

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the	:	
Ohio Development Services Agency for	:	
an Order Approving Adjustments to the	:	Case No. 18-0976-EL-USF
Universal Service Fund Riders of	:	
Jurisdictional Ohio Electric Distribution	:	
Utilities.	:	

TESTIMONY

OF

MEGAN MEADOWS

ON BEHALF OF
THE OHIO DEVELOPMENT SERVICES AGENCY

October 31, 2018

TESTIMONY OF SUSAN MOSER
On Behalf of The Ohio Development Services Agency

I. INTRODUCTION

1 **Q. Please state your name and business address.**

2 A. My name is Megan M. Meadows. My business address is Ohio Development Services
3 Agency ("ODSA"), 77 South High Street, 25th Floor, Columbus, Ohio 43216-1001.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by ODSA as Assistant Deputy Chief of the Office of Community
6 Assistance ("OCA), an office within ODSA's Division of Community Services.

7 **Q. Please briefly describe your educational background and employment experience.**

8 A. I have served as the Assistant Deputy Chief for OCA since March of 2016. In this
9 position I directly oversee the preparation of the Universal Services Fund rate case. Prior
10 to this position I was the Director of Operations and Planning for Lancaster-Fairfield
11 Community Action Agency, a non-profit Community Action Agency whose mission is to
12 serve those in need with programs that promote self-sufficiency. While in this position I
13 provided service to many low-income Ohioans that participated in the PIPP program and
14 other energy assistance programs available. I also oversaw the agency's regional
15 Homeless Crisis Response Program, Adult Literacy and Basic Education program and the
16 Temporary Assistance for Needy Families Summer Youth program. In that position I was
17 also responsible for and participated in the development of the grant application and
18 reporting for all other agency programs. I have a Bachelor of Arts degree in Psychology
19 from Wheeling Jesuit University, WV.

1 **Q. What are your duties and responsibilities as OCA’s Assistant Deputy Chief?**

2 A. OCA administers a number of energy assistance programs for low-income utility
3 customers, including the federally-funded Low-Income Home Energy Assistance
4 Program (“LIHEAP”), Home Weatherization Assistance Program (“HWAP”),
5 Community Service Block Grant (“CSBG”) program, State Energy Program, Ohio Coal
6 Research and Development Program, and Alternative Fuels Transportation Program. In
7 addition, OCA administers the electric PIPP and EPP program, which is funded from the
8 state treasury’s Universal Service Fund (“USF”). As Assistant Deputy Chief, I have
9 responsibility for administering the funds that support these programs. I also have
10 management responsibility for the day-to-day operations of the Energy Assistance
11 Programs, State Energy Programs, HWAP/EPP, CSBG, and Special Projects Unit of
12 OCA.

13 **Q. Have you previously testified before this Commission?**

14 A. Yes, I testified in Case Nos. 16-1223-EL-USF and 17-1377-EL-USF.

15 **Q. What is the purpose of your testimony in this proceeding?**

16 A. The purpose of my testimony is to explain how the USF rider rates proposed in ODSA’s
17 application were developed.

18 **Q. Why is it necessary for ODSA to seek adjustments to the USF riders at this time?**

19 A. The stipulation that resolved Case No. 17-1337-EL-USF required ODSA to file an
20 application for approval of such adjustments to the riders as are necessary to assure, to
21 the extent possible, that each EDU’s rider will generate its associated revenue
22 requirement—but not more than its associated revenue requirement—during the 2019
23 collection period. As indicated in the application filed contemporaneously with this

1 testimony, ODSA has determined that, on an aggregated basis, the total pro forma annual
2 revenue that the current USF riders would generate will under-collect funding for the
3 low-income customer assistance and consumer education programs and their associated
4 administrative costs during the 2019 collection period. ODSA has determined that the
5 pro forma revenues that would be generated by the current USF riders of Columbus AEP
6 Ohio (“AEP”), Dayton Power and Light (“DPL”), Duke Energy Ohio (“Duke”),
7 Cleveland Electric Illuminating Company (“CEI”), Ohio Edison Company (“OE”) and
8 Toledo Edison Company (“TE”) would under collect their respective 2019 USF rider
9 revenue responsibilities during the collection year. By its application, ODSA seeks an
10 order from the Commission directing each EDU to adjust its USF rider rate accordingly.

11 **Q. In your previous answer, you have not included Columbus Southern Power**
12 **Company (“CSP”) and Ohio Power Company (“OP”) as separate EDUs, as ODSA**
13 **had done in prior USF cases. Why?**

14 A. The AEP Ohio operating companies, CSP and OP, merged effective December 31, 2011,
15 with Ohio Power Company as the surviving entity. See Case No. 10-2376-EL-UNC, et
16 al. (Entry, March 7, 2012). Although CSP and OP had merged, the former CSP
17 customers continued to be subject to a separate rate schedule, including a separate USF
18 rider, as were the customers that were served by OP prior to the merger. ODSA
19 traditionally proposed separate USF rider rates for these two customer groups based on a
20 revenue requirement specific to each respective customer group. The underlying basis
21 for separate USF rider rates will be eliminated in January 2019, the beginning of the USF
22 collection year. See Case No. 15-1046-EL-USF, NOI Opinion and Order (October 28,

2015) at 21-22. Accordingly, ODSA has unified the USF rider rate for OP and CSP customers as a single AEP Ohio rate.

Q. What factors contribute to the need to adjust the USF riders?

A. Generally speaking, the need to adjust the riders is primarily attributable to two separate factors. First, because the current riders are based on historical kWh sales, they will not, in actual practice, generate the level of revenue they were designed to produce on a pro forma basis. Although one would never expect test-period sales to be identical to sales in the collection period, updating the sales volumes to reflect the more recent experience of each company should, all else being equal, produce a more representative result. Second, the USF rider revenue requirement for each company has also changed from the revenue requirements the Commission found to be reasonable in Case No. 17-1377-EL-USF. These changes are due to a number of factors, including, among other things, Commission-approved changes in the EDUs' underlying tariff rates, an increase in Pre-PIPP enrollment arrears, a decrease in PIPP customer payment portion and payments to arrears, as well as a reduced year-end USF balance for the EDUs. Thus, the current USF rider rates must be adjusted so they do not collect more than their related revenue requirements, but collect the revenue required over the 2019 collection period.

II. USF RIDER REVENUE REQUIREMENT ANALYSIS

A. Methodology

Q. How was the USF rider revenue requirement target for each EDU determined?

A. As described in the application, the annual revenue requirement the proposed USF rider rates are designed to generate is comprised of seven elements: (1) the cost of PIPP Plus,

(2) the cost of targeted energy efficiency programs and the consumer education programs, referred to, collectively, as EPP, (3) an allowance for ODSA's PIPP-related administrative costs, (4) an allowance to account for projected EDU December 31, 2018 USF PIPP account balance deficits or surpluses, (5) an allowance to fund a reserve, (6) an allowance for undercollection, and (7) an allowance to account for actual cost of the proposed EDU Agreed Upon Procedures. As indicated in the application, ODSA has used a calendar year 2018 test period for purposes of its USF rider revenue requirements analysis.

Q. If ODSA has used a calendar 2018 test period for purposes of its analysis, what is the source of the data for the final months of the test period for which actual data is not yet available?

A. ODSA projects the results for those months of the test period for which actual information was not available at the time the application was prepared, by substituting the data from the corresponding months of the previous year. Although this is simply another way of saying that ODSA has utilized the most recent twelve months of actual data available at the time the application was prepared for purposes of the test-period analysis, it is conceptually appropriate to consider calendar 2018 as the test period for reasons discussed below.

Q. For which months of 2018 did ODSA have actual data available when it prepared its application?

In all USF rider rate adjustment applications prior to the 2012 application, ODSA utilized actual data through August of the test period, and used the data from September through December of the previous year as a surrogate for the results for the remaining months of

1 the test period. Once the September data became available, ODSA filed an amended
2 application to substitute the actual data for September for the projected data for
3 September that had been utilized in preparing the initial application. However, in 2012,
4 and again in the 2013 proceeding, ODSA was able to include actual September data in its
5 original analysis. In 2014, ODSA reverted back to the original methodology of providing
6 data from September through August and filing an amended application to substitute the
7 actual data for September for the surrogate data in the initial application. For 2019,
8 ODSA will again use the original methodology of providing actual data from January
9 through August 2018, and surrogate 2017 data for September through December. Once
10 the September 2018 data becomes available, ODSA will file an amended application to
11 replace the surrogate September 2017 data.

12 **Q. Is ODSA’s methodology for determining the USF rider revenue requirement**
13 **proposed in the application in this case generally consistent with the methodology**
14 **previously approved by the Commission in prior USF rider adjustment cases?**

15 A. Yes. The revenue requirement methodology used in preparing this application is
16 generally consistent with that approved in prior USF rider rate adjustment proceedings.
17 Moreover, it is identical to the methodology approved by the Commission in its
18 September 19, 2018 opinion and order in the Notice of Intent (“NOI”) phase of this
19 proceeding (the “*NOI Order*”).

20 **B. Cost of PIPP**

21 **Q. How was the cost of PIPP component of the USF rider revenue requirement**
22 **calculated for purposes of this case?**

1 A. The cost of PIPP under the PIPP Plus rules adopted November 1, 2010, represents the
2 total cost of electricity consumed by each EDU's PIPP customers during the test period,
3 plus their pre-PIPP balances, less the monthly installment payments billed to PIPP
4 customers, less payments made by or on behalf of PIPP customers, including agency
5 payments, to the extent that these payments exceed the amount of the installment
6 payments billed over the same period. This same formula has been used in every USF
7 proceeding since Case No. 11-3223-EL-USF.

8 **Q. What is the source of the information ODSA used in the cost of PIPP calculation?**

9 A. The information necessary to perform this calculation comes from the USF Monthly
10 Report and Remittance forms (USF-301) and the USF Monthly Reimbursement Request
11 forms (USF-302), the documents the EDUs use to report the USF rider collections
12 remitted to ODSA for deposit in the USF and to request reimbursement from the USF for
13 the cost of electricity delivered to PIPP customers. As in prior cases, ODSA used the
14 unadjusted actual data for the most recent twelve months for which information was
15 available at the time the application was prepared to calculate the test-period cost of
16 PIPP. The workpapers showing the calculation for each EDU are attached as Exhibits
17 MM-1 through MM-8 to my testimony.¹ The resulting test-period cost of PIPP
18 components for each EDU is shown in Exhibit A to the application. However, the use of
19 the unadjusted test-period cost of PIPP numbers will not produce the appropriate
20 allowance for this component of the USF rider revenue requirement.

¹ The test period cost of PIPP for CSP and OP are contained in Exhibits MM-1 and MM-2, respectively. The test period cost of PIPP for the merged AEP operating companies is contained in Exhibit MM-8.

1 **Q. Please explain.**

2 A. Pursuant to various orders of this Commission, including those related to the aggregation
3 of the PIPP Plus load, certain elements of the tariffed rates for electric service to
4 residential customers of each of the EDUs changed during 2018. Because we are using
5 the data from September through December of 2017 as a surrogate for the corresponding
6 months of the 2018 test period to determine the cost of electricity delivered to PIPP
7 customers, this data must be restated to capture the net impact of these rate changes as
8 must the data for the months of 2018 that predated the rate changes. In addition, certain
9 elements of each EDU's tariffed rates applicable to the service provided to PIPP
10 customers will cause the EDU's PIPP rates to change during 2019. These 2018 rate
11 adjustments will change the cost of electricity delivered to PIPP customers during the
12 2019 collection period, but there will be no change in the monthly installment payments
13 billed to PIPP customers because those payments are based on fixed, specified
14 percentages of customer income and are not tied to the rates charged. Thus, a net
15 decrease in an EDU rate element will decrease the cost of PIPP by narrowing the gap
16 between the cost of electricity delivered to PIPP customers and the installment payment
17 amounts billed to PIPP customers. Accordingly, it is necessary to adjust the test-period
18 cost of PIPP to recognize these post-test period rate changes so that the new USF rider
19 rates will reflect the impact of these changes on the cost of PIPP during the collection
20 period.

21 **Q. What adjustments to the test-period cost of PIPP has ODSA proposed to recognize**
22 **the impact of these underlying EDU rate changes?**

1 A. The respective adjustments for each of the EDUs are shown in Exhibits A.1.a through
2 A.1.d to the application. The normalization adjustments for the 2019 rate changes were
3 calculated by applying the net percentage of the rate change to the cost of electricity
4 delivered by the EDU to PIPP customers during the months that predated the rate change,
5 including September-December 2017, which are used as surrogates for September-
6 December 2018. The adjustments to annualize the impact of the EDU's 2018 and 2019
7 net rate changes were calculated by applying the net percentage of the rate change to the
8 normalized test-period cost of electricity delivered to PIPP customers. The adjustments
9 shown in Exhibits A.1.a through A.1.d are carried forward and summarized on Exhibit
10 A.1 to the application, which shows the overall impact of the Commission-approved rate
11 changes on the test-period cost of PIPP for the EDUs in question.

12 **Q. Has the Commission approved adjustments of this type in past USF rider rate**
13 **adjustment proceedings?**

14 A. Yes. The Commission has consistently approved such adjustments to recognize known
15 changes in EDU rates for residential service.

16 **Q. Does ODSA have a proposal to address any changes in EDU residential rates that**
17 **may take effect during the 2019 collection period?**

18 A. ODSA proposes that the Commission allow this docket to remain open to permit the
19 filing of a supplemental application after the information necessary to annualize the
20 impact of any such rate increases on the cost of PIPP becomes available. This is the same
21 procedure that was utilized in Case No. 05-717-EL-UNC to address anticipated EDU rate
22 changes during the collection period in that case where the amount of the changes were
23 unknown at the time of the hearing in the USF rider rate adjustment case. I should add

1 that ODSA will not necessarily file a supplemental application as result of an EDU 2019
2 rate change. This is a decision that will be made based on the status of the EDU's USF
3 PIPP account balance at the time.

4 **Q. Has ODSA proposed any other adjustments to the test-period cost of PIPP?**

5 A. Yes. In every USF proceeding since Case No. 09-463-EL-UNC the Commission
6 approved adjustments to capture the impact of the anticipated changes in PIPP enrollment
7 on the cost of PIPP during the collection period. As ODSA noted in testimony submitted
8 in those cases, PIPP enrollment had increased dramatically over the period since ODSA
9 assumed responsibility for the administration of the electric PIPP program. In 2001,
10 there were 131,330 PIPP customers in the month of the highest PIPP enrollment. In
11 2013 and 2014 there were 375,083 and 386,718 PIPP customers, respectively, in the
12 month with the highest PIPP customer count. This pattern of year-over-year increases
13 changed in 2015; the enrollment has decreased, as evidenced by the fact that in Case No.
14 15-1046-EL-USF March of 2015 was the test-period month with the highest PIPP
15 customer count with 397,615 customers enrolled in PIPP. In Case No.16-1223-EL-USF,
16 September 2015 had the highest number of customers enrolled in PIPP at 360,311. The
17 enrollment number has continued to decrease. The average enrollment during the 2016
18 test year was 331,517 and during the 2017 test year the average enrollment was 289,827.
19 The average enrollment during the 2018 test year was 269,726. By analyzing previous
20 decreases in enrollment, ODSA projects a decrease to an average monthly enrollment of
21 256,240 PIPP customers for 2019. Accordingly, in the NOI in this case, ODSA proposed
22 an adjustment to capture the impact of the anticipated change in PIPP enrollment on the
23 cost of PIPP during the 2019 collection period. ODSA proposed, and the Commission

1 approved, in the NOI proceeding a projected 2019 PIPP enrollment methodology based
2 on an analysis of the historical and most recent changes in PIPP enrollment to reflect
3 enrollment trends. The analysis of this data determined that the forecast methodology
4 that has been used in every USF proceeding since 2009 is appropriate for purposes of
5 projecting 2019 PIPP enrollment in this proceeding.

6 **Q. How did you calculate this adjustment to the cost of PIPP for each EDU?**

7 A. Using data from the period 2013 through year-to-date, I determined the average annual
8 PIPP enrollment for each EDU for each of those years. These average annual enrollment
9 figures are shown on the second schedule in Exhibit A.2 to the application. I then used
10 the EXCEL trend function to project the next number in the series, and utilized that
11 number as my forecast of the average PIPP enrollment for each EDU during 2019. As
12 shown in the first schedule in Exhibit A.2, I then identified the average test-period cost of
13 PIPP for each PIPP customer and multiplied that average cost per customer by the
14 projected decrease in the number of PIPP customers in 2019 to produce the adjustment to
15 the test-period cost of PIPP for each EDU.

16 **Q. In your opinion, does this methodology produce a reasonable result?**

17 A. Yes. Although there may be more sophisticated methods available to forecast 2019 PIPP
18 enrollment, I believe this straightforward methodology produces an estimate that is
19 reasonable for the purpose at hand. One should also bear in mind that, to the extent the
20 forecast misses the mark, the year-end USF PIPP account balance element of the USF
21 rider revenue requirement in the 2019 case will serve to true-up the difference.

22 **Q. After performing the adjustments for underlying EDU rate changes and the**
23 **projected 2019 PIPP enrollment, what allowance for the cost of PIPP do you**

1 **recommend for inclusion in the USF rider revenue requirement of each of the**
2 **EDUs?**

3 A. The proposed cost of PIPP components of the respective EDU revenue requirements are
4 shown in the Total Adjusted Test-Period Cost of PIPP column (Column F) on Exhibit
5 A.2 to the application.

6 **C. EPP Costs**

7 **Q. How was the proposed allowance for the cost of the Electric Partnership Program**
8 **determined?**

9 A. This USF rider revenue requirement component is intended to recognize the cost of the
10 low-income customer energy efficiency and consumer education programs that are
11 funded through the USF. In all previous USF rider adjustment cases, the Commission
12 has accepted the \$14,946,196 EPP allowance first proposed by ODSA when the initial
13 USF riders were established in the ETP proceedings. However, as a part of a settlement
14 agreement entered into with the Office of the Ohio Consumers' Counsel ("OCC") in the
15 NOI phase of Case No. 05-717-EL-UNC, ODSA agreed that, in future USF rider rate
16 adjustment proceedings, ODSA would base its proposed allowance for EPP costs on its
17 projection of payments to EPP providers and the administrative costs associated with
18 ODSA's oversight of the EPP program during the collection period.

19 **Q. What has ODSA projected these costs to be for the 2019 collection period during**
20 **which the USF rider rates set in this case will be in effect?**

21 A. As shown in Exhibit A to the NOI submitted in this proceeding, the analysis for 2019
22 supported the use of the same \$14,946,196 annual allowance for these costs that the
23 Commission has accepted in all prior USF rider rate adjustment proceedings.

1 **Q. Did the Commission approve the proposed \$14,946,196 allowance for EPP costs in**
2 **the NOI phase of this case?**

3 A. Yes. However, as indicated in the NOI, ODSA would adjust the proposed allowance for
4 EPP costs if updated projections suggested that \$14,946,196 allowance was no longer
5 appropriate.

6 **Q. Has ODSA's projection of EPP costs during the 2019 collection period changed**
7 **since it proposed the \$14,946,196 allowance in the NOI phase of this case?**

8 A. No. ODSA continues to believe this allowance to be appropriate.

9 **Q. How has ODSA allocated the EPP costs among the EDUs?**

10 A. As in all prior USF rider rate adjustment applications, ODSA allocated this component of
11 the revenue requirement among the EDUs based on the ratio of their respective adjusted
12 costs of PIPP to the total adjusted cost of PIPP. The development of the allocation
13 factors and the results of the allocation are shown in Exhibit B to the application.

14 **D. Administrative Costs**

15 **Q. What allowance for PIPP-related administrative costs has ODSA proposed for**
16 **inclusion in the USF rider revenue requirement in this case?**

17 A. ODSA has proposed an allowance for PIPP-related administrative costs of \$5,517,499.
18 The basis for the proposed allowance is explained in the testimony of ODSA witness
19 Randall Hunt.

20 **Q. How has ODSA allocated the administrative cost component of USF rider revenue**
21 **requirement among the EDUs?**

22 A. As in all previous USF rider rate adjustment applications, ODSA allocated responsibility
23 for the administrative costs to the EDUs based on the relative number of PIPP customers.

Specifically, as shown in Exhibit C to the application, this revenue requirement component is allocated among the EDUs based on the number of PIPP accounts in September 2017, the test-period month exhibiting the highest PIPP customer account total.

E. Projected Year-End USF PIPP Account Balances

Q. You have identified the projected December 31, 2018 USF PIPP account balance as an element of the EDU's USF rider revenue requirement. Why is this component included?

A. The USF rider rate is calculated with reference to historical annual kWh sales. Because actual sales will vary from sales during the test period, and because other factors bearing on the cost of PIPP also change, the EDU's rider rate will, in actual practice, either over-recover or under-recover its associated revenue requirement during the collection period. All else being equal, over-recovery will result in a positive year-end USF account balance for the EDU in question, while under-recovery will create a negative balance. A positive USF account balance reduces the amount needed to satisfy the USF rider revenue requirement on a going-forward basis, while a negative balance means that there will be insufficient cash available for ODSA to make the monthly PIPP reimbursement payments due the EDU in question if the revenue requirement does not recognize the existing deficit. To synchronize the new USF rider with each EDU's existing USF PIPP account cash position, the revenue target must be adjusted by the amount of the USF account balance as of the rider's effective date. Thus, a positive balance must be deducted from the revenue requirement, while a negative balance must be added to the revenue target the rider is designed to generate. Because ODSA is requesting that the proposed USF

riders be made effective January 1, 2019 on a bills-rendered basis, I have adjusted each EDU's rider revenue target by the amount of the EDU's projected December 31, 2018 USF PIPP account balance. The projected balance amounts are displayed in Exhibit H of the application. The workpapers showing the calculation of the projected December 31, 2018 balances are attached to my testimony as Exhibits MM-9 through MM-16.² The ODSA reconciled the beginning year account balances with the cash account balance and utilized that amount to determine the projected end of year account balance. This reconciliation is reflected in a separate line item in Exhibits MM-9 through MM-16.

Q. Has the Commission previously approved the inclusion of this element in determining the target revenues the proposed USF rider rates must be designed to generate?

A. Yes. The Commission has approved this synchronizing adjustment in establishing the USF riders in all previous USF rider adjustment cases, and has again accepted this methodology in its *NOI Order* in this case.

Q. If this component of the USF rider rate remains in effect for longer than one year, would not an EDU with a projected December 31, 2018 USF PIPP account balance surplus begin to under-recover its USF rider revenue requirement?

A. Because a December 31, 2018 balance surplus will be remitted on an annual basis, the reimbursement will, in theory, be complete after the new USF rider has been in place for one year. This means that, all else being equal, this component of the revenue requirement element should come out of their USF riders at that time.

² The projected account balances for CSP and OP are contained in Exhibits MM-9 and MM-10, respectively. The projected account balance for the merged AEP operating companies is contained in Exhibit MM-16.

1 **Q. Is ODSA proposing that the USF riders be automatically adjusted on January 1,**
2 **2020 to recognize that the amortization of the December 31, 2018 balance surplus**
3 **will have been completed at that time?**

4 A. No. Although ODSA will be monitoring the monthly EDU USF balances very closely,
5 ODSA will also continue to examine all the other elements of the USF rider revenue
6 requirement, and will keep a watchful eye on whether, in practice, riders are generating
7 the necessary level of revenue. Rather than proposing an automatic adjustment for one
8 component of the USF riders on the anniversary date, ODSA believes the better approach
9 is to revisit all elements of the rider before January 1, 2020, so that, if it reasonably
10 appears that additional adjustments are required, all proposed adjustments can be
11 incorporated in a single filing with the Commission. Thus, while ODSA agrees that the
12 component reflecting the December 31, 2018 USF PIPP account balance surpluses,
13 should be eliminated once the balance has been fully amortized, that adjustment should
14 be made in the context of this broader evaluation. Indeed, the parties to the stipulations
15 in all previous USF rider adjustment cases have recognized that this annual review
16 process is necessary by requiring that ODSA file a new application on or before
17 October 31 of each year. ODSA continues to support this approach.

18 **F. Reserve Allowance**

19 **Q. What is the purpose of including an allowance to create a reserve as a USF rider**
20 **revenue requirement component?**

21 A. As explained in the application, PIPP-related cash flows can fluctuate significantly
22 throughout the year, due in large measure to the weather-sensitive nature of electricity
23 sales and PIPP enrollment behavior. The graph attached to the application as Exhibit E

1 plots the historical consolidated net USF PIPP account balance. As the graph shows, the
2 month-to-month cash flow fluctuations had, in the past resulted in negative USF PIPP
3 account balances, which means that, in those months, ODSA will have insufficient cash
4 to satisfy its reimbursement obligations to the EDUs on a timely basis. To address this
5 problem, ODSA historically has included an allowance to create a cash reserve as an
6 element of the USF rider revenue requirement.

7 **Q. Was an allowance to create a cash reserve included in developing the revenue target**
8 **for the USF riders approved in previous USF rider rate adjustment cases?**

9 A. No. As ODSA explained in testimony in previous cases, the methodology used to fund
10 the reserve has changed over time, as the more conservative methods for calculating the
11 allowance previously employed proved to be ineffective to fund the reserve. In Case No.
12 06-751-EL-UNC, ODSA calculated the reserve component based on the highest monthly
13 deficit for each EDU during the test period. The Commission approved this approach in
14 that proceeding and in subsequent USF rider rate adjustment cases. In the NOI approved
15 in Case No. 17-1377-EL-USF and subsequent proceedings, the PUCO approved a
16 modification to the calculation of the reserve by considering the highest monthly deficit
17 during the test period for the EDUs in the aggregate rather than individually, because the
18 funds are deposited in one USF account. The modification also requires consideration of
19 the aggregate projected year end account balance to determine whether a reserve
20 allowance is needed. Considering the projected aggregate account balance of
21 \$40,117,833.80, as shown in Exhibit H, ODSA has determined that a reserve allowance
22 need not be included in the calculation of the USF rider rate in this proceeding.

G. Allowance for Undercollection

Q. Another USF rider revenue requirement element you have identified is an allowance for undercollection. What is the purpose of this component?

A. An allowance for undercollection is necessary to recognize that there is a difference between the amount billed through the USF rider and the amount actually collected from ratepayers. If this element is not included in determining the USF rider revenue requirement, the riders will not generate the target revenue.

Q. Was an allowance for undercollection built into the current USF riders?

A. Yes. The Commission has authorized this allowance in all prior USF rider adjustment cases and again approved the inclusion of this element in its *NOI Order* in this case. This allowance is identical in concept to the allowance for uncollectibles routinely recognized in utility ratemaking. Because the EDU is merely a conduit for USF rider revenues, the allowance must be incorporated in the USF rider itself if the USF rider rates are to produce the required revenues.

Q. How was the proposed allowance for undercollection calculated?

A. As in all prior cases, the allowance was calculated on a company-specific basis so as to reflect the test-period undercollection experience of each EDU. For each reported month, an undercollection percentage was determined by dividing the amount of USF rider revenues actually collected by the EDU by the pro forma revenues as determined by multiplying the kWh sales for that month by USF rider rate. The resulting average rate of collection was then applied to the pro forma annual rider revenue. The difference between that result and the pro forma annual rider revenue represents the amount the allowance for undercollection is intended to recover on an annual basis. The proposed

1 allowance for undercollection for each EDU is shown in Exhibit G of the application.

2 The workpapers supporting this analysis are attached to my testimony as Exhibits MM-17
3 through MM-24.³

4 **H. PIPP Plus Program Agreed Upon Procedures**

5 **Q. ODSA is requesting an allowance to perform agreed upon procedures of the PIPP**
6 **Plus Program. Did ODSA request this allowance in the NOI?**

7 A. Yes, In the NOI, ODSA stated that it is anticipating proposing an
8 allowance for EDU agreed upon procedures costs, or other third-party analyses related to
9 the Universal Service Fund. This request is consistent with the recommendation of the
10 USF Rider Working Group. ODSA has previously caused agreed upon procedures to be
11 conducted of each EDU's PIPP-related accounting and reporting to assure that the
12 ODSA-EDU interface was functioning in accordance with ODSA's expectations and to
13 identify any systemic problems that could indicate that the cost of PIPP recovered from
14 ratepayers through the USF riders of the respective EDUs had been overstated. In Case
15 No. 17-1377-EL-USF the PUCO approved agreed upon procedures to be conducted of
16 CEI, OE, and TE during the 2018 collection period. The proposed allowance for the
17 agreed upon procedures was \$99,000. The proposed cost was allocated to each EDU
18 based upon its proposed cost of PIPP. ODSA has received the actual costs expended and
19 the costs have been reconciled for these EDUs for the 2019 collection period, as shown
20 on Exhibit D. In the NOI in this proceeding, ODSA also proposed an allowance of
21 \$150,000 to conduct the similar audits of AEP, DP&L, and Duke. Based on the actual

³ The allowances for undercollection for CSP and OP are contained in Exhibits MM-17 and MM-18, respectively. The allowances for undercollection for the merged AEP operating companies is contained in Exhibit MM-24.

costs for the 2018 agreed upon procedures, ODSA estimates the cost to be \$99,000. Each EDU (AEP, DP&L, and Duke) will be charged based on a fixed cost. The allocation of this cost to the utilities is shown in Exhibit D.

I. Revenue Requirements Summary

Q. What are the results of your USF rider revenue requirements analysis?

A. The USF rider revenue requirement analysis for each EDU is summarized in Exhibit I to the application.

Q. How does the total USF rider revenue requirement proposed in this case compare to total USF rider revenue requirement approved in Case No. 17-1377-EL-USF?

A. The aggregated revenue requirement of \$216,962,989 proposed in this proceeding is above the \$150,073,225 total revenue requirement approved in last year's amended case. On an individual EDU basis, the USF rider revenue requirements of each EDU are above the revenue requirements approved in Case No. 17-1377-EL-USF.

Q. What accounts for these changes to the EDUs USF rider revenue requirements?

A. Obviously, the level of the USF rider revenue requirement of a particular EDU is simply a function of the sum of all the revenue requirement components and the manner in which certain components are allocated among the EDUs. All EDUs will see an increase in the revenue requirement. This can be partly attributed to customers coming into the program with higher Pre-PIPP amounts and less payments being made to arrears. The cumulative effects of this increase in these variables increased the test period cost of PIPP from \$215,581,252.23 to \$242,374,639.67, an increase of 11 percent.

1 **III. USF RIDER RATE DESIGN**

2 **Q. How does ODSA propose to recover the annual USF rider revenue requirement for**
3 **each EDU?**

4 A. ODSA proposes to recover the annual USF rider revenue requirement for each company
5 through a USF rider that incorporates the same two-step declining block rate design
6 approved by the Commission in all prior USF rider adjustment proceedings. The
7 Commission again approved this rate design methodology in *NOI Order* in this case.

8 **Q. How did you calculate the proposed rider for each EDU?**

9 As shown in Exhibit J to the application, I began by dividing the respective revenue
10 requirements by the EDU's test-period kWh sales to determine the per kWh rate which
11 would apply if the EDU's annual USF rider revenue requirement were to be recovered
12 through a uniform per kWh rate. The sales information came from each EDU and is
13 attached to my testimony as Exhibits MM-25 through MM-32.⁴ Under the Commission-
14 approved USF rider rate design methodology, the first block of the rate applies to all
15 monthly consumption up to and including 833,000 kWh (*i.e.*, one-twelfth of an annual
16 consumption of 10,000,000 kWh). The second block applies to all consumption above
17 833,000 kWh per month. The rate per kWh for the second block is set at the lower of the
18 PIPP rider rate in effect in October 1999⁵ or the per-kWh rate that would apply if the
19 EDU's annual USF rider revenue requirement were to be recovered through a single
20 block per-kWh rate, with the first block rate set at the level necessary to produce the
21 remainder of the EDU's annual USF rider revenue requirement. In this case, this cap is in

⁴ The sales information for CSP and OP are contained in Exhibits MM-25 and MM-26, respectively. The sales information for the merged AEP operating companies is contained in Exhibit MM-32.

⁵ The 1999 PIPP rider rate in effect for the merged AEP operating company was determined by averaging CSP's and OP's 1999 rates of \$0.0001830 and \$0.0001681, respectively.

1 play for all of the EDUs so the two-tier declining block structure will be in effect as
2 shown in the Table II of the application. The workpapers supporting the rate calculations
3 are attached to my testimony as Exhibits MM-33 through MM-38.

4 **Q. What do the final three-line items (lines 19, 20, and 21) on each of these workpapers**
5 **represent?**

6 A. Line 19 shows the dollar difference per-kWh between the first block rate under the
7 approved two-tier rate design and a uniform per-kWh rate. Line 20 expresses this
8 difference as a percentage. Line 21 shows the annual cost impact on the average
9 residential customer of the EDU in question resulting from the use of the declining block
10 rate structure as opposed to a uniform rate per kWh. As in prior cases, this analysis is
11 being presented purely for informational purposes.

12 **Q. How do the proposed USF riders compare to the current USF riders?**

13 A. Table II of the application compares the current and proposed rider rates. As indicated in
14 Table I of the application, the revenues produced by the current USF riders of all EDUs
15 would fall short of their indicated revenue targets. Thus, all EDU rider rates will
16 increase.

17 **Q. Does this conclude your testimony?**

18 A. Yes. However, I reserve the right to supplement.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Testimony of Megan K. Meadows* has been served upon the following parties by electronic mail this 31st day of October 2018.



Dane Stinson

Steven T. Nourse
Christen M. Blend
AEP Service Corporation
1 Riverside Plaza
Columbus, Ohio 43215
stnouse@aep.com
cmbblend@aep.com

William L. Wright
Section Chief, Public Utilities Section
Thomas W. McNamee
Assistant Attorney General
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
William.Wright@ohioattorneygeneral.gov
Thomas.McNamee@ohioattorneygeneral.gov

Randall V. Griffin
Judi L. Sobecki
Michael Schuler
The Dayton Power & Light Company
MacGregor Park
1065 Woodman Avenue
Dayton, Ohio 45432
Randall.Griffin@dplinc.com
Judi.Sobecki@dplinc.com
michael.schuler@aes.com

Amy Botschner-O'Brien
Christopher Healey
Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215-3485
Amy.botschner.obrien@occ.ohio.gov
Christopher.Healey@occ.oh.us

Angela Paul Whitfield
Kimberly W. Bojko
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Bojko@carpenterlipps.com
Paul@carpenterlipps.com

Carrie M. Dunn
Joshua R. Eckert
Christine Watchorn
FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308
cdunn@firstenergycorp.com
jeckert@firstenergy.com
cwatchorn@ulmer.com

Sam Randazzo
Frank P. Darr
Matthew Pritchard
McNees, Wallace & Nurick
Fifth Third Center
21 East State Street, Suite 910
Columbus, Ohio 43215
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

Colleen L. Mooney
Ohio Partners for Affordable Energy
PO Box 1793
231 West Lima Street
Findlay, Ohio 45839-1793
cmooney@ohiopartners.org

Elizabeth H. Watts
Duke Energy Ohio, Inc.
155 East Broad Street
Columbus, Ohio 43215
Elizabeth.Watts@duke-energy.com

Universal Service Fund
Current Rider Mechanism

Cost of PIPP

	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A. American Electric Power - Columbus Southern Power													
1. USF Rider Collected on All Customers	\$223,567.80	\$220,418.61	\$209,107.86	\$237,354.29	\$4,236,033.61	\$3,657,868.86	\$3,254,362.93	\$3,189,015.60	\$3,008,120.90	\$3,628,265.83	\$3,952,524.53	\$3,858,872.50	\$29,875,503.32
2. Non-USF Rider Funds													
a. Customer Payments	\$2,845,699.46	\$3,096,635.93	\$2,906,753.87	\$2,686,327.64	\$3,001,393.16	\$3,115,079.81	\$3,109,135.72	\$3,075,401.39	\$3,035,412.90	\$3,034,494.83	\$2,969,180.05	\$3,177,985.45	\$36,023,460.21
b. Other Customer Payments	\$1,454,014.95	\$1,489,262.76	\$1,202,335.55	\$1,072,643.32	\$1,340,264.91	\$1,578,839.29	\$1,618,483.64	\$1,588,107.44	\$1,551,149.17	\$1,518,727.75	\$1,541,610.27	\$1,613,642.17	\$17,569,081.22
c. Agency Payments	\$57,022.76	\$9,739.18	\$27,293.00	\$262,321.07	\$611,068.34	\$744,041.17	\$356,303.63	\$309,032.40	\$148,960.84	\$46,197.00	\$142,948.64	\$188,337.37	\$2,903,855.40
3. Total Payments	\$4,356,737.17	\$4,595,637.87	\$4,136,382.42	\$4,021,292.03	\$4,952,726.41	\$5,437,560.27	\$5,083,922.99	\$4,972,541.23	\$4,735,522.91	\$4,600,009.58	\$4,653,738.96	\$4,975,944.99	\$56,486,416.83
4. Payments Applied to Arrearages													
	\$147,488.15	\$126,950.86	\$58,313.70	\$53,429.61	\$862,836.38	\$982,766.13	\$396,677.36	\$342,340.64	\$288,637.43	\$235,909.18	\$215,977.16	\$158,023.91	\$3,877,348.51
5. Total Amount of Remittance													
	\$371,053.95	\$347,369.47	\$267,421.56	\$290,783.90	\$5,098,869.99	\$4,650,634.99	\$3,651,040.29	\$3,531,395.24	\$3,296,758.33	\$3,864,165.01	\$4,168,501.69	\$4,014,896.41	\$33,552,861.83
B. OCS Admin													
	\$0.00	\$0.00	\$0.00	\$0.00	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$679,219.20
C. EPP/TEE Program													
	\$0.00	\$0.00	\$0.00	\$0.00	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$2,089,371.76
D. Available Balance (A4-B-C)													
	\$371,053.95	\$347,369.47	\$267,421.56	\$290,783.90	\$4,752,796.12	\$4,304,561.12	\$3,304,966.42	\$3,185,282.37	\$2,950,884.46	\$3,518,091.14	\$3,822,427.82	\$3,668,822.54	\$30,784,260.87
E. Total Costs	\$6,050,944.57	\$5,749,066.87	\$6,187,642.84	\$8,670,101.90	\$11,257,688.06	\$9,481,556.81	\$7,933,232.05	\$8,386,747.29	\$6,403,900.34	\$6,651,609.05	\$7,219,462.53	\$6,927,621.96	\$90,919,574.27
F. Active PIPP and Grad PIPP Bill													
	\$3,183,373.83	\$3,275,906.62	\$3,256,488.57	\$3,240,274.39	\$3,221,904.82	\$3,216,325.86	\$3,272,435.70	\$3,242,503.39	\$3,185,550.52	\$3,174,189.80	\$3,139,353.38	\$3,153,825.15	\$38,562,131.83
G. Reimbursement Due													
	\$2,867,570.94	\$2,473,160.25	\$2,931,154.27	\$5,426,827.51	\$8,035,783.24	\$6,265,230.95	\$4,680,796.35	\$5,144,243.90	\$3,218,349.82	\$3,477,419.25	\$4,080,109.15	\$3,773,796.81	\$52,357,442.44
H. Surplus/Deficit (D-G)													
	(\$2,496,516.99)	(\$1,125,790.78)	(\$2,663,732.71)	(\$5,139,043.61)	(\$3,282,987.12)	(\$1,960,669.83)	(\$1,355,828.93)	(\$1,958,961.53)	(\$267,665.36)	\$40,671.89	(\$257,681.33)	(\$104,974.27)	(\$21,573,181.57)
I. Cost to USF													
	\$2,720,084.79	\$2,346,208.39	\$2,872,840.57	\$5,376,397.90	\$7,172,946.86	\$5,272,464.82	\$4,264,118.99	\$4,801,903.26	\$2,929,712.39	\$3,241,510.07	\$3,864,131.99	\$3,617,772.90	\$48,480,093.93

Cost of PIPP \$48,480,094
Adjustment Test-Period Cost of PIPP: \$4,204,532
Enrollment Adjustment Test-Period Cost of PIPP (\$2,634,231)
Total Adjusted Cost of PIPP: \$50,050,395

American Electric Power - Ohio Power	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A. 1. USF Rider Collected on All Customers	\$ 1,463,622.07	\$ 1,422,255.37	\$ 1,371,328.69	\$ 1,632,559.80	\$ 5,885,394.62	\$ 5,125,642.05	\$ 4,620,456.58	\$ 4,598,419.44	\$ 4,180,561.93	\$ 4,608,982.51	\$ 5,137,316.92	\$ 5,020,202.19	\$45,064,742.17
2. Non-USF Rider Funds													
a. Customer Payments	\$ 3,749,634.56	\$ 3,968,969.22	\$ 3,742,663.73	\$ 3,467,508.39	\$ 3,861,220.41	\$ 4,053,764.99	\$ 4,008,799.09	\$ 3,912,522.86	\$ 3,959,072.53	\$ 3,874,140.78	\$ 3,853,789.54	\$ 4,091,640.04	\$46,543,626.14
b. Other Customer Payments	\$ 1,828,666.87	\$ 1,765,226.55	\$ 1,421,758.63	\$ 1,295,203.67	\$ 1,639,447.94	\$ 1,939,069.74	\$ 1,912,037.03	\$ 1,891,192.38	\$ 1,872,276.40	\$ 1,887,399.31	\$ 1,828,439.93	\$ 1,919,396.68	\$21,200,115.13
c. Agency Payments	\$ 55,327.77	\$ 12,437.21	\$ 82,250.53	\$ 358,411.48	\$ 988,008.54	\$ 948,114.68	\$ 406,007.44	\$ 346,020.36	\$ 140,295.92	\$ 50,013.00	\$ 176,479.23	\$ 211,184.85	\$3,674,551.01
3. Total Payments	\$ 5,633,529.20	\$ 5,746,632.98	\$ 5,246,672.89	\$ 5,121,123.54	\$ 6,388,678.89	\$ 6,940,949.41	\$ 6,326,843.56	\$ 6,149,735.60	\$ 5,971,844.85	\$ 5,811,853.09	\$ 5,858,708.70	\$ 6,222,221.57	\$71,418,292.28
4. Payments Applied to Arrearages	\$ 162,035.69	\$ 142,325.81	\$ 72,517.14	\$ 89,499.84	\$ 1,191,447.44	\$ 1,365,079.75	\$ 471,127.61	\$ 403,881.79	\$ 374,989.11	\$ 317,695.92	\$ 310,613.53	\$ 254,399.36	\$ 5,166,562.99
5. Total Amount of Remittance	\$ 1,625,657.76	\$ 1,564,581.18	\$ 1,443,846.83	\$ 1,722,059.64	\$ 7,076,842.06	\$ 6,491,721.80	\$ 5,091,584.19	\$ 5,000,301.23	\$ 4,555,531.04	\$ 4,926,678.43	\$ 5,447,930.45	\$ 5,274,601.55	\$50,221,335.16
B. OCS Admin	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$ 97,504.74	\$780,037.92
C. EPP/TEE Program	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$ 353,835.41	\$2,830,683.28
D. Available Balance (A4-B-C)	\$ 1,625,657.76	\$ 1,564,581.18	\$ 1,443,846.83	\$ 1,722,059.64	\$ 6,625,501.91	\$ 6,040,381.65	\$ 4,640,244.04	\$ 4,548,961.08	\$ 4,104,190.89	\$ 4,475,338.28	\$ 4,996,590.30	\$ 4,823,261.40	\$46,610,613.96
E. Total Costs	\$ 7,435,019.74	\$ 7,232,649.65	\$ 8,075,220.80	\$ 11,983,847.43	\$ 15,801,422.61	\$ 13,181,309.42	\$ 11,006,974.34	\$ 11,748,465.47	\$ 8,432,146.74	\$ 8,118,447.44	\$ 9,089,979.90	\$ 8,725,518.85	\$120,735,001.39
F. Active PIPP and Grad PIPP Bill	\$ 4,196,988.79	\$ 4,160,562.53	\$ 4,136,207.49	\$ 4,122,019.87	\$ 4,133,596.18	\$ 4,139,988.76	\$ 4,187,272.79	\$ 4,153,095.30	\$ 4,094,921.49	\$ 4,052,542.21	\$ 4,038,470.36	\$ 4,061,671.30	\$48,468,727.07
G. Reimbursement Due	\$ 3,238,630.95	\$ 3,072,097.12	\$ 3,339,013.31	\$ 7,761,827.56	\$ 11,867,826.43	\$ 9,041,319.66	\$ 6,819,701.55	\$ 7,595,370.17	\$ 4,347,225.25	\$ 4,065,905.23	\$ 5,055,509.54	\$ 4,663,847.55	\$71,268,274.32
H. Surplus/Deficit (D-G)	\$ (1,611,973.19)	\$ (1,507,515.94)	\$ (2,495,167.48)	\$ (8,039,767.92)	\$ (5,042,324.52)	\$ (3,000,938.01)	\$ (2,179,457.51)	\$ (3,046,409.09)	\$ (243,034.36)	\$ 409,433.05	\$ (58,919.24)	\$ 159,413.85	\$ (24,657,660.36)
I. Cost to USF	\$ 3,076,595.26	\$ 2,928,771.31	\$ 3,866,496.17	\$ 7,672,327.72	\$ 10,476,378.99	\$ 7,675,239.91	\$ 6,348,573.94	\$ 7,191,488.38	\$ 3,972,256.14	\$ 3,748,209.31	\$ 4,744,886.01	\$ 4,409,448.19	\$66,111,681.33

Total Adjusted Cost of PIPP: \$63,271,747

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A. Dayton Power and Light Company													
1. USF Rider Collected on All Customers	\$859,455.30	\$750,208.70	\$747,861.56	\$835,315.97	\$835,315.97	\$138,367.92	\$126,642.88	\$110,775.01	\$108,553.82	\$104,743.01	\$119,970.85	\$128,832.80	\$4,191,323.82
2. Non-USF Rider Funds													
a. Customer Payments	\$1,575,574.03	\$1,650,423.17	\$1,475,057.46	\$1,348,382.37	\$1,602,465.97	\$1,574,697.47	\$1,536,691.12	\$1,504,566.53	\$1,510,638.20	\$1,428,061.49	\$1,493,115.82	\$1,481,467.30	\$18,181,140.93
b. Other Customer Payments	\$326,482.81	\$323,355.12	\$251,266.41	\$246,303.44	\$354,746.86	\$400,010.79	\$377,171.14	\$414,285.05	\$391,371.41	\$358,127.22	\$333,578.56	\$295,963.81	\$4,072,662.42
c. Agency Payments	\$68,828.74	\$45,678.60	\$98,544.73	\$129,865.75	\$502,501.02	\$171,707.24	\$113,458.44	\$74,846.12	\$62,784.75	\$72,653.47	\$63,676.51	\$52,260.20	\$1,456,805.57
3. Total Payments	\$1,970,885.58	\$2,019,456.89	\$1,824,868.60	\$1,724,551.56	\$2,459,713.65	\$2,146,415.50	\$2,027,320.70	\$1,993,697.70	\$1,964,794.36	\$1,858,942.18	\$1,890,370.89	\$1,829,691.31	\$23,710,808.92
4. Payments Applied to Arrearages													
	\$369,815.74	\$226,801.81	\$179,435.60	\$196,208.14	\$273,524.30	\$325,138.80	\$495,993.78	\$369,196.85	\$346,752.77	\$296,876.33	\$272,301.98	\$233,496.23	\$3,584,542.33
5. Total Amount of Remittance	\$1,229,271.04	\$1,007,011.51	\$927,297.16	\$1,031,524.11	\$411,892.22	\$451,781.68	\$606,768.79	\$477,750.67	\$451,495.78	\$415,847.18	\$402,896.98	\$362,329.03	\$7,775,886.15
B. OCS Admin	\$0.00	\$0.00	\$0.00	\$0.00	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$341,971.12
C. EPP/TEE Program	\$0.00	\$0.00	\$0.00	\$0.00	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$581,864.72
D. Available Balance (A4-B-C)	\$1,229,271.04	\$1,007,011.51	\$927,297.16	\$1,031,524.11	\$296,412.74	\$336,302.20	\$491,289.31	\$362,271.19	\$336,016.30	\$300,367.70	\$287,417.50	\$246,849.55	\$6,852,030.31
E. Total Costs	\$2,644,828.39	\$2,335,820.07	\$2,517,222.19	\$3,102,039.31	\$4,163,913.73	\$3,718,454.56	\$3,139,421.16	\$2,990,914.37	\$2,498,573.00	\$2,706,269.49	\$3,136,908.18	\$3,056,541.55	\$36,002,906.00
F. Active PIPP and Grad PIPP Bill	\$1,610,924.27	\$1,584,873.97	\$1,540,258.81	\$1,512,136.99	\$1,504,689.31	\$1,489,988.73	\$1,485,205.68	\$1,460,322.94	\$1,447,495.08	\$1,450,812.51	\$1,447,600.37	\$1,444,841.08	\$17,988,149.54
G. Reimbursement Due	\$1,033,904.12	\$750,946.10	\$967,963.58	\$1,589,902.32	\$2,649,224.42	\$2,228,465.83	\$1,654,215.46	\$1,530,591.43	\$1,051,077.92	\$1,255,456.98	\$1,069,307.81	\$1,613,700.47	\$18,014,756.46
H. Surplus/Deficit (D-G)	\$195,366.92	\$256,065.41	(\$40,866.42)	(\$558,378.21)	(\$2,932,811.68)	(\$1,862,163.63)	(\$1,162,926.17)	(\$1,168,320.24)	(\$715,061.62)	(\$955,089.28)	(\$1,401,890.31)	(\$1,366,850.92)	(\$11,182,726.15)
I. Cost to USF	\$664,088.38	\$524,144.29	\$788,527.98	\$1,393,694.18	\$2,375,700.12	\$1,903,327.03	\$1,158,221.70	\$1,161,394.58	\$704,325.15	\$959,590.65	\$1,417,005.83	\$1,380,204.24	\$14,430,214.13

Cost of PIPP: \$14,430,214
Adjustment Test-Period Cost of PIPP: \$918,352
Enrollment Adjustment Test-Period Cost of PIPP: (\$767,428)
Total Adjusted Cost of PIPP: \$14,581,138

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

Duke Energy	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A.													
1. USF Rider Collected on All Customers	\$526,275.02	\$535,988.37	\$462,025.42	\$621,003.74	\$1,085,498.34	\$916,494.09	\$799,985.27	\$863,914.37	\$823,308.75	\$931,013.19	\$1,079,757.69	\$955,176.94	\$9,624,451.19
2. Non-USF Rider Funds													
a. Customer Payments	\$1,149,349.50	\$1,219,640.16	\$1,108,546.89	\$1,055,894.89	\$1,245,380.90	\$1,205,805.03	\$1,136,514.48	\$1,084,629.46	\$1,110,329.05	\$1,117,736.09	\$1,126,420.31	\$1,163,460.91	\$13,724,709.67
b. Other Customer Payments	\$183,074.19	\$183,139.83	\$161,777.45	\$151,742.07	\$170,523.06	\$195,491.91	\$201,162.53	\$198,050.65	\$194,707.51	\$171,140.46	\$161,914.57	\$165,046.26	\$2,137,770.49
c. Agency Payments	\$14,201.30	\$13,057.36	\$27,278.37	\$24,602.53	\$277,060.50	\$121,251.36	\$61,505.96	\$54,198.02	\$59,657.05	\$31,720.97	\$31,835.54	\$12,233.86	\$728,612.82
3. Total Payments	\$1,346,624.99	\$1,415,837.35	\$1,297,602.71	\$1,232,239.49	\$1,693,964.46	\$1,522,558.30	\$1,399,182.97	\$1,336,878.13	\$1,364,893.61	\$1,320,999.52	\$1,320,704.42	\$1,340,741.03	\$16,591,092.98
4. Payments Applied to Arrangees													
5. Total Amount of Remittance	\$755,638.74	\$746,315.60	\$656,215.60	\$812,695.15	\$1,578,087.49	\$1,237,409.64	\$1,039,322.31	\$1,120,399.00	\$1,065,181.60	\$1,247,230.99	\$1,464,709.55	\$1,249,198.47	\$12,972,404.14
B. OCS Admin	\$0.00	\$0.00	\$0.00	\$0.00	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$273,697.12
C. EPP/TEE Program	\$0.00	\$0.00	\$0.00	\$0.00	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$614,054.68
D. Available Balance (A4-B-C)	\$755,638.74	\$746,315.60	\$656,215.60	\$812,695.15	\$1,467,118.49	\$1,126,440.64	\$928,353.31	\$1,009,430.00	\$954,212.60	\$1,136,261.99	\$1,353,740.55	\$1,138,229.47	\$12,084,652.14
E. Total Costs	\$2,749,667.08	\$2,416,792.49	\$2,452,710.84	\$2,901,089.77	\$3,651,252.36	\$3,144,239.16	\$2,793,041.16	\$2,771,845.82	\$2,323,502.81	\$2,834,504.78	\$3,255,807.60	\$2,871,538.52	\$34,165,992.39
F. Active PIPP and Grad PIPP Bill	\$1,345,422.76	\$1,340,345.83	\$1,315,744.82	\$1,300,218.48	\$1,317,671.71	\$1,293,613.57	\$1,325,834.60	\$1,328,514.54	\$1,296,432.53	\$1,282,994.57	\$1,244,704.40	\$1,246,860.88	\$15,638,358.69
G. Reimbursement Due	\$1,404,244.32	\$1,076,446.66	\$1,136,966.02	\$1,600,871.29	\$2,333,580.65	\$1,850,625.59	\$1,467,206.56	\$1,443,331.28	\$1,027,070.28	\$1,551,510.21	\$2,011,103.20	\$1,624,877.64	\$18,527,633.70
H. Surplus/Deficit (D-G)	(\$648,605.59)	(\$330,131.06)	(\$480,750.42)	(\$768,176.14)	(\$866,462.16)	(\$724,184.95)	(\$538,853.25)	(\$433,901.28)	(\$72,857.68)	(\$415,248.22)	(\$657,362.65)	(\$486,448.17)	(\$6,442,961.56)
I. Cost to USF	\$1,174,880.60	\$866,129.43	\$942,775.84	\$1,409,179.88	\$1,844,991.50	\$1,526,710.04	\$1,227,869.52	\$1,206,846.65	\$785,197.43	\$1,235,292.41	\$1,626,151.34	\$1,330,656.11	\$15,179,680.75

Cost of PIPP: \$15,179,681
Adjustment Test-Period Cost of PIPP: (\$242,714)
Enrollment Adjustment Test-Period Cost of PIPP: (\$746,848)
Total Adjusted Cost of PIPP: \$14,190,118

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

Ohio Edison		9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A	1. USF Rider Collected on All Customers	\$2,642,723.10	\$2,581,181.27	\$2,443,501.96	\$2,749,303.84	\$2,353,511.33	\$2,000,364.29	\$1,901,111.23	\$1,828,181.46	\$1,721,468.83	\$1,975,715.38	\$2,206,855.04	\$2,190,505.35	\$26,602,423.08
	2. Non-USF Rider Funds													
	a. Customer Payments	\$3,106,199.05	\$3,274,879.52	\$2,959,658.48	\$2,671,591.01	\$3,152,410.68	\$3,280,902.28	\$3,287,697.15	\$3,291,776.67	\$3,331,019.63	\$3,145,972.71	\$3,202,847.13	\$3,334,074.11	\$38,039,028.40
	b. Other Customer Payments	\$1,470,975.06	\$1,401,750.37	\$1,021,851.74	\$835,601.61	\$1,020,506.18	\$1,160,052.07	\$1,023,920.55	\$1,091,107.59	\$1,110,028.30	\$1,020,814.98	\$1,142,833.12	\$1,192,115.70	\$13,491,557.27
B	c. Agency Payments	\$7,523.89	\$9,999.30	\$271,441.37	\$248,634.69	\$804,073.46	\$369,281.50	\$574,263.17	\$215,077.00	\$67,032.67	\$34,308.05	\$44,688.77	\$18,480.02	\$2,664,803.89
	3. Total Payments	\$4,584,698.00	\$4,686,629.19	\$4,252,951.59	\$3,755,827.31	\$4,976,990.30	\$4,810,235.85	\$4,885,880.87	\$4,597,961.26	\$4,508,080.60	\$4,201,095.74	\$4,390,369.02	\$4,544,669.83	\$54,195,389.56
	4. Payments Applied to Arrearages	\$292,696.86	\$272,101.71	\$189,456.93	\$155,504.53	\$519,122.92	\$311,843.27	\$243,159.14	\$269,672.48	\$292,084.05	\$257,496.26	\$271,371.48	\$236,810.88	\$3,310,320.51
	5. Total Amount of Remittance	\$2,935,419.96	\$2,853,282.98	\$2,632,958.89	\$2,904,808.37	\$2,872,634.25	\$2,320,207.56	\$2,144,270.37	\$2,097,853.94	\$2,013,552.88	\$2,233,211.64	\$2,478,226.52	\$2,426,316.23	\$28,912,743.59
C	OCS Admin	\$0.00	\$0.00	\$0.00	\$0.00	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$783,162.56
	EPP/TEE Program	\$0.00	\$0.00	\$0.00	\$0.00	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$1,961,850.88
	Available Balance (A-B-C)	\$2,935,419.96	\$2,853,282.98	\$2,632,958.89	\$2,904,808.37	\$2,529,507.57	\$1,977,080.88	\$1,801,143.69	\$1,754,727.26	\$1,670,426.20	\$1,690,084.96	\$2,135,059.84	\$2,083,189.55	\$27,167,730.15
	Total Costs	\$6,722,126.40	\$6,410,796.38	\$6,718,665.52	\$8,699,560.35	\$10,848,676.31	\$9,043,536.24	\$8,424,282.44	\$7,734,576.96	\$6,452,409.07	\$6,658,782.40	\$8,113,240.35	\$7,996,127.53	\$94,021,779.95
D	Active PIPP and Grad PIPP Bill	\$3,251,075.99	\$3,232,155.74	\$3,217,513.55	\$3,253,961.82	\$3,270,194.28	\$3,276,061.83	\$3,308,105.03	\$3,290,090.89	\$3,267,401.85	\$3,263,523.75	\$3,251,639.92	\$3,234,134.89	\$39,105,846.54
	Reimbursement Due	\$3,471,050.41	\$3,718,640.64	\$3,501,151.97	\$5,445,598.53	\$7,578,482.03	\$5,767,484.41	\$5,116,177.41	\$4,444,486.07	\$3,185,007.22	\$3,605,258.65	\$4,861,600.43	\$4,760,992.64	\$54,915,930.41
	Surplus/Deficit (D-G)	(\$535,630.45)	(\$325,357.66)	(\$868,193.08)	(\$2,540,790.16)	(\$5,048,974.46)	(\$3,790,403.53)	(\$3,315,033.72)	(\$2,689,758.81)	(\$1,514,581.02)	(\$1,715,173.69)	(\$2,726,500.59)	(\$2,677,803.09)	(\$27,748,200.26)
	Cost to USF	\$3,178,363.55	\$2,906,538.93	\$3,311,695.04	\$5,290,094.00	\$7,059,359.11	\$5,455,641.14	\$4,873,018.27	\$4,174,813.59	\$2,892,923.17	\$3,347,762.39	\$4,590,228.95	\$4,525,181.76	\$51,605,609.90

Cost of PIPP: \$51,605,610
Adjustment Test-Period Cost of PIPP: \$174,358
Enrollment Adjustment Test-Period Cost of PIPP: (\$2,588,998)
Total Adjusted Cost of PIPP: \$49,190,970

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

Toledo EdisonFirst Energy	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A.													
1. USF Rider Collected on All Customers	\$403,085.80	\$390,383.85	\$378,129.75	\$390,762.14	\$354,606.61	\$262,856.37	\$248,272.06	\$342,962.32	\$224,257.97	\$266,153.76	\$284,285.10	\$282,524.51	\$3,728,164.24
2. Non-USF Rider Funds													
a. Customer Payments	\$823,795.48	\$989,534.46	\$887,988.08	\$803,332.12	\$935,554.10	\$1,008,585.91	\$1,025,234.43	\$1,018,182.94	\$1,040,424.75	\$949,602.25	\$985,676.55	\$1,020,493.28	\$11,600,004.35
b. Other Customer Payments	\$466,696.43	\$417,277.24	\$303,402.42	\$260,390.37	\$324,043.07	\$373,461.46	\$334,571.11	\$348,521.16	\$356,219.56	\$311,460.08	\$352,253.98	\$400,520.89	\$4,248,917.77
c. Agency Payments	\$2,791.28	\$2,068.84	\$57,907.47	\$70,497.41	\$292,625.05	\$98,966.29	\$164,674.27	\$76,762.00	\$32,375.69	\$14,984.12	\$12,120.91	\$6,506.94	\$832,700.27
3. Total Payments	\$1,399,283.19	\$1,408,880.54	\$1,248,897.97	\$1,140,219.90	\$1,552,222.22	\$1,481,013.66	\$1,524,579.61	\$1,443,486.10	\$1,429,020.00	\$1,276,046.45	\$1,350,051.44	\$1,427,921.11	\$16,881,022.39
4. Payments Applied to Arrearages													
	\$106,254.07	\$104,352.37	\$69,474.95	\$54,431.02	\$203,370.16	\$115,724.67	\$87,162.06	\$94,819.95	\$119,748.90	\$98,539.69	\$88,883.65	\$86,762.44	\$1,239,543.93
5. Total Amount of Remittance	\$509,339.87	\$494,716.22	\$447,604.70	\$445,193.16	\$557,976.77	\$378,581.04	\$335,454.12	\$337,682.27	\$344,006.87	\$364,693.45	\$373,172.75	\$379,285.95	\$4,967,708.17
B. OCS Admin	\$0.00	\$0.00	\$0.00	\$0.00	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$240,587.60
C. EPP/TEE Program	\$0.00	\$0.00	\$0.00	\$0.00	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$597,699.52
D. Available Balance (A4-B-C)	\$509,339.87	\$494,716.22	\$447,604.70	\$445,193.16	\$453,190.88	\$273,795.15	\$230,688.23	\$232,866.38	\$239,220.98	\$259,907.56	\$268,386.86	\$274,501.06	\$4,129,421.05
E. Total Costs	\$2,073,237.64	\$1,941,806.18	\$2,033,705.62	\$2,607,984.49	\$3,328,632.47	\$2,745,813.40	\$2,632,655.50	\$2,440,313.34	\$2,003,686.18	\$2,184,544.42	\$2,544,173.26	\$2,494,857.95	\$29,031,415.45
F. Active PIPP and Grad PIPP Bill	\$1,007,483.88	\$1,007,096.17	\$1,008,968.95	\$1,009,215.65	\$1,014,943.94	\$1,010,911.36	\$1,024,781.09	\$1,033,893.77	\$1,024,812.87	\$1,023,221.74	\$1,015,636.42	\$1,013,350.12	\$12,194,295.96
G. Reimbursement Due	\$1,065,753.76	\$934,710.01	\$1,024,736.67	\$1,598,768.84	\$2,313,688.53	\$1,734,902.04	\$1,807,894.41	\$1,406,419.57	\$978,873.31	\$1,161,322.68	\$1,528,541.84	\$1,481,507.83	\$16,837,119.49
H. Surplus/Deficit (D-G)	(\$556,413.89)	(\$439,893.79)	(\$577,131.97)	\$1,153,575.68	\$1,860,497.65	(\$1,461,106.89)	(\$1,377,226.18)	(\$1,173,523.19)	(\$739,652.33)	(\$901,415.12)	(\$1,260,154.98)	(\$1,207,006.77)	(\$12,707,698.44)
I. Cost to USF	\$959,499.69	\$830,357.64	\$965,261.72	\$1,544,337.82	\$2,110,318.37	\$1,619,177.37	\$1,520,712.35	\$1,311,599.62	\$859,124.41	\$1,062,782.99	\$1,439,658.19	\$1,384,745.39	\$15,997,575.56

Cost of PIPP: \$15,597,576
Adjustment Test-Period Cost of PIPP: \$121,824
Enrollment Adjustment Test-Period Cost of PIPP: (\$785,970)
Total Adjusted Cost of PIPP: \$14,933,430

Universal Service Fund

Current Rider Mechanism

Cost of PIPP

	9/2017	10/2017	11/2017	12/2017	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018	Total
A. American Electric Power - Merge													
1. USF Rider Collected on All Customers	\$1,687,189.87	\$1,642,873.98	\$1,360,436.55	\$1,869,914.09	\$10,121,428.23	\$8,783,510.91	\$7,874,819.51	\$7,785,435.04	\$7,188,682.83	\$8,237,238.34	\$9,089,841.45	\$8,879,074.69	\$74,740,245.49
2. Non-USF Rider Funds													
a. Customer Payments	\$6,595,234.02	\$7,035,605.15	\$6,849,417.80	\$6,153,836.03	\$6,862,813.57	\$7,168,844.80	\$7,117,934.81	\$6,987,924.25	\$6,994,485.43	\$6,908,635.61	\$6,822,969.59	\$7,269,605.49	\$82,587,106.35
b. Other Customer Payments	\$3,282,681.82	\$3,254,489.31	\$2,624,094.18	\$2,367,846.98	\$2,978,712.85	\$3,517,909.03	\$3,530,520.67	\$3,479,299.82	\$3,423,425.57	\$3,406,127.06	\$3,370,050.20	\$3,533,038.85	\$38,769,196.35
c. Agency Payments	\$112,350.53	\$22,176.39	\$109,543.53	\$620,732.55	\$1,499,076.88	\$1,692,155.85	\$762,311.07	\$655,052.76	\$289,256.76	\$96,800.00	\$319,427.87	\$399,522.22	\$6,578,406.41
3. Total Payments	\$9,990,266.37	\$10,312,270.85	\$9,383,055.31	\$9,142,415.57	\$11,341,403.30	\$12,378,909.68	\$11,410,766.55	\$11,122,276.83	\$10,707,167.76	\$10,411,562.67	\$10,512,447.66	\$11,202,166.56	\$127,914,709.11
4. Payments Applied to Arrearages	\$309,521.84	\$269,276.67	\$130,830.84	\$142,929.45	\$2,054,283.82	\$2,358,845.88	\$867,804.97	\$746,222.43	\$663,606.54	\$553,605.10	\$526,590.89	\$410,423.27	\$9,033,941.50
5. Total Amount of Remittance	\$1,996,711.71	\$1,911,950.65	\$1,711,267.39	\$2,012,843.54	\$12,175,712.05	\$11,142,356.79	\$8,742,824.48	\$8,531,657.47	\$7,852,289.37	\$8,790,843.44	\$9,616,432.14	\$9,289,497.96	\$83,774,186.99
B. OCS Admin	\$0.00	\$0.00	\$0.00	\$0.00	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$1,459,257.12
C. EPP/TEE Program	\$0.00	\$0.00	\$0.00	\$0.00	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$4,920,055.04
D. Available Balance (A4-B-C)	\$1,996,711.71	\$1,911,950.65	\$1,711,267.39	\$2,012,843.54	\$11,378,298.03	\$10,344,942.77	\$7,945,210.46	\$7,734,243.45	\$7,054,875.35	\$7,993,429.42	\$8,819,018.12	\$8,492,083.94	\$77,394,874.83
E. Total Costs	\$13,485,964.31	\$12,981,716.52	\$14,262,863.64	\$20,553,949.33	\$27,059,110.67	\$22,862,865.23	\$18,940,206.39	\$20,135,212.76	\$14,836,047.08	\$14,770,056.49	\$16,313,442.43	\$15,653,140.81	\$211,664,575.66
F. Active PIPP and Grad PIPP Bill	\$7,379,762.42	\$7,436,459.15	\$7,392,896.06	\$7,362,294.26	\$7,355,501.00	\$7,356,314.62	\$7,459,708.49	\$7,395,598.69	\$7,270,472.01	\$7,226,732.01	\$7,177,823.74	\$7,215,496.45	\$86,028,858.90
G. Reimbursement Due	\$6,106,201.89	\$5,545,257.37	\$6,870,167.58	\$13,191,655.07	\$19,703,609.67	\$15,306,550.61	\$11,400,497.90	\$12,739,614.07	\$7,585,575.07	\$7,543,324.48	\$9,135,618.69	\$8,437,644.36	\$123,625,716.76
H. Surplus/Deficit (D-G)	(\$4,109,490.18)	(\$3,633,306.72)	(\$5,158,900.19)	(\$11,778,811.53)	(\$8,325,311.64)	(\$4,961,607.84)	(\$3,535,287.44)	(\$5,005,370.62)	(\$510,699.72)	\$450,104.94	(\$318,600.57)	\$54,439.58	(\$46,230,841.93)
I. Cost to USF	\$5,796,680.05	\$5,275,980.70	\$6,739,336.74	\$13,048,725.62	\$17,649,325.85	\$12,947,704.73	\$10,612,692.93	\$11,993,391.64	\$6,901,968.53	\$6,989,719.38	\$8,009,028.00	\$8,027,221.09	\$114,591,775.26

Cost of PIPP: \$114,591,775
Adjustment Test-Period Cost of PIPP: \$4,694,690
Enrollment Adjustment Test-Period Cost of PIPP: (\$5,964,323)

Total Adjusted Cost of PIPP: \$113,322,142

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018 - Dec 2018
Columbus Southern Power

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$4,236,033.61	\$3,657,868.86	\$3,254,362.93	\$3,189,015.60	\$3,008,120.90	\$3,628,255.83	\$3,952,524.53	\$3,868,872.50	\$3,336,175.18	\$3,227,683.67	\$2,954,454.89	\$3,488,737.19	\$41,792,105.67
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$3,001,393.16	\$3,115,079.81	\$3,109,135.72	\$3,075,401.39	\$3,035,412.90	\$3,034,494.83	\$2,969,180.05	\$3,177,965.45	\$2,845,699.46	\$3,066,635.93	\$2,906,753.87	\$2,686,327.84	\$36,023,480.21
III C. + D. Other Customer Payments	\$1,340,264.91	\$1,578,839.29	\$1,618,483.64	\$1,588,107.44	\$1,551,149.17	\$1,518,727.75	\$1,541,610.27	\$1,613,642.17	\$1,454,014.95	\$1,489,262.76	\$1,202,335.55	\$1,072,643.32	\$17,569,081.22
III E. 1 + 2 + 3 Agency Payments	\$611,068.34	\$744,041.17	\$356,303.83	\$309,032.40	\$148,960.84	\$46,787.00	\$142,948.84	\$188,337.37	\$57,022.76	\$9,739.18	\$27,293.00	\$262,321.07	\$2,903,855.40
3. Total Payments, 301 III F.	\$4,952,726.41	\$5,437,860.27	\$5,083,922.99	\$4,972,541.23	\$4,735,522.91	\$4,600,009.58	\$4,653,738.96	\$4,979,944.99	\$4,356,737.17	\$4,555,637.87	\$4,136,382.42	\$4,021,292.03	\$58,496,416.83
4. Payments Applied to Arrearages II b.	\$862,836.38	\$992,766.13	\$396,677.36	\$342,340.64	\$288,637.43	\$235,909.18	\$215,977.16	\$156,023.91	\$147,486.15	\$126,950.86	\$59,313.70	\$53,429.61	\$3,877,348.51
5. Total Amount of Remittance II c.	\$5,098,869.99	\$4,650,634.99	\$3,651,040.29	\$3,531,356.24	\$3,296,758.33	\$3,864,165.01	\$4,168,501.89	\$4,014,896.41	\$3,483,661.31	\$3,354,634.53	\$3,012,768.59	\$3,542,166.80	\$45,669,454.18
B. OCS Admin	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$84,902.40	\$1,018,828.80
C. EPP Program	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$261,171.47	\$3,134,057.64
D. Available Balance (A5-B-C)	\$4,752,796.12	\$4,304,561.12	\$3,304,966.42	\$3,185,282.37	\$2,950,684.46	\$3,518,091.14	\$3,822,427.82	\$3,668,822.54	\$3,137,587.44	\$3,008,560.66	\$2,666,694.72	\$3,196,092.93	\$41,516,567.74
E. Total Cost: (302, VIII)	\$11,257,688.06	\$9,481,556.81	\$7,933,232.05	\$8,386,747.29	\$6,403,900.34	\$6,651,609.05	\$7,219,462.53	\$6,927,621.96	\$6,050,944.57	\$5,749,066.87	\$6,187,642.84	\$8,670,101.90	\$90,919,574.27
F. Active PIPP and Grad PIPP Bill (302, X)	\$3,221,904.82	\$3,216,325.86	\$3,272,435.70	\$3,242,503.35	\$3,185,550.52	\$3,174,189.80	\$3,139,353.38	\$3,153,825.15	\$3,183,373.63	\$3,275,906.62	\$3,256,488.57	\$3,240,274.39	\$38,562,131.83
G. Reimbursement Due: (302, XI)	\$8,035,783.24	\$6,265,230.95	\$4,660,796.35	\$5,144,243.90	\$3,218,349.82	\$3,477,419.25	\$4,080,109.15	\$3,773,796.81	\$2,867,570.94	\$2,473,160.25	\$2,931,154.27	\$5,429,827.51	\$52,357,442.44
H. Surplus/Deficit (D-E)	\$31,282,987.12	\$1,960,669.83	\$1,355,829.93	\$1,958,961.53	(\$267,665.36)	\$40,671.89	(\$257,681.33)	(\$104,874.27)	\$270,016.50	\$535,400.41	(\$264,459.55)	(\$2,233,734.58)	(\$10,840,874.70)
I. Cumulative Deficit	\$6,750,713.50	\$4,790,043.67	\$3,434,213.74	\$1,475,252.21	\$1,207,586.85	\$1,248,258.74	\$990,577.41	\$885,603.14	\$1,155,619.64	\$1,691,020.05	\$1,426,560.50	(\$807,174.08)	
J. Monthly Reconciliation	\$31,676,830.25	\$27,221,545.34	\$24,006,721.18	\$21,568,036.45	\$19,089,315.84	\$18,363,142.00	\$17,179,684.73	\$15,859,670.91	\$14,592,489.51	\$12,456,946.91	\$10,321,404.32	\$8,524,029.49	

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018- Dec 2018
Ohio Power

- For Monthly Billing Cycle Ending:
- A. Remittance (Form USF-301-00)
1. USF Rider Collected on All Customers II a.
2. Non-USF Rider Funds
III A. + B. Customer Payments
III C. + D. Other Customer Payments
III E. 1 + 2 + 3 Agency Payments
3. Total Payments, 301 III F.
4. Payments Applied to Arrearages II b.
5. Total Amount of Remittance II c.
- B. OCS Admin 0 0100914200
- C. EPP Program 0 0396913240
- D. Available Balance (A5-B-C)
- E. Total Costs: (302, VIII)
- F. Active PIPP and Grad PIPP Bill (302, XI)
- G. Reimbursement Due (302, XI)
- H. Surplus/Shortfall (D-E)
- I. Cumulative Monthly Deficit
- J. Monthly Reconciliation

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$5,885,394.62	\$5,125,642.05	\$4,620,456.58	\$4,596,419.44	\$4,180,561.93	\$4,608,982.51	\$5,137,316.92	\$5,020,202.19	\$4,474,066.50	\$4,334,381.79	\$4,147,062.61	\$4,989,036.17	\$7,119,523.31
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$3,861,220.41	\$4,063,764.99	\$4,008,799.09	\$3,912,522.86	\$3,950,072.53	\$3,874,140.76	\$3,853,789.54	\$4,091,640.04	\$3,749,534.56	\$3,968,969.22	\$3,742,663.73	\$3,467,508.39	46,543,826.14
III C. + D. Other Customer Payments	\$1,639,447.94	\$1,939,069.74	\$1,912,037.03	\$1,861,192.38	\$1,872,278.40	\$1,867,399.31	\$1,828,439.93	\$1,919,386.68	\$1,628,686.87	\$1,765,258.55	\$1,421,759.63	\$1,295,203.67	21,200,115.13
III E. 1 + 2 + 3 Agency Payments	\$888,008.54	\$948,114.88	\$406,007.44	\$346,020.36	\$140,295.92	\$50,013.00	\$176,479.23	\$211,184.85	\$39,527.77	\$12,437.21	\$82,250.53	\$358,411.48	3,674,551.01
3. Total Payments, 301 III F.	\$6,388,676.89	\$6,940,949.41	\$6,326,843.56	\$6,149,735.60	\$5,971,644.85	\$5,811,553.09	\$5,868,706.70	\$6,222,221.57	\$5,633,529.20	\$5,746,532.86	\$5,246,672.89	\$5,121,123.54	71,418,292.28
4. Payments Applied to Arrearages II b.	\$1,191,447.44	\$1,366,079.75	\$471,127.61	\$403,881.79	\$374,969.11	\$317,695.92	\$310,613.53	\$254,399.36	\$162,035.69	\$142,325.81	\$72,517.14	\$89,489.84	\$1,56,592.99
5. Total Amount of Remittance II c.	\$7,076,842.06	\$6,491,721.80	\$5,091,584.19	\$5,000,301.23	\$4,555,531.04	\$4,936,878.43	\$5,447,930.45	\$5,274,601.55	\$4,636,102.19	\$4,476,707.60	\$4,219,579.75	\$5,076,538.01	62,276,116.30
B. OCS Admin 0 0100914200	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	\$97,504.74	1,170,066.88
C. EPP Program 0 0396913240	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	\$353,835.41	4,246,024.92
D. Available Balance (A5-B-C)	\$6,625,501.91	\$6,040,381.65	\$4,640,244.04	\$4,548,961.08	\$4,104,190.89	\$4,475,338.28	\$4,996,590.30	\$4,823,261.40	\$4,184,762.04	\$4,025,387.45	\$3,768,239.60	\$4,627,195.88	56,860,034.50
E. Total Costs: (302, VIII)	\$15,801,422.61	\$13,181,308.42	\$11,006,974.34	\$11,748,465.47	\$8,432,146.74	\$8,118,447.44	\$9,093,979.90	\$8,725,518.85	\$7,435,019.74	\$7,232,649.65	\$8,075,220.80	\$11,883,847.43	120,735,001.39
F. Active PIPP and Grad PIPP Bill (302, XI)	\$4,133,596.18	\$4,139,988.76	\$4,167,272.79	\$4,153,095.30	\$4,084,921.49	\$4,052,542.21	\$4,036,470.36	\$4,061,671.30	\$4,196,388.79	\$4,160,552.53	\$4,136,207.49	\$4,122,019.87	49,466,727.07
G. Reimbursement Due (302, XI)	\$11,667,826.43	\$9,041,319.66	\$6,819,701.55	\$7,585,370.17	\$4,347,225.25	\$4,065,903.23	\$5,065,509.54	\$4,663,847.55	\$3,238,630.95	\$3,072,097.12	\$3,939,013.31	\$7,761,827.66	71,288,274.32
H. Surplus/Shortfall (D-E)	(\$5,042,324.52)	(\$3,000,938.01)	(\$2,179,457.51)	(\$3,046,409.09)	(\$245,034.36)	\$409,433.05	(\$68,919.24)	\$169,413.85	\$946,131.09	\$953,270.33	(\$170,773.71)	(\$3,134,631.70)	(14,406,239.82)
I. Cumulative Monthly Deficit	\$5,762,742.43	\$2,781,804.42	\$602,346.91	(\$2,444,062.18)	(\$2,687,096.54)	(\$2,277,663.49)	(\$3,336,582.73)	(\$2,177,168.88)	(\$1,231,037.79)	(\$277,767.46)	(\$448,541.17)	(\$3,583,172.87)	
J. Monthly Reconciliation	\$39,794,554.35	\$34,197,527.23	\$30,188,449.95	\$27,095,210.98	\$23,981,276.24	\$23,069,008.06	\$21,582,262.39	\$19,932,980.11	\$18,332,062.02	\$16,649,350.48	\$12,966,438.93	\$10,708,466.38	

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018- Dec 2018
Dayton Power and Light

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$138,367.92	\$126,642.88	\$110,775.01	\$108,553.82	\$104,743.01	\$119,970.85	\$130,595.00	\$128,832.80	\$116,366.98	\$105,728.19	\$100,965.86	\$111,541.69	\$1,403,084.01
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$1,602,465.97	\$1,574,897.47	\$1,536,691.12	\$1,504,556.53	\$1,510,638.20	\$1,428,061.49	\$1,493,115.82	\$1,481,467.30	\$1,575,574.03	\$1,650,423.17	\$1,475,057.46	\$1,348,382.37	\$18,181,140.93
III C. + D. Other Customer Payments	\$354,746.86	\$400,010.79	\$377,171.14	\$414,285.05	\$391,371.41	\$358,127.22	\$333,578.59	\$295,963.81	\$326,482.81	\$323,335.12	\$251,266.41	\$246,303.44	\$4,072,662.42
III E. 1 + 2 + 3 Agency Payments	\$502,501.02	\$171,707.24	\$113,458.44	\$74,846.12	\$62,784.75	\$72,653.47	\$63,676.51	\$52,260.20	\$68,828.74	\$45,678.60	\$98,544.73	\$129,865.75	\$1,456,805.57
3. Total Payments, 301 III F.	\$2,459,713.65	\$2,146,415.50	\$2,027,320.70	\$1,993,597.70	\$1,964,794.36	\$1,858,842.18	\$1,890,370.89	\$1,829,691.31	\$1,970,885.58	\$2,019,456.89	\$1,824,868.60	\$1,724,551.56	\$23,710,608.92
4. Payments Applied to Arreages II b.	\$273,524.30	\$325,138.80	\$495,993.78	\$369,196.85	\$346,752.77	\$295,876.33	\$272,301.98	\$233,496.23	\$368,815.74	\$226,801.81	\$179,435.60	\$196,206.14	\$3,584,542.33
5. Total Amount of Remittance II c.	\$411,892.22	\$451,781.68	\$606,768.79	\$477,750.67	\$451,495.78	\$415,847.18	\$402,896.98	\$362,329.03	\$486,182.72	\$332,530.00	\$280,401.46	\$307,749.83	\$4,887,626.34
B. OCS Admin 0.0163698000	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$42,746.39	\$512,956.68
C. TEE Program 0.0447309160	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$72,733.09	\$872,197.08
D. Available Balance (AS-B-C)	\$286,412.74	\$336,302.20	\$491,289.31	\$362,271.19	\$336,016.30	\$300,367.70	\$287,417.50	\$246,849.55	\$370,703.24	\$217,050.52	\$164,921.98	\$192,270.35	\$3,601,872.58
E. Total Costs: (302, VIII)	\$4,153,913.73	\$3,718,454.56	\$3,139,421.16	\$2,990,914.37	\$2,498,573.00	\$2,706,269.49	\$3,136,908.18	\$3,058,541.55	\$2,544,828.39	\$2,335,820.07	\$2,517,222.19	\$3,102,038.31	\$36,002,906.00
F. Active PIPP and Grad PIPP Bill (302, XI)	\$1,504,689.31	\$1,489,988.73	\$1,485,205.68	\$1,460,322.94	\$1,447,495.08	\$1,450,812.51	\$1,447,600.37	\$1,444,841.08	\$1,610,924.27	\$1,584,873.97	\$1,549,258.61	\$1,512,136.99	\$17,988,149.54
G. Reimbursement Due, (302, XI)	\$2,649,224.42	\$2,228,465.83	\$1,654,215.48	\$1,530,591.43	\$1,051,077.92	\$1,255,456.98	\$1,689,307.81	\$1,613,700.47	\$1,033,904.12	\$750,946.10	\$567,963.58	\$1,589,902.32	\$18,014,756.46
H. Surplus/Deficit (D-E)	(\$2,352,811.68)	(\$1,892,163.63)	(\$1,162,926.17)	(\$1,168,320.24)	(\$715,061.62)	(\$955,085.28)	(\$1,401,890.31)	(\$1,366,850.92)	(\$663,200.88)	(\$533,895.58)	(\$803,041.60)	(\$1,397,531.97)	(\$14,412,883.88)
I. Cumulative Monthly Deficit	\$10,686,638.76	\$8,794,475.13	\$7,631,548.96	\$6,463,228.72	\$5,748,167.10	\$4,793,077.82	\$3,391,187.51	\$2,024,336.59	\$1,361,135.71	\$27,240.12	\$24,198.52	\$1,373,433.44)	
J. Monthly Reconciliation	\$9,296,235.75	\$7,988,738.17	\$7,045,280.03	\$6,329,596.43	\$5,602,163.44	\$5,389,052.37	\$5,041,744.74	\$4,654,355.84	\$4,282,474.65	\$3,655,754.52	\$3,029,034.38	\$2,801,556.72	

For Monthly Billing Cycle Ending:

A. Remittance (Form USF-301-00)

1. USF Rider Collected on All Customers II a.

2. Non-USF Rider Funds

III A. + B. Customer Payments

III C. + D. Other Customer Payments

III E. 1 + 2 + 3 Agency Payments

3. Total Payments, 301 III F.

4. Payments Applied to Arreages II b.

5. Total Amount of Remittance II c.

B. OCS Admin 0.0163698000

C. TEE Program 0.0447309160

D. Available Balance (AS-B-C)

E. Total Costs: (302, VIII)

F. Active PIPP and Grad PIPP Bill (302, XI)

G. Reimbursement Due, (302, XI)

H. Surplus/Deficit (D-E)

I. Cumulative Monthly Deficit

J. Monthly Reconciliation

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018 - Dec 2018
Duke Energy Ohio

For Monthly Billing Cycle Ending:

A. Remittance (Form USF-301-00)

1. USF Rider Collected on All Customers II a.

2. Non-USF Rider Funds

III A. + B. Customer Payments

III C. + D. Other Customer Payments

III E. 1 + 2 + 3 Agency Payments

3. Total Payments, 301 III F.

4. Payments Applied to Arrearages II b.

5. Total Amount of Remittance II c.

B. OCS Admin

C. EPP Program

D. Available Balance (A5-B-C)

E. Total Cost: (302, VIII)

F. Active PIPP & Grad PIPP Bill (302, X)

G. Reimbursement Due, (302, XI)

H. Surplus/Shortfall (D-E)

I. Monthly Cumulative Deficit

J. Monthly Reconciliation

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$1,089,498.34	\$916,484.09	\$799,985.27	\$683,914.37	\$623,308.75	\$931,013.19	\$1,075,757.69	\$955,176.94	\$942,293.94	\$859,948.15	\$816,235.00	\$926,206.19	\$11,023,731.92
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$1,246,380.90	\$1,205,805.03	\$1,136,514.48	\$1,084,629.46	\$1,110,329.05	\$1,117,738.09	\$1,126,420.31	\$1,163,480.91	\$1,149,349.50	\$1,219,640.16	\$1,108,546.89	\$1,035,894.89	\$13,724,709.87
III C. + D. Other Customer Payments	\$170,523.06	\$195,491.91	\$201,162.53	\$198,050.65	\$194,707.51	\$171,140.46	\$161,914.57	\$165,046.26	\$183,074.19	\$183,139.83	\$161,777.45	\$151,742.07	\$2,137,770.49
III E. 1 + 2 + 3 Agency Payments	\$277,060.50	\$121,261.36	\$61,505.96	\$54,198.02	\$59,657.05	\$31,720.97	\$31,835.54	\$12,233.86	\$14,201.30	\$13,057.36	\$27,278.37	\$24,602.53	\$728,612.82
3. Total Payments, 301 III F.	\$1,693,964.46	\$1,522,558.30	\$1,399,182.97	\$1,336,878.13	\$1,364,693.61	\$1,320,170.42	\$1,340,741.03	\$1,346,624.99	\$1,346,624.99	\$1,415,837.35	\$1,297,602.71	\$1,232,239.49	\$16,591,092.88
4. Payments Applied to Arrearages II b.	\$488,589.15	\$320,915.55	\$239,337.04	\$236,484.63	\$241,872.85	\$316,217.80	\$384,951.86	\$294,021.53	\$229,363.72	\$210,317.23	\$194,190.18	\$191,691.41	\$3,347,952.95
5. Total Amount of Remittance II c.	\$1,578,087.49	\$1,237,409.64	\$1,039,322.31	\$1,120,399.00	\$1,065,181.60	\$1,247,230.99	\$1,464,709.55	\$1,249,198.47	\$1,171,657.86	\$1,070,165.38	\$1,010,425.18	\$1,117,897.60	\$14,371,684.87
B. OCS Admin	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$34,212.14	\$410,545.68
C. EPP Program	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$76,756.86	\$921,082.32
D. Available Balance (A5-B-C)	\$1,467,118.49	\$1,126,440.64	\$928,353.31	\$1,009,430.00	\$954,212.60	\$1,136,261.99	\$1,353,740.55	\$1,138,229.47	\$1,060,688.66	\$959,196.33	\$899,456.18	\$1,006,328.60	\$13,040,056.87
E. Total Cost: (302, VIII)	\$3,651,252.36	\$3,144,239.16	\$2,793,041.16	\$2,771,845.82	\$2,323,502.81	\$2,834,504.78	\$3,255,807.60	\$2,871,538.52	\$2,749,667.08	\$2,416,792.49	\$2,452,710.84	\$2,901,089.77	\$34,165,992.39
F. Active PIPP & Grad PIPP Bill (302, X)	\$1,317,671.71	\$1,293,613.57	\$1,325,834.60	\$1,328,514.54	\$1,296,432.53	\$1,282,994.57	\$1,244,704.40	\$1,246,860.88	\$1,345,422.76	\$1,340,345.63	\$1,315,744.92	\$1,300,218.48	\$15,638,358.69
G. Reimbursement Due, (302, XI)	\$2,333,580.65	\$1,850,625.59	\$1,467,206.56	\$1,443,331.28	\$1,027,070.28	\$1,551,510.21	\$2,011,103.20	\$1,624,677.64	\$1,404,244.32	\$1,076,446.66	\$1,136,966.02	\$1,600,871.29	\$18,527,633.70
H. Surplus/Shortfall (D-E)	(\$865,462.16)	(\$724,184.95)	(\$538,853.25)	(\$433,901.28)	(\$72,857.68)	(\$415,248.23)	(\$657,362.65)	(\$486,448.17)	(\$343,555.66)	(\$117,250.28)	(\$237,509.84)	(\$593,942.69)	(\$5,487,578.83)
I. Monthly Cumulative Deficit	\$3,646,746.08	\$2,922,561.13	\$2,383,707.88	\$1,949,806.60	\$1,876,948.92	\$1,461,700.70	\$804,338.05	\$317,889.88	(\$25,665.78)	(\$142,916.06)	(\$380,425.90)	(\$974,366.59)	
J. Monthly Reconciliation	\$9,007,813.73	\$7,740,882.15	\$6,826,695.44	\$6,133,216.40	\$5,428,352.52	\$5,221,853.37	\$4,885,321.19	\$4,509,851.29	\$4,149,607.97	\$3,542,332.25	\$2,935,056.53	\$2,423,944.23	

Universal Service Fund
Projected December 31, 2018 Balance
Jan 2018-Dec 2018
Cleveland Electric Illuminating

For Monthly Billing Cycle Ending:

Remittance (Form USF-301-00)

A. 1. USF Rider Collected on All Customers II a.

2. Non-USF Rider Funds
III A + B. Customer Payments
III C + D. Other Customer Payments
III E. 1 + 2 + 3 Agency Payments

3. Total Payments, 301 III F.

4. Payments Applied to Arrearages II b.

5. Total Amount of Remittance II c.

B. OCS Admin 0.0127841030

C. TEE Program 0.0275052340

D. Available Balance (AS-B-C)

E. Total Cost (302, VIII)

F. Active PIPP & Grad PIPP Bill (302, X)

G. Reimbursement Due, (302, XI)

H. Surplus/Shortfall (D-E)

I. Cumulative Monthly Deficit

J. Monthly Reconciliation

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
A. 1. USF Rider Collected on All Customers II a.	\$1,670,444.21	\$1,452,090.97	\$1,381,982.30	\$1,334,931.22	\$1,270,330.17	\$1,476,196.21	\$1,627,452.23	\$1,564,386.42	\$1,423,001.89	\$1,414,741.62	\$1,299,000.62	\$1,424,949.12	\$17,330,906.89
2. Non-USF Rider Funds													
III A + B. Customer Payments	\$1,985,118.88	\$1,917,108.56	\$1,999,801.96	\$1,928,738.72	\$1,885,711.95	\$1,805,174.06	\$1,866,636.58	\$1,903,281.96	\$1,820,421.75	\$1,919,549.76	\$1,702,281.45	\$1,540,403.28	\$22,154,228.92
III C + D. Other Customer Payments	\$676,717.22	\$752,743.38	\$787,262.50	\$713,451.75	\$703,022.62	\$699,091.05	\$804,273.46	\$811,854.92	\$908,817.95	\$849,844.93	\$652,104.47	\$535,308.85	\$8,884,473.10
III E. 1 + 2 + 3 Agency Payments	\$460,192.70	\$222,038.94	\$303,857.94	\$131,213.78	\$36,881.84	\$22,618.98	\$26,519.93	\$8,742.16	\$4,267.67	\$2,241.15	\$135,909.32	\$167,059.55	\$1,521,543.96
3. Total Payments, 301 III F.	\$3,002,028.80	\$2,891,890.88	\$3,090,922.40	\$2,773,404.25	\$2,695,596.41	\$2,496,884.09	\$2,897,429.97	\$2,793,979.04	\$2,733,507.37	\$2,771,635.84	\$2,496,295.24	\$2,242,771.69	\$32,540,246.98
4. Payments Applied to Arrearages II b.	\$284,808.57	\$200,589.61	\$164,655.22	\$165,713.95	\$184,598.87	\$174,745.14	\$196,285.02	\$204,723.68	\$191,516.14	\$179,319.55	\$134,029.89	\$104,001.73	\$2,186,688.85
5. Total Amount of Remittance II c.	\$1,955,252.78	\$1,652,880.56	\$1,546,637.52	\$1,500,845.17	\$1,455,030.04	\$1,650,844.35	\$1,825,717.25	\$1,768,110.38	\$1,614,518.03	\$1,594,061.17	\$1,433,030.51	\$1,542,827.94	\$19,560,272.71
B. OCS Admin 0.0127841030	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$70,844.39	\$850,132.68
C. TEE Program 0.0275052340	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$161,075.71	\$1,932,908.52
D. Available Balance (AS-B-C)	\$1,723,332.68	\$1,420,760.48	\$1,314,717.42	\$1,268,725.07	\$1,223,009.04	\$1,419,021.25	\$1,593,817.15	\$1,557,190.28	\$1,382,597.83	\$1,362,141.07	\$1,201,110.41	\$1,310,707.84	\$16,777,231.51
E. Total Cost (302, VIII)	\$6,281,205.37	\$5,296,434.11	\$4,966,810.20	\$4,722,088.65	\$4,020,268.56	\$4,283,091.76	\$4,818,960.13	\$4,792,850.91	\$4,302,118.59	\$4,089,038.81	\$4,112,903.78	\$5,147,355.00	\$56,651,108.84
F. Active PIPP & Grad PIPP Bill (302, X)	\$1,997,920.64	\$1,985,548.65	\$2,014,328.95	\$1,986,865.28	\$1,976,989.69	\$1,964,378.95	\$1,951,242.83	\$1,940,244.67	\$1,971,362.88	\$1,972,017.70	\$1,961,961.90	\$1,980,072.39	\$23,606,634.12
G. Reimbursement Due, (302, XI)	\$4,286,285.73	\$3,310,885.46	\$2,952,481.25	\$2,735,203.37	\$2,043,278.68	\$2,328,712.81	\$2,867,717.50	\$2,852,906.24	\$2,330,755.90	\$2,127,021.11	\$2,151,241.86	\$3,167,282.61	\$33,158,472.72
H. Surplus/Shortfall (D-E)	(\$2,565,953.05)	(\$1,890,124.98)	(\$1,637,763.83)	(\$1,466,478.30)	(\$820,168.94)	(\$909,691.56)	(\$1,273,900.35)	(\$1,295,415.96)	(\$948,157.97)	(\$764,880.04)	(\$950,131.45)	(\$1,856,574.77)	(\$16,379,241.21)
I. Cumulative Monthly Deficit	\$10,633,923.68	\$9,643,798.70	\$7,006,034.87	\$5,539,556.97	\$4,719,387.83	\$3,899,896.07	\$2,535,795.72	\$1,240,379.76	\$293,221.78	(\$472,658.26)	(\$1,432,789.71)	(\$3,279,384.48)	
J. Monthly Reconciliation	\$18,632,554.19	\$16,011,921.48	\$14,120,937.28	\$12,006,484.25	\$11,228,481.80	\$10,801,340.76	\$10,105,228.04	\$9,328,779.91	\$8,583,414.10	\$7,327,271.59	\$6,071,120.08	\$5,013,899.44	

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018-Dec. 2018
Ohio Edison

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$2,353,511.33	\$2,008,364.29	\$1,901,111.23	\$1,828,181.46	\$1,721,468.93	\$1,975,715.38	\$2,206,855.04	\$2,190,505.35	\$1,914,017.99	\$1,863,135.60	\$1,772,538.55	\$1,975,568.16	\$23,710,973.22
2. Non-USF Rider Funds													
III A + B. Customer Payments	\$3,152,410.65	\$3,260,902.28	\$3,287,697.15	\$3,291,776.67	\$3,331,019.63	\$3,145,972.71	\$3,202,847.19	\$3,334,074.11	\$3,105,199.05	\$3,274,879.52	\$2,569,658.48	\$2,671,591.01	\$38,039,028.40
III C + D. Other Customer Payments	\$1,020,506.18	\$1,160,052.07	\$1,023,920.55	\$1,091,107.59	\$1,110,028.30	\$1,030,814.68	\$1,142,833.12	\$1,162,115.70	\$1,470,975.06	\$1,401,750.37	\$1,021,851.74	\$835,601.61	\$13,491,557.27
III E. 1 + 2 + 3 Agency Payments	\$904,073.48	\$369,281.50	\$574,253.17	\$215,077.00	\$57,032.67	\$24,306.05	\$44,668.77	\$18,480.02	\$1,523.69	\$9,999.30	\$271,441.37	\$248,634.69	\$2,664,803.69
3. Total Payments, 301 III F.	\$4,976,990.30	\$4,810,235.85	\$4,885,980.87	\$4,597,961.26	\$4,508,080.69	\$4,201,955.74	\$4,390,360.02	\$4,544,669.83	\$4,584,698.00	\$4,686,626.19	\$4,232,951.59	\$3,755,827.31	\$54,195,389.96
4. Payments Applied to Arrearages II b.	\$519,122.92	\$311,843.27	\$243,159.14	\$269,672.48	\$297,084.05	\$257,466.26	\$271,371.48	\$235,810.88	\$287,696.86	\$272,101.71	\$189,456.33	\$155,504.53	\$3,310,320.51
5. Total Amount of Remittance II c.	\$2,872,634.25	\$2,320,207.56	\$2,144,270.37	\$2,067,833.94	\$2,013,552.88	\$2,233,211.64	\$2,478,226.52	\$2,406,316.23	\$2,206,714.85	\$2,135,237.31	\$1,961,995.48	\$2,131,072.69	\$27,021,293.73
OCS Admin 0.0104224585	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$97,895.32	\$1,174,743.64
EPP Program 0.0247582170	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$245,231.36	\$2,942,776.32
Available Balance (A5-B-C)	\$2,529,507.57	\$1,977,080.88	\$1,801,143.69	\$1,754,727.26	\$1,670,426.20	\$1,890,084.96	\$2,135,099.84	\$2,063,189.55	\$1,863,568.17	\$1,792,110.63	\$1,618,868.80	\$1,787,946.01	\$22,903,773.57
Total Cost: (302, VII)	\$10,846,676.31	\$9,043,536.24	\$8,424,282.44	\$7,734,576.96	\$6,452,409.07	\$6,858,782.40	\$8,113,240.35	\$7,995,127.53	\$6,722,126.40	\$6,410,796.39	\$6,718,665.52	\$8,699,560.35	\$94,021,779.95
Active PIPP & Grad PIPP Bill (302, XI)	\$3,270,194.28	\$3,276,051.83	\$3,308,105.03	\$3,290,090.89	\$3,267,401.85	\$3,253,523.75	\$3,251,639.92	\$3,234,134.89	\$3,251,075.99	\$3,232,155.74	\$3,217,513.55	\$3,253,957.82	\$13,144,442.03
Reimbursement Due, (302, XI)	\$7,578,482.03	\$5,767,484.41	\$5,116,177.41	\$4,444,486.07	\$3,185,007.22	\$3,605,258.65	\$4,861,600.43	\$4,760,992.64	\$3,471,050.41	\$3,178,640.64	\$3,301,151.97	\$5,445,598.53	\$54,915,930.41
Surplus/Shortfall (D-E)	(\$5,046,974.46)	(\$3,790,403.53)	(\$3,315,033.72)	(\$2,689,756.81)	(\$1,514,581.02)	(\$1,715,173.69)	(\$2,736,900.59)	(\$2,677,803.09)	(\$1,807,462.24)	(\$1,396,530.01)	(\$1,882,283.17)	(\$3,657,652.92)	(\$32,012,196.84)
Cumulative Monthly Deficit	\$17,229,862.25	\$13,539,458.72	\$10,224,425.00	\$7,534,866.19	\$5,020,065.17	\$4,304,911.48	\$1,578,410.89	(\$1,099,392.20)	(\$2,706,854.44)	(\$4,093,384.45)	(\$5,975,667.62)	(\$9,633,320.14)	
Monthly Reconciliation	\$31,259,800.93	\$26,863,170.38	\$23,690,569.77	\$21,294,090.63	\$18,636,002.68	\$18,121,389.00	\$16,953,521.96	\$16,650,876.42	\$14,400,377.61	\$12,292,846.69	\$10,185,521.78	\$9,411,809.61	

- For Monthly Billing Cycle Ending:
- Remittance (Form USF-301-00)
- A.
1. USF Rider Collected on All Customers II a.
2. Non-USF Rider Funds
- III A + B. Customer Payments
- III C + D. Other Customer Payments
- III E. 1 + 2 + 3 Agency Payments
3. Total Payments, 301 III F.
4. Payments Applied to Arrearages II b.
5. Total Amount of Remittance II c.
- OCS Admin 0.0104224585
- B.
- EPP Program 0.0247582170
- C.
- Available Balance (A5-B-C)
- D.
- Total Cost: (302, VII)
- E.
- Active PIPP & Grad PIPP Bill (302, XI)
- F.
- Reimbursement Due, (302, XI)
- G.
- Surplus/Shortfall (D-E)
- H.
- Cumulative Monthly Deficit
- I.
- Monthly Reconciliation
- J.

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018- Dec 2018
Toledo Edison

For Monthly Billing Cycle Ending:

A. Remittance (Form USF-301-00)

1. USF Rider Collected on All Customers II a.

2. Non-USF Rider Funds

III A. + B. Customer Payments

III C. + D. Other Customer Payments

III E. 1 + 2 + 3 Agency Payments

3. Total Payments, 301 III F.

4. Payments Applied to Arrearages II b.

5. Total Amount of Remittance II c.

B. OCS Admin 0.0084963130

C. EPP Program 0.0214163350

D. Available Balance (A5-B-C)

E. Total Cost: (302, VIII)

F. Active PIPP & Grad PIPP Bill (302, X)

G. Reimbursement Due, (302, XI)

H. Surplus/Shortfall (D-E)

I. Cumulative Monthly Deficit

J. Monthly Reconciliation

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$354,606.61	\$262,856.37	\$248,272.06	\$242,862.32	\$224,257.97	\$266,153.76	\$284,289.10	\$282,524.51	\$265,794.97	\$320,705.49	\$313,364.35	\$317,300.87	\$3,382,988.38
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$935,554.10	\$1,008,585.91	\$1,025,234.43	\$1,018,182.94	\$1,040,424.75	\$949,802.25	\$985,676.55	\$1,020,493.28	\$929,795.48	\$989,534.46	\$887,568.08	\$809,332.12	\$11,600,004.35
III C. + D. Other Customer Payments	\$324,043.07	\$373,461.46	\$334,671.11	\$348,521.16	\$356,219.56	\$311,460.08	\$352,253.96	\$400,520.89	\$466,698.43	\$417,277.24	\$303,402.42	\$260,390.37	\$4,248,917.77
III E. 1 + 2 + 3 Agency Payments	\$292,625.05	\$99,966.29	\$164,674.27	\$76,782.00	\$32,375.69	\$14,984.12	\$12,120.91	\$6,906.94	\$2,791.28	\$2,068.84	\$7,907.47	\$70,497.41	\$832,700.27
3. Total Payments, 301 III F.	\$1,552,222.22	\$1,481,013.66	\$1,524,579.81	\$1,443,486.10	\$1,429,020.00	\$1,276,046.45	\$1,350,051.44	\$1,427,921.11	\$1,399,283.19	\$1,408,880.54	\$1,248,897.97	\$1,140,219.90	\$16,881,622.39
4. Payments Applied to Arrearages II b.	\$203,370.16	\$115,724.67	\$87,182.06	\$94,819.95	\$119,748.90	\$98,539.69	\$88,883.65	\$96,762.44	\$106,254.07	\$104,352.37	\$69,474.95	\$54,431.02	\$1,239,543.93
5. Total Amount of Remittance II c.	\$557,976.77	\$376,581.04	\$335,454.12	\$337,682.27	\$344,005.87	\$364,683.45	\$373,172.75	\$379,286.95	\$372,049.04	\$425,057.86	\$382,839.30	\$371,731.89	\$4,622,532.31
B. OCS Admin 0.0084963130	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$30,073.45	\$360,881.40
C. EPP Program 0.0214163350	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$74,712.44	\$896,549.28
D. Available Balance (A5-B-C)	\$463,190.88	\$273,795.15	\$230,668.23	\$232,896.38	\$239,220.98	\$259,907.56	\$268,386.86	\$274,501.06	\$267,263.15	\$320,271.97	\$278,053.41	\$266,946.00	\$3,365,101.63
E. Total Cost: (302, VIII)	\$3,328,632.47	\$2,745,813.40	\$2,632,855.50	\$2,440,313.34	\$2,003,686.18	\$2,184,544.42	\$2,544,178.26	\$2,494,857.95	\$2,073,237.64	\$1,941,806.18	\$2,033,705.62	\$2,607,984.49	\$29,031,415.45
F. Active PIPP & Grad PIPP Bill (302, X)	\$1,014,943.94	\$1,010,911.36	\$1,024,761.09	\$1,033,893.77	\$1,024,812.87	\$1,023,221.74	\$1,015,636.42	\$1,013,350.12	\$1,007,483.88	\$1,007,096.17	\$1,008,968.95	\$1,009,215.65	\$12,194,395.96
G. Reimbursement Due, (302, XI)	\$2,313,688.53	\$1,734,902.04	\$1,607,894.41	\$1,406,419.57	\$978,873.31	\$1,161,322.68	\$1,528,541.84	\$1,481,507.83	\$1,065,753.76	\$934,710.01	\$1,024,796.67	\$1,598,768.84	\$16,837,119.49
H. Surplus/Shortfall (D-E)	(\$1,860,497.65)	(\$1,461,106.89)	(\$1,377,226.18)	(\$1,173,523.19)	(\$739,652.33)	(\$901,415.12)	(\$1,260,154.98)	(\$1,207,006.77)	(\$798,490.61)	(\$614,438.04)	(\$746,683.26)	(\$1,331,822.84)	(\$13,472,017.86)
I. Cumulative Monthly Deficit	\$ 9,177,093.90	\$ 7,715,987.01	\$ 6,338,760.83	\$ 5,165,237.64	\$ 4,425,585.31	\$ 3,524,170.19	\$ 2,364,015.21	\$ 1,057,008.44	\$ 258,517.83	\$ (355,920.21)	\$ (1,102,603.46)	\$ (2,434,426.31)	
J. Monthly Reconciliation	\$ 9,417,313.37	\$ 8,092,786.46	\$ 7,137,040.37	\$ 6,412,035.44	\$ 5,675,128.09	\$ 5,459,241.39	\$ 5,107,410.29	\$ 4,714,975.89	\$ 4,338,251.19	\$ 3,703,368.42	\$ 3,088,485.64	\$ 2,534,137.93	

Universal Service Fund
Projection of December 31, 2018 Balance
Jan 2018- Dec 2018
AEP

AEP

For Monthly Billing Cycle Ending:

A. Remittance (Form USF-301-00)

1. USF Rider Collected on All Customers II a.
2. Non-USF Rider Funds
 - III A. + B. Customer Payments
 - III C. + D. Other Customer Payments
 - III E. 1 + 2 + 3 Agency Payments
3. Total Payments, 301 III F.
4. Payments Applied to Arrearages II b.
5. Total Amount of Remittance II c.
- B. OCS Admin
- C. EPP Program
- D. Available Balance (A5-B-C)
- E. Total Cost: (302, VII)
- F. Active PPP and Grad PPP Bill (302, XI)
- G. Reimbursement Due: (302, XI)
- H. Surplus/Deficit (D-E)
- I. Cumulative Deficit
- J. Monthly Reconciliation

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total
1. USF Rider Collected on All Customers II a.	\$ 10,121,428.23	\$ 8,783,510.91	\$ 7,874,819.51	\$ 7,785,435.04	\$ 7,188,682.83	\$ 8,237,238.34	\$ 9,089,841.45	\$ 8,879,074.69	\$ 7,810,241.66	\$ 7,562,065.46	\$ 7,101,517.50	\$ 8,477,773.36	\$ 98,911,628.99
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$6,862,613.57	\$7,168,844.80	\$7,117,934.81	\$6,987,924.25	\$6,994,485.43	\$6,908,635.61	\$6,822,989.59	\$7,268,605.49	\$6,595,234.02	\$7,035,605.15	\$6,649,417.60	\$6,153,836.03	\$ 82,567,106.35
III C. + D. Other Customer Payments	\$2,979,712.85	\$3,517,909.03	\$3,330,520.67	\$3,479,299.82	\$3,423,425.51	\$3,406,127.06	\$3,370,090.20	\$3,353,038.85	\$3,282,681.82	\$3,254,189.31	\$2,824,094.18	\$2,187,846.99	\$ 38,768,186.35
III E. 1 + 2 + 3 Agency Payments	\$1,499,076.88	\$1,692,155.85	\$1,692,311.07	\$655,052.76	\$289,256.76	\$96,600.00	\$319,427.87	\$399,222.22	\$12,350.53	\$22,176.39	\$109,543.53	\$620,732.55	\$ 6,678,406.41
3. Total Payments, 301 III F.	\$ 11,341,403.30	\$ 12,378,909.68	\$ 11,510,766.55	\$ 11,222,276.83	\$ 10,707,167.76	\$ 10,411,562.67	\$ 10,512,447.66	\$ 11,202,166.56	\$ 9,990,266.37	\$ 10,312,270.86	\$ 9,363,055.31	\$ 9,142,415.57	\$ 127,914,709.11
4. Payments Applied to Arrearages II b.	\$2,054,283.82	\$2,358,945.88	\$867,804.97	\$746,222.43	\$663,606.54	\$553,605.10	\$265,590.69	\$410,423.27	\$309,521.84	\$269,276.67	\$130,830.84	\$142,929.45	\$ 9,033,941.50
5. Total Amount of Remittance II c.	\$ 12,175,712.05	\$ 11,142,356.79	\$ 8,742,624.48	\$ 8,531,657.47	\$ 7,852,289.37	\$ 8,790,843.44	\$ 9,618,492.14	\$ 9,269,487.96	\$ 8,119,763.50	\$ 7,831,342.13	\$ 7,232,348.34	\$ 8,620,702.81	\$ 107,945,570.49
B. OCS Admin	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$182,407.14	\$ 2,188,885.68
C. EPP Program	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$615,006.88	\$ 7,380,082.56
D. Available Balance (A5-B-C)	\$ 11,378,296.03	\$ 10,344,942.77	\$ 7,945,210.46	\$ 7,344,243.45	\$ 7,054,875.35	\$ 7,993,429.42	\$ 8,819,018.12	\$ 8,492,083.94	\$ 7,322,348.48	\$ 7,033,928.11	\$ 6,434,934.32	\$ 7,823,288.79	\$ 98,376,602.25
E. Total Cost: (302, VII)	\$27,059,110.67	\$22,662,865.23	\$18,940,206.39	\$20,135,212.76	\$14,836,047.08	\$14,770,056.49	\$16,313,442.43	\$15,653,140.81	\$13,485,964.31	\$12,981,716.52	\$14,262,863.64	\$20,553,949.33	\$ 211,654,575.66
F. Active PPP and Grad PPP Bill (302, XI)	\$7,355,501.00	\$7,356,314.62	\$7,458,708.49	\$7,385,598.69	\$7,270,472.01	\$7,226,732.01	\$7,177,823.74	\$7,215,496.45	\$7,379,762.42	\$7,436,459.15	\$7,392,696.06	\$7,382,294.26	\$ 88,028,888.90
G. Reimbursement Due: (302, XI)	\$19,703,608.67	\$15,306,550.61	\$11,460,487.90	\$12,739,614.07	\$7,565,575.07	\$7,543,324.48	\$9,135,618.69	\$8,437,644.36	\$6,106,201.89	\$5,645,257.37	\$6,870,167.58	\$13,191,655.07	\$ 123,825,716.76
H. Surplus/Deficit (D-E)	\$ (8,325,311.64)	\$ (4,961,607.84)	\$ (3,535,287.44)	\$ (5,005,370.62)	\$ (510,699.72)	\$ (316,600.57)	\$ (316,600.57)	\$ (54,439.56)	\$ 1,216,147.59	\$ 1,488,670.74	\$ (435,233.26)	\$ (5,368,366.28)	\$ (25,249,174.51)
I. Cumulative Deficit	\$ 12,533,465.93	\$ 7,571,848.09	\$ 4,036,560.65	\$ (968,809.87)	\$ (1,479,509.69)	\$ (1,029,404.75)	\$ (1,346,005.32)	\$ (1,291,565.74)	\$ (75,418.16)	\$ 1,413,252.59	\$ 978,019.33	\$ (4,390,346.85)	
J. Monthly Reconciliation	\$71,471,384.60	\$61,419,072.57	\$54,165,571.12	\$48,663,247.43	\$43,070,892.08	\$41,432,150.06	\$38,761,977.12	\$35,783,651.03	\$32,924,651.52	\$28,106,197.39	\$23,287,843.25	\$19,232,485.87	

American Electric Power - Columbus Southern Power

Calculation of Allowance for Undercollection

	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	1,948,353,342	\$4,296,287.57	\$4,236,033.61	98.60%
02/2018	1,663,659,355	\$3,681,218.25	\$3,657,868.86	99.37%
03/2018	1,532,864,945	\$3,321,185.92	\$3,254,362.93	97.99%
04/2018	1,454,818,530	\$3,184,246.85	\$3,189,015.60	100.15%
05/2018	1,447,868,996	\$3,053,464.24	\$3,008,120.90	98.52%
06/2018	1,733,270,184	\$3,680,863.99	\$3,628,255.83	98.57%
07/2018	1,812,378,618	\$4,010,102.33	\$3,952,524.53	98.56%
08/2018	1,856,679,994	\$3,924,537.18	\$3,858,872.50	98.33%
09/2017	1,593,403,160	\$227,856.65	\$223,567.80	98.12%
10/2017	1,567,185,386	\$224,107.51	\$220,418.61	98.35%
11/2017	1,424,805,039	\$203,747.12	\$209,107.86	102.63%
12/2017	1,640,657,216	\$234,613.98	\$237,354.29	101.17%
Total	19,675,944,765	\$30,042,231.60	\$29,675,503.32	99.20%

Target Revenue	\$ 45,731,227
Total Cost: (Target Revenue/Average Collection)	\$ 46,099,172
Allowance: (Total Cost-Target Revenue)	\$ 367,945

American Electric Power - Ohio Power Calculation of Allowance for Undercollection				
	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	2,264,634,966	\$5,921,618.72	\$5,885,394.62	99.39%
02/2018	2,196,618,622	\$5,122,115.62	\$5,125,642.05	100.07%
03/2018	1,983,913,698	\$4,611,570.16	\$4,620,456.58	100.19%
04/2018	1,955,817,194	\$4,589,667.41	\$4,596,419.44	100.15%
05/2018	1,908,996,521	\$4,183,675.38	\$4,180,561.93	99.93%
06/2018	2,010,045,168	\$4,624,405.73	\$4,608,982.51	99.67%
07/2018	2,121,760,736	\$5,151,206.50	\$5,137,316.92	99.73%
08/2018	2,088,588,107	\$5,037,459.32	\$5,020,202.19	99.66%
09/2017	1,967,047,587	\$1,475,946.31	\$1,463,622.07	99.16%
10/2017	1,899,005,268	\$1,429,058.77	\$1,422,255.37	99.52%
11/2017	1,858,276,846	\$1,372,332.11	\$1,371,328.69	99.93%
12/2017	2,085,874,766	\$1,632,731.72	\$1,632,559.80	99.99%
Total	24,340,579,479	\$45,151,787.75	\$45,064,742.17	99.78%
Target Revenue				\$ 57,786,802
Total Cost: (Target Revenue/Average Collection)				\$ 57,912,865
Allowance: (Total Cost-Target Revenue)				\$ 126,064

Dayton Power and Light Company
Calculation of Allowance for Undercollection

	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	1,400,574,320	\$136,976.17	\$138,367.92	101.02%
02/2018	1,297,065,582	\$126,853.01	\$126,642.88	99.83%
03/2018	1,133,596,650	\$110,865.75	\$110,775.01	99.92%
04/2018	1,110,201,158	\$108,577.67	\$108,553.82	99.98%
05/2018	1,070,776,373	\$104,721.93	\$104,743.01	100.02%
06/2018	1,225,886,142	\$119,891.66	\$119,970.85	100.07%
07/2018	1,335,233,448	\$130,585.83	\$130,595.00	100.01%
08/2018	1,316,438,229	\$128,747.66	\$128,832.80	100.07%
09/2017	1,189,803,826	\$863,498.25	\$859,455.30	99.53%
10/2017	1,081,026,636	\$783,865.16	\$780,209.70	99.53%
11/2017	1,032,333,813	\$747,622.52	\$747,861.56	100.03%
12/2017	1,140,467,301	\$834,985.32	\$835,315.97	100.04%
Total	14,333,403,478	\$4,197,190.94	\$4,191,323.82	100.00%

Target Revenue	\$	13,528,777
Total Cost: (Target Revenue/Average Collection)	\$	13,528,777
Allowance: (Total Cost-Target Revenue)		\$0

Duke Energy Calculation of Allowance for Undercollection				
	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	2,015,245,980	\$1,058,275.27	\$1,089,498.34	102.95%
02/2018	1,682,565,858	\$883,566.83	\$916,494.09	103.73%
03/2018	1,451,329,626	\$765,080.35	\$799,985.27	104.56%
04/2018	1,574,067,393	\$823,545.95	\$883,914.37	107.33%
05/2018	1,510,834,513	\$788,063.18	\$823,308.75	104.47%
06/2018	1,805,985,296	\$948,766.67	\$931,013.19	98.13%
07/2018	2,106,259,348	\$1,096,994.70	\$1,079,757.69	98.43%
08/2018	1,854,742,451	\$970,995.96	\$955,176.94	98.37%
09/2017	1,680,404,421	\$486,645.12	\$526,275.02	108.14%
10/2017	1,532,128,606	\$443,704.44	\$535,998.37	120.80%
11/2017	1,455,606,512	\$421,543.65	\$462,025.42	109.60%
12/2017	1,648,867,119	\$477,511.92	\$621,003.74	130.05%
Total	20,318,037,123	\$9,164,694.04	\$9,624,451.19	107.21%

Target Revenue	\$	13,109,037
Total Cost: (Target Revenue/Average Collection)	\$	13,109,037
Allowance: (Total Cost-Target Revenue)		\$0

Cleveland Electric Illuminating Company
Calculation of Allowance for Undercollection

	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	1,780,141,473	\$1,681,404.86	\$1,670,444.21	99.35%
02/2018	1,565,722,462	\$1,458,256.09	\$1,452,090.97	99.58%
03/2018	1,489,838,046	\$1,382,831.19	\$1,381,982.30	99.94%
04/2018	1,446,829,028	\$1,339,941.94	\$1,334,931.22	99.63%
05/2018	1,383,914,684	\$1,261,013.66	\$1,270,730.17	100.77%
06/2018	1,591,351,607	\$1,428,851.50	\$1,476,196.21	103.31%
07/2018	1,747,109,518	\$1,640,005.47	\$1,627,452.23	99.23%
08/2018	1,689,449,175	\$1,595,546.43	\$1,584,386.42	99.30%
09/2017	1,532,359,159	\$1,439,755.38	\$1,430,369.39	99.35%
10/2017	1,526,767,782	\$1,431,345.40	\$1,421,973.48	99.35%
11/2017	1,407,539,683	\$1,314,155.88	\$1,305,708.09	99.36%
12/2017	1,521,764,066	\$1,441,927.08	\$1,438,626.21	99.77%
Total	18,682,786,683	\$17,415,034.89	\$17,394,890.90	99.91%

Target Revenue	\$	27,091,745
Total Cost: (Target Revenue/Average Collection)	\$	27,115,886
Allowance: (Total Cost-Target Revenue)	\$	24,141

Ohio Edison				
Calculation of Allowance for Undercollection				
	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	2,344,651,208	\$2,324,487.21	\$2,353,511.33	101.25%
02/2018	2,046,774,810	\$2,029,172.55	\$2,008,364.29	98.97%
03/2018	1,936,377,759	\$1,919,724.91	\$1,901,111.23	99.03%
04/2018	1,863,692,354	\$1,847,664.60	\$1,828,181.46	98.95%
05/2018	1,754,184,174	\$1,739,098.19	\$1,721,468.83	98.99%
06/2018	2,013,288,430	\$1,995,974.15	\$1,975,715.38	98.99%
07/2018	2,248,766,915	\$2,229,427.52	\$2,206,855.04	98.99%
08/2018	2,232,197,742	\$2,213,000.84	\$2,190,505.35	98.98%
09/2017	1,946,639,776	\$2,669,792.23	\$2,642,723.10	98.99%
10/2017	1,894,890,162	\$2,607,165.33	\$2,581,181.27	99.00%
11/2017	1,802,749,014	\$2,468,442.93	\$2,443,501.96	98.99%
12/2017	2,009,238,982	\$2,776,934.09	\$2,749,303.84	99.01%
Total	24,093,451,326	\$26,820,884.55	\$26,602,423.08	99.18%

Target Revenue	\$	45,121,119
Total Cost: (Target Revenue/Average Collection)	\$	45,492,271
Allowance: (Total Cost-Target Revenue)	\$	371,152

Toledo Edison/First Energy				
Calculation of Allowance for Undercollection				
	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	987,913,211	\$295,484.84	\$354,606.61	120.01%
02/2018	887,624,515	\$265,488.49	\$262,856.37	99.01%
03/2018	838,449,236	\$250,780.17	\$248,272.06	99.00%
04/2018	820,400,468	\$245,381.78	\$242,862.32	98.97%
05/2018	758,048,969	\$226,732.45	\$224,257.97	98.91%
06/2018	898,686,086	\$268,797.01	\$266,153.76	99.02%
07/2018	960,077,059	\$287,159.05	\$284,289.10	99.00%
08/2018	954,218,587	\$285,406.78	\$282,524.51	98.99%
09/2017	882,211,000	\$407,140.38	\$403,085.80	99.00%
10/2017	855,350,152	\$394,744.10	\$390,363.85	98.89%
11/2017	827,611,366	\$381,942.65	\$378,129.75	99.00%
12/2017	855,662,927	\$394,888.44	\$390,762.14	98.96%
Total	10,526,253,576	\$3,703,946.12	\$3,728,164.24	100.73%

Target Revenue	\$	13,704,981
Total Cost: (Target Revenue/Average Collection)	\$	13,704,981
Allowance: (Total Cost-Target Revenue)		\$0

American Electric Power - Merge Calculation of Allowance for Undercollection				
	KWH	KWh sales X current rider = Rider Expected Revenue	Rider Collection	Expected Revenue / Rider Collection
01/2018	4,212,988,308	\$10,217,906.30	\$10,121,428.23	99.06%
02/2018	3,860,277,977	\$8,803,333.88	\$8,783,510.91	99.77%
03/2018	3,516,778,643	\$7,932,756.08	\$7,874,819.51	99.27%
04/2018	3,410,635,724	\$7,773,914.25	\$7,785,435.04	100.15%
05/2018	3,356,865,517	\$7,237,139.62	\$7,188,682.83	99.33%
06/2018	3,743,315,352	\$8,305,269.72	\$8,237,238.34	99.18%
07/2018	3,934,139,354	\$9,161,308.83	\$9,089,841.45	99.22%
08/2018	3,945,268,101	\$8,961,996.50	\$8,879,074.69	99.07%
09/2017	3,560,450,747	\$1,703,802.97	\$1,687,189.87	99.02%
10/2017	3,466,190,654	\$1,653,166.28	\$1,642,673.98	99.37%
11/2017	3,283,081,885	\$1,576,079.23	\$1,580,436.55	100.28%
12/2017	3,726,531,982	\$1,867,345.70	\$1,869,914.09	100.14%
Total	44,016,524,244	\$75,194,019.35	\$74,740,245.49	99.49%

Target Revenue	\$	103,518,029
Total Cost: (Target Revenue/Average Collection)	\$	104,012,037
Allowance: (Total Cost-Target Revenue)	\$	494,009

CSP KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	1,948,353,342
Feb	1,663,659,355
Mar	1,532,864,945
Apr	1,454,818,530
May	1,447,868,996
June	1,733,270,184
July	1,812,378,618
Aug	1,856,679,994
Sept	1,593,403,160
Oct	1,567,185,386
Nov	1,424,805,039
Dec	1,640,657,216
Total	19,675,944,765

MM-25

OP KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	2,264,634,966
Feb	2,196,618,622
Mar	1,983,913,698
Apr	1,955,817,194
May	1,908,996,521
June	2,010,045,168
July	2,121,760,736
Aug	2,088,588,107
Sept	1,967,047,587
Oct	1,899,005,268
Nov	1,858,276,846
Dec	2,085,874,766
Total	24,340,579,479

MM-26

DPL KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	1,400,574,320
Feb	1,297,065,582
Mar	1,133,596,650
Apr	1,110,201,158
May	1,070,776,373
June	1,225,886,142
July	1,335,233,448
Aug	1,316,438,229
Sept	1,189,803,826
Oct	1,081,026,636
Nov	1,032,333,813
Dec	1,140,467,301
Total	14,333,403,478

MM-27

Duke KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	2,015,245,980
Feb	1,682,565,858
Mar	1,451,329,626
Apr	1,574,067,393
May	1,510,834,513
June	1,805,985,296
July	2,106,259,348
Aug	1,854,742,451
Sept	1,680,404,421
Oct	1,532,128,606
Nov	1,455,606,512
Dec	1,648,867,119
Total	20,318,037,123

MM-28

CEI KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	1,780,141,473
Feb	1,565,722,462
Mar	1,489,838,046
Apr	1,446,829,028
May	1,383,914,684
June	1,591,351,607
July	1,747,109,518
Aug	1,689,449,175
Sept	1,532,359,159
Oct	1,526,767,782
Nov	1,407,539,683
Dec	1,521,764,066
Total	18,682,786,683

MM-29

OE KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	2,344,651,208
Feb	2,046,774,810
Mar	1,936,377,759
Apr	1,863,692,354
May	1,754,184,174
June	2,013,288,430
July	2,248,766,915
Aug	2,232,197,742
Sept	1,946,639,776
Oct	1,894,890,162
Nov	1,802,749,014
Dec	2,009,238,982
Total	24,093,451,326

MM-30

TE KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	987,913,211
Feb	887,624,515
Mar	838,449,236
Apr	820,400,468
May	758,048,969
June	898,686,086
July	960,077,059
Aug	954,218,587
Sept	882,211,000
Oct	855,350,152
Nov	827,611,366
Dec	855,662,927
Total	10,526,253,576

MM-31

AEP KWH Sales
Sept 2017- Aug 2018

KWH	
Jan	4,212,988,308
Feb	3,860,277,977
Mar	3,516,778,643
Apr	3,410,635,724
May	3,356,865,517
June	3,743,315,352
July	3,934,139,354
Aug	3,945,268,101
Sept	3,560,450,747
Oct	3,466,190,654
Nov	3,283,081,885
Dec	3,726,531,982
Total	44,016,524,244

MM-32

**Two-Tiered Rider
DPL**

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0010387
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate	\$ 0.0005700

Calculation

1	10/99 USF Rider	\$ 0.0005700
2	USF Rider Revenue Requirement	\$13,528,776.95
3	Total kWh Used in Calculation	14,333,403,478
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0009439
5	Accounts with Annual kWh Greater than 10,000,000 kWh	95
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	3,849,691,708
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	949,166,667
9	Revenue First Block Rate x (8)	\$ 985,911.61
10	Total Second Block kWh (6) - (8)	2,900,525,041
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0005700
12	Second Block Revenue (11) x (10)	\$ 1,653,299.27
13	Total First and Second Block Revenue (9) + (12)	\$ 2,639,210.88
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 3,633,583.64
15	Reduction in Total Revenue (13) - (14)	\$ (994,372.76)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 10,889,566.07
17	Adjusted kWh (3) - (6)	10,483,711,770
18	Adjusted USF (16)/(17)	\$ 0.0010387
19	Change (18) - (4)	\$ 0.0000948
20	% Change	10.0%
21	<u>Annual Cost to Consumer Using 1010 kWh per Month (19) x 1010 x 12</u>	\$ 1.15

Two-Tiered Rider Duke

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0006872
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate	\$ 0.0004690

Calculation

1	10/99 USF Rider	\$ 0.0004690
2	USF Rider Revenue Requirement	\$ 13,109,037.47
3	Total kWh Used in Calculation	20,318,037,123
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0006452
5	Accounts with Annual kWh Greater than 10,000,000 kWh	116
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,069,552,376
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,155,833,333
9	Revenue First Block Rate x (8)	\$ 794,320.79
10	Total Second Block kWh (6) - (8)	3,913,719,043
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0004690
12	Second Block Revenue (11) x (10)	\$ 1,835,534.23
13	Total First and Second Block Revenue (9) + (12)	\$ 2,629,855.02
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 3,270,835.25
15	Reduction in Total Revenue (13) - (14)	\$ (640,980.23)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 10,479,182.45
17	Adjusted kWh (3) - (6)	15,248,484,747
18	Adjusted USF (16)/(17)	\$ 0.0006872
19	Change (18) - (4)	\$ 0.0000420
20	% Change	6.5%
21	<u>Annual</u> Cost to Consumer Using 1046 kWh per Month (19) x 1046 x 12	\$ 0.53

Two-Tiered Rider CEI

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0017150
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate (4)]	\$	0.0005680

Calculation

1	10/99 USF Rider	\$ 0.0005680
2	USF Rider Revenue Requirement	\$ 27,115,886.09
3	Total kWh Used in Calculation	18,682,786,683
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0014514
5	Accounts with Annual kWh Greater than 10,000,000 kWh	134
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,635,460,897
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,341,666,667
9	Revenue First Block Rate x (8)	\$ 2,300,947.98
10	Total Second Block kWh (6) - (8)	4,293,794,230
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0005680
12	Second Block Revenue (11) x (10)	\$ 2,438,875.12
13	Total First and Second Block Revenue (9) + (12)	\$ 4,739,823.10
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 8,179,214.29
15	Reduction in Total Revenue (13) - (14)	(\$3,439,391.19)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 22,376,062.99
17	Adjusted kWh (3) - (6)	13,047,325,786
18	Adjusted USF (16)/(17)	\$ 0.0017150
19	Change (18) - (4)	\$0.0002636
20	% Change	18.2%
21	<u>Annual</u> Cost to Consumer Using 716 kWh per Month (19) x 716 x 12	\$ 2.26

Two-Tiered Rider Ohio Edison

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0020691
Over 833,000 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	\$ 45,492,270.79
3	Total kWh Used in Calculation	24,093,451,326
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0018882
5	Accounts with Annual kWh Greater than 10,000,000 kWh	162
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,878,848,833
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,618,333,333
9	Revenue First Block Rate x (8)	\$ 3,348,413.37
10	Total Second Block kWh (6) - (8)	4,260,515,500
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0010461
12	Second Block Revenue (11) x (10)	\$ 4,456,925.26
13	Total First and Second Block Revenue (9) + (12)	\$ 7,805,338.64
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 11,100,202.27
15	Reduction in Total Revenue (13) - (14)	\$ (3,294,863.63)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 37,686,932.15
17	Adjusted kWh (3) - (6)	18,214,602,493
18	Adjusted USF (16)/(17)	\$ 0.0020691
19	Change (18) - (4)	\$ 0.0001809
20	% Change	9.6%
21	<u>Annual</u> Cost to Consumer Using 857 kWh per Month (19) x 857 x 12	\$ 1.86

Two-Tiered Rider Toledo Edison

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0018766
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$ 0.0004615

Calculation

1	10/99 USF Rider	\$ 0.0005610
2	USF Rider Revenue Requirement	\$ 13,704,980.75
3	Total kWh Used in Calculation	10,526,253,576
4	Uniform per Kwh rate	\$ 0.0013020
5	Accounts with Annual kWh Greater than 10,000,000 kWh	65
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,250,174,046
7	First Block Annual kWh (833,334 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	652,500,000
9	Revenue First Block Rate x (8)	\$ 1,224,493.97
10	Total Second Block kWh (6) - (8)	4,597,674,046
11	Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$ 0.0005610
12	Second Block Revenue (11) x (10)	\$ 2,579,295.14
13	Total First and Second Block Revenue (9) + (12)	\$ 3,803,789.11
14	Revenue @ ODOD Proposed Rate (6) x (4)	\$ 6,835,626.15
15	Revenue shortfall (13) - (14)	\$ (3,031,837.05)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 9,901,191.64
17	Adjusted kWh (3) - (6)	5,276,079,530
18	Adjusted First Block Rate (16)/(17)	\$ 0.0018766
19	Change (18) - (4)	\$ 0.0005746
20	% Change	44.1%
21	<u>Annual</u> Cost to Consumer Using 792 kWh per Month (19) x 792 x 12	\$ 5.46

Two-Tiered Rider AEP

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0031250
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh rate (4)]	\$	0.0001756

Calculation

1	10/99 USF Rider	\$	0.0001756
2	USF Rider Revenue Requirement	\$	104,012,037.37
3	Total kWh Used in Calculation		44,016,524,244
4	Uniform per Kwh rate	\$	0.0023630
5	Accounts with Annual kWh Greater than 10,000,000 kWh		311
6	Total Kwh of Accounts Over 10,000,000 kWh Annually		14,400,392,311
7	First Block Annual kWh (833,334 Monthly)		10,000,000
8	Total kWh in First Block (5) x (7)		3,105,000,000
9	Revenue First Block Rate x (8)	\$	9,681,830.48
10	Total Second Block kWh (6) - (8)		11,295,392,311
11	Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$	0.0001756
12	Second Block Revenue (11) x (10)	\$	1,982,906.12
13	Total First and Second Block Revenue (9) + (12)	\$	11,664,736.60
14	Revenue @ ODOT Proposed Rate (6) x (4)	\$	34,028,451.11
15	Revenue shortfall (13) - (14)	\$	(22,363,714.51)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$	92,347,300.77
17	Adjusted kWh (3) - (6)		29,616,131,933
18	Adjusted First Block Rate (16)/(17)		\$0.0031181
19	Change (18) - (4)	\$	0.0007551
20	% Change		32.0%
21	<u>Annual</u> Cost to Consumer Using 975 kWh per Month (19) x 1008.50 x 12	\$	9.14

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Summary: Testimony of Megan M. Meadows on behalf of the Ohio Development Services Agency electronically filed by Teresa Orahod on behalf of Dane Stinson