-658-EL-UNC Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities.
SUPPLEMENTAL TESTIMONY

## OF

DONALD A. SKAGGS

ON BEHALF OF
THE OHIO DEPARTMENT OF DEVELOPMENT

November 26, 2008

## SUPPLEMENTAL TESTIMONY OF DONALD A. SKAGGS <br> On Behalf of The Ohio Department of Development

Q. Please state your name and business address.
A. My name is Donald A. Skaggs. My business address is Ohio Department of Development ("ODOD"), 77 South High Street, 25th Floor, Columbus, Ohio 432161001.
Q. By whom are you employed and in what capacity?
A. I am employed by ODOD in its Office of Community Services ("OCS") as Assistant Office Chief.
Q. Have you previously submitted written testimony on behalf of ODOD in support of its application in this proceeding?
A. Yes. My direct testimony in support of ODOD's original application was filed in this docket on October 31, 2008.
Q. What is the purpose of your supplemental testimony?
A. The purpose of this supplemental testimony is to support the amended application which ODOD has filed in this proceeding. In this testimony, I discuss the reasons for the changes to the Universal Service Fund ("USF") rider revenue requirements and USF rider rates originally proposed for each electric distribution utility ("EDU") and sponsor the revised exhibits and workpapers that document these changes.
Q. Why has ODOD filed an amended application?
A. The approved test period for purposes of this case is calendar 2008. Because actual 2008 data was only available through August 2008 at the time the original application was prepared, ODOD utilized data from the corresponding months of 2007 as a surrogate for
those months of the 2008 test period for which actual data was not available. However, ODOD reserved the right to update its calculations to incorporate additional actual data as it became available. ODOD now has EDU-reported data for September 2008, and I have substituted that data for the September 2007 data that was used in the original testperiod analysis. In addition, I have also revised the test-period analysis to annualize the impact of certain 2008 EDU rate changes that were not reported by the EDUs in question until after the original application was prepared.
Q. How does the inclusion of the additional month of actual data impact your revenue requirement analysis?
A. Substituting the actual numbers for September 2008 for the estimates used in the original analysis changes the test-period cost of electricity delivered to the EDU's PIPP customers as well as the amount of the test-period USF rider collections that are offset against that cost to determine the test-period cost of PIPP. Although the primary impact is on the cost of PIPP, there are also changes to several other USF rider revenue requirement components that flow from substituting actual numbers from September 2008 for the September 2007 numbers used in my original analysis.

## Q. Please explain.

A. First, because the Electric Partnership Program ("EPP") costs are allocated based on the EDU's relative cost of PIPP, the changes to the EDU's respective cost of PIPP components produce changes in the EPP component as well. Second, the projected December 31, 2008 PIPP account balances for each EDU must also be recalculated to capture the impact of this additional actual data, resulting in changes in the adjustments
necessary to synchronize the proposed riders with EDU's PIPP USF account balances as of the riders' proposed effective date of January 1, 2009. Third, the substitution of the actual Kwh sales for September 2008 in the Kwh sales figures used in the original calculations, coupled with other factors driving revisions to the cost of PIPP, also impacts the interest component. Finally, the changes in Kwh sales and pro forma rider revenues also affect the calculation of the undercollection component.
Q. You indicated that you also revised your USF rider revenue requirement analysis to reflect the impact of 2008 EDU rate changes that had not been reported at the time the original application was prepared. How do changes in EDU rates affect the USF rider revenue requirement?
A. As I explained in my direct testimony, EDU rate adjustments affect the cost of electricity delivered to PIPP customers, but do not change the level of PIPP customer payments because those payments are based on fixed, specified percentages of customer income and are not tied to the rates charged. Thus, an increase in an EDU rate element increases the cost of PIPP by widening the gap between the cost of electricity delivered to PIPP customers and the amount paid by PIPP customers. On the other hand, a decrease in an EDU rate element reduces the cost of PIPP by narrowing this gap. Although the use of actual data for months subsequent to a rate change will capture the impact of the rate adjustment for those months, it is necessary to annualize the impact of the rate change if the total test-period cost of PIPP is to reflect the annual revenue requirement that must be recovered through this component of the USF rider rate. Again, the primary impact these adjustments is on the cost of PIPP, but, as in the case of the adjustment to include actual

September 2008 data, these adjustments also affect those other elements of the USF rider revenue requirement identified above.
Q. What is the overall impact on the indicated aggregate USF rider revenue requirement of the various adjustments to cost of PIPP you have just described?
A. These changes produce an indicated aggregate USF rider revenue requirement of $\$ 156,579,457$, as compared to the total annual USF rider revenue target of $\$ 161,636,546$ identified in the original application. This revised revenue requirement, when compared to the revised adjusted test-period USF rider revenues of $\$ 152,257,281$, produces the indicated aggregate revenue deficiency of $\$ 4,332,628$ shown on the table on page 6 of the amended application, as compared to the $\$ 8,412,820$ total deficiency reported in the original application. On an individual company basis, DPL, OE, and TE continue to show projected deficiencies based on the adjusted pro forma revenues their current USF rider rates would generate, while CEI, CSP, Duke Energy Ohio ("Duke"), and OP continue to show a projected surplus at their current rates.
Q. Have you prepared revised exhibits supporting the changes you have described?
A. Yes. I prepared the exhibits attached to the amended application, which show the elements of the revised USF rider revenue requirement on a company-by-company basis. The workpapers supporting theses changes are attached to my supplemental testimony. The underlying methodology for each calculation is the same as described in my initial testimony.
Q. How was the cost of PIPP component of each EDU's revenue requirement determined for purposes of the amended application?
A. The cost of PIPP represents the total cost of electricity consumed by each EDU's PIPP customers during the test period, plus pre-PIPP balances, less all payments made by or on behalf of PIPP customers, including agency payments, over the same period. Substituting actual data for September 2008 for the September 2007 data used in the original analysis produces the revised test-period cost of PIPP for each EDU shown in Exhibit A to the amended application. The supporting work papers are attached to my supplemental testimony as Exhibits DAS-Rev-1 through DAS-Rev-7. However, as discussed above, it is necessary to adjust the test-period cost of PIPP to reflect the impact of EDU rate increases not otherwise captured in the test-period analysis.
Q. Your direct testimony describes the adjustments to the cost of PIPP you made to reflect Commission-approved changes to the rates charged by the Dayton Power and Light Company ("DPL") that took effect during the test period, as well as adjustments you made to reflect known changes to DPL's rates that will become effective January 1, 2009. What additional adjustments are you proposing for EDU rate changes at this time?
A. Subsequent to the preparation of the application, Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP") reported two Commission-approved changes in their respective generation service riders that were not captured in my original calculation of the test-period cost of PIPP for these companies. These riders changed effective December 2007 - the CSP rider increased and OP rider decreased - and both riders increased effective February 2008. To annualize the impact of these changes, it was necessary to restate the proforma collections for those months of the test period prior
to the months in which the changes took effect, including the surrogate months of October, November, and December 2007. The calculation of the adjustments for CSP and OP are shown, respectively, in Exhibit A.1.a and A.1.b of the amended application. The net amounts are carried forward to the " 2008 EDU Rate Increases" column in Exhibit A.1. CSP and OP also reported that their regulatory asset riders were removed effective January 2008. To avoid overstating the test-period cost of electricity delivered to PIPP customers, it was necessary to recalculate the amount collected from PIPP customers during the surrogate 2007 months to remove the dollars associated with these riders. These calculations are also shown on Exhibits A.1.a and A.1.b of the amended application, and the net reductions are carried forward to the " 2008 EDU Rate Decreases" column in Exhibit A.1. The Cleveland Electric Illumination Company ("CET"), Ohio Edison Company ("OE"), and Toledo Edison Company ("TE") reported that they were authorized to increase their respective transmission riders applicable to residential service effective July 1, 2008. Although impact of these increases on the test-period cost of PIPP is included in the actual data for July through September 2008, the data for the remaining months of the test period (i.e., January through June of 2008, and the surrogate months of October through December 2007) do not reflect these rate increases. Thus, I also adjusted the actual results for the other months of the test period to annualize the impact of these rate changes on the cost of electricity delivered to PIPP customers. These adjustments for CEI, OE, and TE are shown, respectively, in Exhibits A.1.d, A.1.e, and A.1.f to the amended application, and the increases are carried forward to the " 2008 EDU Rate Increase" column in Exhibit A. 1.
Q. Are the adjustments to the cost of PIPP for DPL rate changes shown on Exhibit A. 1 of the amended application the same as the adjustments shown in the original application?
A. Yes. However, I consolidated the presentation of the calculations supporting those adjustments on a single exhibit for purposes of the amended application. Those calculations are now shown in Exhibit A.1.c.
Q. What was the overall effect on the adjusted test-period cost of PIPP of substituting actual data for September 2008 and the additional adjustments for EDU rate increases you have described?
A. A comparison of Exhibit A. 1 to the October 31, 2008 application with Exhibit A. 1 to the amended application shows that the net impact of these changes reduced the indicated aggregate revenue requirement associated with the cost of PIPP component from $\$ 123,269,741$ to $\$ 120,639,312$.
Q. How was the EPP component of the USF rider revenue requirement determined for purposes of the amended application?
A. As in the original application, the amended application proposes the $\$ 14,946,196$ allowance for EPP that was approved by the Commission in its September 10, 2008 finding and order in the NOI phase of this proceeding. As explained above, the specific amount allocated to each EDU has changed slightly due to the changes in the relative costs of PIPP, the basis upon which the total allowed EPP costs are allocated. The development of the allocation factors and the results of the allocation are shown in Exhibit B to the amended application.
Q. Tow was the atmimistrative cost compenent of the USF rider revenue reunirement datermaned for parposes of the amonded application?
A. There is mo change in this componeni from the amonat included for adminisirative cosis in the original application. Because these costs were allocated to the boUs based on the relative namber of PIPP customers during
 cotals, the amounts allocated to the incividual RDTS were unaffected fy the indusion of the Septenber 2008 data. The results af the allocation are shown on Exhibit $C$ to the amended application.
Q. What was the impact of substituthry actual data for september vois and
 increases on the projected December 31, 2068 USF account balamee

A. As show, in Exhibit D of the amerbed application, ODOD now projetes a
 the sumplus of $\$ 5,655,63$ inentifed in the orizinal application. The workpapers showing the calowation of he Decmber 31, 2008 USF aceount baknces now projected for each company are atanhed to my suplemental

Q. Were changor made to the reserve companent of the USF fider revenae target ia prepariag the amended application?
A. As explaned in my initial testimony, the reserve component is based on the EDU's highest monthy deficit during the test period. The inchsion of actual data for Sememher 20 madiasments for the Eoll rate increases had na impact on the catculation of the
respective EDU reserve requirements for most of the EDUs. However, for Duke, the surrogate month of September 2007 was the month of the highest test-period deficit. With the substitution of actual data for September 2008, the surrogate month of October 2007 becomes the month of the highest deficit for Duke. The reserve component for each EDU is shown in Exhibit F to the amended application.
Q. You indicated that substituting actual Kwh sales for September 2008 and the adjustments for EDU rate increases that you have described, coupled with other factors the drive the cost of the PIPP, also impact the allowance for interest proposed in the amended application. What is this impact?
A. Although the impact is relatively small, these changes do affect the results of the cash flow analysis used to develop the allowance for interest. As shown in Exhibit $G$ to the amended application, the new total allowance for interest is $\$ 323,309$, as opposed to the $\$ 333,010$ proposed in the original application. The workpapers supporting the revised allowance are attached to my supplemental testimony as Exhibits DAS-Rev-15 through DAS-Rev-21.
Q. You also indicated that substituting actual Kwh sales for September 2008 in calculating test-period sales, coupled with the change in pro forma USF rider revenue for the CEI, CSP, OE, OP, and TE rate increases, affects the undercollection component of the revenue requirement. What was the impact of these changes on the undercollection component?
A. As shown in Exhibit H to the amended application, the total allowance for undercollection is now $\$ 2,147,082$, as compared to the $\$ 2,138,542$ proposed in the
original application. The workpapers supporting the revision are attached to my testimony as Exhibits DAS-Rev-22 through DAS-Rev-28.
Q. Did you revise the proposed allowance for the cost of the audits of CEI, DPL, OE, and TE that will be conducted in 2009 in determining the revised revenue requirement for purposes of the amended application?
A. No. The allowances for the cost of the audits of these EDUs are fixed estimates and are unaffected by the additional adjustments I have described.
Q. Taking into account the various changes you have described, what are the results of your USF rider revenue requirement analysis?
A. The results of the revised USF rider revenue requirement analysis for each EDU is summarized in Exhibit I to the amended application.
Q. How did you calculate the proposed USF rider rate for each EDU?
A. I applied the same Commission-approved rate design methodology described in my initial testimony, substituting actual September 2008 Kwh sales for the September 2007 sales used in the original calculation. I began by dividing each EDU's indicated revenue requirement by its revised test-period sales to determine the per Kwh rate that would be applicable if the EDU's revenue requirement were to be recovered through a uniform per Kwh rate. The Kwh sales figures for each EDU are shown in Exhibits DAS-Rev-29 through DAS-Rev-36.
Q. How did you convert the indicated uniform per Kwh USF rider rate for each EDU into the two-tiered rates proposed in the amended application?
A. Under the Commission-approved methodology, the first block of the rate applies to all monthly consumption up to and including $833,000 \mathrm{Kwh}$ (i.e., one-twelfth of an annual consumption of $10,000,000 \mathrm{Kwh}$ ), while the second block applies to all consumption above $833,000 \mathrm{Kwh}$ per month. The rate per Kwh for the second block is set at the lower of the PIPP rider rate in effect in October 1999 or the per-Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per-Kwh rate, with the rate for the first block set at the level necessary to produce the remainder of the EDU's annual USF rider revenue requirement. In this case, this cap is in play for all the EDUs, so all the proposed rider rates have this declining block feature as shown in the table on page 13 of the amended application. The workpapers supporting the rate calculations are attached to my testimony as Exhibits DAS-Rev-36 through DAS-Rev-42. The final line item (line 21) on each of these exhibits shows the annual cost impact on the average residential consumer resulting from the use of the declining block rate structure as opposed to an uniform rate per Kwh. As in prior cases, I have included this analysis purely for informational purposes.
Q. How do the USF riders proposed in the amended application compare to the current USF riders?
A. The table presented at page 13 of the amended application compares the USF rider rate now proposed for each EDU with the EDU's current USF rider. As I previously indicated, the test period revenues produced by the current DPL, OE, and TE rider rates are below the indicated USF rider revenue requirements for these companies. Accordingly, the USF rider rates proposed for these EDUs are higher than their current

USF rider rates. On the other hand, the current CEI, CSP, Duke, and OP riders would generate pro forma revenues that exceed their indicated revenue requirements. Thus, the proposed USF rider rates for these EDUs are lower than their current USF rider rates.
Q. Will the USF rider adjustments proposed in the amended application produce the minimum amount of revenue necessary to serve the purposes for which the USF riders were created?
A. Yes. ODOD's goal is to be to propose USF riders at the lowest possible level that will generate revenues sufficient to fund the low-income customer assistance and consumer education programs and cover the associated administrative costs. However, ODOD continues to believe that the USF riders must be reviewed no less frequently than annually to assure, to the extent possible, that these riders will generate the necessary level of revenues, but no more than that level.
Q. Does this conclude your supplemental testimony?
A. Yes.

EXHIBITS
Universal Service Fund Current oost of PIPP
Current Rider Mechanism Cost of PIPP
Company: COLUMEUS SOUTHERN POWER

Ohio Power
Current Rlder
Cost of PIPP

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

Company: Duke

Universal Service Fund
Cleveland Illuminating Company
Current Rider Mechanism
Gost of PIPP
Company: Cleveland Illuminating Company

Ohio Edison
Current Rider Mechanism
Cost of PIPP




## Universal Service Fund Projection of December 31, 2008 Balance <br> Projection Jan 2008 -Dec 2008


Universal Service Fund
Projection of Decernber 31, 2008 Balance Jan 2008 - Dec 2008



Unlversal Servica Fund
PTojected of Docember 31, 2008 Balance
Jan 2008-Dec 2008

Universal Service Fund
Prajection of December 31,2008 Balance
Jan $2008-$ Dec 2008

Company: Toledo Edison


## CSP

## Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec <br> January <br> Begin through Jan | $\begin{array}{r} (487,960.80) \\ 357,037.42 \\ (130,923.39) \\ \hline \end{array}$ | \$0.00 | Begin through Jan x. $000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $\begin{array}{r} (130,923.39) \\ 179,278.04 \\ 48,354.66 \\ \hline \end{array}$ | \$322.04 | Begin through Feb $\times .000222 \times 30$ |
| March | Begin through Feb March <br> Begin through March | $\begin{array}{r} 48,676.70 \\ 789,355.04 \\ \hline \end{array}$ | \$5,581.29 | Begin through March $\times .000222 \times 30$ |
|  |  | 838,03 |  |  |
| April | Begin through March April <br> Begin through April | $\begin{array}{r} 843,613.03 \\ 276,146.08 \\ 1,119,759.11 \\ \hline \end{array}$ | \$7,457.60 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April <br> May <br> Begin through May | $\begin{gathered} \hline 1,127,216.70 \\ 1169,704.99) \\ 957,511.71 \end{gathered}$ | \$6,377.03 | Begin through May x. $000222 \times 30$ |
| June | Begin through May June Begin through June | $\begin{array}{r} 963,888.74 \\ 94,630.73 \\ 1,058,519.47 \end{array}$ | \$7,049.74 | Begin through June x . $000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\begin{array}{r} \hline 1,065,569.21 \\ 185,679.82 \\ 1,251,249.03 \\ \hline \end{array}$ | \$8,333.32 | Begin through July x . $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{gathered} \hline 1,259,582.35 \\ (488,567.62) \\ 771,014.74 \\ \hline \end{gathered}$ | \$5,134.96 | Begin through Aug $\times .000222 \times 30$ |
| September | $\begin{aligned} & \text { Begin through Aug } \\ & \text { September } \\ & \text { Begin through Sept } \end{aligned}$ | $\begin{array}{r} 776,149.69 \\ (859,418.33) \\ (83,268.63) \\ \hline \end{array}$ | \$0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept October Begin through October | $\begin{array}{r} (83,268.63) \\ (2,299,446.27) \\ (2,382,714.90) \end{array}$ | 0.00 | Begin through Oct $\mathrm{x} .000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $\begin{array}{r} (2,382,714.90) \\ (550,701.58) \\ (2,933,416.48) \\ \hline \end{array}$ | 0.00 | Begin + Dec $\times .000222 \times 30$ |
| December | Begin through Nov December Begin through Dec | $\begin{aligned} & \hline(2,933,416.48) \\ & (1,243,165.76) \\ & (4,176,582.24) \end{aligned}$ | \$0.00 |  |
|  |  | Total Interest:\| | \$40,255.97 |  |

Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Dec-06 January Begin through Jan | (\$3,293,316.50) \$1,020,861.76 <br> (\$2,272,454.73) | \$0.00 | Begin through Jan x . $000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | (\$2,272,454.73) $\$ 685,570.41$ <br> (\$1,586,884.32) | \$0.00 | Begin through Feb $\times .000222 \times 30$ |
| March | Begin through Feb March Begin through March | $\begin{array}{r} (\$ 1,586,884.32) \\ \$ 1,675,379.32 \\ \$ 88,495.00 \\ \hline \end{array}$ | \$589.38 | Begin through March x . $000222 \times 30$ |
| April | Begin through March April <br> Begin through April | $\begin{array}{r} \$ 89,084.37 \\ \$ 477,335.73 \\ \$ 566,420.10 \\ \hline \end{array}$ | \$3,772.36 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May <br> Begin through May | $\begin{gathered} \$ 570,192.46 \\ (\$ 353,411.37) \\ \$ 216,781.09 \\ \hline \end{gathered}$ | \$1,443.76 | Begin through May $\times .000222 \times 30$ |
| June | Begin through May June <br> Begin through June | $\begin{gathered} \hline \$ 218,224.85 \\ (\$ 396,909.67) \\ (\$ 178,684.82) \\ \hline \end{gathered}$ | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | (\$178,684.82) (\$714,116.02) (\$892,800.84) | \$0.00 | Begin through July $\times .000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{array}{r} (\$ 892,800.84) \\ (\$ 705,789.59) \\ (\$ 1,598,590.43) \end{array}$ | \$0.00 | Begin through Aug x. $000222 \times 30$ |
| September | Begin through Aug September Begin through Sept | (\$1,598,590.43) (\$1,247,015.61) (\$2,845,606.04) | \$0.00 | Begin through Sept x $000222 \times 30$ |
| October | Begin through Sept October Begin through Octobe | $\begin{aligned} & (\$ 2,845,606.04) \\ & (\$ 1,959,586.20) \\ & (\$ 4,805,192.23) \end{aligned}$ | \$0.00 | Begin through Oct $\times .000222 \times 30$ |
| November | Begin througth Octob6 November Begin through Nov | $\begin{array}{r} (\$ 4,805,192.23) \\ (\$ 449,719.25) \\ (\$ 5,254,911.48) \end{array}$ | \$0.00 |  |
| December | Begin through Nov December Begin through Dec | $(\$ 5,254,911.48)$ <br> $\$ 423,024.67$ <br> $(\$ 4,831,886.81)$ <br> Total Interest: | $\begin{array}{r} \$ 0.00 \\ \hline \$ 5,805.50 \end{array}$ |  |

Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January Begin through Jan | (\$1,060,611.57) <br> (\$24,231.97) <br> (\$1,084,843.54) | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February <br> Begin throug Feb | (\$1,084,843.54) (\$757,119.06) <br> (\$1,841,962.59) | \$0.00 | Begin through Feb $\times .000222 \times 30$ |
| March | Begin through Feb March <br> Begin through March | (\$1,841,962.59) \$513,766.84 (\$1,328, 195.75) | \$0.00 | Begin through March x. $000222 \times 30$ |
| April | Begin through March April <br> Begin through April | (\$1,328, 195.75) \$286,923.96 (\$1,041,271.79) | \$0.00 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May <br> Begin through May | $\begin{array}{r} \hline(\$ 1,041,271.79) \\ (\$ 29,648.26) \\ (\$ 1,070,920.05) \\ \hline \end{array}$ | \$0.00 | Begin through May $\times .000222 \times 30$ |
| June | Begin through May June <br> Begin through June | (\$1,070,920.05) <br> $\$ 42,114.22$ <br> ( $\$ 1,028,805.83$ ) | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\begin{gathered} (\$ 1,028,805.83) \\ \$ 147,767.27 \\ (\$ 881,038.56) \\ \hline \end{gathered}$ | \$0.00 | Begin through July $\times .000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{gathered} \hline(\$ 881,038.56) \\ \$ 186,684.78 \\ (\$ 694,353.78) \\ \hline \end{gathered}$ | \$0.00 | Begin through Aug $\times .000222 \times 30$ |
| September | Begin through Aug September Begin through Sept | (\$694,353.78) (\$162,418.13) ( $\$ 856,771.91$ ) | \$0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept October Begin through Octobe | $\begin{array}{r} (\$ 856,771.91) \\ (\$ 1,123,334.29) \\ (\$ 1,980,106.20) \end{array}$ | \$0.00 | Begin through Oct $\times .000222 \times 30$ |
| November | Begin througth Octobe November Begin through Nov | $\begin{array}{r} (\$ 1,980,106.20) \\ (\$ 795,550.39) \\ (\$ 2,775,656.59) \end{array}$ | \$0.00 |  |
| December | Begin through Nov December Begin through Dec | $(\$ 2,775,656.59)$ <br> $(\$ 85,212.96)$ <br> $(\$ 848,337.32)$ <br> Total Interest: | $\$ 0.00$ <br> $\$ 0.00$ |  |

## DPL

InterestCalculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January Begin through Jan | $\begin{aligned} & \$ 510,646.19 \\ & \$ 438,304.71 \\ & \$ 94895090 \end{aligned}$ | \$6,320.01 | Begin through Jan x . $000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $\begin{array}{r} \$ 955,270.91 \\ \$ 489,008.15 \\ \$ 1,444,279.07 \end{array}$ | \$9,618.90 | Begin through Feb $\times .000222 \times 30$ |
| March | Begin through Feb March Begin through March | $\begin{array}{r} \hline \$ 1,453,897.97 \\ (\$ 194,048.07) \\ \$ 1,259,849.90 \\ \hline \end{array}$ | \$8,390.60 | Begin through March $\times .000222 \times 30$ |
| April | Begin through March April <br> Begin through Apri | $\begin{array}{r} \$ 1,268,240.50 \\ \$ 485,438.15 \\ \$ 1,753,678.65 \\ \hline \end{array}$ | \$11,679.50 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April <br> May <br> Begin through May | $\begin{array}{r} \$ 1,765,358.15 \\ (\$ 87,070.35) \\ \$ 1,678,287.80 \end{array}$ | \$11,177.40 | Begin through May x $000222 \times 30$ |
| June | Begin through May June Begin through June | \$1,689,465.20 <br> (\$504,999.28) <br> \$1,184,465.92 | \$7,888.54 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July Begin through July | $\begin{gathered} \$ 1,192,354.46 \\ (\$ 678,890.97) \\ \$ 513,463.49 \end{gathered}$ | \$3,419.67 | Begin through July x . $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{aligned} & \$ 516,883.16 \\ & (\$ 883,279.94) \\ & (\$ 366,396.78) \\ & \hline \end{aligned}$ | \$0.00 | Begin through Aug x. $000222 \times 30$ |
| September | $\begin{aligned} & \text { Begin through Aug } \\ & \text { September } \\ & \text { Begin through Sept } \end{aligned}$ | $\begin{array}{r} (\$ 366,396.78) \\ (\$ 1,190,287.86) \\ (\$ 1,556,684.64) \end{array}$ | 0.00 | Begin through Sept $\mathrm{x} .000222 \times 30$ |
| Octaber | Begin through Sept October Begin through October | $(\$ 1,556,684.64)$ $(\$ 1,556,188.42)$ $(\$ 3,112,873.06)$ | 0.00 | Begin through Oct $\times .000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $\begin{array}{r} \hline(\$ 3,12,873.06) \\ (\$ 621,138.24) \\ (\$ 3,734,011.31) \end{array}$ | \$0.00 | Begin + Dec x . $000222 \times 30$ |
| December | Begin through Nov December <br> Begin through Dec | $\begin{gathered} (\$ 3,734,011.31) \\ \$ 1,477,355.35 \\ (\$ 2,256,655.95) \\ \hline \end{gathered}$ | \$0.00 |  |

CEI
Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | $\begin{aligned} & \text { Begin through Dec } \\ & \text { January } \\ & \text { Begin through Jan } \end{aligned}$ | $\begin{gathered} (\$ 2,297,840.92) \\ \$ 1,060,543.79 \\ (\$ 1,237,297.13) \end{gathered}$ | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $(\$ 1,237,297.13)$ $\$ 604,835.60$ $(\$ 632,461.53)$ | \$0.00 | Begin through Feb x $000222 \times 30$ |
| March | Begin through Feb March Begin through March | $\begin{array}{r} (\$ 632,461.53) \\ \$ 1,088,141.50 \\ \$ 455,679.97 \end{array}$ | \$3,034.83 | Begin through March x. $000222 \times 30$ |
| April | Begin through March April <br> Begin through April | $\begin{aligned} & \$ 458,714,79 \\ & \$ 520,088.53 \\ & \$ 978,803.33 \end{aligned}$ | \$6,518.83 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May <br> Begin through May | $\begin{array}{r} \$ 985,322.16 \\ \$ 248,631.65 \\ \$ 1,233,953.80 \\ \hline \end{array}$ | \$8,218.13 | Begin through May x $000222 \times 30$ |
| June | Begin through May June <br> Begin through June | $\begin{array}{r} \$ 1,242,171.94 \\ \$ 69,215.52 \\ \$ 1,311,387.45 \\ \hline \end{array}$ | \$8,733.84 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July Begin through July | $\begin{array}{r} \$ 1,320,121.29 \\ (\$ 183,362.44) \\ \$ 1,136,758.86 \end{array}$ | \$7,570.81 | Begin through July x . $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{array}{r} \hline \$ 1,144,329.67 \\ \$ 93,098.25 \\ \$ 1,237,427.92 \\ \hline \end{array}$ | \$8,241.27 | Begin through Aug x $000222 \times 30$ |
| September | $\begin{aligned} & \text { Begin through Aug } \\ & \text { September } \\ & \text { Begin through Sept } \end{aligned}$ | $\$ 1,245,669.19$ $(\$ 560,666.09)$ $\$ 685,003.10$ | \$4,562.12 | Begin through Sept x . $000222 \times 30$ |
| October | Begin through Sept October Begin through Octaber | $\begin{array}{r} \$ 689,565.22 \\ (\$ 1,310,049.33) \\ (\$ 620,484.11) \end{array}$ | \$0.00 | Begin through Oct $\mathrm{x} .000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $(\$ 620,484.11)$ $(\$ 639,769.59)$ $(\$ 1,260,253.70)$ | \$0.00 | Begin + Dec x $000222 \times 30$ |
| December | Begin through Nov December <br> Begin through Dec | $(\$ 1,260,253.70)$ <br> $\$ 391,445.49$ <br> $\langle \$ 868,808.21)$ <br> Total Interest: | $\begin{array}{r} \$ 0.00 \\ \hline \$ 46,879.84 \end{array}$ |  |

Interest Calculation


| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | $\begin{aligned} & \text { Begin through Dec } \\ & \text { January } \\ & \text { Begin through Jan } \end{aligned}$ | (510,946.03) | (225.42) | Begin through Jan $\times .000222 \times 30$ |
|  |  | 477,099.85 |  |  |
|  |  | (33,846.17) |  |  |
| February | Begin through Jan February Begin throug Feb | (34,071.59) | (41.03) | Begin through Feb $\times .000222 \times 30$ |
|  |  | 27,910.21 |  |  |
|  |  | (6,161.38) |  |  |
| March | Begin through Feb | (6,202 | 3,442.19 | Begin through March $\times .000222 \times 30$ |
|  | March | 523,047.30 |  |  |
|  |  | 516,044.89 |  |  |
| April | Begin through March April <br> Begin through April | 520,287.07 | 5,528.44 | Begin through April $\times .000222 \times 30$ |
|  |  | 309,809.65 |  |  |
|  |  | 830,096.73 |  |  |
| May | Begin through AprilMayBegin through May | 835,625.17 | 3,187.86 | Begin through May x . $000222 \times 30$ |
|  |  | (356,967.85) |  |  |
|  |  | 478,657.33 |  |  |
| June | $\begin{aligned} & \text { Begin through May } \\ & \text { June } \\ & \text { Begin through June } \end{aligned}$ | 481,845.18 | 1,184.50 | Begin through June $\times .000222 \times 30$ |
|  |  | (303,992.83) |  |  |
|  |  | 177,852.35 |  |  |
| July | Begin through June July <br> Begin through July | 179,036.85 | 0.00 | Begin through July x $000222 \times 30$ |
|  |  | (399,032.40) |  |  |
|  |  | (219,995.55) |  |  |
| August | Begin through July <br> August <br> Begin through Aug | (219,995.55) | 0.00 | Begin through Aug $\times .000222 \times 30$ |
|  |  | (280,879.88) |  |  |
|  |  | (500,875.43) |  |  |
| September | Begin through AugSeptemberBegin through Sept | $(500,875.43)$ | 0.00 | Begin through Sept $\mathrm{x} .000222 \times 30$ |
|  |  | (687,293.13) |  |  |
|  |  | $(1,188,168.56)$ |  |  |
| October | Begin through Sept October Begin through October | $(1,188,168.56)$ | 0.00 | Begin through Oct $\times .000222 \times 30$ |
|  |  | (1,010,105.34) |  |  |
|  |  | (2,198,273.90) |  |  |
| November | Begin througth October November Begin through Nov | (2,198,273.90) | 0.00 | Begin through Nov x . $000222 \times 30$ |
|  |  | $(556,543.96)$ |  |  |
|  |  | (2,754,817,86) |  |  |
| December | Begin through Nov December <br> Begin through Dec | (2,754,817, 86) | 0.00 |  |
|  |  | 86,935,36 |  |  |
|  |  | (2,667,882.50) |  |  |
|  |  | Total Interest: | 13,076.54 |  |

## CSP

## Calculation of Allowance for Undercollection

|  | KWh | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenue <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-08 | 1,913,383,008 | \$1,990,678.25 | \$1,978,745.81 | 99.40\% | 99.62\% |
| Feb-08 | 1,920, 124,516 | \$1,863,258.55 | \$1,856,218.55 | 99.62\% | 99.00\% |
| Mar-08 | 2,072,231,989 | \$1,856,235.70 | \$1,854,157.17 | 99.89\% |  |
| Apr-08 | 1,727,288,648 | \$1,637,354.80 | \$1,634, 745.28 | 99.84\% |  |
| May-08 | 1,582,333,899 | \$1,434,556.88 | \$1,431,101.50 | 99.76\% |  |
| Jun-08 | 1,759,882,309 | \$2,152,540.86 | \$2,145,094.51 | 99.65\% |  |
| Jut-08 | 1,998,028,106 | \$2,495,651.21 | \$2,485,704.44 | 99.60\% |  |
| Aug-08 | 2,060,374,545 | \$2,574,561.62 | \$2,561,711.79 | 99.50\% |  |
| Sep-07 | 1,938,516,203 | \$2,421,452.03 | \$2,407,737.61 | 99.43\% |  |
| Oct-07 | 1,938,846,398 | \$1,021,676.95 | \$1,018,688.07 | 99.71\% |  |
| Nov-07 | 1,658,659,518 | \$917.799,64 | \$913,346.72 | 99.51\% |  |
| Dec-07 | 1,857,698,472 | \$1,044,192.34 | \$1,039,349.32 | 99.54\% |  |
|  | 22,427,367,611 | \$21,409,958.83 | \$21,326,600.77 |  |  |

Target Revenue:
Total Cost:(Target Revenue / 99\%)
Allowance:(Total Cost - Total Revenue)
\$22,756,011.34
\$22,985,870.04
\$229,858.70

## DAS-Rev-23

## OP

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X current rider $=$ Expected Revenue | Rider Collection | Expected Revenue/ Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| JJan-08 | 2,608,060,780 | \$2,307,893,58 | \$2,302,391.82 | 99.76\% | 100.08\% |
| Feb-08 | 2,410,529,684 | \$2,148,098.27 | \$2,146,326.83 | 99.92\% | 99.00\% |
| Mar-08 | 2,344,191,605 | \$2,084,246.10 | \$2,082,530.46 | 99.92\% |  |
| Apr-08 | 2,452,636,431 | \$1,930,226.15 | \$1,930,517.21 | 100.02\% |  |
| May-08 | 2,134,575,008 | \$1,672,116.17 | \$1,668,788.34 | 99.80\% |  |
| Jun-08 | 2,147,397,297 | \$2,185,884,89 | \$2,178,451.31 | 99.66\% |  |
| Jut-08 | 2,482,389,862 | \$2,416,902.47 | \$2,408,099.95 | 99.64\% |  |
| Aug-08 | 2,353,886,412 | \$2,369,874,04 | \$2,452,751.94 | 103.50\% |  |
| Sep-08 | 2,354,433,814 | \$2,367,250.11 | \$2,358,109.90 | 99.61\% |  |
| Oct-07 | 2,314,213,323 | \$921,341.16 | \$918,450.88 | 99.69\% |  |
| Nov-07 | 2,065,642,532 | \$872,387.69 | \$869,390.30 | 99.66\% |  |
| Dec-07 | 2,553,089,923 | \$1,052,481.11 | \$1,050,063.51 | 99.77\% |  |
|  | 28,221,046,671 | \$22,328,701.74 | \$22,365,872.45 |  |  |

## Target Revenue: <br> Total Cost:(Target Revenue /.99) <br> Allowance:(Total Cost - Total Revenue)

\$20,060,597.19
$\$ 20,263,229.48$
\$202,632.29

## DAS-Rev-24

## Duke

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenuef <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-08 | 1,942,717,131 | \$2,091,400.20 | \$2,068,615.84 | 98.91\% | 98.87\% |
| Feb-08 | 1,827,754,668 | \$1,967,744.65 | \$1,941,651.50 | 98.67\% |  |
| Mar-08 | 1,772,667,337 | \$1,899,179.52 | \$1,877,841.84 | 98.88\% |  |
| Apr-08 | 1,623,311,620 | \$1,710,278.07 | \$1,693,165.53 | 99.00\% |  |
| May-08 | 1,487,877,304 | \$1,554,079.89 | \$1,537,511.06 | 98.93\% |  |
| Jun-08 | 1,732,552,584 | \$1,818,039.53 | \$1,797,474.49 | 98.87\% |  |
| Jul-08 | 1,923,236,804 | \$2,044,613.14 | \$2,019,861.03 | 98.79\% |  |
| Aug-08 | 1,968,276,817 | \$2,100,311.33 | \$2,074,850.18 | 98.79\% |  |
| Sep-08 | 1,882,929,895 | \$2,006,519.10 | \$1,981,813.31 | 98.77\% |  |
| Oct-07 | 1,765,164,510 | \$1,415,951.07 | \$1,401,376.38 | 98.97\% |  |
| Nov-07 | 1,593,626,762 | \$1,268,719.95 | \$1,255,079.53 | 98.92\% |  |
| Dec-07 | 1,789, 125,563 | \$1,451,330.36 | \$1,436,680.72 | 98.99\% |  |
|  | 21,309,240,995 | \$21,328,166.83 | \$21,085,921.41 |  |  |

[^0]
## DAS-Rev-25

## DPL

Calculation of Allowance for Undercollection

|  | KWH | KWh sales X current rider = Expected Revenue | Rider Collection | Expected Revenue <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-08 | 1,374,260,433 | \$1,120,648.16 | \$1,103,309.93 | 98.45\% | 97.32\% |
| Feb-08 | 1,319,198,229 | \$1,075,747.39 | \$1,055,604.60 | 98.13\% |  |
| Mar-08 | 1,311,554,328 | \$1,069,514.14 | \$1,050,847.95 | 98.25\% |  |
| Apr-08 | 1,160,307,516 | \$946,179.09 | \$919,266.20 | 97.16\% |  |
| May-08 | 1,047,396,835 | \$854,105.46 | \$822,323.44 | 96.28\% |  |
| Jun-08 | 1,153,063,996 | \$940,272.32 | \$910,209.10 | 96.80\% |  |
| Jul-08 | 1,322,701,853 | \$1,078,604.44 | \$1,047,840.17 | 97.15\% |  |
| Aug-08 | 1,343,297,945 | \$1,095,399.63 | \$1,066,188.86 | 97.33\% |  |
| Sep-08 | 1,305,895,314 | \$1,064,899.45 | \$1,030,503.09 | 96.77\% |  |
| Oct-07 | 1,210,529,263 | \$1,030,660.22 | \$996,246.86 | 96.66\% |  |
| Nov-07 | 1,155,270,068 | \$983,611.83 | \$950,751.37 | 96.66\% |  |
| Dec-07 | 1,194,142,544 | \$1,016,708.35 | \$997,765.98 | 98.14\% |  |
|  | 14,897,618,324 | \$12,276,350.47 | \$11,950,857.55 |  |  |


| Target Revenue: | $\$ 18,683,087.64$ |
| :--- | ---: |
| Total Cost:(Target Revenue / Average Collection) | $\$ 19,198,559.97$ |
| Allowance:(Total Cost - Total Revenue) | $\$ 515,472.33$ |

## DAS-REV-26

## CEI

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenuef Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| JJan-08 | 1,772,859,428 | \$1,572,903.42 | \$1,551,781,66 | 98.66\% | 99.14\% |
| Feb-08 | 1,697,795,452 | \$1,490,201.03 | \$1,477,067.78 | 99.12\% | 99.00\% |
| Mar-08 | 1,692,492,209 | \$1,481,932.55 | \$1,477,563.13 | 99.71\% |  |
| Apr-08 | 1,573, 126,572 | \$1,368,404.24 | \$1,339,015.69 | 97.85\% |  |
| May-08 | 1,415,846,529 | \$1,223,199.89 | \$1,227,067.64 | 100.32\% |  |
| Jun-08 | 1,548,001,445 | \$1,346,908.26 | \$1,333,326.67 | 98.99\% |  |
| Jul-08 | 1,707,495,458 | \$1,497,431.04 | \$1,482,825.67 | 99.02\% |  |
| Aug-08 | 1,772,781,294 | \$1,552,089.69 | \$1,551,806.68 | 99.98\% |  |
| Sep-08 | 1,690,082,028 | \$1,483,155.58 | \$1,466,194.71 | 98.86\% |  |
| Oct-07 | 1,612,830,787 | \$1,454,047.03 | \$1,434,500.78 | 98.66\% |  |
| Nov-07 | 1,507,438,249 | \$1,357,026.67 | \$1,336,241.26 | 98.47\% |  |
| Dec-07 | 1,535,133,602 | \$1,384,085.30 | \$1,385,504.02 | 100.10\% |  |
|  | 9,525,883,053 | \$17,211,384.70 | \$17,062,895.69 |  |  |

Target Revenue:
Total Cost:(Target Revenue / 99\% Allowance:(Total Cost - Target Revenue)

```
$15,217,564.81
$15,371,277.58
    $153,712.78
```


## DAS-Rev-27

## OE

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider $=$ Expected Revenue | Rider Collection | Expected Revenuel Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-08 | 2,282,644,528 | \$3,161,510 | \$3,158,182 | 99.89\% | 100.64\% |
| Feb-08 | 2,267,886,039 | \$3,100,762 | \$3,130,889 | 100.97\% | 99.00\% |
| Mar-08 | 2,239,563,950 | \$3,058,255 | \$3,093,273 | 101.15\% |  |
| Apr-08 | 2,048,265,242 | \$2,789,488 | \$2,810,430 | 100.75\% |  |
| May-08 | 1,837,859,707 | \$2,470,573 | \$2,516,466 | 101.86\% |  |
| Jun-08 | 2,047,807,029 | \$2,771,849 | \$2,809,208 | 101.35\% |  |
| Jul-08 | 2,223,596,402 | \$3,054,304 | \$3,065,692 | 100.37\% |  |
| Aug-08 | 2,319,392,520 | \$3,162,779 | \$3,201,828 | 101.23\% |  |
| Sep-07 | 2,206,660,675 | \$3,024,529 | \$3,033,648 | 100.30\% |  |
| Oct-07 | 2,110,592,062 | \$2,516,671 | \$2,516,269 | 99.98\% |  |
| Nov-07 | 1,982,740,550 | \$2,363,475 | \$2,359,752 | 99.84\% |  |
| Dec-07 | 2,133,029,824 | \$2,551,770 | \$2,552,214 | 100.02\% |  |
|  | 25,700,038,528 | \$34,025,964 | \$34,247,851 |  |  |

Target Revenue:
Total Cost:(Target Revenue / .99)
Allowance:(Total Cost - Total Revenue)
\$43,609,742.73
$44,050,245.18$
440,502.45

## DAS-Rev-28

## TE

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenu <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-08 | 918,323,821 | \$1,234,586.53 | \$1,177,265.11 | 95.36\% | 97.44\% |
| Feb-08 | 915,032,435 | \$1,189,552.89 | \$1,175,713.88 | 98.84\% |  |
| Mar-08 | 889,689,458 | \$1,174,010.69 | \$1,157,491.28 | 98.59\% |  |
| Apr-08 | 827,759,412 | \$1,087,485.31 | \$1,041,913.16 | 95.81\% |  |
| May-08 | 795,248,673 | \$991, 128.87 | \$980,909.82 | 98.97\% |  |
| Jun-08 | 854,291,050 | \$1,100,341.90 | \$1,072,937.42 | 97.51\% |  |
| Jul-08 | 892,273,114 | \$1,217,434.54 | \$1,165,075.97 | 95.70\% |  |
| Aug-08 | 946,165,888 | \$1,265,237.15 | \$1,238,667.05 | 97.90\% |  |
| Sep-07 | 898,950,445 | \$1,189,599.29 | \$1,145,279.96 | 96.27\% |  |
| Oct-07 | 857,952,666 | \$764,688.71 | \$746,685.52 | 97.65\% |  |
| Nov-07 | 820,418,367 | \$731,205.69 | \$711,779.51 | 97.34\% |  |
| Dec-07 | 868,397,715 | \$774,770.30 | \$769,701.67 | 99.35\% |  |
|  | 10,484,503,044 | \$12,720,041.86 | \$12,383,420.35 |  |  |


| Target Revenue: | $\$ 13,956,977.02$ |
| :--- | ---: |
| Total Cost:(Target Revenue / Average Collection) | $\$ 14,323,628.43$ |
| Allowance:(Total Cost - Total Revenue) | $\$ 366,651.40$ |

CSP
KWH Sales

|  | KVH Sales |
| ---: | ---: |
|  | Past 12 months <br> KWh |
| Jan-08 | $1,913,383,008$ |
| Feb-08 | $1,920,124,516$ |
| Mar-08 | $2,072,231,989$ |
| Apr-08 | $1,727,288,648$ |
| May-08 | $1,582,333,899$ |
| Jun-08 | $1,759,882,309$ |
| Jul-08 | $1,998,028,106$ |
| Aug-08 | $2,060,374,545$ |
| Sep-08 | $1,938,516,203$ |
| Oct-07 | $1,938,846,398$ |
| Nov-07 | $1,658,659,518$ |
| Dec-07 | $1,857,698,472$ |

## OP

KWH Sales

|  | Kast 12 months <br> KWh |
| ---: | ---: |
| Jan-08 | $2,608,060,780$ |
| Feb-08 | $2,410,529,684$ |
| Mar-08 | $2,344,191,605$ |
| Apr-08 | $2,452,636,431$ |
| May-08 | $2,134,575,008$ |
| Jun-08 | $2,147,397,297$ |
| Jul-08 | $2,482,389,862$ |
| Aug-08 | $2,353,886,412$ |
| Sep-07 | $2,354,433,814$ |
| Oct-07 | $2,314,213,323$ |
| Nov-07 | $2,065,642,532$ |
| Dec-07 | $2,553,089,923$ |

## DAS-REV-31

## Duke

|  | KWH |
| ---: | ---: |
| Jan-08 | $1,942,717,131$ |
| Feb-08 | $1,827,754,668$ |
| Mar-08 | $1,772,667,337$ |
| Apr-08 | $1,623,311,620$ |
| May-08 | $1,487,877,304$ |
| Jun-08 | $1,732,552,584$ |
| Jul-08 | $1,923,236,804$ |
| Aug-08 | $1,968,276,817$ |
| Sep-07 | $1,882,929,895$ |
| Oct-07 | $1,765,164,510$ |
| Nov-07 | $1,593,626,762$ |
| Dec-07 | $1,789,125,563$ |

DAS-REV-32

# DPL <br> KWH Sales 

|  | KWH |
| ---: | :---: |
| Jan-08 | $1,374,260,433$ |
| Feb-08 | $1,319,198,229$ |
| Mar-08 | $1,311,554,328$ |
| Apr-08 | $1,160,307,516$ |
| May-08 | $1,047,396,835$ |
| Jun-08 | $1,153,063,996$ |
| Jul-08 | $1,322,701,853$ |
| Aug-08 | $1,343,297,945$ |
| Sep-07 | $1,305,895,314$ |
| Oct-07 | $1,210,529,263$ |
| Nov-07 | $1,155,270,068$ |
| Dec-07 | $1,194,142,544$ |

## DAS-REV-33

## CEI <br> KWH Sales

|  | KWH |
| ---: | ---: |
| Jan-08 | $1,772,859,428$ |
| Feb-08 | $1,697,795,452$ |
| Mar-08 | $1,692,492,209$ |
| Apr-08 | $1,573,126,572$ |
| May-08 | $1,415,846,529$ |
| Jun-08 | $1,548,001,445$ |
| Jul-08 | $1,707,495,458$ |
| Aug-08 | $1,772,781,294$ |
| Sep-07 | $1,690,082,028$ |
| Oct-07 | $1,612,830,787$ |
| Nov-07 | $1,507,438,249$ |
| Dec-07 | $1,535,133,602$ |
|  | $19,525,883,053$ |

## DAS-REV-34

## OE <br> KWH Sales

|  | KWH |
| ---: | ---: |
| Jan-08, | $2,282,644,528$ |
| Feb-08 | $2,267,886,039$ |
| Mar-08 | $2,239,563,950$ |
| Apr-08 | $2,048,265,242$ |
| May-08 | $1,837,859,707$ |
| Jun-08 | $2,047,807,029$ |
| Jul-08 | $2,223,596,402$ |
| Aug-08 | $2,319,392,520$ |
| Sep-07 | $2,206,660,675$ |
| Oct-07 | $2,110,592,062$ |
| Nov-07 | $1,982,740,550$ |
| Dec-07 | $2,133,029,824$ |
|  | $25,700,038,528$ |

## DAS-REV-35

## TE <br> KWH Sales

|  | KWH |
| ---: | ---: |
| Jan-08 | $918,323,821$ |
| Feb-08 | $915,032,435$ |
| Mar-08 | $889,689,458$ |
| Apr-08 | $827,759,412$ |
| May-08 | $795,248,673$ |
| Jun-08 | $854,291,050$ |
| Jul-08 | $892,273,114$ |
| Aug-08 | $946,165,888$ |
| Sep-07 | $898,950,445$ |
| Oct-07 | $857,952,666$ |
| Nov-07 | $820,418,367$ |
| Dec-07 | $868,397,715$ |
| $10,484,503,044$ |  |

## Two-Tiered Rider CSP

## Proposal

First Block 833,000 kWh (10,000,000 per Year ) (18) \$ 0.0013130
Over $833,000 \mathrm{kWh}$ [Lower of 10/99 Rate (1) or Uniform per Kwh rate (4)] \$ 0.0001830

## Calculation

| 1 | 10/99 USF Rider | \$ 0.0001830 |
| :---: | :---: | :---: |
| 2 | USF Rider Revenue Requirement | \$ 22,985,870.04 |
| 3 | Total kWh Used in Calculation | 22,427,367,611 |
| 4 | Uniform per Kwh rate | \$ 0.0010249 |
| 5 | Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$ | 126 |
| 6 | Total Kwh of Accounts Over 10,000,000 kWh Annually | 6,977,424,681 |
| 7 | First Block Annual kWh (833,334 Monthly) | 10,000,000 |
| 8 | Total KWh in First Block (5) $\times$ (7) | 1,260,000,000 |
| 9 | Revenue First Block Rate $\times$ (8) | \$ 1,654,336.74 |
| 10 | Tatal Second Block KWh (6) - (8) | 5,717,424,681 |
| 11 | Lower of 10/99 Rate (1) or Uniform per Kwh rate | \$ 0.0001830 |
| 12 | Second Block Revenue (11) $\times$ (10) | \$ 1,046,288.72 |
| 13 | Total First and Second Block Revenue (9) + (12) | \$ 2,700,625,45 |
| 14 | Revenue@ ODOD Proposed Rate (6) x (4) | \$ 7,151,181.53 |
| 15 | Revenue shortfall (13) - (14) | \$ (4,450,556.07) |

## Adjustment to Calculation

16

18 Adjusted First Block Rate (16)/(17)
Adjusted Cost (2) - (9) - (12)
Adjusted kWh (3) - (6)

Change (18) - (4)
\% Change $\$ 20,285,244.58$

Annual Cost to Consumer Using 918 kWh per Month (19) $\times 918 \times 12$

## Two-Tiered Rider <br> Ohio Power

## Proposal

$\begin{array}{lll}\text { First Block } 833,000 \mathrm{kWh}(10,000,000 \text { per Year }) \text { (18) } & \$ 0.0010601 \\ \text { Over } 833,000 \mathrm{kWh} \text { [Lower of 10/99 Rate (1) or Uniform per Kwh rate (4)] } & \$ 0.0001681\end{array}$

## Calculation

1 10/99 USF Rider

2 USF Rider Revenue Requirement
$\$ 20,263,229.48$
3 Total kWh Used in Calculation
$28,221,046,671$
4 Uniform per Kwh rate
5 Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$
197

6 Total Kwh of Accounts Over 10,000,000 kWh Annually
$12,791,996,246$
7 First Block Annual kWh ( 833,334 Monthly)
$10,000,000$
8 Total KWh in First Block (5) $\times$ (7)
9 Revenue First Block Rate $\times$ (8)
$1,970,000,000$

10 Total Second Block kWh (6) - (8)
\$ 2,088,319.84

11 Lower of 10/99 Rate (1) or Uniform per Kwh rate
$10,821,996,246$

12 Second Block Revenue (11) $\times$ (10)
13 Total First and Second Block Revenue (9) + (12)
14 Revenue @ ODOD Proposed Rate (6) $\times$ (4)
(9,184,888.09
15 Revenue shortfall (13)-(14)
$\$(5,277,390.68)$
Adjustment to Calculation
16 Adjusted Cost (2) - (9) - (12)
$\$ 16,355,732.07$
17 Adjusted kWh (3) - (6)
18 Adjusted First Block Rate (16)/(17)
19
Change (18) - (4)
$\$ 0.0003420$
\% Change
47.6\%

## Two-Tiered Rider <br> Duke

## Proposal

First Block 833,000 kWh (10,000,000 per Year ) (18)
Over $833,000 \mathrm{kWh}$ [Lower of $10 / 99$ Rate (1) or Uniform per Kwh Rate
$\begin{array}{ll}\$ & 0.0010857 \\ \$ & 0.0004690\end{array}$
$\$ 20,386,646.58$
$21,309,240,995$ 0.0009567

5,877,523,147
$10,000,000$
$1,420,000,000$
$\$ 1,541,707.33$
$4,457,523,147$
$\$ 0.0004690$
$\$ 2,090,578,36$
$\$ 3,632,285,68$
$\$ 5,623,052.80$
$\$(1,990,767.11)$
$\$ 16,754,360.89$
$15,431,717,848$
$\$ 0.0010857$
\$ 0.0001290
$13.5 \%$
\$

## Two-Tlered Rider <br> DPL

## Proposal

> | >  First Block $833,000 \mathrm{kWh}(10,000,000$ per Year ) (18) | $\$$ | 0.0014757 |
| :--- | :--- | :--- |
| > Over $833,000 \mathrm{kWh}$ [Lower of 10/99 Rate (1) or Uniform per Kwh Rate | $\$$ | 0.0005700 > |

## Calculation

1 10/99 USF Rider
2 USF Rider Revenue Requirement

3 Total kWh Used in Calculation

4 Uniform per Kwh Rate (2) / (3)

5 Accounts with Annual kWh Greater than 10,000,000 kWh
106
6 Total Kwh of Accounts Over $10,000,000 \mathrm{kWh}$ Annually
7 First Block Annual KWh ( 833,000 Monthly)
$10,000,000$
8 Total kWh in First Block (5) $\times(6)$
9 Revenue First Block Rate $\times(8)$
10 Total Second Block $k W h(6)-(8)$
11 Lower of $10 / 99$ Rate (1) or Uniform Per Kwh Rate (4)
\$ 0.0005700

12 Second Block Revenue (11) $\times(10)$
13 Total First and Second Black Revenue (9) + (12)
14 Revenue © Uniform per Kwh Rate (6) x (4)
15 Reduction in Total Revenue (13) - (14)
\$ 1,753,145.13
\$ 3,317,369.19
$\$ 5,329,667.62$
$\$(2,012,298.43)$

## Adjustment to Calculation

16 Adjusted Cost (2) - (9) - (12)
17 Adjusted kWh (3) - (6)
\% Change
\$ 15,881,190.79
$10,761,925,122$
\$ 0.0014757
$\$ 0.0001870$
$14.5 \%$
21 Annual Cost to Consumer Using 1010 kWh per Month $(19) \times 1010 \times 12 \$$ ..... 2.27

# Two-Tiered Rider 

DAS-REV-40

## CEI

## Proposal

First Block $833,000 \mathrm{kWh}$ ( $10,000,000$ per Year ) (18)
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate (4)]

| $\$$ | 0.0008495 |
| :--- | :--- |
| $\$$ | 0.0005680 |

## Calculation

1 10/99 USF Rider
2 USF Rider Revenue Requirement
3 Total kWh Used in Calculation
4 Uniform per Kwh Rate (2) / (3)
5 Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$
6 Total Kwh of Accounts Over $10,000,000 \mathrm{KWh}$ Annually
7 First Black Annual kWh ( 833,000 Monthly)
8 Total KWh in First Block (5) $\times(6)$
9 Revenue First Block Rate $\times(B)$
10 Total Second Block KWh (6) - (8)
11 Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)
12 Second Block Revenue (11) $\times$ (10)
13 Total First and Second Block Revenue (9) + (12)
14 Revenue @ Uniform per Kwh Rate (6) x (4)
15 Reduction in Total Revenue (13) - (14)

## Adiustment to Calculation

| 16 | Adjusted Cost (2)-(9)-(12) | $\$$ | $11,642,496.99$ |
| :--- | :--- | ---: | ---: |
| 17 | Adjusted $\mathrm{kWh}(3)-(6)$ |  | $13,704,609,483$ |
| 18 | Adjusted USF (16)/(17) | $\$$ | 0.0008495 |
| 19 | Change (18) - (4) | $\$ 0.0000623$ |  |
| 20 | $\%$ Change |  | $7.9 \%$ |
| 21 | Annual Cost to Consumer Using 672 KWh per Month (19) $\times 672 \times 12$ | $\$$ | 0.50 |

## Two-Tiered Rider <br> Ohio Edison

## Proposal

First Block $833,000 \mathrm{kWh}(10,000,000$ per Year ) (18)
Over $833,000 \mathrm{kWh}$ [Lower of $10 / 99$ Rate (1) or Uniform per Kwh Rate
$\$ 0.0019474$
\$ 0.0010461

## Calculation

1 10/99 USF Rider
$\$ 0.0010461$
2 USF Rider Revenue Requirement
$\$ 44,050,245.18$
3 Total kWh Used in Calculation
$25,700,038,528$
4 Uniform per Kwh Rate (2) / (3)
5 Accounts with Annual KWh Greater than $10,000,000 \mathrm{kWh}$ 195
6 Total Kwh of Accounts Over 10,000,000 kWh Annually
$8,605,014,719$
7 First Block Annual KWh (833,000 Monthly)
$10,000,000$
8 Total kWh in First Block (5) $\times(6)$
$1,950,000,000$
9 Revenue First Black Rate $\times(8)$
10 Total Second Block KWh (6) - (8)
11 Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)
12 Second Block Revenue (11) $\times$ (10)
13 Total First and Second Block Revenue (9) + (12)
\$ 3,797,445.86
$6,655,014,719$
14 Revenue @ Uniform per Kwh Rate (6) x (4)
$\$ 0.0010461$
15 Reduction in Total Revenue (13) - (14)
\$ 14,749, 122.17
15 Reduction in Total Revenue (13) - (14)
$\$(3,989,865.42)$

## Adjustment to Calculation

| 16 | Adjusted Cost (2) - (9) - (12) | \$ 33,290,988.42 |  |
| :---: | :---: | :---: | :---: |
| 17 | Adjusted kWh (3) - (6) | 17,095,023,809 |  |
| 18 | Adjusted USF (16)/(17) | \$ | 0.0019474 |
| 19 | Change (18) - (4) | \$ | 0.0002334 |
| 20 | \% Change |  | 13.6\% |
| 21 | Annual Cost to Consumer Using 800 kWh per Month (19) $\times 800 \times 12$ | \$ | 2.24 |

## Two-Tiered Rider <br> Toledo Edison

## Proposal

First Block 833,000 kWh (10,000,000 per Year ) (18)
Over $833,000 \mathrm{kWh}$ [Lower of 10/99 Rate (1) or Uniform per Kwh rate
$\$ 0.0018964$
\$ 0.0005610

## Calculation

1 10/99 USF Rider

2 USF Rider Revenue Requirement
3 Total kWh Used in Calculation

4 Uniform per Kwh rate
5 Accounts with Annual $k W h$ Greater than $10,000,000 \mathrm{kWh}$

6 Total Kwh of Accounts Over 10,000,000 kWh Annually
7 First Block Annual kWh (833,334 Monthly)
8 Total kWh in First Block (5) $\times(6)$

9 Revenue First Block Rate x (8)
10 Total Second Block kWh (6) - (8)
11 Lower of 10/99 Rate (1) or Uniform per Kwh rate
12 Second Block Revenue (11) x (10)
13 Total First and Second Block Revenue (9) + (12)
14 Revenue © ODOD Proposed Rate (6) $\times(4)$
15 Revenue shortfall (13)-(14)
Adjustment to Calculation

Change (18) - (4)
\% Change

Annual Cost to Consumer Using 769 kWh per Month (19) $\times 769 \times 12$
$\$ 10,736,747.74$
$5,661,782,030$
\$ 0.0018964
$\$ 0.0005302$
$38.8 \%$
$\$$
4.89

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by first class mail, postage prepaid, this 26th day of November 2008.


Marvin I. Resnik<br>Steven T. Nourse<br>AEP Service Corporation<br>1 Riverside Plaza<br>Columbus, Ohio 43215<br>Randall Griffin<br>Judi Sobecki<br>The Dayton Power \& Light Company MacGregor Park<br>1065 Woodman Avenue<br>Dayton, Ohio 45432

## Paul Colbert

Duke Energy Ohio, Inc.
155 East Broad Street
Columbus, Ohio 43215

## Kathy Kolich

FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308
Janine Migden-Ostrander
Ann Hotz
Richard Reese
Ohio Consumers' Counsel
10 West Broad Street
Suite 1800
Columbus, Ohio 43215-3485

Samuel C. Randazzo
Gretchen J. Hummel
McNees, Wallace \& Nurick
Fifth Third Center
Suite 910
21 East State Street
Columbus, Ohio 43215
David C, Rinebolt, Esq.
Ohio Partners for Affordable Energy
PO Box 1793
Findlay, Ohio 45839-1793


[^0]:    Target Revenue:
    Total Cost:(Target Revenue / Average Collection) Allowance:(Total Cost - Total Revenue)

