## 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. 09-463-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


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# SUPPLEMENTAL TESTIMONY OF DONALD A. SKAGGS 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 November 2, 2009.
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 2009. Because actual 2009 data was only available through August 2009 at the time the original application was prepared, ODOD utilized data from the corresponding months of 2008 as a surrogate for those months of the 2009 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 2009, and I bave substituted that data for the September 2008 data that was used in the original testperiod analysis. In addition, I have also revised the proposed USF rider revenue requirement for the AEP companies (CSP and OP), the FirstEnergy companies (CEI, OE, and TE) and DPL to reflect ODOD's decision not to proceed with the third-party audits of those EDUs at this time.
Q. How does the inclusion of the additional month of actual data impact your revenue requirement analysis?
A. Substituting the actual numbers for September 2009 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 2009 for the September 2008 numbers used in my original analysis.
Q. Have you prepared revised exhibits showing the impact of updating the test-period analysis to include an additional month of actual data?
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 these 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 2009 for the September 2008 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.
Q. In your direct testimony, you discussed the need to adjust the test-period cost of PIPP to capture the impact of Commission-approved changes in EDU tariff rates that were not in effect throughout the entire test period. Does the use of actual September 2009 data in your revised analysis affect these adjustments?
A. Yes. As I explained in my direct testimony, with the exception of Duke, certain elements of each EDU's tariff rates for electric service to residential customers were adjusted during 2009 pursuant to orders of this Commission. In addition, the Commission has approved increases in various elements of the CSP, DPL, and OP tariff rates that will become effective January 1, 2010. Although these rate adjustments change the cost of electricity delivered to PIPP customers, they 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 a rate element reduces the cost of PIPP by narrowing this gap. Therefore, it is necessary to adjust the test-period cost of PIPP to annualize the impact of these known changes in the underlying EDU tariff rates. This is accomplished by restating the total cost of electricity delivered to PIPP customers during those months of the test period prior to the effective date of the rate change, including the 2008 months used as surrogates for the final months of the test period. Replacing the September 2008 data with the actual September 2009 data changes the total cost of electricity to which the percentage increase or reduction is applied. The specific adjustments for each EDU are shown in Exhibits A.1.a through A.1.f of the amended application. These adjustments are carried forward and summarized on Exhibit A. 1 of the amended application.
Q. Does the use of actual September 2009 data affeet the adjustment to the cost of PIPP for the projected increase in PIPP enrollment during the $\mathbf{2 0 1 0}$ collection period?
A. Yes. As explained in my direct testimony, this adjustment was calculated utilizing the annual PIPP enrollment for each EDU for the period 2005 through 2009. The inclusion of the actual September 2009 enrollments produced a slight increase in the average 2009 PIPP enrollment shown in the second schedule in Exhibit A. 2 to the amended application. The adjustments to the cost of PIPP described above also affected the rate adjusted testperiod cost of PIPP shown in Column B of the first schedule in Exhibit A. 2 and the average test-period cost of PIPP per customer shown in Column $C$ of that schedule.

Changing these inputs, but using the same methodology described in my direct testimony, produced the revised total adjusted cost of PIPP for each EDU shown in the final column (Column F) in Exhibit A. 2.
Q. What was the overall effect on the adjusted test-period cost of PIPP of substituting actual data for September 2009 for the September 2008 data used in your original analysis?
A. A comparison of Exhibit A. 2 to the original application with Exhibit A. 2 to the amended application shows that the net impact of these changes was to reduce the indicated aggregate revenue requirement associated with the adjusted test-year cost of PIPP component from $\$ 154,751,894$ to $\$ 153,037,043$.
Q. You indicated that, although the primary impact of updating the USF rider revenue requirement analysis was on the cost of PIPP, other components were also affected by the substituting actual numbers from September 2009 for the September 2008 numbers used in my original analysis. Please describe these other changes.
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, 2009 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 the EDU's PIPP USF account balances as of the riders' proposed effective date of January 1,2010 . Third, the substitution of the actual Kwh sales for September 2009 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. 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 October 28, 2009 finding and order in the NOI phase of this proceeding (the "NOI Order"). 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. How was the administrative cost component of the USF rider revenue requirement determined for purposes of the amended application?
A. There is no change in this component from the amount included for administrative costs in the original application. Because these costs were allocated to the EDUs based on the relative number of PIPP customers during March 2009, the test-period month with the highest PIPP customer account totals, the amounts allocated to the individual EDUs were unaffected by the inclusion of the September 2009 data. The results of the allocation are shown on Exhibit C to the amended application.
Q. What was the effect of substituting actual data for September 2009 and annualiving the impact of the $\mathbf{2 0 0 9}$ Commission-approved EDU rate changes on the projected

December 31, 2009 USF account balance element of the USF rider revenue requirement?
A. As shown in Exhibit D of the amended application, ODOD now projects a December 31, 2009 consolidated USF surplus of $\$ 1,367,571$, as compared to the surplus of $\$ 1,554.239$ identified in the original application. The workpapers showing the calculation of the December 31, 2009 USF account balances now projected for each company are attached to my supplemental testimony as Exhibits DAS-Rev-8 through DAS-Rev-14.
Q. Were changes made to the reserve component of the USF rider revenue target in preparing the amended application?
A. No. As explained in my initial testimony, the reserve component is based on the EDU's highest monthly deficit during the test period. The inclusion of actual data for September 2009 and the adjustments for the EDU rate changes did not change the months of the highest deficits for any of the EDUs. Thus, the reserve components shown for each EDU shown in Exhibit F to the amended application are identical to those shown in Exhibit F to the original application.
Q. You indicated that substituting actual Kwh sales for September 2009 and the adjustments for EDU rate changes 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, the changes to these inputs 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 $\$ 284,293$, as opposed
to the $\$ 280,439$ 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 indicated that substituting actual Kwh sales for September 2009 in calculating test-period sales, coupled with the changes in pro forma USF rider revenues, 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 $\$ 2,537,843$, as compared to the $\$ 2,709,986$ proposed in the original application. The workpapers supporting the revisions for each EDU are attached to my testimony as Exhibits DAS-Rev-22 through DAS-Rev-28.
Q. You also indicated that you have revised the proposed USF rider revenue requirement for the AEP companies, the FirstEnergy companies, and DPL to reflect ODOD's decision not to proceed with the third-party audits of the PIPP-related accounting and reporting of those EDUs at this time. What was the basis for this decision?
A. The stipulation adopted by the Commission in its NOI Order provided that the PIPPrelated accounting and reporting of each EDU would be subject to a third-party audit in 2010. As I explained in my direct testimony, the agreed-upon procedures performed in the first round of EDU audits identified certain areas of risk. ODOD contemplated that the 2010 audits would involve increased sample sizes and a more in-depth analysis to assess the subject EDU's performance in these areas. Accordingly, in the original
application, ODOD requested an allowance for audit costs of $\$ 150,000$ for each EDU (with the AEP and FirstEnergy companies considered to be a single EDU for this purpose). After the application was filed, representatives of several of the EDUs expressed concern to ODOD that going forward with these audits in 2010 would impose a significant additional burden on the same EDU personnel that will be involved in implementing the changes that will be required to comply with the new electric PIPP rules that will go into effect November 1, 2010. ODOD does not wish to jeopardize the timely implementation of these important changes. In addition, ODOD concluded that delaying the second round of audits until after the changes have been implemented would be more productive in view of the fact that the review period covered by a 2010 audit would result in a re-examination of the current PIPP-related accounting and reporting practices that were reviewed in the first round of audits. Delaying the audits will provide an opportunity to test the EDUs' performance under the new rules. Thus, after consulting with the USF Rider Working Group, ODOD is withdrawing its request for an allowance to fund a 2010 audit of the AEP companies, the FirstEnergy companies, and DPL.
Q. Why is ODOD continuing to propose the $\mathbf{\$ 1 5 0 , 0 0 0}$ allowance for the cost of a Duke audit?
A. As I explained in my direct testimony, several open issues remain with respect to Schneider Downs' findings, ODOD's conclusions, and Duke's responses in connection with the Duke audit conducted in conjunction with the 2008 USF rider rate adjustment case, Case No. 08-658-EL-UNC. Pursuant to the stipulation that resolved that case, issues raised by ODOD in the Supplement to the NOI in that case are proceeding on a
separate track. Although discussions are ongoing, these issues have not yet been resolved. If a satisfactory settlement cannot be reached, an in-depth audit may be necessary to quantify the impact of these issues on the USF and Duke ratepayers. If no allowance for this audit is included in the Duke USF rider revenue requirement, ODOD will not be able to fund the audit if it ultimately determines that an additional audit is required. If the issues are resolved and the audit does not go forward, ratepayers will be made whole for their contribution to the audit costs by virtue of the December 31, 2010 PIPP account balance component of the revenue requirement in the 2010 USF rider rate adjustment proceeding.
Q. Taking into account the various changes you have described, what are the results of your revised USF rider revenue requirement analysis?
A. The results of the revised USF rider revenue requirement analysis for each EDU are summarized in Exhibit I to the amended application. As shown in the table on page 5 of the amended application, the total revised revenue requirement is $\$ 197,947,166$, as compared to the $\$ 200,093,639$ identified in the original 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 2009 Kwh sales for the September 2008 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 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 on page 13 of the amended application compares the current and proposed rider rates. As indicated in the table on page 5 of the amended application, the revenues
produced by the current USF riders of each EDU fall short of their respective indicated revenue targets. Thus, all the USF rider rates will increase.
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 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.
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## DAS-Rev-5


Toledo Edison
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Universal Service Fund
Projection of December 31, 2009 Batance Jan 2009 - Dec 2009

Company:
COLUMBUB SOUTHERN POWER

Company: OHIO POWER COMPANY

Univarsal Service Fund
Projection of December 31, 2009 Balance
Jan 2009 - Dec 2009


Univarsal Service Fund
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DAS-Rev-11
Univorsal Service Fund
Projected of December 31, 2009 Balance
Jan 2009-Dec 2009


DAS-Rev-12
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Projection of December 31, 2009 Balance
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Universal Service Fund
Projection of December 31, 2009

Company: Toledo Edison


## Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January Begin through Jan | $\begin{array}{r} 5,401.61 \\ (433,318.14) \\ (427,916.54) \end{array}$ | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $(427,916.54)$ $(675,865.50)$ $(1,103,782.03)$ | \$0.00 | Begin through Feb x $000222 \times 30$ |
| March | $\begin{array}{\|l} \text { Begin through Feb } \\ \text { March } \\ \text { Begin through March } \end{array}$ | $\begin{array}{r} (1,103,782.03) \\ (115,645.98) \\ \hline(1,219,428.00) \\ \hline \end{array}$ | \$0.00 | Begin through March x . $000222 \times 30$ |
| April | Begin through March April <br> Begin through April | $\begin{array}{r} (1,219,428.00) \\ (316,418.87) \\ (1,535,846.87) \end{array}$ | \$0.00 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May Begin through May | $\begin{array}{r} \hline(1,535,846.87) \\ (305,094.02) \\ (1,840,940.89) \end{array}$ | \$0.00 | Begin through May x $000222 \times 30$ |
| June | Begin through May <br> June <br> Begin through June | $\begin{gathered} (1,840,940.89) \\ 50,659.98 \\ (1,790,280.91) \end{gathered}$ | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\begin{array}{r} (1,790,280.91) \\ (513,299.63) \\ (2,303,580.54) \end{array}$ | \$0.00 | Begin through July x. $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{aligned} & (2,303,580.54) \\ & (1,336,112.28) \\ & (3,639.692 .82) \end{aligned}$ | \$0.00 | Begin through Aug $\times .000222 \times 30$ |
| September | Begin through Aug <br> September <br> Begin through Sept | $(3,639,692.82)$ $(1,833,231.15)$ $(5,472,923.97)$ | \$0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept October Begin through October | $\begin{aligned} & (5,472,923.97) \\ & (3,07,990.05) \\ & (8,550,914.03) \end{aligned}$ | \$0.00 | Begin through Oct $\times .000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $\begin{array}{r} (8,550,914.03) \\ (757,037.05) \\ (9,307,951.07) \end{array}$ | \$0.00 | Begin + Dec $\times .000222 \times 30$ |
| December | $\begin{aligned} & \text { Begin through Nov } \\ & \text { December } \\ & \text { Begin through Dec } \end{aligned}$ | $\begin{gathered} (9,307,951.07) \\ 5,963,941.44 \\ (3,344,009.64) \end{gathered}$ | \$0.00 |  |

Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Dec-09 <br> January <br> Begin through Jan | $(\$ 1,645,506.22)$ $\$ 664,450.24$ $(\$ 981,055.98)$ | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February <br> Begin throug Feb | $\begin{gathered} \hline(\$ 981,055.98) \\ \$ 507,372.81 \\ (\$ 473,683.17) \\ \hline \end{gathered}$ | \$0.00 | Begin through Feb x. $000222 \times 30$ |
| March | Begin through Feb March Begin through March | $\begin{gathered} \hline(\$ 473,683.17) \\ \$ 521,949.11 \\ \$ 48,265.95 \\ \hline \end{gathered}$ | \$321.45 | Begin through March x . $000222 \times 30$ |
| April | Begin through March April <br> Begin through Apri | $\begin{gathered} \$ 48,587.40 \\ (\$ 18,067.15) \\ \$ 30,530.25 \end{gathered}$ | \$203.33 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May Begin through May | $\$ 30,733.58$ $(\$ 271,400.53)$ $(\$ 240,666.95)$ | \$0.00 | Begin through May x $0000222 \times 30$ |
| June | Begin through May June Begin through June | $\begin{aligned} & (\$ 240,666.95) \\ & (\$ 565,570.76) \\ & (\$ 806,237.71) \end{aligned}$ | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June <br> July <br> Begin through July | $\begin{array}{r} (\$ 806,237.71) \\ (\$ 1,122,516.49) \\ (\$ 1,928,754.20) \end{array}$ | \$0.00 | Begin through July $\times .000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{aligned} & \hline(\$ 1,928,754.20) \\ & (\$ 1,558,604.82) \\ & (\$ 3,487,359.02) \end{aligned}$ | \$0.00 | Begin through Aug x $0000222 \times 30$ |
| September | Begin through Aug September <br> Begin through Sept | $\begin{aligned} & (\$ 3,487,359.02) \\ & (\$ 2,131,127.54) \\ & (\$ 5,618,486.56) \end{aligned}$ | \$0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept <br> October <br> Begin through Octobe | $(\$ 5,618,486.56)$ $(\$ 2,570,092.93)$ $(\$ 8,188,579.50)$ | \$0.00 | Begin through Oct x . $000222 \times 30$ |
| November | Begin througth Octobe November Begin through Nov | $\begin{array}{r} (\$ 8,188,579.50) \\ (\$ 487,636.72) \\ (\$ 8,676,216.22) \end{array}$ | \$0.00 |  |
| December | Begin through Nov <br> December <br> Begin through Dec | $\begin{gathered} (\$ 8,678,216.22) \\ \$ 6,858,351.86 \\ (\$ 1,817,864.35) \end{gathered}$ | \$52.00 |  |

Duke
DAS-Rev-17
Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January <br> Begin through Jan | $\begin{gathered} \$ 2,062,232.63 \\ (\$ 1,567,832.12) \\ \$ 494,400.51 \\ \hline \end{gathered}$ | \$3,292.71 | Begin through Jan x. $000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $\begin{aligned} & \$ 497,693.22 \\ & \$ 336,043.21 \\ & \$ 833,736.42 \\ & \hline \end{aligned}$ | \$5,552.68 | Begin through Feb x . $000222 \times 30$ |
| March | Begin through Feb March <br> Begin through March | $\begin{array}{r} \$ 839,289.11 \\ \$ 500,027.19 \\ \$ 1,339,316.30 \end{array}$ | \$8,919.85 | Begin through March $\times .000222 \times 30$ |
| April | Begin through March April <br> Begin through April | $\$ 1,348,236.15$ <br> $(\$ 527,346.31)$ <br> $\$ 820,889.84$ | \$5,467.13 | Begin through April x . $000222 \times 30$ |
| May | Begin through April May <br> Begin through May | $\begin{array}{c\|} \hline \$ 826,356.96 \\ (\$ 376,546.71) \\ \$ 449,810.25 \\ \hline \end{array}$ | \$2,995.74 | Begin through May x $0000222 \times 30$ |
| June | Begin through May June <br> Begin through June | $\begin{array}{r} \$ 452,805.99 \\ (\$ 487,570.97) \\ (\$ 34,764.98) \end{array}$ | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\begin{gathered} \hline(\$ 34,764.98) \\ (\$ 82,933.01) \\ (\$ 117,697.99) \end{gathered}$ | \$0.00 | Begin through July $\times .000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | (\$117,697.99) $(\$ 413,820.98)$ $(\$ 531,518.97)$ | \$0.00 | Begin through Aug x . $000222 \times 30$ |
| September | Begin through Aug September <br> Begin through Sept | $(\$ 531,518.97)$ $(\$ 782,074.45)$ $(\$ 1,313,593.43)$ | \$0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept October <br> Begin through Octobe | $(\$ 1,313,593.43)$ $(\$ 1,307,701.79)$ $(\$ 2,621,295.22)$ | \$0.00 | Begin through Oct $\times .000222 \times 30$ |
| November | Begin througth Octob <br> November <br> Begin through Nov | $\begin{array}{r} (\$ 2,621,295.22) \\ (\$ 705,708.29) \\ (\$ 3,327,003.51) \\ \hline \end{array}$ | \$0.00 |  |
| December | Begin through Nov December <br> Begin through Dec | $\begin{gathered} (\$ 3,327,003.51) \\ \$ 905,277.91 \\ (\$ 2,421,725.59) \end{gathered}$ | $\$ 0.00$ |  |
| M- Total Interest: $\$ 26,228.10$ |  |  |  |  |

DPL
InterestCalculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January Begin through Jan | $\begin{gathered} \hline(\$ 1,895,586.20) \\ \$ 1,278,813.82 \\ (\$ 816,772.38) \end{gathered}$ | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan <br> February <br> Begin throug Feb | $\begin{gathered} \hline(\$ 616,772.38) \\ \$ 679,522.21 \\ \$ 62,749.83 \end{gathered}$ | \$417.91 | Begin through Feb x $000222 \times 30$ |
| March | Begin through Feb <br> March <br> Begin through March | $\begin{array}{r} \$ 63,167.75 \\ \$ 841,147.83 \\ \$ 904,315.58 \\ \hline \end{array}$ | \$6,022.74 | Begin through March x . $000222 \times 30$ |
| April | Begin through March April <br> Begin through Apria | $\$ 910,338.32$ $\$ 330,571.33$ $\$ 1,240,909.65$ | \$8,264.46 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April <br> May <br> Begin through May | $\begin{gathered} \hline \$ 1,249,174.11 \\ (\$ 950,015.69) \\ \$ 299,158.4) \end{gathered}$ | \$1,992.40 | Begin through May x. $000222 \times 30$ |
| June | Begin through May June <br> Begin through June | $\$ 301,150.82$ $(\$ 495,950.21)$ $(\$ 194,79939)$ | \$0.00 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | (\$194,799.39) ( $\mathbf{5 6 7 6 , 1 7 8 . 8 2 )}$ (\$870,978.21) | \$0.00 | Begin through July x $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\mathbf{( \$ 8 7 0 , 9 7 8 . 2 1 )}$ $(\$ 1,243,437.32)$ $(\$ 2,114,415.54)$ | \$0.00 | Begin through Aug x $000222 \times 30$ |
| September | Begin through Aug September Begin through Sept | $(\$ 2,114,415.54)$ $(\$ 1,704,455.54)$ $(\$ 3,818,871.08)$ | 0.00 | Begin through Sept $\times .000222 \times 30$ |
| October | Begin through Sept October Begin through October | $\begin{aligned} & (\$ 3,818,871.08) \\ & (\$ 2,251,797.65) \\ & (\$ 6,070,668.73) \end{aligned}$ | 0.00 | Begin through Oct $\mathrm{x} .000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $\begin{array}{r} (\$ 6,070,668.73) \\ (\$ 953,659.80) \\ (\$ 7,024,328.53) \end{array}$ | \$0.00 | Begin + Dec x . $000222 \times 30$ |
| December | Begin through Nov December Begin through Dec | $(\$ 7,024,328.53)$ <br> $\$ 2,685,765.20$ <br> $(\$ 4,338,563.33)$ <br> Total Interest | $\begin{array}{r} \$ 0.00 \\ \hline 16,697.51 \end{array}$ |  |

Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January <br> Begin through Jan | $\begin{array}{r} \$ 2,776,891.64 \\ (\$ 465,900.31) \\ \$ 2,310,991.33 \\ \hline \end{array}$ | \$15,391.20 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $\begin{array}{r} \$ 2,326,382.53 \\ (\$ 196,118.96) \\ \$ 2,130,263.58 \end{array}$ | \$14,187.56 | Begin through Feb $\times .000222 \times 30$ |
| March | Begin through Feb <br> March <br> Begin through March | $\begin{array}{r} \hline \$ 2,144,451.13 \\ (\$ 236,607.01) \\ \$ 1,907,844.12 \end{array}$ | \$12,706.24 | Begin through March $\times .000222 \times 30$ |
| April | Begin through March <br> April <br> Begin through April | $\$ 1,920,550.36$ $(\$ 465,874.53)$ $\$ 1,454,675.83$ | \$9,688.14 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April <br> May <br> Begin through May | $\begin{array}{r} \hline \$ 1,464,363.97 \\ (\$ 357,923.09) \\ \$ 1,106,440.88 \\ \hline \end{array}$ | \$7,368.90 | Begin through May x . $000222 \times 30$ |
| June | Begin through May June Begin through June | $\$ 1,113,809.78$ $(\$ 903,527.69)$ $\$ 210,282.09$ | \$1,400.48 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\$ 211,682.57$ $(\$ 1,319,140.97)$ $(\$ 1,107,458.40)$ | \$0.00 | Begin through July x . $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{aligned} & (\$ 1,107,458.40) \\ & (\$ 1,207,277.66) \\ & (\$ 2,314,736.06) \end{aligned}$ | \$0.00 | Begin through Aug $\times .000222 \times 30$ |
| September | Begin through Aug September Begin through Sept | $\begin{aligned} & (\$ 2,314,736.06) \\ & (\$ 1,426,679.07) \\ & (\$ 3,741,415.13) \end{aligned}$ | \$0.00 | Begin through Sept x $000222 \times 30$ |
| October | Begin through Sept October Begin through October | $(\$ 3,741,415.13)$ $(\$ 2,472,622.83)$ $(\$ 6,214,037.97)$ | \$0.00 | Begin through Oct $\times .000222 \times 30$ |
| Novernber | Begin througth October November Begin through Nov | $(\$ 6,214,037.97)$ $(\$ 1,402,121.89)$ $(\$ 7,616,159.86)$ | \$0.00 | Begin + Dec x . $000222 \times 30$ |
| December | Begin through Nov December <br> Begin through Dec | $(\$ 7,616,159.86)$ <br> $\$ 4,044,735.91$ <br> $(\$ 3,571,423.95)$ | $\begin{array}{r} \$ 0.00 \\ \hline \$ 60,742.52 \end{array}$ |  |

Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through Dec January <br> Begin through Jan | $\begin{array}{r} (\$ 2,727,094.71) \\ \$ 2,382,883.97 \\ (\$ 344,210.74) \\ \hline \end{array}$ | \$0.00 | Begin through Jan $\times .000222 \times 30$ |
| February | Begin through Jan February Begin throug Feb | $\begin{array}{r} (\$ 344,210.74) \\ \$ 1,198,839.46 \\ \$ 854,628.72 \end{array}$ | \$5,691.83 | Begin through Feb x $000222 \times 30$ |
| March | Begin through Feb March Begin through March | $\$ 860,320.55$ $\$ 1,966,496.53$ $\$ 2,826,817.08$ | \$18,826.60 | Begin through March $\times .000222 \times 30$ |
| April | Begin through March April <br> Begin through April | $\begin{aligned} & \$ 2,845,643.68 \\ & \$ 1,111,765.86 \\ & \$ 3,957,409.54 \end{aligned}$ | \$26,356.35 | Begin through April $\times .000222 \times 30$ |
| May | Begin through April May Begin through May | $\begin{array}{r} \$ 3,983,765.89 \\ \$ 558,127.32 \\ \$ 4,541,893.21 \\ \hline \end{array}$ | \$30,249.01 | Begin through May $\times .000222 \times 30$ |
| June | Begin through May June <br> Begin through June | $\begin{gathered} \$ 4,572,142.22 \\ (\$ 625,590.32) \\ \$ 3,946,551.91 \end{gathered}$ | \$26,284.04 | Begin through June $\times .000222 \times 30$ |
| July | Begin through June July <br> Begin through July | $\begin{gathered} \$ 3,972,835.94 \\ (\$ 2,060,753.86) \\ \$ 1,912,082.08 \end{gathered}$ | \$12,734.47 | Begin through July x. $000222 \times 30$ |
| August | Begin through July August <br> Begin through Aug | $\begin{array}{r} \hline \$ 1,924,816.55 \\ (\$ 2,186,472.24) \\ (\$ 261,655.69) \end{array}$ | \$0.00 | Begin through Aug x. $000222 \times 30$ |
| September | Begin through Aug September <br> Begin through Sept | $(\$ 261,655.69)$ $(\$ 2,439,771.34)$ $(\$ 2,701,427.03)$ | \$0.00 | Begin through Sept x $0000222 \times 30$ |
| October | Begin through Sept October Begin through October | $\begin{aligned} & (\$ 2,701,427.03) \\ & (\$ 3,542,075.97) \\ & (\$ 6,243,502.99) \end{aligned}$ | \$0.00 | Begin through Sept x $000222 \times 30$ |
| November | Begin througth October November Begin through Nov | $(\$ 6,243,502.99)$ $(\$ 1,254,690.83)$ $(\$ 7,488,193.83)$ | \$0.00 | Begin + Dec $\times .000222 \times 30$ |
| December | Begin through Nov December Begin through Dec | $\begin{array}{r} (\$ 7,498,193.83) \\ (\$ 636,667.79) \\ (\$ 8,134,861.61) \\ \hline \text { Total Interest. } \end{array}$ | $\begin{array}{r} \$ 0.00 \\ \hline \$ 120,142.29 \end{array}$ |  |

TE
DAS-Rev-21
Interest Calculation

| Month | Debt | Deficit | Interest | Notes |
| :---: | :---: | :---: | :---: | :---: |
| January | Begin through DecJanuaryBegin through Jan | 56,089.78 | 3,992.50 | Begin through Jan x . $000222 \times 30$ |
|  |  | 543,384.10 |  |  |
|  |  | 599,473.88 |  |  |
| February | Begin through Jan February Begin throug Feb | 603,466.38 | 5,842.23 | Begin through Feb $\times .000222 \times 30$ |
|  |  | 273,744.60 |  |  |
|  |  | 877,210.98 |  |  |
| March | Begin through Feb March Begin through March | $883,053.20$ $560,941.11$ $1,443,994.31$ | 9,617.00 | Begin through March x. $000222 \times 30$ |
| April | Begin through March April <br> Begin through April | 1,453,611.31 | 10,583.21 | Begin through April $\times .000222 \times 30$ |
|  |  | 135,458.55 |  |  |
|  |  | 1,589,089.86 |  |  |
| May | Begin through ApriaMayBegin through May | 1,599,653.07 | 11,030.66 | Begin through May $\times .000222 \times 30$ |
|  |  | 56,602.42 |  |  |
|  |  | 1,656,255.49 |  |  |
| June | Begin through May June <br> Begin through June | 1,667,286.15 | 9,463.39 | Begin through June $\times .000222 \times 30$ |
|  |  | $(246,356.54)$ |  |  |
|  |  | 1,420,929.61 |  |  |
| July | Begin through June July <br> Begin through July | 1,430,393.00 | 6,433.54 | Begin through July x $000222 \times 30$ |
|  |  | (464,396.03) |  |  |
|  |  | 965,996.97 |  |  |
| August | Begin through July August <br> Begin through Aug | 972,430.51 | 2,995.03 | Begin through Aug $\times .000222 \times 30$ |
|  |  | (522,726.33) |  |  |
|  |  | 449,704.18 |  |  |
| September | Begin through Aug September Begin through Sept | 452,699.21 | 0.00 | Begin through Sept x $000222 \times 30$ |
|  |  | (804,321.14) |  |  |
|  |  | (351,621.93) |  |  |
| October | Begin through Sept October <br> Begin through October | (351,621.93) | 0.00 | Begin through Oct $\times .000222 \times 30$ |
|  |  | (1,063,971.69) |  |  |
|  |  | (1,415,593.63) |  |  |
| November | Begin througth October November Begin through Nov | (1,415,593.63) | 0.00 | Begin through Nov x . $000222 \times 30$ |
|  |  | (483,710.09) |  |  |
|  |  | (1,899,303.71) |  |  |
| December | Begin through Nov December <br> Begin through Dec | (1,899,303.71) | 0.00 |  |
|  |  | (393,317.51) |  |  |
|  |  | (2,292,621.22) |  |  |
|  |  | Total Interest: | 59,957.55 |  |

## DAS-Rev-22

## CSP

Calculation of Allowance for Undercollection

|  | KWh | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenus <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| JJan-09 | 2,074,359,051 | \$2,247,554.76 | \$2,202,360.18 | 97.99\% | 99.77\% |
| Feb-09 | 1,940,878,131 | \$2,082,015.63 | \$2,070,384.03 | 99.44\% | 99.00\% |
| Mar-09 | 1,758,743,359 | \$1,737,963.60 | \$1,830,424.05 | 105.32\% |  |
| Apr-09 | 1,601,025,321 | \$1,642,007.52 | \$1,634,496.06 | 99.54\% |  |
| May-09 | 1,524,850,632 | \$1,559,684,46 | \$1,552,557.26 | 99.54\% |  |
| Jun-09 | 1,516,213,531 | \$1,715,979.04 | \$1,706,220.82 | 99.43\% |  |
| Jul-09 | 1,967,206,526 | \$1,952,556.35 | \$1,937,980.61 | 99.25\% |  |
| Aug-09 | 1,758,517,379 | \$1,869,352.45 | \$1,855,339.39 | 99.25\% |  |
| Sep-09 | 1,753,982,349 | \$1,875,568.67 | \$1,857,657.83 | 99.05\% |  |
| Oct-08 | 1,683,896,622 | \$2,005,710.59 | \$1,994,737.99 | 99.45\% |  |
| Nov-08 | 1,647,152,145 | \$2,017,691.33 | \$2,007,772.67 | 99.51\% |  |
| Dec-08 | 1,919,274,709 | \$2,453,456.48 | \$2,439,777.27 | 99.44\% |  |
|  | 21,146,099,755 | \$23,159,520.89 | \$23,089,708.16 |  |  |

Target Revenue:
Total Cost:(Tanget Revenue / 99\%)
Allowance:(Total Cost - Total Revenue)
\$32,436,030.88
\$32,763,667.55
\$327,636.68

## OP

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X current rider $=$ Expected Revenue | Rider Collection | Expected Revenue/ <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-09 | 2,600,546,948 | \$1,986,641.58 | \$1,980,187.57 | 99.68\% | 99.85\% |
| Feb-09 | 2,292,947,311 | \$1,827,493.31 | \$1,819,021.98 | 99.54\% | 99.00\% |
| Mar-09 | 2,166,097,356 | \$1,519,412.05 | \$1,632,415.58 | 107.44\% |  |
| Apr-09 | 2,022,144,423 | \$1,476,594.20 | \$1,476,426.24 | 99.99\% |  |
| May-09 | 1,926,222,627 | \$1,404,448.31 | \$1,393,360.86 | 99.21\% |  |
| Jun-09 | 1,704,952,962 | \$1,407,855.48 | \$1,399,875.35 | 99.43\% |  |
| Jul-09 | 2,229,758,118 | \$1,582,060.05 | \$1,571,404.55 | 99.33\% |  |
| Aug-09 | 1,937,381,133 | \$1,525,174.63 | \$1,515,373.05 | 99.36\% |  |
| Sep-09 | 2,120,047,465 | \$1,621,439.32 | \$1,548,901.19 | 95.53\% |  |
| Oct-08 | 2,072,403,529 | \$2,046,829.80 | \$2,034,887.55 | 99.42\% |  |
| Nov-08 | 1,993,368,905 | \$2,074,889.07 | \$2,067,465.85 | 99.64\% |  |
| Dea-08 | 2,481,117,597 | \$2,601,889.85 | \$2,592,549.18 | 99.64\% |  |
|  | 25,546,988,374 | \$21,074,727.67 | \$21,031,868.95 |  |  |

Target Revenue:
Total Cost:(Target Revenue / .99)
Allowance:(Total Cost - Total Revenue)
$\$ 27,230,539.04$
\$27,505,594.98
$\$ 275,055.95$

DAS-Rev-24

## Duke

Calculation of Allowance for Undercollection

|  | KWH | KWh sales $\bar{X}$ USF rider= Expected Revenue | Rider Collection | Expected Revenue/ <br> Rider Collection | Average <br> Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-09 | 1,872,854,087 | \$1,884,742.31 | \$1,926,709.89 | 103.32\% | 99.87\% |
| Feb-09 | 1,779,344,762 | \$1,763,818.65 | \$1,747,207.37 | 99.06\% | 99.00\% |
| Mar-09 | 1,573,272,133 | \$1,534,981.71 | \$1,519,403.15 | 98.99\% |  |
| Apr-09 | 1,431,041,927 | \$1,390,864.10 | \$1,377,407.05 | 99.03\% |  |
| May-09 | 1,361,711,795 | \$1,344,504.75 | \$1,330,517.65 | 98.96\% |  |
| Jun-09 | 1,696,518,233 | \$1,618,440.44 | \$1,599,843.20 | 98.85\% |  |
| Jul-09 | 1,799,051,805 | \$1,621,011.75 | \$1,712,830.33 | 105.66\% |  |
| Aug-09 | 1,751,899,872 | \$1,694,571.85 | \$1,668,867.75 | 98.48\% |  |
| Sep-09 | 1,759,069,773 | \$1,686,903.71 | \$1,663,731.77 | 98.63\% |  |
| Oct-08 | 1,542,006,332 | \$1,620,133.21 | \$1,613,278.27 | 99.58\% |  |
| Nov-08 | 1,494,813,027 | \$1,602,367.66 | \$1,584,586.43 | 98.89\% |  |
| Dec-08 | 1,851,461,439 | \$2,012,408.15 | \$1,991,801.67 | 98.98\% |  |
|  | 19,913,045,185 | \$19,754,748.29 | \$19,736,184.53 |  |  |


| Target Revenue: | $\$ 26,721,977.38$ |
| :--- | ---: |
| Total Cost:(Target Revenue / Average Collection) | $\$ 26,991,896.35$ |
| Allowance:(Total Cost - Total Revenue) | $\$ 269,918.96$ |

## DPL

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales $\mathbf{X}$ current rider $=$ Expected Revenue | Rider Collection | Expected Revenue) Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| \|Jan-09 | 1,374,778,678 | \$1,859,497.10 | \$1,793,016.38 | 96.42\% | 97.57\% |
| Feb-09 | 1,279,447,610 | \$1,714,094.85 | \$1,663,671.80 | 97.06\% |  |
| Mar-09 | 1,131,250,903 | \$1,509,030.68 | \$1,464,348.91 | 97.04\% |  |
| Apr-09 | 1,044,936,553 | \$1,369,701.07 | \$1,329,192.34 | 97.04\% |  |
| May-09 | 1,004,709,169 | \$1,306,036.06 | \$1,267,661.68 | 97.06\% |  |
| Jun-09 | 1,116,725,298 | \$1,436,357.51 | \$1,394,312.79 | 97.07\% |  |
| Jul-09 | 1,201,854,609 | \$1,528,934.40 | \$1,545,386.97 | 101.08\% |  |
| Aug-09 | 1,186,478,702 | \$1,543,330.18 | \$1,497,822.89 | 97.05\% |  |
| Sep-09 | 1,176,729,146 | \$1,523,307.15 | \$1,477,997.57 | 97.03\% |  |
| Oct-08 | 1,110,777,253 | \$873,263.56 | \$872,236.46 | 99.88\% |  |
| Nov-08 | 1,096,089,202 | \$890,515.08 | \$864,073.06 | 97.03\% |  |
| Dec-08 | 1,249,649,891 | \$1,034,655.88 | \$1,003,839.10 | 97.02\% |  |
|  | 13,973,427,014 | \$16,588,723.53 | \$16,173,559.95 |  |  |


| Target Revenue: | $\$ 22,020,720.43$ |
| :--- | ---: |
| Total Cost:(Target Revenue / Average Collection) | $\$ 22,570,173.98$ |
| Allowance:(Total Cost - Total Revenue) | $\$ 549,453.54$ |

## DAS-Rev-26

## CEI

Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenued <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| \|Jan-09 | 1,701,624,827 | \$1,371,280.58 | \$1,358,719.54 | 99.08\% | 98.70\% |
| Feb-09 | 1,619,708,202 | \$1,303,772.51 | \$1,283,769.08 | 98.47\% | 99.00\% |
| Mar-09 | 1,469,982,953 | \$1,178,293.42 | \$1,171,731.96 | 99.44\% |  |
| Apr-09 | 1,357,965,612 | \$1,102,290.53 | \$1,073,160.73 | 97.36\% |  |
| May-09 | 1,322,035,255 | \$1,058,988.51 | \$1,048,181.40 | 98.98\% |  |
| Jun-09 | 1,330,053,849 | \$1,083,648.28 | \$1,057,156.58 | 97.56\% |  |
| Jul-09 | 1,489,540,182 | \$1,192,909.55 | \$1,184,128.94 | 99.26\% |  |
| Aug-09 | 1,535,752,882 | \$1,230,624.88 | \$1,227,309.27 | 99.73\% |  |
| Sep-09 | 1,437,323,119 | \$1,149,926.13 | \$1,139,061.68 | 99.06\% |  |
| Oct-08 | 1,457,984,416 | \$1,269,596.26 | \$1,262,265.04 | 99.42\% |  |
| Nov-08 | 1,439,838,133 | \$1,278,555.57 | \$1,249,856.26 | 97.76\% |  |
| Dec-08 | 1,520,711,598 | \$1,364,671.59 | \$1,341,885.99 | 98.33\% |  |
|  | 7,682,521,028 | \$14,584,557.81 | \$14,397,226.47 |  |  |

[^0]
## DAS-Rev-27

## OE

## Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider $=$ Expected Revenue | Rider Collection | Expected Revenua/ <br> Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| \|Jan-09 | 2,198,729,250 | \$3,965,807 | \$3,942,352 | 99.41\% | 100.13\% |
| Feb-09 | 2,178,593,598 | \$3,912,450 | \$3,920,189 | 100.20\% | 99.00\% |
| Mar-09 | 1,980,378,864 | \$3,591,726 | \$3,548,075 | 98.78\% |  |
| Apr-09 | 1,764,518,022 | \$3,189,528 | \$3,173,833 | 99.51\% |  |
| May-09 | 1,688,549,104 | \$2,987,924 | \$3,031,376 | 101.45\% |  |
| Jun-09 | 1,736,010,272 | \$3,170,582 | \$3,115,882 | 98.27\% |  |
| Jul-09 | 1,921,349,368 | \$3,448,408 | \$3,462,796 | 100.42\% |  |
| Aug-09 | 1,881,088,337 | \$3,312,895 | \$3,404,401 | 102.76\% |  |
| Sep-09 | 1,938,785,357 | \$3,438,343 | \$3,473,122 | 101.01\% |  |
| Oct-08 | 1,890,806,373 | \$2,554,470 | \$2,583,189 | 101.12\% |  |
| Nov-08 | 1,912,412,546 | \$2,638,646 | \$2,630,910 | 99.71\% |  |
| Dec-08 | 2,000,325,064 | \$2,818,555 | \$2,788,712 | 98.94\% |  |
|  | 23,091,546,155 | \$39,029,336 | \$39,074,836 |  |  |

Target Revenue:
Total Cost:(Target Revenue / 99)
\$42,036,442.85
Allowance:(Total Cost - Total Revenue)
42,461,053.39
424,610.53

TE
Calculation of Allowance for Undercollection

|  | KWH | KWh sales X USF rider= Expected Revenue | Rider Collection | Expected Revenu Rider Collection | Average Collection |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Jan-09 | 835,776,914 | \$1,261,841.48 | \$1,189,009.61 | 94.23\% | 98.06\% |
| Feb-09 | 801,561,786 | \$1,196,337.98 | \$1,178,918.12 | 98.54\% |  |
| Mar-09 | 803,537,788 | \$1,186,405.11 | \$1,126,046.32 | 94.91\% |  |
| Apr-09 | 789,500,111 | \$1,145,498.86 | \$1,049,145.17 | 91.59\% |  |
| May-09 | 708,192,150 | \$983,292.11 | \$957,200.06 | 97.35\% |  |
| Jun-09 | 723,680,191 | \$968,321.60 | \$989,235.20 | 102.16\% |  |
| Jut-09 | 785,932,593 | \$1,041,196.43 | \$1,102,993.89 | 105.94\% |  |
| Aug-09 | 813,247,634 | \$1,084,123.87 | \$1,126,370.85 | 103.90\% |  |
| Sep-09 | 802,871,491 | \$1,073,089.49 | \$1,108,896.95 | 103.34\% |  |
| Oct-08 | 811,598,705 | \$1,069,579.50 | \$1,015,526.06 | 94.95\% |  |
| Nov-08 | 770,662,376 | \$1,054,856.73 | \$989,400.96 | 93.79\% |  |
| Dec-08 | 796,427,844 | \$1,112,528.40 | \$1,068,409.75 | 96.03\% |  |
|  | ,442,989,583 | \$13,177,071.57 | \$12,901,152.94 |  |  |


| Target Revenue: | $\$ 15,135,610.24$ |
| :--- | ---: |
| Total Cost:(Target Revenue / Average Collection) | $\$ 15,435,001.86$ |
| Allowance:(Total Cost - Total Revenue) | $\$ 299,391.63$ |

## CSP

KWH Sales

|  | $\begin{gathered} \text { Past } 12 \text { months } \\ \mathrm{KWh} \end{gathered}$ |
| :---: | :---: |
| Jan-09 | 2,074,359,051 |
| Feb-09 | 1,940,878,131 |
| Mar-09 | 1,758,743,359 |
| Apr-09 | 1,601,025,321 |
| May-09 | 1,524,850,632 |
| Jun-09 | 1,516,213,531 |
| Jul-09 | 1,967,206,526 |
| Aug-09 | 1,758,517,379 |
| Sep-09 | 1,753,982,349 |
| Oct-08 | 1,683,896,622 |
| Nov-08 | 1,647,152,145 |
| Dec-08 | 1,919,274,709 |
|  | 21,146,099,755 |

## DAS-Rev-30



DAS-Rev-31

## Duke

|  | KWH |
| ---: | ---: |
| Jan-09 | $1,872,854,087$ |
| Feb-09 | $1,779,344,762$ |
| Mar-09 | $1,573,272,133$ |
| Apr-09 | $1,431,041,927$ |
| May-09 | $1,361,711,795$ |
| Jun-09 | $1,696,518,233$ |
| Jul-09 | $1,799,051,805$ |
| Aug-09 | $1,751,899,872$ |
| Sep-09 | $1,759,069,773$ |
| Oct-08 | $1,542,006,332$ |
| Nov-08 | $1,494,813,027$ |
| Dec-08 | $1,851,461,439$ |
|  | $19,913,045,185$ |

DAS-Rev-32

## DPL <br> KWH Sales

| KWH |  |
| :---: | :---: |
| Jan-09 | 1,374,778,678 |
| Feb-09 | 1,279,447,610 |
| Mar-09 | 1,131,250,903 |
| Apr-09 | 1,044,936,553 |
| May-09 | 1,004,709,169 |
| Jun-09 | 1,116,725,298 |
| Jul-09 | 1,201,854,609 |
| Aug-09 | 1,186,478,702 |
| Sep-09 | 1,176,729,146 |
| Oct-08 | 1,110,777,253 |
| Nov-08 | 1,096,089,202 |
| Dec-08 | 1,249,649,891 |
|  | 13,973,427,014 |

DAS-Rev-33

## CEI

KWH Sales

|  | KWH |
| ---: | ---: |
| Jan-09 | $1,701,624,827$ |
| Feb-09 | $1,619,708,202$ |
| Mar-09 | $1,469,982,953$ |
| Apr-09 | $1,357,965,612$ |
| May-09 | $1,322,035,255$ |
| Jun-09 | $1,330,053,849$ |
| Jul-09 | $1,489,540,182$ |
| Aug-09 | $1,535,752,882$ |
| Sep-09 | $1,437,323,119$ |
| Oct-08 | $1,457,984,416$ |
| Nov-08 | $1,439,838,133$ |
| Dec-08 | $1,520,711,598$ |
| $17,682,521,028$ |  |

DAS-Rev-34

## OE <br> KWH Sales

KWH

| Jan-09 | $2,198,729,250$ |
| ---: | ---: |
| Feb-09 | $2,178,593,598$ |
| Mar-09 | $1,980,378,864$ |
| Apr-09 | $1,764,518,022$ |
| May-09 | $1,688,549,104$ |
| Jun-09 | $1,736,010,272$ |
| Jul-09 | $1,921,349,368$ |
| Aug-09 | $1,881,088,337$ |
| Sep-09 | $1,938,785,357$ |
| Oct-08 | $1,890,806,373$ |
| Nov-08 | $1,912,412,546$ |
| Dec-08 | $2,000,325,064$ |
| $23,091,546,155$ |  |

## DAS-Rev-35

## TE <br> KWH Sales

| KWH |  |
| ---: | ---: |
| Jan-09 | $835,776,914$ |
| Feb-09 | $801,561,786$ |
| Mar-09 | $803,537,788$ |
| Apr-09 | $789,500,111$ |
| May-09 | $708,192,150$ |
| Jun-09 | $723,680,191$ |
| Jul-09 | $785,932,593$ |
| Aug-09 | $813,247,634$ |
| Sep-09 | $802,871,491$ |
| Oct-08 | $811,598,705$ |
| Nov-08 | $770,662,376$ |
| Dec-08 | $796,427,844$ |
| $9,442,989,583$ |  |

## Two-Tiered Rider <br> CSP

## Proposal

| First Block $833,000 \mathrm{kWh}(10,000,000$ per Year ) (18) | $\$ 0.0019994$ |
| :--- | :--- | :--- |
| 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
$\$ 32,763,667.55$
3 Total KWh Used in Calculation
$21,146,099,755$
4 Uniform per Kwh rate
$\$ 0.0015494$
5 Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$
6 Total Kwh of Accounts Over 10,000,000 kWh Annually
$6,448,638,808$
7 First Block Annual kWh (833,334 Monthly) $\quad \mathbf{1 0 , 0 0 0 , 0 0 0}$
8 Total kWh in First Block (5) $\times(7)$
$1,210,000,000$
9 Revenue First Block Rate x (8)
\$ 2,419,245.04
10 Total Second Block kWh (6) - (8)
5,238,638,808
11 Lower of $10 / 99$ Rate (1) or Uniform per Kwh rate
\$ 0.0001830
12 Second Block Revenue (11) $\times$ (10)
\$ 958,670.90
13 Total First and Second Block Revenue (9) + (12)
\$ 3,377,915.94
14 Revenue @ ODOD Proposed Rate (6) $\times$ (4)
\$ 9,991,490.65
15 Revenue shortfall (13) - (14)
$\$(6,613,574.71)$

## Adjustment to Calculation

16 Adjusted Cost (2) - (9) - (12)
\$29,385,751.81
17 Adjusted kWh (3) - (6)
14,697,460,947
18 Adjusted First Block Rate (16)/(17)
$\$ 0.0019994$
19 Change (18) - (4)
\$ 0.0004500
20 \% Change 29.0\%

## Two-Tiered Rider

## Ohio Power

## Proposal

$\begin{array}{llll}\text { First Block } 833,000 \mathrm{kWh}(10,000,000 \text { per Year })(18) & \$ & 0.0015873 \\ \text { Over } 833,000 \mathrm{kWh} \text { [Lower of 10/99 Rate (1) or Uniform per Kwh rate (4)] } & \$ & 0.0001681\end{array}$

## Calculation

$110 / 99$ USF Rider

2 USF Rider Revenue Requirement $\$ 27,505,594.98$

3 Total kWh Used in Calculation

4 Uniform per Kwh rate
$\$ 0.0010767$

5 Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$
182

6 Total Kwh of Accounts Over $10,000,000$ kWh Annually
$11,011,731,869$
7 First Block Annuad kWh (833,334 Monthly) $10,000,000$

8 Total kWh in First Block (5) $\times$ (7)
$1,820,000,000$
9 Revenue First Block Rate $\times$ (8)
10 Total Second Block kWh (6) - (8)
\$ 2,888,859.98

9,191,731,869
11 Lower of $10 / 99$ Rate (1) or Uniform per Kwh rate
$\$ \quad 0.0001681$

12 Second Block Revenue (11) $\times$ (10)
\$ 1,545,130.13

13 Total First and Second Block Revenue (9) + (12)
14 Revenue ODOD Proposed Rate (6) $\times(4)$
\$ 4,433,990.11

15 Revenue shortfall (13) - (14)
\$ 11,855,966.44
$\$(7,421,976.33)$
Adiustment to Calculation
16 Adjusted Cost (2) - (9) - (12) $\$ 23,071,604.87$
17 Adjusted kWh (3) - (6)
$14,535,256,505$

18 Adjusted First Block Rate (16)/(17)
$\$ 0.0015873$
19 Change (18) - (4)
\$ 0.0005106
20 \% Change
47.4\%

21 Annual Cost to Consumer Using 1029 KWh par Wonth (19) $\times 1029 \times 12$
6.31

## Two-Tiered Rider <br> Duke

## 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
$\$ \quad 0.0015704$
\$ 0.0004690

## Calculation

1 10/99 USF Rider
\$ 0.0004690
2 USF Rider Revenue Requirement
\$26,991,896.35
3 Total kWh Used in Calculation
19,913,045,185
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 $10,000,000$ kWh Annually
7 First Block Annual kWh (833,000 Monthly) 10,000,000

8 Total kWh in First Block (5) $\times$ (6)
1,240,000,000
9 Revenue First Block Rate $\times$ (8)
10 Total Second Block $\mathbf{k W h}$ (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)
Adjustment to Calculation
16 Adjusted Cost (2) - (9) - (12) \$23,222,222.71
17 Adjusted kWh (3) - (6)
14,787,395,811
18 Adjusted USF (16)/(17)
19 Change (18) - (4)
20 \% Change
21 Annual Cost to Consumer Using 1007 kWh per Month (19) $\times 1007 \times 12$
\$
2.60

## Two-Tiered Rider <br> DPL

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
\$ 0.0018615
\$ 0.0005700

## Calculation

1 10/99 USF Rider
2 USF Rider Revenue Requirement
$\$ \quad 0.0005700$
3 Total kWh Used in Calculation
\$22,570,173.98
13,973,427,014
4 Uniform per Kwh Rate (2) / (3)
5 Accounts with Annual kWh Greater than $10,000,000 \mathrm{kWh}$
\$ 0.0016152
6 Total Kwh of Accounts Over 10,000,000 kWh Annually
7 First Block Annual kWh ( 833,000 Monthly)
3,604,349,239
8 Total kWh in First Block (5) $\times(6)$
$10,000,000$
940,000,000
9 Revenue First Block Rate $\times$ (8)
$\$ 1,749,780.63$
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) $\times$ (4)
15 Reduction in Total Revenue (13) - (14)
2,664,349,239
\$ 0.0005700
\$ 1,518,679.07
diustment to Calculation

| 16 | Adjusted Cost (2) - (9) - (12) | \$ | 19,301,714.28 |
| :--- | :--- | ---: | ---: |
| 17 | Adjusted KWh (3) - (6) | $10,369,077,775$ |  |
| 18 | Adjusted USF (16)(17) | $\$$ | 0.0018615 |
| 19 | Change (18) - (4) | $\$$ | 0.0002462 |
| 20 | \% Change |  | $15.2 \%$ |
| 21 | Annual Cost to Consumer Using 1010 kWh per Month (49) $\times 1010 \times 12$ | $\$$ | 2.98 |

## CEI

## 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 (4)]

| $\$$ | 0.0019513 |
| :--- | :--- |
| $\$$ | 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 Block Annual kWh (833,000 Monthly)
4,366,802,153

8 Total kWh in First Block (5) $\times$ (6)
9 Revenue First Block Rate $\times$ ( 8 )
10 Total Second Block kWh (6) - (8)
11 Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)
\$ $10,000,000$
\$
1,270,000,000

12 Second Block Revenue (11) x (10)
13 Total First and Second Block Revenue (9) + (12)
14 Revenue © Uniform per Kwh Rate (6) x (4)
2,478,123.25
3,096,802,153 0.0005680

1,758,983.62
4,237,106.87
7,462,951.24
15 Reduction in Total Revenue (13) - (14)
$(\$ 3,225,844.37)$
Adjustment to Calculation

| 16 | Adjusted Cost (2)-(9)-(12) | $\$$ | $25,982,671.25$ |
| :--- | :--- | ---: | ---: |
| 17 | Adjusted $\mathrm{KWh}(3)-(6)$ |  | $13,315,718,875$ |
| 18 | Adjusted USF (16)(17) | $\$$ | 0.0019513 |
| 19 | Change (18) - (4) | $\$ 0.0002423$ |  |
| 20 | \% Change |  | $14.2 \%$ |
| 21 | Annual Cost to Consumer Using 699 kWh per Month (19) $\times 699 \times 12$ | $\$$ | 2.03 |

## Two-Tiered Rider <br> Ohio Edison

## Proposal

| First Block $833,000 \mathrm{kWh}(10,000,000$ per Year $)(18)$ | $\$$ | 0.0020252 |
| :--- | :--- | :--- |
| Over $833,000 \mathrm{kWh}$ [Lower of 10/99 Rate (1) or Uniform per Kwh Rate (4)] | $\$ 0.0010461$ |  |

## Calculation

1 10/99 USF Rider
\$ 0.0010461
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 kWh Annually
First Block Annual kWh ( 833,000 Monthly)
$10,000,000$
8 Total kWh in First Block (5) $\times(6)$
1,630,000,000
9 Revenue First Block Rate $\times$ (8)
10 Total Second Block kWh (B) - (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 (4) Uniform per Kwh Rate (6) x (4)
\$ 11,079,969.30
15 Reduction in Total Revenue (13) - (14)
$\$(3,180,666.82)$

## Adjustment to Calculation

16 Adjusted $\operatorname{Cost}(2)-(9)-(12) \quad \$ 34,561,750.90$

17 Adjusted kWh (3) - (B)
17,065,939,107
18 Adjusted USF (16)(17)
19 Change (18) - (4)
20 \% Change
21 Annual Cost to Consumer Using 833 kWh per Month (19) $\times 833 \times 12$
\$
1.86

## Two-Tiered Rider

Toledo 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

## 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 kWh 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 $\times$ (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) $\times$ (10)
13 Total First and Second Block Revenue (9) + (12)
14 Revenue @ ODOD Proposed Rate (6) x (4)
15 Revenue shortfall (13) - (14)
Adjustment to Calculation
16 Adjusted Cost (2) - (9) - (12)
17 Adjusted kWh (3) - (6)
18 Adjusted First Block Rate (16)(17)
19 Change (18) - (4)
20 \% Change
21 Annual Cost to Consumer Using 767 kWh per Month (19) $\times 767 \times 12$
\$ 12,285,725.66
5,478,050,296
\$ 0.0022427
\$ 0.0006082 $37.2 \%$

## 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 $24^{\circ}$ day of November 2009.


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[^0]:    Target Revenue:
    Total Cost:(Target Revenue / Average Collection) Allowance:(Total Cost - Target Revenue)
    \$29,828,002.17
    \$30,219,778.12
    $\$ 391,775.95$

