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 Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities.	)))))	Case No. 18-976-EL-USF

AMENDED APPLICATION

By its application in this docket of October 31, 2018, the Ohio Development Services Agency ("ODSA"), by its Director, David Goodman, petitioned the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4928.52(B), Revised Code, for an order approving adjustments to the Universal Service Fund ("USF") riders of all jurisdictional Ohio electric distribution utilities ("EDUs"). Pursuant to Rule 4901-1-06, Ohio Administrative Code, ODSA hereby moves to amend its application as set forth below. As more fully described in the supplemental testimony of Megan Meadows submitted herewith, this amended application reflects information that was not available to ODSA at the time the original application was prepared. Accordingly, ODSA respectfully requests the Commission to accept this amended application for filing.

As its amended application, ODSA states as follows:

1. Under the legislative scheme embodied in SB 3, the 1999 legislation that restructured Ohio's electric utility industry and transferred administration of the electric percentage of income payment plan ("PIPP") program to ODSA, the USF riders replaced the EDUs' existing PIPP riders. The USF riders were to be calculated so as to generate the same

level of revenue as the PIPP riders they replaced,[1] plus an amount equal to the level of funding for low-income customer energy efficiency programs reflected in the electric rates in effect on the effective date of the statute,[2] plus the amount necessary to pay the administrative costs associated with the low-income customer assistance programs and the consumer education program created by Section 4928.56, Revised Code.[3]

2. Pursuant to Section 4928.51(A), Revised Code, all USF rider revenues collected by the EDUs are remitted to ODSA for deposit in the state treasury's USF. ODSA then makes disbursements from the USF to fund the low-income customer assistance programs (including PIPP and the low-income customer energy efficiency programs) and the consumer education program, and to pay their related administrative costs.

3. Section 4928.52(B), Revised Code, provides that, if ODSA, after consultation with the Public Benefits Advisory Board ("PBAB"), determines that the revenues in the USF, together with revenues from federal and other sources of funding,[4] will be insufficient to cover the cost of the low-income customer assistance and consumer education programs and their related administrative costs, ODSA shall file a petition with the Commission for an increase in the USF rider rates. The statute further provides that, after providing reasonable notice and opportunity for hearing, the Commission may adjust the USF rider by the minimum amount necessary to generate the additional revenues required; provided, however, that the Commission

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[1] *See* Section 4928.52(A)(1), Revised Code.

[2] *See* Section 4928.52(A)(2), Revised Code.

[3] *See* Section 4928.52(A)(3), Revised Code.

[4] Section 4928.52(B), Revised Code, specifically identifies the Ohio Energy Credit Program as a funding source. However, this program was discontinued as of July 1, 2003.

may not decrease a USF rider without the approval of the ODSA Director, after consultation by the Director with the PBAB.

4. Unlike traditional ratemaking, where the objective is to establish rates that will provide the applicant utility with a reasonable earnings opportunity, the USF riders must actually generate sufficient revenues during the collection period to enable ODSA to meet its USF-related statutory and contractual obligations on an ongoing basis. In recognition of this fact, the stipulations adopted by the Commission in all prior USF rider rate adjustment proceedings have required that ODSA file a Section 4928.52(B), Revised Code, application with the Commission each year, proposing such adjustments to the USF rider rates as may be necessary to assure, to the extent possible, that each EDU's rider will generate its associated revenue requirement — but not more than its associated revenue requirement — during the annual collection period following Commission approval of such adjustments. This is the eighteenth annual USF rider adjustment application filed pursuant to this statute since the establishment of the initial USF riders in the electric transition plan proceedings initiated by applications filed by the EDUs pursuant to SB 3.

5. By its opinion and order of December 13, 2017, in Case No. 17-1377-EL-USF, this Commission granted ODSA's 2017 application for approval of adjustments to the USF riders of all Ohio EDUs based on its acceptance of a stipulation and recommendation submitted jointly by the parties to that proceeding. The new USF riders replaced the USF riders approved by the Commission in Case No. 16-1223-EL-USF, and became effective on a bills-rendered basis with the January 2018 EDU billing cycles.

6. The Commission's opinion and order of December 13, 2017 in Case No. 17-1377-EL-USF provided for the continuation of the notice of intent ("NOI") process first approved by

the Commission in Case No. 04-1616-EL-UNC. Under this process, ODSA was required to make a preliminary filing by May 31 setting out the methodology it would employ in developing the USF rider revenue requirements and rate design for its subsequent annual USF rider adjustment application. The purpose of this procedure is to permit the Commission to resolve any issues relating to methodology prior to the preparation and filing of the application itself, so as to limit the number of potential issues in the second phase of the case and thereby permit the Commission to act on the application in time for the new USF rider rates to take effect on January 1 of the following year. ODSA filed its NOI in this case on May 31, 2018. Hearing was held on the NOI application on August 7, 2018. The Commission approved the methodology proposed by ODSA in the NOI by its opinion and order of September 19, 2018 (the "*NOI Order*").

7. Based on the methodology approved in the *NOI Order* as described below, ODSA has determined that, on an aggregated basis, the 2019 revenue requirement will exceed the 2018 revenue requirement, by some $50,759,192 required to fulfill the objectives identified in Section 4928.52(A), Revised Code, during the 2019 collection period. On an electric distribution utility ("EDU") specific basis, ODSA's analysis shows that the 2019 revenue requirement of AEP Ohio ("AEP")[5] would decrease over its 2018 revenue requirement. The 2019 revenue requirement of Dayton Power and Light Company ("DPL"), Duke Energy Ohio ("Duke"), The Cleveland Electric Illuminating Company ("CEI"), Ohio Edison Company

[5] The AEP Ohio operating companies, Columbus Southern Power ("CSP") and Ohio Power ("OP") merged, effective December 31, 2011, with Ohio Power Company as the surviving entity. See Case No. 10-2376-EL-UNC, et al. (Entry, March 7, 2012). Although CSP and OP had merged, the former CSP customers continued to be subject to a separate rate schedule, including a separate USF rider, as were the customers that were served by OP prior to the merger. OSDA traditionally proposed separate USF rider rates for these two customer groups based on a revenue requirement specific to each respective customer group. The underlying basis for separate USF rider rates will be eliminated in January 2019, the beginning of the USF 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.

("OE"), and The Toledo Edison Company ("TE") would increase over their 2018 revenue requirement. Accordingly, ODSA, having consulted with the PBAB, proposes that the rider rates for DPL, Duke, CEI, OE and TE be increased, and for AEP be reduced, so as to generate the required annual revenue indicated in the following table so as to generate their respective indicated revenue targets.

Table I

	2018 Revenue Requirement	2019 Revenue Requirement	Surplus/Deficiency
AEP	$94,909,024	$84,526,343	$10,382,680.95
DPL	$1,343,770	$14,186,628	-$12,842,858.05
Duke	$10,330,554	$13,085,514	-$2,754,959.97
CEI	$17,108,645	$27,890,761	-$10,782,116.04
OE	$23,260,408	$46,991,355	-$23,730,947.24
TE	$3,120,824	$14,151,816	-$11,030,991.92
Totals	$150,073,225	$200,832,417	-$50,759,192.27

8. As described in further detail in the written testimony of ODSA witness Megan Meadows filed with this application, the revenue requirement that the proposed USF riders are designed to generate consists of the elements identified below.

a. Cost of PIPP. The cost of PIPP component of the USF rider revenue requirement is intended to reflect the total cost of electricity consumed by the EDU's PIPP customers for the 12-month period January 2018 through December 2018 (the "test period"), plus pre-PIPP balances, less the monthly installment payments billed to PIPP customers, less payments made by or on behalf of PIPP customers, including agency payments, to the extent that these payments are applied to outstanding PIPP arrearages over the same period. Because actual data for September through December 2018 was

not available at the time the application was prepared, information from the corresponding months of 2017 was combined with actual data from January through September of 2018 to determine the test-period cost of PIPP for each EDU as displayed in Exhibit A hereto. As explained in ODSA witness Meadow's written testimony, and consistent with the *NOI Order*, ODSA adjusted the test-period cost of PIPP to recognize the impact of Commission-approved EDU rate changes that took effect during the 2018 test period and to annualize the impact of Commission-approved EDU rate changes that will take effect in 2019. The calculations of these adjustments are shown in attached Exhibits A.1.a through A.1.d. The net impact of these adjustments is shown in Exhibit A.1. As explained in Ms. Meadow's testimony, and consistent with the *NOI Order*, the totals shown in Exhibit A.1 were then adjusted to reflect the projected decrease in PIPP enrollments during the 2019 collection period. The projections are shown in attached Exhibit A.2. The cumulative effect of the foregoing adjustments is shown in the Total Adjusted Test-Period Cost of PIPP column (Column F) in Exhibit A.2.

b. Electric Partnership Program and Consumer Education Program Costs. This element of the USF rider revenue requirement reflects the cost of the low-income customer energy efficiency programs and the consumer education program, referred to collectively by ODSA as the "Electric Partnership Program" ("EPP"), and their associated administrative costs, which are recovered through the USF riders pursuant to Section 4928.52(A)(2) and (3), Revised Code. ODSA's proposed $14,946,196 allowance for these items is identical to the allowance accepted by the Commission in all previous USF riders rate adjustment proceedings and is supported by the analysis submitted by ODSA as Exhibit A to the NOI. Consistent with the *NOI Order*, this component of the

USF rider revenue requirement is allocated to the EDUs based on the ratio of their respective costs of PIPP to the total cost of PIPP. The results of the allocation are shown in attached Exhibit B.

c. Administrative Costs. This USF rider revenue requirement element represents an allowance for the costs ODSA incurs in connection with its administration of the PIPP program and is included as a revenue requirement component pursuant to Section 4928.52(A)(3), Revised Code. As explained in the testimony of ODSA witness Randall Hunt filed with the application, the proposed allowance for administrative costs of $$5,517,499 has been determined in accordance with the standard approved by the Commission in the *NOI Order*. The requested allowance for administrative costs has been allocated to the EDUs based on the number of PIPP customer accounts as of October 2017, the test-period month exhibiting the highest PIPP customer account totals. The results of the allocation are shown in attached Exhibit C.

d. December 31, 2018 USF PIPP Account Balances. Because the USF rider rate is based on historical sales and historical PIPP enrollment patterns, the cost of PIPP component of an EDU's USF rider rate will, in actual practice, either over-recover or under-recover its associated annual revenue requirement over the collection period. Over-recovery creates a positive USF PIPP account balance for the company in question, thereby reducing the amount needed on a forward-going basis to satisfy the USF rider revenue requirement. Conversely, where under-recovery has created a negative USF PIPP account balance as of the effective date of the new riders, there will be a shortfall in the cash available to ODSA, which will impair its ability to make the PIPP reimbursement payments due the EDUs on a timely basis. Thus, the amount of any

existing positive USF PIPP account balance must be deducted in determining the target revenue level the adjusted USF rider is to generate, while the deficit represented by a negative USF PIPP account balance must be added to the associated revenue requirement. In this case, ODSA is requesting that its proposed USF riders be implemented on a bills-rendered basis effective January 1, 2019. Accordingly, the USF rider revenue requirement of each EDU has been adjusted by the amount of the EDU's projected December 31, 2018 USF PIPP account balance so as to synchronize the new riders with the EDU's USF PIPP account balance as of their effective date. This conforms to the methodology approved by the Commission in the *NOI Order*. The adjusted projected December 31, 2018 USF PIPP account balance for each EDU is shown in Exhibit H.

e. Reserve. PIPP-related cash flows can fluctuate significantly throughout the year, due, in large measure, to the weather-sensitive nature of electricity sales and PIPP enrollment patterns. As shown on the test-period graph attached hereto as Exhibit E, the month-to-month cash flow fluctuations had, in the past resulted in negative USF PIPP account balances, which mean that, in those months, ODSA had insufficient cash to satisfy its reimbursement obligations to the EDUs on a timely basis. To address this problem, ODSA traditionally has included an allowance to create a cash reserve as an element of the USF rider revenue requirement. However, in the NOI approved in this case, and Case No. 16-1223-EL-USF and subsequent cases, the PUCO approved a modification to the calculation of the reserve by considering the highest monthly deficit during the test period for the EDUs in the aggregate rather than individually, because the funds are deposited in one USF account. The modification also requires consideration of

the aggregate projected year end account balance to determine whether a reserve allowance is needed. Considering the projected aggregate account balance of $37,665,304 as shown in Exhibit H, ODSA has determined that a reserve allowance need not be included in the calculation of the USF rider rate in this proceeding. The proposed reserve component for each EDU is set forth in attached Exhibit F.

f. Allowance for Undercollection. This component of the USF rider revenue requirement is an adjustment to recognize that, due to the difference between amounts billed through the USF rider and the amounts actually collected from EDU customers, the rider will not generate the target revenues. In accordance with the methodology approved in the *NOI Order*, the allowance for undercollection for each company is based on the collection experience of that company. The allowance for undercollection for each EDU is shown in attached Exhibit G.

g. PIPP Plus Program Audit Costs. In the NOI Application, ODSA recognized that the Commission has permitted audits[6] to be conducted of each EDU's PIPP-related accounting and reporting to assure that the ODSA-EDU interface was functioning in accordance with ODSA's expectations and to identify any systemic problems that could indicate that the cost of PIPP recovered from ratepayers through the USF riders of the respective EDUs had been overstated.

In Case No. 17-1377-EL-USF the PUCO approved audits to be conducted of CEI, OE, and TE during the 2018 collection period. The proposed allowance for the audits was $99,000. The cost of each audit was to be based upon the amount expended to audit each EDU. ODSA has received the actual amounts expended for each audit and the costs

[6] Although characterized as an "audit" in the initial RFP, the work performed by the firm awarded the contract was actually an "application of agreed-upon procedures" designed to test the subject EDU's performance in specific areas. However, the terms are used interchangeably herein.

have been reconciled for these EDUs for the 2019 collection period, as shown on Exhibit D.

In the NOI in this proceeding, ODSA also proposed an allowance of $150,000 to conduct the similar audits of AEP, DP&L and Duke. Based upon the costs of the 2018 audits, ODSA estimates the cost to be $99,000. Each EDU (AEP, DP&L and Duke) will be charged based on a fixed cost. This allocated audit cost for the 2019 collection period also is shown on Exhibit D.

h. Aggregation of PIPP Plus Customers. Pursuant to Section 4928.544(B) of the Ohio Revised Code, the reimbursement of the Commission's costs incurred for aggregation are administrative costs of the program and will be included in the Administrative Costs set forth in paragraph 8.c.

9. A summary schedule showing the USF rider component costs by EDU and their revenue requirements is attached as Exhibit I. As stated in ODSA witness Meadows' Supplemental Testimony, AEP's revenue requirement was decreased by Fuel Adjustment Clause and Significantly Excessive Earnings Test refunds totaling $16,499,152. The refunds and reduction to AEP's revenue requirement were ordered by the Public Utilities Commission of Ohio's Entry issued October 31, 2018, in Case No. 17-1382-EL-ORD.

ODSA proposes to recover the annual USF rider revenue requirement for each EDU through a USF rider that incorporates the same two-step declining block rate design approved by the Commission in all prior USF rider rate adjustment cases and the *NOI Order* in this proceeding. The first block of the rate applies to all monthly consumption up to and including 833,000 Kwh. The second rate block applies to all consumption above 833,000 Kwh per month. For each EDU, the rate per Kwh for the second block is set at the lower of the PIPP charge in

effect in October 1999 or the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate. The rate for the first block rate is set at the level necessary to produce the remainder of the EDU's annual USF rider revenue requirement. Thus, if the EDU's October 1999 PIPP charge exceeds the per Kwh rate that would apply if the EDU's annual USF rider revenue requirement were to be recovered through a single block per Kwh rate, a calculation shown in Exhibit J, the rate for both consumption blocks would be the same. As discussed in the testimony of ODSA witness Meadows, in this case, the October 1999 PIPP charge cap has been triggered for each of the EDUs. Thus, all the new USF rider rates proposed herein have the declining block feature for all EDUs. The following table compares the resulting proposed USF riders for each EDU with the EDU's current USF rider.

Table II

2018 USF Riders				
	Current 2018 USF Rider		Proposed 2019 USF Rider	
	First 833,000 Kwh	Above 833,000 Kwh	First 833,000 Kwh	Above 833,000 Kwh
AEP	$0.0029882	$0.0001756	$0.0024978	$0.0001756
DPL	$0.0000978	$0.0000978	$0.0010858	$0.0005700
Duke	$0.0005368	$0.0004690	$0.0006774	$0.0004690
CEI	$0.0010366	$0.0005680	$0.0017446	$0.0005680
OhEd	$0.0009914	$0.0009914	$0.0021150	$0.0010461
TolEd	$0.0002991	$0.0002991	$0.0019295	$0.0005610

11. Consistent with Section 4928.52(B), Revised Code, the proposed USF rider rates set forth above for all EDUs represent the minimum rates necessary to satisfy their respective

USF rider revenue responsibilities. If its application is granted, ODSA will consent to the USF rider decreases for DPL, CEI, OE and TE as required by Section 4928.52(B), Revised Code.

12. In calculating the USF rider revenue requirement, ODSA has relied on certain information reported by the EDUs. Although ODSA believes this information to be reliable, ODSA has not performed an audit to verify the accuracy of this information. If any party questions or wishes to challenge the accuracy of this information, ODSA requests that the Commission require such party to direct its inquiries to the EDU in question, either informally or through formal discovery.

13. The adjustments to the USF riders proposed in this application are based on the most recent information available to ODSA at the time the application was prepared and includes actual data for the calendar 2018 test period through the month of September 2018. In previous ODSA USF rider rate adjustment applications, ODSA has reserved the right to amend its application by updating its test-period calculations to incorporate additional actual data as it became available. Thus, ODSA again reserves the right to amend its application to incorporate additional actual test-period data that becomes available subsequent to the preparation of this amended Application.

13. ODSA requests that, as a part of its order in this proceeding, the Commission require that ODSA file its 2020 USF rider rate adjustment application no later than October 31, 2019 and provide that the NOI procedure again be used in connection with the 2019 application.

WHEREFORE, ODSA respectfully requests that the Commission, after providing such notice as it deems reasonable, affording interested parties the opportunity to be heard, and conducting a hearing, if a hearing is deemed to be required, issue an order (1) finding that USF

rider rate adjustments proposed in the application represent the minimum adjustments necessary to provide the revenues necessary to satisfy the respective USF rider revenue requirements; (2) granting the application; and (3) directing the EDU's to incorporate the new USF rider rates approved herein in their filed tariffs, to be effective January 1, 2019 on a bills-rendered basis.

Respectively submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Amended Application has been served upon the following parties by first class mail, postage prepaid, and/or electronic mail this 29th day of November 2018.

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EXHIBITS TO AMENDED APPLICATION

November 29, 2018

Exhibit A

Cost of PIPP October 2017 through September 2018					
	Electrical Service A	**Pre-PIPP** B	**PIPP Customer Portion** C	**Payments to PIPP Arrears** D	**Cost of PIPP** (A+B)-C-D
CSP	$88,370,034.50	$3,426,628.76	$38,516,006.87	$3,866,408.32	$ 49,414,248.07
OP	$118,085,733.51	$3,894,288.16	$49,299,162.78	$5,151,836.99	$ 67,529,021.90
DPL	$34,042,712.39	$2,228,696.64	$17,809,436.75	$3,426,255.95	$ 15,035,716.33
Duke	$31,857,593.46	$2,387,084.15	$15,508,869.34	$3,320,676.25	$ 15,415,132.02
CEI	$51,420,082.97	$5,930,917.81	$23,651,160.40	$2,163,289.11	$ 31,536,551.27
OE	$88,236,449.39	$6,833,483.83	$39,065,713.97	$3,223,976.15	$ 52,780,243.10
TE	$26,805,824.29	$2,551,664.59	$12,199,227.40	$1,213,574.25	$ 15,944,687.23
Total:	**$438,818,430.51**	**$27,252,763.94**	**$196,049,577.51**	**$22,366,017.02**	**$247,655,599.92**

Merged Cost of PIPP October 2017 through September 2018					
	Electrical Service A	**Pre-PIPP** B	**PIPP Customer Portion** C	**Payments to PIPP Arrears** D	**Cost of PIPP** (A+B)-C-D
AEP	$206,455,768.01	$7,320,916.92	$87,815,169.65	$9,018,245.31	$ 116,943,269.97
DPL	$34,042,712.39	$2,228,696.64	$17,809,436.75	$3,426,255.95	$ 15,035,716.33
Duke	$31,857,593.46	$2,387,084.15	$15,508,869.34	$3,320,676.25	$ 15,415,132.02
CEI	$51,420,082.97	$5,930,917.81	$23,651,160.40	$2,163,289.11	$ 31,536,551.27
OE	$88,236,449.39	$6,833,483.83	$39,065,713.97	$3,223,976.15	$ 52,780,243.10
TE	$26,805,824.29	$2,551,664.59	$12,199,227.40	$1,213,574.25	$ 15,944,687.23
Total:	**$438,818,430.51**	**$27,252,763.94**	**$196,049,577.51**	**$22,366,017.02**	**$247,655,599.92**

Exhibit A.1

Adjusted Test-Period Cost of PIPP				
	10/1/2017 to 9/30/18 Cost of PIPP Plus	2018 EDU Rate Changes	2019 EDU Rate Changes	Adjusted Test-Period Cost of PIPP
CSP	$49,414,248.07	($1,314,172.74)	$2,449,796.97	$50,549,872.30
OP	$67,529,021.90	($5,111,496.98)	$1,621,961.83	$64,039,486.75
DPL	$15,035,716.33	$0.00	$918,352.37	$15,954,068.70
Duke	$15,415,132.02	($266,519.59)	($394,941.36)	$14,753,671.07
CEI	$31,536,551.27	$0.00	($6,684.61)	$31,529,866.66
OE	$52,780,243.10	$0.00	$176,472.90	$52,956,716.00
TE	$15,944,687.23	$0.00	$123,306.79	$16,067,994.02
Total	**$247,655,599.92**	**($6,692,189.32)**	**$4,888,264.90**	**$245,851,675.50**

Merged Adjusted Test-Period Cost of PIPP				
	10/1/2017 to 9/30/18 Cost of PIPP Plus	2018 EDU Rate Changes	2019 EDU Rate Changes	Adjusted Test-Period Cost of PIPP
AEP	$116,943,269.97	($6,425,669.73)	$4,071,758.80	$114,589,359.05
DPL	$15,035,716.33	$0.00	$918,352.37	$15,954,068.70
Duke	$15,415,132.02	($266,519.59)	($394,941.36)	$14,753,671.07
CEI	$31,536,551.27	$0.00	($6,684.61)	$31,529,866.66
OE	$52,780,243.10	$0.00	$176,472.90	$52,956,716.00
TE	$15,944,687.23	$0.00	$123,306.79	$16,067,994.02
Total	**$247,655,599.92**	**($6,692,189.32)**	**$4,888,264.90**	**$245,851,675.50**

Exhibit A.1.a

American Electric Power- Columbus Southern Power					
Billing Cycle Dates	Cost of Electricity	2018 Rate Adjustment (1.49%)	2019 Rate Adjustment 2.77%	Total	For 2018-2019
Oct-17	$ 5,580,261.52	$ (82,985.46)	$ 154,696.19	$ 5,651,972.26	Oct-18
Nov-17	$ 5,971,713.36	$ (88,806.83)	$ 165,548.03	$ 6,048,454.56	Nov-18
Dec-17	$ 8,452,303.11	$ (125,696.30)	$ 234,315.02	$ 8,560,921.83	Dec-18
Jan-18	$ 10,907,056.52	$ (162,201.55)	$ 302,365.78	$ 11,047,220.75	Jan-19
Feb-18	$ 9,083,539.90	$ (135,083.58)	$ 251,814.19	$ 9,200,270.51	Feb-19
Mar-18	$ 7,441,875.61	$ (110,669.98)	$ 206,303.92	$ 7,537,509.55	Mar-19
Apr-18	$ 8,056,701.76	$ (119,813.21)	$ 223,348.15	$ 8,160,236.69	Apr-19
May-18	$ 6,120,568.12	$ (91,020.49)	$ 169,674.59	$ 6,199,222.22	May-19
Jun-18	$ 6,411,967.06	$ (95,353.96)	$ 177,752.76	$ 6,494,365.86	Jun-19
Jul-18	$ 7,040,683.92	$ (104,703.76)	$ 195,182.07	$ 7,131,162.23	Jul-19
Aug-18	$ 6,621,837.11	$ (98,474.99)	$ 183,570.78	$ 6,706,932.91	Aug-19
Sep-18	$ 6,681,526.51	$ (99,362.64)	$ 185,225.50	$ 6,767,389.36	Sep-19
Total	**$ 88,370,034.50**	**$ (1,314,172.74)**	**$ 2,449,796.97**	**$ 89,505,658.73**	

American Electric Power- Ohio Power					
Billing Cycle Dates	Cost of Electricity	2018 Rate Adjustment (4.33%)	2019 Rate Adjustment 1.37%	Total	Total
Oct-17	$ 7,110,296.02	$ (307,778.56)	$ 97,663.18	$ 6,900,180.65	Oct-18
Nov-17	$ 7,870,191.36	$ (340,671.63)	$ 108,100.70	$ 7,637,620.43	Nov-18
Dec-17	$ 11,600,100.98	$ (502,125.70)	$ 159,332.72	$ 11,257,308.00	Dec-18
Jan-18	$ 15,338,553.78	$ (663,949.57)	$ 210,682.09	$ 14,885,286.30	Jan-19
Feb-18	$ 12,669,684.34	$ (548,424.03)	$ 174,023.94	$ 12,295,284.25	Feb-19
Mar-18	$ 10,435,638.64	$ (451,720.41)	$ 143,338.29	$ 10,127,256.53	Mar-19
Apr-18	$ 11,415,508.18	$ (494,135.35)	$ 156,797.25	$ 11,078,170.08	Apr-19
May-18	$ 8,112,087.75	$ (351,142.44)	$ 111,423.25	$ 7,872,368.57	May-19
Jun-18	$ 7,858,221.04	$ (340,153.48)	$ 107,936.28	$ 7,626,003.84	Jun-19
Jul-18	$ 8,858,690.27	$ (383,460.11)	$ 121,678.18	$ 8,596,908.34	Jul-19
Aug-18	$ 8,408,521.16	$ (363,973.95)	$ 115,494.90	$ 8,160,042.12	Aug-19
Sep-18	$ 8,408,239.99	$ (363,961.78)	$ 115,491.04	$ 8,159,769.25	Sep-19
Total	**$ 118,085,733.51**	**$ (5,111,496.98)**	**$ 1,621,961.83**	**$ 114,596,198.36**	

American Electric Power Merge					
Billing Cycle Dates	Cost of Electricity	2018 Rate Adjustment	2019 Rate Adjustment	Total	For 2018-2019
Oct-17	$ 12,690,557.54	$ (390,764.01)	$ 252,359.38	$ 12,552,152.90	Oct-18
Nov-17	$ 13,841,904.72	$ (429,478.46)	$ 273,648.73	$ 13,686,074.98	Nov-18
Dec-17	$ 20,052,404.09	$ (627,822.00)	$ 393,647.74	$ 19,818,229.83	Dec-18
Jan-18	$ 26,245,610.30	$ (826,151.11)	$ 513,047.86	$ 25,932,507.05	Jan-19
Feb-18	$ 21,753,224.24	$ (683,507.60)	$ 425,838.13	$ 21,495,554.76	Feb-19
Mar-18	$ 17,877,514.25	$ (562,390.39)	$ 349,642.21	$ 17,664,766.07	Mar-19
Apr-18	$ 19,472,209.94	$ (613,948.57)	$ 380,145.40	$ 19,238,406.77	Apr-19
May-18	$ 14,232,655.87	$ (442,162.92)	$ 281,097.84	$ 14,071,590.79	May-19
Jun-18	$ 14,270,188.10	$ (435,507.44)	$ 285,689.04	$ 14,120,369.70	Jun-19
Jul-18	$ 15,899,374.19	$ (488,163.87)	$ 316,860.25	$ 15,728,070.57	Jul-19
Aug-18	$ 15,030,358.27	$ (462,448.93)	$ 299,065.69	$ 14,866,975.02	Aug-19
Sep-18	$ 15,089,766.50	$ (463,324.42)	$ 300,716.54	$ 14,927,158.62	Sep-19
Total	**$ 206,455,768.01**	**$ (6,425,669.73)**	**$ 4,071,758.80**	**$ 204,101,857.09**	

Exhibit A.1.b

Dayton Power and Light Company		
Billing Cycle Dates	**2019 Rate Adjustment**	
Jan-19	$	198,383.17
Feb-19	$	163,594.77
Mar-19	$	117,561.79
Apr-19	$	108,745.71
May-19	$	68,280.58
Jun-19	$	(30,020.50)
Jul-19	$	(34,296.96)
Aug-19	$	9,017.66
Sep-19	$	92,161.35
Oct-19	$	67,572.36
Nov-19	$	57,543.23
Dec-19	$	99,809.21
Total	**$**	**918,352.37**

Exhibit A.1.c

Duke Energy Ohio					
Billing Cycle Dates	**Cost of Electricity**	**Rate Adjustment (3.66%)**	**Rate Adjustment (1.61%)**	**Total**	**For 2018-2019**
Oct-17	$ 2,257,299.64	$ (82,548.70)		$ 2,174,750.94	Oct-18
Nov-17	$ 2,282,957.39	$ (83,486.99)		$ 2,199,470.40	Nov-18
Dec-17	$ 2,747,739.15	$ (100,483.91)		$ 2,647,255.24	Dec-18
Jan-18	$ 3,441,187.28		$ (55,315.00)	$ 3,385,872.28	Jan-19
Feb-18	$ 2,887,524.43		$ (46,415.20)	$ 2,841,109.23	Feb-19
Mar-18	$ 2,554,923.54		$ (41,068.84)	$ 2,513,854.70	Mar-19
Apr-18	$ 2,546,516.19		$ (40,933.70)	$ 2,505,582.49	Apr-19
May-18	$ 2,115,307.86		$ (34,002.29)	$ 2,081,305.57	May-19
Jun-18	$ 2,657,665.18		$ (42,720.35)	$ 2,614,944.83	Jun-19
Jul-18	$ 3,071,539.16		$ (49,373.13)	$ 3,022,166.03	Jul-19
Aug-18	$ 2,675,520.76		$ (43,007.37)	$ 2,632,513.39	Aug-19
Sep-18	$ 2,619,412.88		$ (42,105.47)	$ 2,577,307.41	Aug-19
Total	**$ 31,857,593.46**	**$ (266,519.59)**	**$ (394,941.36)**	**$ 31,196,132.51**	

Exhibit A.1.d

First Energy- Cleveland Electric Illuminating Company				
Billing Cycle Dates	Cost of Electricity	2019 Rate Adjustment (1.30%)	Total	For 2018-2019
Oct-17	$ 3,705,666.98	$ (481.74)	$ 3,705,185.24	Oct-18
Nov-17	$ 3,665,791.64	$ (476.55)	$ 3,665,315.09	Nov-18
Dec-17	$ 4,671,513.83	$ (607.30)	$ 4,670,906.53	Dec-18
Jan-18	$ 5,638,384.96	$ (732.99)	$ 5,637,651.97	Jan-19
Feb-18	$ 4,681,435.65	$ (608.59)	$ 4,680,827.06	Feb-19
Mar-18	$ 4,277,007.72	$ (556.01)	$ 4,276,451.71	Mar-19
Apr-18	$ 4,128,367.36	$ (536.69)	$ 4,127,830.67	Apr-19
May-18	$ 3,475,039.14	$ (451.76)	$ 3,474,587.38	May-19
Jun-18	$ 3,861,454.29	$ (501.99)	$ 3,860,952.30	Jun-19
Jul-18	$ 4,456,453.87	$ (579.34)	$ 4,455,874.53	Jul-19
Aug-18	$ 4,371,894.54	$ (568.35)	$ 4,371,326.19	Aug-19
Sep-18	$ 4,487,072.99	$ (583.32)	$ 4,486,489.67	Sep-19
Total	**$ 51,420,082.97**	**$ (6,684.61)**	**$ 51,413,398.36**	

First Energy- Ohio Edison				
Billing Cycle Dates	Cost of Electricity	2019 Rate Adjustment 0.2%	Total	For 2018-2019
Oct-17	$ 6,063,370.51	$ 12,126.74	$ 6,075,497.25	Oct-18
Nov-17	$ 6,221,310.16	$ 12,442.62	$ 6,233,752.78	Nov-18
Dec-17	$ 8,118,015.48	$ 16,236.03	$ 8,134,251.51	Dec-18
Jan-18	$ 10,000,097.34	$ 20,000.19	$ 10,020,097.53	Jan-19
Feb-18	$ 8,231,295.18	$ 16,462.59	$ 8,247,757.77	Feb-19
Mar-18	$ 7,523,478.83	$ 15,046.96	$ 7,538,525.79	Mar-19
Apr-18	$ 7,117,595.73	$ 14,235.19	$ 7,131,830.92	Apr-19
May-18	$ 5,872,685.63	$ 11,745.37	$ 5,884,431.00	May-19
Jun-18	$ 6,451,057.47	$ 12,902.11	$ 6,463,959.58	Jun-19
Jul-18	$ 7,735,368.03	$ 15,470.74	$ 7,750,838.77	Jul-19
Aug-18	$ 7,514,681.72	$ 15,029.36	$ 7,529,711.08	Aug-19
Sep-18	$ 7,387,493.31	$ 14,774.99	$ 7,402,268.30	Sep-19
Total	**$ 88,236,449.39**	**$ 176,472.90**	**$ 88,412,922.29**	

First Energy- Toledo Edison				
Billing Cycle Dates	Cost of Electricity	2019 Rate Adjustment 0.46%	Total	For 2018-2019
Oct-17	$ 1,788,818.03	$ 8,228.56	$ 1,797,046.59	Oct-18
Nov-17	$ 1,870,181.39	$ 8,602.83	$ 1,878,784.22	Nov-18
Dec-17	$ 2,402,263.54	$ 11,050.41	$ 2,413,313.95	Dec-18
Jan-18	$ 3,080,504.59	$ 14,170.32	$ 3,094,674.91	Jan-19
Feb-18	$ 2,515,852.87	$ 11,572.92	$ 2,527,425.79	Feb-19
Mar-18	$ 2,318,774.31	$ 10,666.36	$ 2,329,440.67	Mar-19
Apr-18	$ 2,169,378.17	$ 9,979.14	$ 2,179,357.31	Apr-19
May-18	$ 1,731,470.23	$ 7,964.76	$ 1,739,434.99	May-19
Jun-18	$ 1,995,813.92	$ 9,180.74	$ 2,004,994.66	Jun-19
Jul-18	$ 2,420,272.06	$ 11,133.25	$ 2,431,405.31	Jul-19
Aug-18	$ 2,308,453.98	$ 10,618.89	$ 2,319,072.87	Aug-19
Sep-18	$ 2,204,041.20	$ 10,138.59	$ 2,214,179.79	Sep-19
Total	**$ 26,805,824.29**	**$ 123,306.79**	**$ 26,929,131.08**	

Exhibit A.2

Cost of PIPP Adjustment for Projected Enrollment						
	Average Enrollment 10/17-9/18	Adjusted Test Cost of PIPP	Average Cost of PIPP 10/17-9/18 B/A	Projected Annual Enrollment	Additional Cost of PIPP (D-A)X C	Total Adjusted Cost of PIPP B+E
	A	B	C	D	E	F
CSP	49,337	$50,549,872.30	$1,025	46,870	(2,527,493.62)	$48,022,378.69
OP	57,824	$64,039,486.75	$1,107	54,933	(3,201,974.34)	$60,837,512.41
DPL	22,714	$15,954,068.70	$702	21,578	(797,703.44)	$15,156,365.27
Duke	19,516	$14,753,671.07	$756	18,540	(737,683.55)	$14,015,987.52
CEI	40,732	$31,529,866.66	$774	38,695	(1,576,493.33)	$29,953,373.33
OE	60,258	$52,956,716.00	$879	57,245	(2,647,835.80)	$50,308,880.20
TE	18,227	$16,067,994.02	$882	17,316	(803,399.70)	$15,264,594.32
Total	**268,608**	**$245,851,675.50**		**255,178**	**(12,292,583.77)**	**$233,559,091.72**

Average Annual PIPP Enrollment						
	10/2013-9/2014	10/2014-9/2015	10/2015-9/2016	10/2016-9/2017	10/2017-9/2018	Projected 2019
CSP	67,251	69,761	59,399	53,148	49,337	46,870
OP	74,387	77,958	67,820	61,715	57,824	54,933
DPL	38,520	39,178	32,530	26,251	22,714	21,578
Duke	29,113	28,931	24,995	21,631	19,516	18,540
CEI	59,647	60,496	51,248	43,434	40,732	38,695
OE	82,180	82,535	69,755	61,909	60,258	57,245
TE	27,546	27,577	21,734	18,581	18,227	17,316
Total	**378,644**	**386,436**	**327,481**	**286,669**	**268,608**	**255,178**

Merged Cost of PIPP Adjustment for Projected Enrollment						
	Average Enrollment 10/17-9/18	Adjusted Test Cost of PIPP	Average Cost of PIPP 10/17-9/18 B/A	Projected Annual Enrollment	Additional Cost of PIPP (D-A)X C	Total Adjusted Cost of PIPP B+E
	A	B	C	D	E	F
AEP	107,161	$114,589,359.05	$2,132	101,803	$ (5,729,468)	$108,859,891.09
DPL	22,714	$15,954,068.70	$702	21,578	$ (797,703)	$15,156,365.27
Duke	19,516	$14,753,671.07	$756	18,540	$ (737,684)	$14,015,987.52
CEI	40,732	$31,529,866.66	$774	38,695	$ (1,576,493)	$29,953,373.33
OE	60,258	$52,956,716.00	$879	57,245	$ (2,647,836)	$50,308,880.20
TE	18,227	$16,067,994.02	$882	17,316	$ (803,400)	$15,264,594.32
Total	**268,608**	**$245,851,675.50**		**255,178**	**$ (12,292,584)**	**$233,559,091.72**

Merged Average Annual PIPP Enrollment						
	10/2013-9/2014	10/2014-9/2015	10/2015-9/2016	10/2016-9/2017	10/2017-9/2018	Projected 2019
AEP	141,638	147,719	127,219	114,863	107,161	101,803
DPL	38,520	39,178	32,530	26,251	22,714	21,578
Duke	29,113	28,931	24,995	21,631	19,516	18,540
CEI	59,647	60,496	51,248	43,434	40,732	38,695
OE	82,180	82,535	69,755	61,909	60,258	57,245
TE	27,546	27,577	21,734	18,581	18,227	17,316
Total	**378,644**	**386,436**	**327,481**	**286,669**	**268,608**	**255,178**

Exhibit B

Electric Partnership Program Allocation				
	2019 Cost of PIPP	Percent Cost of PIPP		Allocated For EPP
CSP	$48,022,378.69	20.56%	$ 14,946,196	$3,073,106
OP	$60,837,512.41	26.05%	$ 14,946,196	$3,893,188
DPL	$15,156,365.27	6.49%	$ 14,946,196	$969,904
Duke	$14,015,987.52	6.00%	$ 14,946,196	$896,928
CEI	$29,953,373.33	12.82%	$ 14,946,196	$1,916,813
OE	$50,308,880.20	21.54%	$ 14,946,196	$3,219,427
TE	$15,264,594.32	6.54%	$ 14,946,196	$976,830
Total	**$233,559,091.72**			**$14,946,196**

Merged Electric Partnership Program Allocation				
	2019 Cost of PIPP	Percent Cost of PIPP		Allocated For EPP
AEP	$108,859,891.09	46.61%	$ 14,946,196	$6,966,294
DPL	$15,156,365.27	6.49%	$ 14,946,196	$969,904
Duke	$14,015,987.52	6.00%	$ 14,946,196	$896,928
CEI	$29,953,373.33	12.82%	$ 14,946,196	$1,916,813
OE	$50,308,880.20	21.54%	$ 14,946,196	$3,219,427
TE	$15,264,594.32	6.54%	$ 14,946,196	$976,830
Total	**$233,559,091.72**			**$14,946,196**

Exhibit C

Allocation of Administrative Costs			
	Customers October 2017	Admin Costs per Customer	Administrative Costs
CSP	50,793	$20.16	$1,024,220.65
OP	58,864	$20.16	$1,186,969.16
DPL	24,070	$20.16	$485,361.98
Duke	20,175	$20.16	$406,820.85
CEI	41,400	$20.16	$834,814.54
OE	59,954	$20.16	$1,208,948.57
TE	18,367	$20.16	$370,363.25
Total	**273,623**		**$5,517,499.00**

Merged Allocation of Administrative Costs			
	Customers October 2017	Admin Costs per Customer	Administrative Costs
AEP	109,657	$20.16	$2,211,189.80
DPL	24,070	$20.16	$485,361.98
Duke	20,175	$20.16	$406,820.85
CEI	41,400	$20.16	$834,814.54
OE	59,954	$20.16	$1,208,948.57
TE	18,367	$20.16	$370,363.25
Total	**273,623**		**$5,517,499.00**

Exhibit D

USF Agreed Upon Procedures			
	Total Audit Cost	2017 Rate Case Allocated Cost	2018 Reconciled Audit Costs
CEI	$25,000.00	$33,000.00	($8,000.00)
OE	$45,000.00	$33,000.00	$12,000.00
TE	$25,000.00	$33,000.00	($8,000.00)
Total	**$95,000.00**	**$99,000.00**	**($4,000.00)**

2018 USF Agreed Upon Procedures		
	2019 Total Audit Cost	2019 Allocated Audit Cost
AEP	$33,000	$33,000.00
DPL	$33,000	$33,000.00
Duke	$33,000	$33,000.00
Total	$99,000	**$99,000.00**

Exhibit E

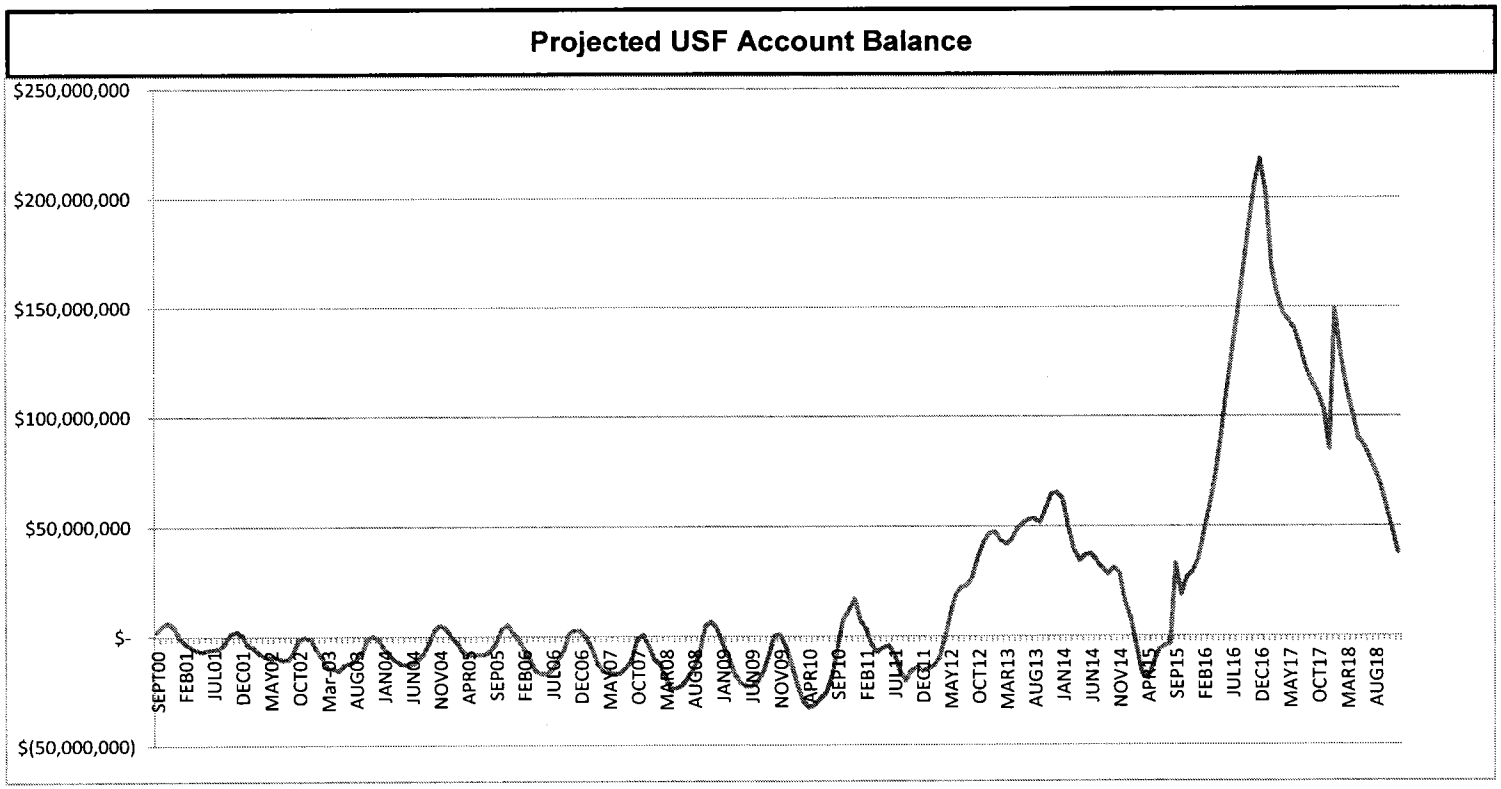
Projected USF Account Balance
$250,000,000
$200,000,000
$150,000,000
$100,000,000
$50,000,000
$-
$(50,000,000)
SEPT00
FEB01
JUL01
DEC01
MAY02
OCT02
Mar-03
AUG03
JAN04
JUN04
NOV04
APR05
SEP05
FEB06
JUL06
DEC06
MAY07
OCT07
MAR08
AUG08
JAN09
JUN09
NOV09
APR10
SEP10
FEB11
JUL11
DEC11
MAY12
OCT12
MAR13
AUG13
JAN14
JUN14
NOV14
APR15
SEP15
FEB16
JUL16
DEC16
MAY17
OCT17
MAR18
AUG18

Exhibit F

Calculation of Annual Reserve Component		
	Largest Monthly Cash Deficit	Reserve Required
CSP	N/A	$0
OP	N/A	$0
DPL	N/A	$0
Duke	N/A	$0
CEI	N/A	$0
OE	N/A	$0
TE	N/A	$0
Total		**$0**

Calculation of Annual Reserve Component		
	Largest Monthly Cash Deficit	Reserve Required
AEP	N/A	$0
DPL	N/A	$0
Duke	N/A	$0
CEI	N/A	$0
OE	N/A	$0
TE	N/A	$0
Total		**$0**

Exhibit G

Allowance for Undercollection	
CSP	$351,802
OP	$107,198
DPL	$0
Duke	$0
CEI	$26,170
OE	$383,916
TE	$0
Total	**$869,087**

Merged Allowance for Undercollection	
AEP	$459,000
DPL	$0
Duke	$0
CEI	$26,170
OE	$383,916
TE	$0
Total	**$869,087**

Exhibit H

Projected Universal Service Fund Account Balance	
	Balance 12/31/2018
CSP	$7,751,190.72
OP	$9,752,689.42
DPL	$2,458,003.66
Duke	$2,267,222.43
CEI	$4,832,409.26
OE	$8,141,816.57
TE	$2,451,972.04
Total	**$37,655,304.10**

Projected Universal Service Fund Account Balance Merge	
	Balance 12/31/2018
AEP	$17,503,880.14
DPL	$2,458,003.66
Duke	$2,267,222.43
CEI	$4,832,409.26
OE	$8,141,816.57
TE	$2,451,972.04
Total	**$37,655,304.10**

Exhibit I

Revenue Requirement Summary								
	CSP	OP	DPL	Duke	CEI	OE	TE	USF Revenue Requirements
Cost of PIPP Plus	$48,022,378.69	$60,837,512.41	$15,156,365.27	$14,015,987.52	$29,953,373.33	$50,308,880.20	$15,264,594.32	**$233,559,092**
EPP/CE	$3,073,106.16	$3,893,187.71	$969,904.46	$896,928.03	$1,916,812.51	$3,219,426.73	$976,830.39	**$14,946,196**
Administration	$1,024,220.65	$1,186,969.16	$485,361.98	$406,820.85	$834,814.54	$1,208,948.57	$370,363.25	**$5,517,499**
Agreed Upon Procedures	$16,500.00	$16,500.00	$33,000.00	$33,000.00	-$8,000.00	$12,000.00	-$8,000.00	**$95,000**
Reserve	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	**$0**
Adjustment for Undercollection	$351,802.05	$107,198.37	$0.00	$0.00	$26,169.93	$383,916.30	$0.00	**$869,087**
Subtotal	$52,488,007.55	$66,041,367.64	$16,644,631.71	$15,352,736.40	$32,723,170.30	$55,133,171.81	$16,603,787.96	**$254,986,873**
Account Balance 12/31	-$7,751,190.72	-$9,752,689.42	-$2,458,003.66	-$2,267,222.43	-$4,832,409.26	-$8,141,816.57	-$2,451,972.04	**($37,655,304)**
17-1382-EL-UNC Refund	-$7,306,269.97	-$9,192,882.03						**($16,499,152)**
Total	**$37,430,546.86**	**$47,095,796.19**	**$14,186,628.05**	**$13,085,513.97**	**$27,890,761.04**	**$46,991,355.24**	**$14,151,815.92**	**$200,832,417**

Subtotal Percentage Amount	20.585%	25.900%	6.528%	6.021%	12.833%	21.622%	6.512%	**100%**
Account Balance Based on Subtotal	$7,751,190.72	$9,752,689.42	$2,458,003.66	$2,267,222.43	$4,832,409.26	$8,141,816.57	$2,451,972.04	**$37,655,304.10**

Merged Revenue Requirement Summary							
	AEP	DPL	Duke	CEI	OE	TE	USF Revenue Requirements
Cost of PIPP Plus	$108,859,891.09	$15,156,365.27	$14,015,987.52	$29,953,373.33	$50,308,880.20	$15,264,594.32	**$233,559,092**
EPP/CE	$6,966,293.87	$969,904.46	$896,928.03	$1,916,812.51	$3,219,426.73	$976,830.39	**$14,946,196**
Administration	$2,211,189.80	$485,361.98	$406,820.85	$834,814.54	$1,208,948.57	$370,363.25	**$5,517,499**
Agreed Upon Procedures	$33,000.00	$33,000.00	$33,000.00	-$8,000.00	$12,000.00	-$8,000.00	**$95,000**
Reserve	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	**$0**
Adjustment for Undercollection	$459,000.42	$0.00	$0.00	$26,169.93	$383,916.30	$0.00	**$869,087**
Subtotal	$118,529,375.19	$16,644,631.71	$15,352,736.40	$32,723,170.30	$55,133,171.81	$16,603,787.96	**$254,986,873**
Account Balance 12/31	-$17,503,880.14	-$2,458,003.66	-$2,267,222.43	-$4,832,409.26	-$8,141,816.57	-$2,451,972.04	**($37,655,304)**
17-1382-EL-UNC Refund	-$16,499,152.00						**($16,499,152)**
Total	**$84,526,343.05**	**$14,186,628.05**	**$13,085,513.97**	**$27,890,761.04**	**$46,991,355.24**	**$14,151,815.92**	**$200,832,417**

Uniform kWh Rate			
	KWH Sales	Required Revenue	Indicated Costs/KWH
CSP	19,902,478,609	$ 37,430,547	$ 0.0018807
OP	24,512,272,239	$ 47,095,796	$ 0.0019213
DPL	14,444,224,206	$ 14,186,628	$ 0.0009822
Duke	20,520,969,379	$ 13,085,514	$ 0.0006377
CEI	18,879,877,064	$ 27,890,761	$ 0.0014773
OE	24,376,576,480	$ 46,991,355	$ 0.0019277
TE	10,596,597,324	$ 14,151,816	$ 0.0013355
Total	**133,232,995,301**	**$ 200,832,417**	

kWh sales were sales reported for the last twelve months
(October 2017 - September 2018)

Merged Uniform kWh Rate			
	KWH Sales	Required Revenue	Indicated Costs/KWH
AEP	44,414,750,848	$ 84,526,343	$ 0.0019031
DPL	14,444,224,206	$ 14,186,628	$ 0.0009822
Duke	20,520,969,379	$ 13,085,514	$ 0.0006377
CEI	18,879,877,064	$ 27,890,761	$ 0.0014773
OE	24,376,576,480	$ 46,991,355	$ 0.0019277
TE	10,596,597,324	$ 14,151,816	$ 0.0013355
Total	**133,232,995,301**	**$ 200,832,417**	

kWh sales were sales reported for the last twelve months
(October 2017 - September 2018)

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11/29/2018 4:04:16 PM

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Case No(s). 18-0976-EL-USF

Summary: Amended Application of the Ohio Development Services Agency electronically filed by Teresa Orahood on behalf of Dane Stinson