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Via Telefax Transmission and Overnight Mail

February 20, 2012

Public Utilities Commission of Ohio PUCO Docketing 180 E. Broad Street, 10th Floor Columbus, Ohio 43215

> In re: 10-2376-EL-UNC, 11-346-EL-SSO, 11-348-EL-SSO 11-349-EL-AAM, 11-350-EL-AAM 10-343-EL-ATA, 10-344-EL-ATA 10-2929-EL-UNC 11-4920-EL-RDR, 11-4921-EL-RDR

Dear Sir/Madam:

Please find attached the OHIO ENERGY GROUP'S RESPONSE IN PARTIAL SUPPORT OF OHIO POWER COMPANY'S APPLICATION FOR REHEARING for filing in the above-referenced matters. The original and twenty (20) copies will follow by overnight mail.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,

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David F. Boehm, Esq. Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. BOEHM, KURTZ & LOWRY

MLKkew Encl. Cc: Ccrtificate of Service

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## BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company and Columbus Southern Power Company for Authority to Merge and Related Approvals.	::	Case No. 10-2376-EL-UNC
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan.	:::::::::::::::::::::::::::::::::::::::	Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority	::	Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM
In the Matter of the Application of Columbus Southern Power Company to Amend its Emergency Curtailment Service Riders	:	Case No. 10-343-EL-ATA
In the Matter of the Application of Ohio Power Company to Amend its Emergency Curtailment Service Riders	:	Case No. 10-344-EL-ATA
In the Matter of the Commission Review of the Capacity Charges of Ohio Power Company and Columbus Southern Power Company	:	Case No. 10-2929-EL-UNC
In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144	: : :	Case No. 11-4920-EL-RDR
In the Matter of the Application of Ohio Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Ohio Revised Code 4928.144	•	Case No. 11-4921-EL-RDR
	:	

## RESPONSE IN PARTIAL SUPPORT OF OHIO POWER COMPANY'S APPLICATION FOR REHEARING OF THE OHIO ENERGY GROUP

## **RESPONSE IN PARTIAL SUPPORT**

Pursuant to §4901-1-35 of the Ohio Administrative Code, the Ohio Energy Group ("OEG") hereby submits this Response to the Application for Rehearing filed by Ohio Power Company ("AEP" or "Company") on February 10, 2012 ("Application for Rehearing").<sup>1</sup>

In its Application for Rehearing, AEP lists three methods to address concerns about the rate impact of the Electric Security Plan ("ESP") on GS-2 customers: 1) expanding eligibility for the shopping credit; 2) earmarking dollars within the Ohio Growth Fund for GS-2 rate impact mitigation; and 3) redesigning the Load Factor Provision ("LFP") to mitigate the early impact of the rider on low load factor GS-2 customers.<sup>2</sup> OEG files this Response to address the third method listed – redesigning the LFP.

Redesigning the LFP as AEP describes would result in significant benefits to GS-2 customers, at the expense of GS-3 and GS-4 customers. Under the LFP redesign, the Company would implement a revenue-neutral phase-in of the GS-2 LFP demand charge by a commensurate reduction to the GS-3 and GS-4 energy credit. The redesign would reduce the current GS-2 demand charge of \$3.29/KW for a period of three years, as shown below (even though these numbers are shown on a calendar year basis, we understand the AEP proposal to be for the first 36 months after any Commission Order):<sup>3</sup>

Year	2012	2013	2014
Current GS-2 Demand Charge (\$/kW)	\$3.29	\$3.29	\$3.29
Proposed GS-2 Demand Charge (\$/kW)	\$0.82	\$1.65	\$2.47

<sup>&</sup>lt;sup>1</sup> Ohio Adm. Code §4901-1-38(B) provides "[t]he commission may, upon its own motion or for good cause shown, waive any requirement, standard, or rule set forth in this chapter or prescribe different practices or procedures to be followed in a case." To the extent that a Response In Partial Support may not be provided for in the Commission's rules, the Commission should accept OEG's Response because good cause to accept such a pleading exists. Because of the unique circumstances of this case, in which the Commission has now indicated publically that it will resolve small business customer rate issues, parties should be permitted to respond to proposed solutions to those issues.

<sup>&</sup>lt;sup>2</sup> Application for Rehearing at 14.

<sup>&</sup>lt;sup>3</sup> See pages 14-15 of the Application for Rehearing (describing a 25% phase-in in 2012, 50% in 2013, 75% in 2014, and 100% in 2015).

Based upon the Company's work papers, such a reduction would provide a \$42 million benefit to GS-2 customers during the first 12 months of the LFP redesign, with a corresponding increase to Ohio Power's other business customers.<sup>4</sup> This translates into a first year rate reduction to the average GS-2 customer of \$779.<sup>5</sup> Over a three year period, the total savings to GS-2 would be approximately \$84 million, with a corresponding \$84 million increase to the Company's other business customers.

These very significant savings would be reflected as a reduction in the current GS-2 distribution demand charge. And the substantial reduction in the GS-2 distribution demand charge would provide greater relative benefit to low load factor GS-2 customers. For example, a GS-2 customer with a 13.7% load factor would save  $2.47 \Box$ /kwh over the first 12 months under this method.<sup>6</sup>

Large business customers, such as those served under the GS-3 and GS-4 rate schedules, include businesses that compete on a national and international, rather than a local, scale. The Commission must carefully consider whether a redesign of the LFP that shifts more costs to such large business customers is warranted. R.C. 4928.02(N) provides that it is the policy of the state to "[f]acilitate the state's effectiveness in the global economy." A redesign of the LFP that requires large business customers on transmission service voltage, many of which compete globally, to continue subsidizing distribution voltage customers, who almost exclusively compete locally, could hinder Ohio's effectiveness in the global economy. Further, a redesign of the LFP could upset the careful balance of interests achieved by the parties through the settlement in this case. Accordingly, the Commission should not take a redesign of a critical provision in the ESP settlement lightly.

<sup>&</sup>lt;sup>4</sup> See attached "Load Factor Rider" from Roush Stipulation workpapers.

<sup>&</sup>lt;sup>5</sup> The attached FERC Form 1 data shows that AEP has approximately 53,890 GS-2 customers. \$42 million divided by the average number of customers equals \$779.

<sup>&</sup>lt;sup>6</sup> A customer with a demand of 1 kw and a 100% load factor would use 730 kwh per month (730 hours in a month x. 1 kw) so a customer with a demand of 1 kw and a 13.7% load factor would use 100.01 kwh per month (730 hours x 1 x 0.137 = 100.01 kwh). Under the third method, the GS-2 customer's 2012 demand charge is reduced from \$3.29/kW to \$0.82/kw, resulting in a reduction in the charge of \$2.47/kW. For the low load factor customer, this would result in  $2.47 \perp /kWh$  savings (\$2.47+100.01 kwh).

Additionally, the Commission should not view the issue of how to address GS-2 rate impacts as one that pits commercial customers against industrial customers. In fact, significant numbers of both commercial and industrial customers are included in both the GS-2 *and* the GS-3 rate classes.<sup>7</sup> FERC Form 1 data for 2010 reflects that approximately 3500 GS-2 customers are industrial customers.<sup>8</sup> The data also reflects that approximately 9800 GS-3 customers are commercial customers.<sup>9</sup> There is no clear delineation between how AEP's ESP impacts commercial versus industrial customers in this case. Consequently, the Commission's adoption of the redesign of the LFP that AEP describes would result in a benefit to both commercial *and* industrial customers in the GS-2 rate class and a detriment to both commercial *and* industrial customers in the GS-3 and GS-4 rate classes.

It is also important to provide clarity regarding public misconceptions about the rate impact of the ESP on small business customers. For example, a February 19, 2012 Columbus Dispatch article contrasted a "small factory" with a 1000 kw demand and energy usage of 100,000 kwh per month with a "large factory" with a 20,000 kw demand and energy usage of 12 million kwh per month.<sup>10</sup> Using these numbers, the "small factory" would have an unusual and extraordinarily low load factor of 13.7%.<sup>11</sup> The "large factory" would have an unusual and extremely high load factor of 82.29%.<sup>12</sup> The comparison of an 82.29% load factor customer to a 13.7% load factor customer is misleading. Such a comparison is equivalent to comparing the cost of buying soda from a vending machine to the cost of a whole case of soda at Costco.

As described earlier, the change to the LFP proposed by AEP would reduce the distribution charge to the Columbus Dispatch's hypothetical "small factory" by 2.47□/kwh. This would be huge savings to exactly the type of atypical customer who the media has been focused on. However, in

<sup>&</sup>lt;sup>7</sup> See attached FERC Form 1 at 304-304.1.

<sup>&</sup>lt;sup>8</sup> Id. Columbus Southern Power Co. FERC Form 1 at 304.1, lines 8-9 and Ohio Power Co. FERC Form 1 at 304.1, line 3.

<sup>&</sup>lt;sup>9</sup> Columbus Southern Power Co. FERC Form 1 at 304, line 23 and Ohio Power Co. FERC Form 1 at 304, line 16.

<sup>&</sup>lt;sup>10</sup> "First AEP plan aided smaller business," Columbus Dispatch (February 19, 2012), available at

http://www.dispatch.com/content/stories/business/2012/02/19/first-aep-plan-aided-smaller-businesses.html.

<sup>&</sup>lt;sup>11</sup> 1000 kw x 730 hours in a month = 730,000 kwh. 100,000 kwh  $\div$  730,000 kwh = 13.7% load factor. <sup>12</sup> 20,000 kw x 730 hours in a month = 14,600,000 kwh. 12,000,000 kwh  $\div$  14,600,000 kwh = 82.29% load factor.

making comparisons to evaluate the rate impact of the ESP, the Commission should look to the impact of the ESP on the average GS-2 customer versus the average GS-3 or GS-4 customer. Additionally, the Commission should consider the *total* bill impact and should not narrowly focus on the impact of the ESP on the distribution component of customers' rate in isolation.

Notwithstanding the above discussion, OEG understands that the Commission has serious and legitimate reasons to mitigate the rate impact of the ESP on GS-2 customers. A \$42 million rate reduction to these customers in year one and a three year rate reduction of \$84 million, at the expense of the GS-3 and GS-4 customers, should accomplish that mitigation goal. Thus, in order to achieve closure to these very contentious issues, OEG supports the Commission's adoption of AEP's proposed redesign of the LFP. Such a solution is reasonable in light of the unique circumstances raised in the present case.

Respectfully Submitted,

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David F. Boehm, Esq. Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. **BOEHM, KURTZ & LOWRY** 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202 E-mail: <u>dboehm@BKLlawfirm.com</u> <u>mkurtz@BKLlawfirm.com</u> <u>kboehm@BKLlawfirm.com</u>

COUNSEL FOR OHIO ENERGY GROUP

February 20, 2012

Load Factor Rider

<u>Capacity / Energy Toggle Rider</u>					
Demand for All Customers <= 250 MW Demand Charge (GS-3/GS-4) Demand Revenue Energy for All Customers <= 250 MW Energy Credit (GS-3/GS-4)		58,467,397 <b>\$6.57</b> \$384,130,798 24,869,325,754 <b>(\$0.01545)</b>			
Demand Charge (GS-2) Energy Charge (GS-2)		\$3.29 (\$0.00228)			
	Billing Demand	Billing Energy	Load Factor \$	Metered Energy	Cents/kWh
CSP GS-2 Sec	3,904,507	1,027,831,040		700 000 V	2
CSP GS-2 Pri	290,971 6 064 266	54,158,51U	0/7/10/14 0/2/16/14	100,282,080,1	- -
CSP GS-3 560 CSP GS-3 Pri	3,922,440	2,304,202,263	(\$4,578,039)	4,901,182,198	(0.08)
CSP GS-4/IRP-D	6,794,455	3,713,614,118	(\$4,630,774)	3,700,591,045	(0.13)
CSP Subtotal	21,876,629	9,694,146,580	\$2,529,763	9,692,065,780	
OP GS-2 Sec	10,313,047	2,569,663,242			
OP GS-2 Pri	1,790,463	410,200,630			
OP GS-2 Sub	809,733	217,878,295			
OP GS-2 Tran	277,680	76,698,276	\$35,872,783	3,383,968,182	1.06
OP GS-3 Sec	5,635,294	2,637,608,847	(\$3,727,175)		
OP GS-3 Pri	5,229,407	2,613,125,517	(\$6,015,585)		
OP GS-3 Sub	1,826,458	889,252,820	(\$1,739,127)		
OP GS-3 Tran	87,399	45,078,990	(\$122,259)	6,182,567,492	(0.19)
OP GS-4/IRP-D Pri	469,074	266,149,072	(\$1,030,187)		
OP GS-4/IRP-D Sub	4,387,314	2,376,506,531	(\$7,892,373)	0,000,700,000	(15.0)
OP GS-4/IRP-D Tran	9,849,144	5,805,010,854	(171',1U1,11¢)	0,000,100,000	(10-0)
OP Subtotal	40,675,013	18,007,179,174	(\$2,361,644)	18, 150, 324, 602	
AEP Ohio Total	62,551,642	27,701,325,754	\$168,119	27,842,390,382	
Less: Customer over 250 MW - CSP Less: Customer over 250 MW - OP	2,096,226 1,988,019	1,416,000,000 1,416,000,000			
Total	58,467,397	24,869,325,754			

customer, and average novones per KvA, excluding date for Splate for Reade which is reported on Fagues 316-311.         Page 316-311.           covide a subbarding and balls reach principies operating events as count in the sequence forbugs in "Back". Covide a subbarding encluding count on environing account subbarding encluding encludi	"201 Coum	10412-8080 FERC PDF (Un Streenhein PowerSchnein)		Signal 1 esubmission CTRICITY BY RAT	Date of Report (Mo, Da, Yr) / / E SCHEDULES		of Report		
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303-01. 11 Me sales under any mit e schedule and seles data under each explosite and seles data under each explosite revenues account disabilitation (such as a general indexidential explosite). In earlier schedule and seles data under each explosite and an of peak wate testing schedule. In an of this select schedule and seles data under each explosite revenue account disabilitation (such as a general indexidential explosite). In earlier schedule and the schedule and the select schedule and the schedule a	customer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311. 2 Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues." Page								
pplinibility         accurat advancing.         S. Where the same evolutioner accurat advancing on the same revenue account advanting incurs as a general residential advancer.           S. Where the same evolutioner accurate advancing the same revenue account advanting being periods during the year (1)         S. Stangel advancer.           S. Stangel advancer.         S. Stangel advancer.         Stangel advancer.           S. Stangel advancer.         S. Stangel advancer.         Stangel advancer.           S. Stangel advancer.         S. Stangel advancer.         Stangel advancer.           S. Stangel advancer.         Stangel advancer.         Stangel advancer.           S. Stangel advancer.         Stangel advancer.         Stangel advancer.           No.         (a)         (b)         (c)         (c)           (c)         (c)         (c)         (c)         (c)           (c)         (c)         (c)         (c)         (c)         (c)           (c)         (c)         (c)         (c)         (c)         (c)         (c)           (c)         (c)         (c)         (c)         (c)         (c)         (c)         (c)           (c)         (c)         (c)         (c)         (c)         (c)         (c)         (c)         (c)         (c)         (	300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each								
abc/defa	applicable revenue account subheading.								
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Tumb Tar Bull         (a)         With Statu         Ference         Performance         Peri	5. For	any rate schedule having a fuel adjust				lled pursuant thereto.			
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2         PR Residential Service         6,769.333         764.766.44         434.607         13,738         0.1125           3         RR-1 Ras Small Jau Load Mgt         927,117         107,375,451         172,010         5,380         0.1136           4         RLM Ras Optical Demana Rate         6,587         561,211         70         18,228         0.0679           5         RS-TOR Rat Time of Day         62         5,505         7         5,857         0.1114           7         GS-1 General Service Small         1         144         0.61430         0.61430           6         GS-2 Gen Svc.Low Load Fractor         20         2,554         0.2116         0.0291           10         ADA-PR Open Ace PM Area Ught         3         2,440,922         0.2218         0.0291           11         ADA-PR Open Ace PM Area Ught         3         2,944         0.0091         10.01130           12         Shbolal-Biled         7,744,031         97,5197.912         687,001         11,701         0.1132           13         Net Unbiled         60,434         8,566,72         67,001         11,701         0.1132           14         Total-Residential         7,694,465         583,766,72         67,2001			(b)	(c)	(d)	(e)	(f)		
8         RPA: Here Small Use Load Mgt         927.117         107.375.491         172,010         5,360         0.1158           4         RUM Res Optionial Demand Rate         6,387         557.111         70         97,243         0.06878           6         RSE ES Res Exercy Stratege         117         2,086         2         6,505         7         5,857         0.1114           7         GS-1 General Service-Strand         1         143         0.1430         0.1430           7         GS-1 General Service-Strand         1         144         0.1430         0.1177           FL Frivate Area Lighting         11,050         2,454         6         7,000         0.02818           10 OAD-RC Open Access Res Sive         33         2,024         6         7,000         0.01818           2 Subtotal-Billed         7,744,031         875.197,873         687,001         11,610         0.1482           11 Ne Unbilled         60,434         65,568,750         1         0.1482         0.1482           12 Subtotal-Billed         7,44,031         875.197,873         687,001         11,701         0.1432           13 Ne Unbilled         60,434         6,568,756         0.0430         0.663,766,072         687,001 </td <td>·</td> <td></td> <td></td> <td></td> <td></td> <td><u> </u></td> <td></td>	·					<u> </u>			
4         RUM Res Optionial Demand Rate         6,387         561 211         70         61,243         0,8878           6         R8-EG Ras Energy Storage         11         2,086         2         8,600         0.1226           6         R8-TCO Ras Time-of-Day         62         6,955         7         8,857         0.1114           7         GS-1 General Service-Small         1         1.45         0.1117           7         GS-1 General Service-Small         1         1.45         0.1117           7         GA-1 General Service-Small         1         1.45         0.1117           7         GA-1 General Service-Small         1         1.45         0.1117           7         GA-27         C.2216         0.2216         0.2216           7         GA-27         Statum         3         2.46         0.0217           10 AD-AL Open Ace Priv Area Ught         3         2.46         0.0431         0.132           11 AD-14         GA-465         853,760,072         667,001         11,701         0.132           11         Statum         7,804,465         853,760,072         687,001         11,701         0.132           16         Statum         7,804,455 <td></td> <td></td> <td>6,799,335</td> <td>764,796,494</td> <td>494,907</td> <td>13,739</td> <td>0.1125</td>			6,799,335	764,796,494	494,907	13,739	0.1125		
6         R3-ES Res Energy Storage         17         2,085         2         6,500         0.1228           6         R3-TOD Res Time-of Day         62         6,805         7         6,807         6,805         7         6,807         6,805         7         6,807         6,810         0,0218         6,850         6,001         11,010         0,1130         0,1130         0,1130         0,1130         0,1130         0,1130         0,1141         11,117         0,1132         11,117         0,1132         11,117         0,1132         11,117         0,1132         11,117         0,1132         11,117         11,117         0,1133         0,11132         11,111         11,111         11,117			927,117	107,375,481	172,010	5,390	0.1158		
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2         65-1         General Service-Small         1         143         0.1430           6         GS-2         Gen Svo-Low Load Factor         20         2,554         0.1171           16         GAD-RR Open Access Res Svo         39         2,004         6         7,600         0.0341           17         DAD-RR Open Acces Res Svo         39         2,004         6         7,600         0.0341           18         DAD-L Open Acce Priv Area Light         3         284         0.0341         0.0341           13         Net Unbitted         60,433         8,569,169         0.1180         0.1132           14         Total-Residential         7,744,051         853,766,072         667,001         11,701         0.1132           15	5 F	RS-ES Res Energy Storage	17	2,088	2	8,500	0.1228		
8         GS-2 Gen Svo-Low Load Factor         20         2,354         0.1177           9         AL Private Area Lighting         11,050         2,460,928         0.2218         0.2218           10         QAD-RR Open Acces Res Svo         39         2,024         5         7,000         0.0518           11         QAD-RR Open Acces Res Svo         39         2,024         5         7,000         0.0511           12         Subtolat-Billed         7,744,033         875,197,913         667,001         11,510         0.1332           13         Net Unbilled         66,434         8,566,159         0.4419         0.1419           14         Total-Residential         7,604,465         683,766,072         667,001         11,701         0.132           15	6 F	RS-TOD Res Time-of-Day	62	6,905	7	8,857	D.1114		
SAL Private Area Lighting         11,050         2,450,928         0.2218           10 QAD-RR Open AccePriv Area Light         35         2,024         5         7,800         0.0519           11 QAD-AL Open AccePriv Area Light         3         2,84         0.0097         11,610         0.1130           13 Net Unblied         60,434         6,556,155         0.111,610         0.1132           13 Net Unblied         60,434         6,556,155         0.111,701         0.1132           14 Total-Residential         7,604,465         683,766,072         687,001         11,701         0.1132           15	70	3S-1 General Service-Small	1	143			0.1430		
10 DAD-RR Open Access Res Svo       33       2,024       6       7,800       0.0518         11 QAD-AL Open Acc Priv Area Light       3       284       0.0647       1       0.0647         12 Subcloaten Billed       7,744,031       57,519,7913       667,001       11,1610       0.1132         13 Net Unbilled       7,804,465       683,766,072       667,001       11,701       0.1132         15       7       7,804,465       683,766,072       667,001       11,701       0.1132         16       7       7,804,465       683,766,072       667,001       11,701       0.1132         15       7       7,804,465       683,766,072       667,001       11,701       0.1132         16       7       7,804,465       683,766,072       667,001       11,701       0.1132         16       7       7,804,465       683,766,072       667,001       11,701       0.1132         17       7,804,465       683,766,072       667,001       11,701       0.1132         17       87,742,072       7,857,523       622,0723       7,726,053       0.1630         20       653,164,160,514       49,812       6,813       0.01520       0.01522         21 <td>80</td> <td>SS-2 Gen Svc-Low Load Factor</td> <td>20</td> <td>2,354</td> <td></td> <td></td> <td>0.1177</td>	80	SS-2 Gen Svc-Low Load Factor	20	2,354			0.1177		
11       CAD-AL Open Acc Priv Area Light       3       234       0.0947         12       Subclai-Billed       7,744,051       675,197,913       667,001       11,610       0.1130         13       Net Unbilled       60,434       6,566,159       0.1418       0.1418         14       Total-Residential       7,804,465       683,766,072       667,001       11,701       0.1132         15	9/	AL Private Area Lighting	11,050	2,450,929			0.2218		
11       OAD-AL Open Acc Priv Area Light       3       244       0.0847         12       Subclai-Billed       7.744.031       875,187,913       667,001       11,610       0.1418         13       Net Unbilled       60,434       8.566,159       0.1418       0.1418         14       Total-Residential       7,604,465       883,766,072       687,001       11,701       0.1132         16	10 0	DAD-RR Open Access Res Svc	39	2,024	5	7,800	0.0519		
13       Net Unbilled       60,434       8,568,159       0.1416         14       Total-Residential       7,604,465       683,765,072       667,001       11,701       0.1132         15	110	DAD-AL Open Acc Priv Area Light		.284			0.0947		
13       Net Unbilled       60,454       8,568,159       0.1418         14       Total-Residential       7,604,465       683,766,072       667,001       11,701       0.1132         15	12	Subtotal-Billed	7,744,031	875,197,913	667,001	11,610	0.1130		
14       Total-Residential       7,804,465       883,766,072       667,001       11,701       0.1132         15	131	Net Unbilled	60,434	B,568,159			the second s		
15	14	Total-Residential	7,804,465		667.001	11,701			
16									
1         3423 Officiental Service         -2         -66         0.0480           19         RR-1 Res Small Use Load Mgt         1         180         0.1800           19         RR-1 Res Small Use Load Mgt         1         180         0.1800           20         GS-1 General Service-Small         339,347         46,160,514         49,612         6,613         0,1360           21         GS-2 General Service-Small         339,347         46,160,514         49,612         6,613         0,1360           21         GS-2 General Service-Small         (13,747,107)         475,567,521         22,076         4786,695         -0.1187           24         GS-4 General Service-Large         800,653         453,774,064         4,903         1,088,228         0.0853           25         SL Street Lighting         264         21,990         8         88,000         0.0833           26         ADCSS 2 Orgen Access GS-Small         4,638         169,692         2822         17,702         0.0386           27         QAD-GS-3 Open Acc GS-Med Load         375,458         9,006,581         430         873,160         0.0220           26         QAD-GS-3 Open Acc GS-Med Load         375,458         9,006,581         430         8			─── <del>──</del>						
18       RR Residential Service       -2       -96       0.0480         19       RR-1 Res Small Use Load Mgt       1       100       0.1800         20       GS-1 General Service-Small       339,347       46,160,514       49,812       6,613       0,1360         21       GS-2 Gens Svc 14V 1681 Adds, [JA79,197       A175567,523       22,076		442 Commercial							
19       RR-1 Res Small Use Load Mgt       1       180       0.1800         20       0S-1 General Service-Small       339,347       46,160,514       49,812       6,813       0,1800         24       0S-2 Gen Svid-Live Small       339,347       46,160,514       49,812       6,813       0,1800         24       0S-2 Gen Svid-Live Small       339,347       46,160,514       49,812       6,813       0,1800         24       0S-2 Gen Svid-Live Small       339,347       46,160,514       49,812       6,813       0,1800         24       0S-3       Gen Svid-Kult Mitsel Falloh,       (1,187,174       40,098       1,088,726       0,0180         24       0S-4       Gen Svid-Kel Load Factor       5,335,684       453,774,064       4,903       1,088,726       0,0553         24       OS-4 General Benvice-Large       890,0653       47,999,228       11       80,960,0       0,0533         25       Listreet Lighting       21,116       0,968,505       .       0,2208       .       0,2208         26       AD,053       Open Acces S-Small       4,635       169,592       262       17,702       0,0366         28       QAD-6S-1 Open Acces S-Marel Load       376,465       9,006,651				-96			0.0480		
20         GS-1         General Service-Small         339,347         46,160,514         49,612         6,613         9,1360           21         GS22,GentSvc1, 4921,263         A22,026         A265,852         A1479,107         A175,867,423         A22,026         A265,855         40,1187           23         GS-3         Gen Svc-Med Load Factor         5,335,584         453,774,064         4,903         1,088,226         0.0850           24         GS-4         General Service-Large         B90,553         47,999,228         11         80,988,455         0.0539           25         SL         Street Lighting         41,196         8,095,085									
21         05:2         0			339 347			6.813			
22 35 2 100 Ten Ster Thie Stop         f 10;347									
23       GS-3       Gen Syc-Med Load Factor       5,535,564       453,774,064       4,903       1,088,228       0.0850         24       GS-4       General Service-Large       890,653       47,999,228       11       80,968,455       0.0539         25       SL Street Lighting       264       21,990       3       88,000       0.0833         26       AL Private Area Lighting       41,196       9,095,085       0.2208       0.2208         27       QAD-GS-1 Open Access GS-Small       4,636       169,592       252       17,702       0.0386         28       GAD-GS-3 Open Access GS-Small       4,636       169,592       252       17,702       0.0386         29       GAD-GS-3 Open Access GS-Small       4,636       169,592       252       17,702       0.0386         29       GAD-GS-3 Open Access-Med Load       375,456       9,006,581       430       673,160       0.0240         30       DAD-GS-4 Open Acce GS-Med Load       375,456       9,006,581       430       673,160       0.0240         31       DAD-LO Pen Acc Priv Area Light       90       7,383       0.0022       1       2,268,000       0.1424         33       Net Estimated Billings       14,866       1,190,9									
24         GS.4         General Service-Large         890,653         47,999,228         11         80,668,455         0.0539           25         SL. Street Lighting         264         21,990         3         88,000         0.0833           26         AL. Private Area Lighting         41,196         9,095,085         .         0.2206           27         QAD-GS-1 Open Access GS-Small         4,638         169,592         2.62         17,702         0.0366           28         QAD-GS-1 Open Access GS-Small         4,638         169,592         2.62         17,702         0.0366           29         QAD-GS-20067 Acc GS-Med Load         376,455         9,006,581         430         873,160         0.0240           30         DAD-GS-4 Open Acc GS-Large Load         1,489         11,599         0.0078         0.00620           31         DAD-AL Open Acc GS-Large Load         1,489         11,90,974         5         2,873,200         0.0820           32         IRP-D Interruptible Power Discret         2,268         322,952         1         2,268,000         0.1424           34         Subtotal-Billed         8,649,656         748,723,101         78,647         109,981         0.0866           36			10 3 4 2 2 3 4 7 1 2 3				A The American		
25       SL. Street Lighting       264       21,990       8       88,000       0.0833         26       AL. Private Area Lighting       41,196       8,095,085       :       0.2208         27       QAD-GS-1 Open Access GS-Small       4,636       169,592       262       17,702       0.0366         28       GAD-GS-2 Open Access GS-Small       4,636       169,592       262       17,702       0.0366         29       QAD-GS-1 Open Access GS-Small       4,636       19,692       262       17,702       0.0366         20       QAD-GS-1 Open Acc GS-Med Load       375,459       9,006,581       430       673,160       0.0240         30       DAD-GS-4 Open Acc GS-Large Load       1,489       11,599       0.0078       0.0078         31       QAD-AL Open Acc Priv Area Light       P0       7,383       0.00240       0.00240         32       IRP-D Interruptible Power Discret       2,266       322,952       1       2,268,000       0.1424         33       Net Estimated Billings       14,866       1,190,974       5       2,873,200       0.0801         34       Subtotal-Billed       8,649,658       748,723,101       78,647       110,740       0.09633         36									
26         AL Private Area Lighting         41,196         9,095,085         0.2208           27         QAD-GS-1 Open Access GS-Small         4,635         169,592         262         17,702         0.0366           28         QAD-GS-1 Open Access GS-Small         4,635         169,592         262         17,702         0.0366           28         QAD-GS-1 Open Access Job Lade         3154,451         4,343,180         (1,027)         //150,098         0.0282           29         CAD-GS-3 Open Acc GS-Med Load         375,459         9,006,581         430         873,160         0.0240           30         OAD-GS-4 Open Acc GS-Large Load         1,489         11,599         0.0078         0.0078           31         OAD-GL Open Acc GS-Large Load         1,489         11,599         0.0078         0.0078           32         IRP-D Interruptible Power Discret         2,266         322,952         1         2,268,000         0.1424           34         Subtotal-Billed         8,649,658         748,723,101         76,647         109,981         0.0866           35         Net Unbilled         59,709         3,000,981         0.0563         0.0563           39	<u> </u>								
27       QAD-GS-1 Open Access GS-Small       4,638       169,592       262       17,702       0.0366         28       QAD-GS-2 Open Acc GS-Med Load       375,459       8,006,581       430       873,160       0.0240         30       QAD-GS-4 Open Acc GS-Med Load       375,459       8,006,581       430       873,160       0.0240         30       QAD-GS-4 Open Acc GS-Large Load       1,489       11,599       0.0078       0.0078         31       DAD-AL Open Acc Priv Area Light       90       7,383       0.0820       0.0078         32       IRP-D Interruptible Power Discret       2,266       322,952       1       2,268,000       0.1424         34       Subtata-Billed       8,649,656       748,723,101       78,647       109,981       0.0866         35       Net Unbilled       59,709       3,000,981       0.0503       0.0503         36       TotAL-Commercial       8,709,667       751,724,062       78,647       110,740       0.0863         39       40									
28         OAL 032 200en Acc 03 1001264         154,151         4,343,180         (1,027)         //150,098         (0.0282           29         OAD-05:3 Open Acc 03-Med Load         375,459         9,006,581         430         873,160         0.0240           30         DAD-05:4 Open Acc 03-Large Load         1,489         11,599         0.0078           31         DAD-AL Open Acc Priv Area Light         90         7,383         0.00820           32         IRP-D Interruptible Power Discret         2,268         322,952         1         2,268,000         0.1424           33         Net Estimated Billings         14,866         1,190,974         5         2,973,200         0.00801           34         Subtotal-Billed         8,649,658         748,723,101         78,647         109,981         0.0666           35         Net Unbilled         59,709         3,000,981         0.0563         0.0563           36         37            0.0563         748,723,101         78,647         110,740         0.0666           37              0.0563         37            0.0563         37 <td< td=""><td>- F - I</td><td></td><td></td><td></td><td>╋<del>╴╺╸╺╴╺╴</del>╺╸<u>╺</u>╸</td><td></td><td></td></td<>	- F - I				╋ <del>╴╺╸╺╴╺╴</del> ╺╸ <u>╺</u> ╸				
28         OAD-CS: 3         Open Acc CS-Med Load         376,458         9,006,581         430         873,160         0.0240           30         OAD-GS: 4 Open Acc CS-Large Load         1,489         11,599         0.0078           31         OAD-AL Open Acc CS-Large Load         1,489         11,599         0.0078           31         OAD-AL Open Acc Priv Area Light         90         7,383         0.00820           32         IRP-D Interruptible Power Discret         2,268         322,952         1         2,268,000         0.1424           33         Net Estimated Billings         14,866         1,190,974         5         2,973,200         0.0801           34         Subtotal-Billed         8,649,658         748,723,101         78,647         109,981         0.0866           35         Net Unbilled         59,709         3,000,981         0.05603         0.05603           36         Total-Commercial         8,709,367         751,724,082         78,647         110,740         0.0866           39	· · · ·	and the second s	the state of the s			27	ال سے بھنے سنگر سے سے ا		
30       DAD-GS-4 Open Acc CS-Large Load       1,489       11,599       0.0078         31       DAD-AL Open Acc Priv Area Light       90       7,383       0.0080         32       IRP-D Interruptible Power Discret       2,268       322,952       1       2,268,000       0.1424         33       Net Estimated Billings       14,866       1,190,974       5       2,973,200       0.0801         34       Subtotal-Billed       8,649,658       748,723,101       78,647       109,981       0.0663         35       Net Unbilled       59,709       3,000,981       0.0503       0.0803         36       Total-Commercial       8,709,367       751,724,062       78,647       110,740       0.0863         39		CONTRACTOR OF A			-777.				
31 OAD-AL Open Acc Priv Area Light       90       7.383       0.0620         32 IRP-D Interruptible Power Discret       2,268       322,952       1       2,268,000       0.1424         33 Net Estimated Billings       14,666       1,190,974       5       2,973,200       0.0801         34 Subtotal-Billed       8,649,658       748,723,101       78,647       109,981       0.0663         35 Net Unbilled       59,709       3,000,991       0.0503       0.0863         36 Total-Commercial       8,709,367       751,724,062       78,647       110,740       0.0863         39       -						873,160			
32         IRP-D Interruptible Power Discret         2,268         322,952         1         2,268,000         0.1424           33         Net Estimated Billings         14,866         1,190,974         5         2,873,200         0.0801           34         Subtotal-Billed         8,649,658         748,723,101         78,647         109,981         0.0866           35         Net Unbilled         59,709         3,000,981         0.0503         0.0503           36         Total-Commercial         8,709,367         751,724,082         78,647         110,740         0.0863           37			┠━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━						
33       Net Estimated Billings       14,866       1,190,974       5       2,973,200       0.0801         34       Subtotal-Billed       8,649,658       748,723,101       78,647       109,981       0.0866         35       Net Unbilled       59,709       3,000,981       0.0503       0.0503         36       Total-Commercial       8,709,367       751,724,082       78,647       110,740       0.0863         37       38									
34 Subtatal-Billed       8,649,658       748,723,101       78,647       109,981       0.0866         35 Net Unbilled       59,709       3,000,981       0.0503       0.0503         36 Total-Commercial       8,709,367       751,724,082       78,647       110,740       0.0863         37       - <t< td=""><td></td><td></td><td><u></u></td><td></td><td></td><td></td><td></td></t<>			<u></u>						
35       Net Unbilled       59,709       3,000,981       0.0503         36       Total-Commercial       8,709,367       751,724,062       78,647       110,740       0.0963         37       38       39       39       39       30       30       30         40			·						
36 Total-Commercial       8,709,367       751,724,082       78,647       110,740       0.0863         37						109,981			
37       38         39       39         40       40         41       TOTAL Billed         21,108,735       1,888,051,484         749,275       28,172         0.089         42       Total Unbilled Rev.(See Instr. 6)         126,317       11,272,267         0       0         43       TOTAL									
38       39         40       40         41       TOTAL Billied         21,108,735       1,888,051,484         749,275       28,172         41       TOTAL Billied         42       Total Unbilled Rev.(See Instr. 6)         126,317       11,272,267         0       0         43       TOTAL         21,235,052       1,899,323,751         749,275       28,341         0.089			B,709,367	751,724,08	2 7B,64	110,740	0.0863		
39       40         40       40         41       TOTAL Billed         21,108,735       1,888,051,484         749,275       28,172         41       TOTAL Billed         41       TOTAL Billed         42       Total Unbilled Rev.(See Instr. 6)         126,317       11,272,267         0       0         43       TOTAL         21,235,052       1,899,323,751         749,275       28,341         0.089									
40       40         41       TOTAL Billed         21,108,735       1,888,051,484         749,275       28,172         42       Total Unbilled Rev.(See Instr. 6)         126,317       11,272,267         0       0         43       TOTAL         21,235,052       1,899,323,751         749,275       28,341			<u> </u>	ļ	<u></u>				
41       TOTAL Billed       21,108,735       1,888,051,484       749,275       28,172       0,089         42       Total Unbilled Rev.(See Instr. 6)       126,317       11,272,267       0       0       0,089         43       TOTAL       21,235,052       1,899,323,751       749,275       28,341       0,089			<b></b>	ļ	1				
42         Total Unbilled Rev. (See Instr. 6)         126,317         11,272,267         0         0         0         0.089         0	40	2		<b></b>					
42         Total Unbilled Rev. (See Instr. 6)         126,317         11,272,267         0         0         0         0.089         0									
42         Total Unbilled Rev. (See Instr. 6)         126,317         11,272,267         0         0         0         0.089         0			24 400 70						
43 TOTAL 21,235,052 1,899,323,751 749,275 28,341 0.089						a20,17			
Allow we find the second						75 28.34			
	L	an i Million a sum Gataria Anale in		Page 304			1		

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Colum	ubus Southern Power Company	(2)	(n <sup>1</sup> Orig計出1 、Resubmission		End of	2010/Q4			
SALES OF ELECTRICITY BY RATE SCHEDULES									
custon 2. Pro 300-3( applica 3. Wh schedu	<ol> <li>Report below for each rate schedule in effect during the year the MWH of electricity sold, revenue, average number of customer, average Kwh per pustomer, and average revenue per Kwh, excluding date for Sales for Resale which is reported on Pages 310-311.</li> <li>Provide a subheading and total for each prescribed operating revenue account in the sequence followed in "Electric Operating Revenues," Page 300-301. If the sales under any rate schedule are classified in more than one revenue account, List the rate schedule and sales data under each applicable revenue account subheading.</li> <li>Where the same customers are served under more than one rate schedule in the same revenue account classification (such as a general residential schedule and off peak water heating schedule), the entries in column (d) for the special schedule should denote the duplication in number of reported</li> </ol>								
custor					· · · ·				
4. The	a average number of customers sho	uld be the number of bill	s rendered during the	year divided by the num	iber of billing periods du	ring the year (12			
	lllings are made monthly). r any rate schedule having a fuel adji	ustment plause state in .	Fortacto the police						
6 Re	port amount of unbilled revenue as c	of end of year for each a	a loculote die estima onlicable revenue acr	ieu aduitional revenue u xuint subheading	meo pursuant mereto.				
Line	Number and Title of Rate schedule		Revenue	Average Number	KWh of Sales	Revenue Per			
No.	(a)	(b)	(c)	of Customers (d)	KWn of Sales Per Customer	Revenue Per KWh Sold (f)			
-1									
		·			<u></u>				
	<u> </u>		· · · · · · · · · · · · · · · · · · ·	·	<u>_</u>				
4		<b>}</b>	<u>├</u>						
5	277			·	·				
	442)ndüstrial)	<u> </u>	<u>`</u>		, ·				
	GS-1 General Service-Small	8,780	1,236,190	1,655	5,305	0.1408			
8	GS-2-Gen Svc Low Load Factor	/147,995	18,396,420	F1,108	/133,569	0,1243			
9	GS-2-TOD Gen Svo-Time-of-Day	254	27,670	8	\$254,000	0.1089			
10	GS-3 Gen Svc-Med Load Factor	1,312,757	105,799,774	434	3,024,786	0.0806			
11	GS-4 General Service-Large	2,884,413			125,409,261	0.0411			
	AL Private Area Lighting	2,251				0.1674			
	IRP-D Interruptible Power Discret	13,399			13,399,000	0.0577			
	OAD-GS-1 Open Access GS-Small				13,800	0.0385			
	OAD-GS-2 Open Acc GS-Low Load								
L 103					396,279	- 3.g.			
	OAD-GS-3 Open Acc GS-Med Loan				2,573,480	0.0209			
-	OAD-GS-4 Open Acc Gs-Large Loa	ad 4,69				0.0079			
	OAD-AL Open Acc Priv Area Light		6 46	· · · · · · · · · · · · · · · · · · ·		0.0770			
	Net Estimated Billings	196,91			98,458,500	0.0501			
20	Subtotal-Billed	4,660,11	9 257,085,35	3 3,320	1,403,650	0.0552			
21	Net Unbilled	6,17	6 -305,20	0		-0.0494			
22	Total-Industrial	4,666,29	5 256,780,15	3 3,320	1,405,511	0.0550			
23			·						
24				+		,,			
	444-Street & Highway Lighting		+	<u>+</u>					
	GS-1 General Service-Small	13,50	1,332,98	98	137,847	0.0987			
-	SL Street Lighting	41,41			<u></u>	0.1379			
1	Subtotal-Billed	54,92			┟━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━━	0.1283			
1	Net Unbilled		-2 8,32		170,915	-4.1635			
	Total-Str & Highway Lighting			_ <u></u>	470 000	······································			
1		54,9/	25 7,053,44	<u>4</u> <u>30</u> 7	178,909	0.1284			
31				<u></u>	ļ				
32		*			<u> </u>				
	Fuel Adj Clause - See Footnole		÷		·				
34			_ <b>_</b>		<u> </u>				
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	1 TOTAL Billed	21,108,	735 1,888,051,4	184 749,2	75 28,17	2 0.0894			
	2 Total Unbilled Rev.(See Instr. 6				d	0.089			
	3 TOTAL	21,235,			75 28,34	·↓─────			
EF.	RC FORM NO, 1 (ED. 12-95)		Page 304.1		- <del>-</del>	<u> </u>			

lages of Respondent		s: Original lesubmission	Date of Report (Mo, Da, Yr)	End of	d of Report
		CTRICITY BY RAT			<u> </u>
		· · · · · · · · · · · · · · · · · · ·			
Report below for each rate schedule in effect stomer, and average revenue per Kwh, exclu-	t during the year the N ding data for Sales for	NVH of electricity se Recale which is re-	old, revenue, average nu ported on Barnes 310-31:	mber of customer, ave	rage Kwn per
Provide a subheading and total for each pres					ues." Page
0-301. If the sales under any rate schedule a					
plicable revenue account subheading.					
Where the same customers are served under back used and an off pack water backing ashed					
hedule and an off peak water heating schedu Istomers.	iej, me ennes in colui	nin (a) ior the speci	iai ecuedirie stidnia deud	te the adplication in ht	lunei oi tehoirea
The average number of customers should be	e the number of bills re	endered during the	year divided by the rumi	per of billing periods di	tring the year (12
all billings are made monthly).			• • •		
For any rate schedule having a fuel adjustm				ed pursuant thereto.	
. Report amount of unbilled revenue as of end net Number and Title of Rate schedule [	MWh Sold	Revenue	Ount subheading.	Kwh of Sales	Revenue Par
lo. (a)	(b)	1	of Customers	Per Customer (e)	KWh Sold
1 440-Residential		(c)	( <u>a)</u>	<u>(6)</u>	(†)
2 RS Residential Service	7,599,116	727,605,898	605,909	12,542	0.095
3 RS-ES Res Energy Storage	8,397	699.904	370	22,695	0.083
4 RS-TOD Res Time of Day	719	66,311	370	18,921	0.083
5 GS-1 Gen Svc-Non-Demand Meter	13	1,132		10,921	0.087
6 GS-2 Gen Svc-Low Load Factor		608	<u> </u>		0.086
	47.440	3,550,324	····		0.086
7 OL Outdoor Lighting 8 Subtotal-Billed	14,416	731,924,177	600 D47	40 570	0.246
9 Net Unbilled	7,622,668		606,317	12,572	-0.08
	-41,150	3,627,235			
10 Total-Residential	7,581,518	735,551,412	606,317	12,504	0.09
11					
12 442-Commercial					
13 RS Residential Service	27	2,395		<u>_</u>	0.08
14 GS-1 Gen Svc-Non-Demand Meter	356,619	39,416,968	**************************************	5,946	0.11
15 GS-2/Gen SVC Low Load Factor	2,307,164	203,065,596		85,479	
16 GS-3 Gen Svc-Med/High Load	2,912,576	202,468,487		- 591,626	0.06
17 GS-TOD Gen Svc-Time of Day	98,786	7,475,984	┝╾╼╴╼╴╼╴┥┙	138,162	0.07
18 SBS Standby Service	3	174,715		3,000	58.23
19 OL Outdoor Lighting	38,066	6,600,293	┟───────────────────────		0.17
20 EHG Electric Heating General	22,174	1,832,155		46,584	0.08
21 EHS Electric Heating Schools	407	18,030		407,000	0.04
22 SS School Service	43,776	3,609,207		244,559	0.0
23 Net Estimated Billings	2,768	199,589		1,384,000	0.0
24 Subtotal-Billed	5,782,366	464,863,419	┶───	61,997	0.0
25 Net Unbilled	-37,810	-93,882		6,301,667	0.0
26 Total-Commercial	5,744,556	464,769,537	7 93,262	61,596	0.0
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41 TOTAL Billed	26,291,258				
42 Total Unbilled Rev. (See Instr. 6)	-91,505			15,250,83	
43 TOTAL	26,199,753	1,873,422,9	34 709,272	36,93	aj c

Name of Respondent	This Report	ls: Original	Date of Repor (Mo, Da, Yr)	t Year/Peri	od of Report
Ohio Power Company		Resubmission		End of	2010/Q4
		CTRICITY BY RAT	1		
<ul> <li>Report below for each rate schedule in eff ustomer, and average revenue per Kwh, exc</li> </ul>					erage Kwn per
. Provide a subheading and total for each p.					enues." Page
00-301. If the sales under any rate schedule					
pplicable revenue account subheading.	•				
Where the same customers are served un					
chedule and an off peak water heating sche ustomers.	dule), the entries in colu	imn (d) for the speci	al schedule should den	ote the duplication in n	umber of reported
. The average number of customers should	be the number of bills r	endered during the	vear divided by the num	ther of billing periods d	urino the year (1)
all billings are made monthly).			y==; 0,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		billig alle year (il
. For any rate schedule having a fuel adjust				illed pursuant thereto.	
. Report amount of unbilled revenue as of e			-		
ne Number and Title of Rate schedule	MWh Sold	Revenue	Average Number	KWh of Sales Per Customer	KWh Sold
	(b)	(c)	of Customers	(e)	(f)
1442-Industrial					
2 GS-1 Gen Svc-Non-Demand Meter	17,271	2,110,474	3,980	4,339	0.12
3 GS-2 Gen Svc-Low Load Factor	1,109,109	92,507,580	(2,490)	445,425	
4 GS-3 Gen Svc-Med/High Load	3,209,260	209,984,177	605	5,304,562	0.06
5 GS-4 General Service-Large	5,115,941	209,617,179	39	131,177,974	0.04
6 GS-TOD Gen Svc-Time of Day	7,492	595,126	29	258,345	0.0
7 OL Outdoor Lighting	6,176	1,022,450			0.16
8 EHG Electric Heating General	1,009	91,633	17	59,353	0.09
9 IRP-D Interruptible Power Discret	1,020,223	41,928,717	4	255,055,750	0.04
10 IRP-D Special Contract	1,895,366	85,257,155	2	947,683,000	0.0
11 Net Estimated Billings	430,299	19,446,554	2	215,149,500	0.0
12 Subtotal-Billed	12,812,146	662,561,045	7,168	1,787,409	0.0
13 Net Unbilled	-12,275	-415,829			0.0
14 Total-Industrial	12,799,871	662,145,216	7,168	1,785,696	0.0
15					
16 444-Street & Highway Lighting				-	
17 GS-1 Gen Svc-Non-Demand Meter	5,942	727,457	1,479	4,018	0.1
18 GS-2 Gen Svc-Low Load Factor	/ 1,568	/ 133,877	é 19	. 82,526	<u>f 0.0</u>
19 GS-3 Gen Svc-Med/High Load	915	64,217	1	915,000	0.0
20 OL Outdoor Lighting	228	44,525			0.1
21 SL Street Lighting	64,912	9,955,363	999	64,977	0.1
22 SL Special Contract	13	5,629	1	13,000	0.4
23 Subtotal-Billed	73,578	10,931,068	2,499	29,443	0.1
24 Net Unbilled	-269	-7,088			0.0
25 Total-St & Highway Lighting	73,309	10,923,980	2,499	29,335	0.1
26					
27 A/C 445 Pub Authorities - Other					
28 Special Contracts	500	32,584	26	19,231	0.0
29 Subtotal-Billed	500	32,584	26	19,231	0.0
30 Net Unbilled	-1	205			-0.3

				~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		
30	Net Unbilled		205			
31	Total-Pub Authorities - Other	499	32,789	26	19,192	
32						
33	Fuel Adj Clause - Footnote					
34						
35						
36						
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41	TOTAL Billed	26,291,25	1,870,312,29	3 709,27	8 37,06	l
42		-91,50			6 15,250,83	
43		26,199,75				
<u></u>			L			<u> </u>

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### **CERTIFICATE OF SERVICE**

I hereby certify that true copy of the foregoing was served by electronic mail (when available) or ordinary mail, unless otherwise noted, this  $20^{th}$  day of February, 2012 the following:

mpl

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