

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. 21-659-EL-USF
Universal Service Fund Riders of	:	
Jurisdictional Ohio Electric Distribution	:	
Utilities.	:	

TESTIMONY

OF

MEGAN MEADOWS

ON BEHALF OF
THE OHIO DEPARTMENT OF DEVELOPMENT

October 29, 2021

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On Behalf of The Ohio Department of Development

I. INTRODUCTION

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

2 A. My name is Megan M. Meadows. My business address is Ohio Department of
3 Development ("Development"), 77 South High Street, 25th Floor, Columbus, Ohio
4 43216-1001.

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

6 A. I am employed by Development as Assistant Chief, Community Services Division
7 ("CSD").

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

9 A. I served as the Assistant Deputy Chief for Office of Community Assistance ("OCA")
10 since March of 2016. In September 2019 I was promoted to Deputy Chief for OCA.
11 While in that position, I directly oversaw the preparation of the Universal Services Fund
12 rate case. In my current role as the Assistance Chief, CSD I oversee the OCA, Office of
13 Division Support ("ODS"), Office of Energy and Environment and the Office of
14 Community development. Preparation of the Universal Services Fund rate case is done
15 within the ODS. Prior to working at Development, I was the Director of Operations and
16 Planning for Lancaster-Fairfield Community Action Agency, a non-profit Community
17 Action Agency whose mission is to serve those in need with programs that promote self-
18 sufficiency. While in this position I provided service to many low-income Ohioans that
19 participated in the PIPP program and other energy assistance programs available. I also
20 oversaw the agency's regional Homeless Crisis Response Program, Adult Literacy and

1 Basic Education program and the Temporary Assistance for Needy Families Summer
2 Youth program. In that position I was also responsible for and participated in the
3 development of the grant application and reporting for all other agency programs. I have
4 a Bachelor of Arts degree in Psychology from Wheeling Jesuit University, WV.

5 **Q. What are your duties and responsibilities as CSD Assistant Chief?**

6 A. A number of energy assistance programs for low-income utility customers, including the
7 federally-funded Low-Income Home Energy Assistance Program ("LIHEAP"), Home
8 Weatherization Assistance Program ("HWAP"), Universal Service Funded Electric
9 Partnership Program (EPP), Community Service Block Grant ("CSBG") program, State
10 Energy Program, Community Development Block Grant, Homeless Crisis Response
11 Program, Community Housing Impact and Preservation Program and the Ohio Coal
12 Research and Development Program are administered within CSD. As Assistant Chief,
13 CSD, I have responsibility for administering the funds that support these programs.

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

15 A. Yes, I testified in Case Nos. 16-1223-EL-USF, 17-1377-EL-USF, 18-0976-EL-USF 19-
16 1270-EL-USF and 20-1103-EL-USF.

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

18 A. The purpose of my testimony is to explain how the USF rider rates proposed in
19 Development's application were developed, including the calculation of Development's
20 PIPP-related administrative costs.

21 **Q. Why is it necessary for Development to seek adjustments to the USF riders at this**
22 **time?**

1 A. The stipulation that resolved Case No. 20-1103-EL-USF required Development to file an
2 application for approval of such adjustments to the riders as are necessary to assure, to
3 the extent possible, that each EDU's rider will generate its associated revenue
4 requirement – but not more than its associated revenue requirement – during the 2022
5 collection period. As indicated in the application filed contemporaneously with this
6 testimony, Development has determined that, on an aggregated basis, the total pro forma
7 annual revenue that the current USF riders would generate will under-collect funding for
8 the low-income customer assistance and consumer education programs and their
9 associated administrative costs during the 2022 collection period. Development has
10 determined that the pro forma revenues that would be generated by the current USF riders
11 of American Electric Power- Ohio Power (“OP”), AES Ohio (“AES”), Duke Energy
12 Ohio (“Duke”), Cleveland Electric Illuminating Company (“CEI”), Ohio Edison
13 Company (“OE”) and Toledo Edison Company (“TE”) would under-collect their
14 respective 2022 USF rider revenue responsibilities during the collection year. By its
15 application, Development seeks an order from the Commission directing each EDU to
16 adjust its USF rider rate accordingly.

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

18 A. Generally speaking, the need to adjust the riders is primarily attributable to two separate
19 factors. First, because the current riders are based on historical kWh sales, they will not,
20 in actual practice, generate the level of revenue they were designed to produce on a pro
21 forma basis. Although one would never expect test-period sales to be identical to sales in
22 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. 20-1103-EL-USF. These changes are due to a number of factors, including, among other things, slight increase in projected enrollment from the actual 2021 enrollments, an increase in the cost of PIPP, and the need to anticipate possible cash flow changes in the reserve component due to the Special Reconnect Order and the pandemic situation. Thus, the current USF rider rates must be adjusted so they do not under-collect their related revenue requirements, but collect the revenue required over the 2022 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 Development's PIPP-related administrative costs, (4) an allowance to account for projected EDU December 31, 2021 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,

1 Development has used a calendar year 2021 test period for purposes of its USF rider
2 revenue requirements analysis.

3 **Q. If Development has used a calendar 2021 test period for purposes of its analysis,**
4 **what is the source of the data for the final months of the test period for which actual**
5 **data is not yet available?**

6 A. Development projects the results for those months of the test period for which actual
7 information was not available at the time the application was prepared, by substituting the
8 data from the corresponding months of the previous year. Although this is simply
9 another way of saying that Development has utilized the most recent twelve months of
10 actual data available at the time the application was prepared for purposes of the test-
11 period analysis, it is conceptually appropriate to consider calendar year 2021 as the test
12 period for reasons discussed below.

13 **Q. For which months of 2021 did Development have actual data available when it**
14 **prepared its application?**

15 In all USF rider rate adjustment applications prior to the 2012 application, Development
16 utilized actual data through August of the test period and used the data from September
17 through December of the previous year as a surrogate for the results for the remaining
18 months of the test period. Once the September data became available, Development filed
19 an amended application to substitute the actual data for September for the projected data
20 for September that had been utilized in preparing the initial application. However, in
21 2012, and again in the 2013 proceeding, Development was able to include actual
22 September data in its original analysis. In 2014, Development reverted back to the

1 original methodology of providing data from September through August and filing an
2 amended application to substitute the actual data for September for the surrogate data in
3 the initial application. For 2022, Development will again use the original methodology
4 of providing actual data from January through August 2021, and surrogate 2020 data for
5 September through December. Once the September 2021 data becomes available,
6 Development will file an amended application to replace the surrogate September 2020
7 data.

8 **Q. Is Development’s methodology for determining the USF rider revenue requirement**
9 **proposed in the application in this case generally consistent with the methodology**
10 **previously approved by the Commission in prior USF rider adjustment cases?**

11 A. Yes. The revenue requirement methodology used in preparing this application is
12 generally consistent with that approved in prior USF rider rate adjustment proceedings.
13 Moreover, it is identical to the methodology approved by the Commission in its
14 October 6, 2021 opinion and order in the Notice of Intent (“NOI”) phase of this
15 proceeding (the “*NOI Order*”).

16 **B. Cost of PIPP**

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

19 A. The cost of PIPP under the PIPP Plus rules adopted November 1, 2010, represents the
20 total cost of electricity consumed by each EDU’s PIPP customers during the test period,
21 plus their pre-PIPP balances, less the monthly installment payments billed to PIPP
22 customers, less payments made by or on behalf of PIPP customers, including agency

1 payments, to the extent that these payments exceed the amount of the installment
2 payments billed over the same period. This same formula has been used in every USF
3 proceeding since Case No. 11-3223-EL-USF.

4 **Q. What is the source of the information Development used in the cost of PIPP**
5 **calculation?**

6 A. The information necessary to perform this calculation comes from the USF Monthly
7 Report and Remittance forms (USF-301) and the USF Monthly Reimbursement Request
8 forms (USF-302), the documents the EDUs use to report the USF rider collections
9 remitted to Development for deposit in the USF and to request reimbursement from the
10 USF for the cost of electricity delivered to PIPP customers. As in prior cases,
11 Development used the unadjusted actual data for the most recent twelve months for
12 which information was available at the time the application was prepared to calculate the
13 test-period cost of PIPP. The workpapers showing the calculation for each EDU are
14 attached as Exhibits MM-1 through MM-6 to my testimony. The resulting test-period
15 cost of PIPP components for each EDU is shown in Exhibit A to the application.
16 However, the use of the unadjusted test-period cost of PIPP numbers will not produce the
17 appropriate allowance for this component of the USF rider revenue requirement.

18 **Q. Please explain.**

19 A. Pursuant to various orders of this Commission, including those related to the aggregation
20 of the PIPP Plus load, certain elements of the tariffed rates for electric service to
21 residential customers of each of the EDUs changed during 2021. Because we are using
22 the data from September through December of 2020 as a surrogate for the corresponding

1 months of the 2021 test period to determine the cost of electricity delivered to PIPP
2 customers, this data must be restated to capture the net impact of these rate changes as the
3 data for the months of 2021 that predated the rate changes. In addition, certain elements
4 of each EDU's tariffed rates applicable to the service provided to PIPP customers will
5 cause the EDU's PIPP rates to change during 2022. These 2021 rate adjustments will
6 change the cost of electricity delivered to PIPP customers during the 2022 collection
7 period, but there will be no change in the monthly installment payments billed to PIPP
8 customers because those payments are based on fixed, specified percentages of customer
9 income established by regulation and are not tied to the rates charged. Thus, a net
10 decrease in an EDU rate element will decrease the cost of PIPP by narrowing the gap
11 between the cost of electricity delivered to PIPP customers and the installment payment
12 amounts billed to PIPP customers. Accordingly, it is necessary to adjust the test-period
13 cost of PIPP to recognize these post-test period rate changes so that the new USF rider
14 rates will reflect the impact of these changes on the cost of PIPP during the collection
15 period.

16 **Q. What adjustments to the test-period cost of PIPP has Development proposed to**
17 **recognize the impact of these underlying EDU rate changes?**

18 A. The respective adjustments for each of the EDUs are shown in Exhibits A.1.a through
19 A.1.d to the application. The normalization adjustments for the 2022 rate changes were
20 calculated by applying the net percentage of the rate change to the cost of electricity
21 delivered by the EDU to PIPP customers during the months that predated the rate change,
22 including September-December 2020, which are used as surrogates for September-

December 2021. The adjustments to annualize the impact of the EDU's 2021 and 2022 net rate changes were calculated by applying the net percentage of the rate change to the normalized test-period cost of electricity delivered to PIPP customers. The adjustments shown in Exhibits A.1.a through A.1.d are carried forward and summarized on Exhibit A.1 to the application, which shows the overall impact of the Commission-approved rate changes on the test-period cost of PIPP for the EDUs in question.

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

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

Q. Does Development have a proposal to address any changes in EDU residential rates that may take effect during the 2022 collection period?

A. Development proposes that the Commission allow this docket to remain open to permit the filing of a supplemental application after the information necessary to annualize the impact of any such rate increases on the cost of PIPP becomes available. This is the same procedure that was utilized in Case No. 05-717-EL-UNC to address anticipated EDU rate changes during the collection period in that case where the amount of the changes were unknown at the time of the hearing in the USF rider rate adjustment case. I should add that Development will not necessarily file a supplemental application as result of an EDU 2022 rate change. This is a decision that will be made based on the status of the EDU's USF PIPP account balance at the time.

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

1 A. Yes. In every USF proceeding since Case No. 09-463-EL-UNC the Commission
2 approved adjustments to capture the impact of the anticipated changes in PIPP enrollment
3 on the cost of PIPP during the collection period. As Development noted in testimony
4 submitted in those cases, PIPP enrollment had increased dramatically over the period
5 since Development assumed responsibility for the administration of the electric PIPP
6 program. In 2001, there were 131,330 PIPP customers in the month of the highest PIPP
7 enrollment. In 2013 and 2014 there were 375,083 and 386,718 PIPP customers,
8 respectively, in the month with the highest PIPP customer count. This pattern of year-
9 over-year increases changed in 2015; the enrollment has decreased, as evidenced by the
10 fact that in Case No. 15-1046-EL-USF March of 2015 was the test-period month with the
11 highest PIPP customer count with 397,615 customers enrolled in PIPP. In Case No.16-
12 1223-EL-USF, September 2015 had the highest number of customers enrolled in PIPP at
13 360,311. The enrollment number continued to decrease. The average enrollment during
14 the 2016 test year was 331,517, during the 2017 test year the average enrollment was
15 289,827 and the average enrollment during the 2018 test year was 269,726. The 2019 test
16 year average had less of a decrease than what was projected with 260,538 as the average
17 enrollment. The 2020 test period enrollment was 240,657. By analyzing previous
18 enrollment trends and current economic forecasts Development is projecting a slight
19 increase in the average monthly enrollment of 254,544 PIPP customers for 2022.
20 Accordingly, in the NOI in this case, Development proposed an adjustment to capture the
21 impact of the anticipated change in PIPP enrollment on the cost of PIPP during the 2022
22 collection period. Development proposed, and the Commission approved, in the NOI

1 proceeding a projected 2022 PIPP enrollment methodology based on an analysis of the
2 historical and most recent changes in PIPP enrollment to reflect enrollment trends. The
3 analysis of this data determined that the forecast methodology that has been used in every
4 USF proceeding since 2009 is appropriate for purposes of projecting 2022 PIPP
5 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 2018 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 forecast the
10 average PIPP enrollment for each EDU based upon the expected slight increase in PIPP
11 enrollment using the trends and current economic forecasts I discussed previously. 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 2022 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 2022 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 2022 case will serve to true-up the difference.

1 **Q. After performing the adjustments for underlying EDU rate changes and the**
2 **projected 2022 PIPP enrollment, what allowance for the cost of PIPP do you**
3 **recommend for inclusion in the USF rider revenue requirement of each of the**
4 **EDUs?**

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

8 **C. EPP Costs**

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

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

1 **Q. What has Development projected these costs to be for the 2022 collection period**
2 **during which the USF rider rates set in this case will be in effect?**

3 A. In the NOI submitted in this proceeding, Development projected EPP costs to be
4 \$14,946,196 for the 2022 collection period.

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

7 A. Yes. It approved that amount, but Development indicated that it would re-examine its
8 projections prior to filing its application and revise its estimates as necessary.

9 **Q. Has Development's projection of EPP costs during the 2022 collection period**
10 **changed since it proposed the \$14,946,196 allowance in the NOI phase of this case?**

11 A. Yes. Development has re-examined projected EPP costs and now proposes to allocate
12 \$13,141,665 based upon current costs needed to fully fund the program.

13 **Q. How has Development allocated the EPP costs among the EDUs?**

14 A. As in all prior USF rider rate adjustment applications, Development allocated this
15 component of the revenue requirement among the EDUs based on the ratio of their
16 respective adjusted costs of PIPP to the total adjusted cost of PIPP. The development of
17 the allocation factors and the results of the allocation are shown in Exhibit B to the
18 application.

19 **D. Administrative Costs**

20 **Q. What allowance for PIPP-related administrative costs has Development proposed**
21 **for inclusion in the USF rider revenue requirement in this case?**

1 A. Development has proposed an allowance for PIPP-related administrative costs of
2 \$4,749,241.

3 **Q. What standard did you use in determining the proposed allowance for**
4 **administrative costs associated with the PIPP program?**

5 A. The Office of the Ohio Consumer's Counsel ("OCC") entered into a settlement
6 agreement in the Notice of Intent ("NOI") phase of Case No. 05-717-EL-UNC with
7 Development. The settlement agreement provided, among other things, that in future
8 USF rider rate adjustment applications, the proposed allowance for administrative costs
9 would be based on the costs actually incurred during the test period, subject to
10 adjustment(s), plus or minus, for reasonably anticipated post-test period cost changes, so
11 as to assure, to the extent possible, that the administrative cost component of the USF
12 rider revenue requirement will recover the administrative costs incurred during the
13 collection year. This standard for determining the allowance for administrative costs was
14 approved by the Commission in the 2005 case, and was used by Development in all
15 subsequent USF rider rate adjustment proceedings. This standard was again approved by
16 the Commission in its October 6, 2021, opinion and order in the NOI phase of this case.
17 Accordingly, I determined the proposed allowance for administrative costs using this
18 standard.

19 **Q. How did you identify the costs actually incurred by Development during the test**
20 **period in connection with its administration of the PIPP program?**

21 A. The approved test period in this case is calendar year 2021. However, Development's
22 accounting is based on the state fiscal year ("FY"), which is the twelve months ending

June 30, not the calendar year. Thus, I relied on OCA's FY 2021 (the twelve months ending June 30, 2021) accounting records to identify the costs actually incurred by Development in connection with the administration of the PIPP program during FY 2021. Because the actual costs for calendar 2021 are not yet known, consistent with the practice in prior cases, I utilized the actual costs incurred in the most recent fiscal year as a surrogate for the test-period PIPP administration costs.

Q. You indicated that OCA has responsibilities other than the administration of the PIPP program. For accounting purposes, how does OCA distinguish between the costs incurred in connection with its administration of the PIPP program and the costs associated with these other activities?

A. The method used depends on the nature of the costs involved. As shown in Exhibit MM-31 to my testimony, OCA breaks its costs down into four categories for accounting and budget purposes: (1) Payroll, (2) Consultants / Mail Services, (3) Indirect Costs, and (4) Maintenance. In some instances, costs are directly assigned to PIPP administration, while, in others, costs are allocated to PIPP administration based on OCA's estimates of the portion of the total costs in the category that relate to this function. I would point out that PIPP administrative costs make up a relatively small percentage of OCA's total costs and budget.

Q. What costs are included in the Payroll category?

A. The Payroll category includes the salaries and employee benefits for the members of the OCA and ODS staff.

1 **Q. Do OCA staff members report their time in a manner that permits OCA to track**
2 **the employee hours that are chargeable to PIPP administration as opposed to other**
3 **OCA activities?**

4 A. OCA staff members, must estimate the percentage of the time to be coded to PIPP
5 administration based on an exercise of informed judgment as to the hours the employees
6 devote to PIPP-related matters as opposed to other activities.

7 **Q. What costs are included in the Consultant / Mail Services category?**

8 A. The “Consultants” component includes costs incurred by OCA in FY 2021 for outside
9 professional services, including legal services, in connection with its administration of
10 the PIPP program. Consultant costs that can be directly assigned to PIPP administration
11 are so coded when they are entered into the state accounting system. However, where
12 professional consulting services benefit more than one program, the costs are allocated
13 between or among the programs based on an exercise of judgment, taking into account
14 the funds available to the respective programs. “Mail Services” costs are the costs
15 associated with mail opening, document imaging, and keying in information in
16 connection with processing applications. OCA contracts these services out to third-party
17 vendors. For accounting purposes, these costs are allocated to PIPP administration based
18 on the number of PIPP applications received versus the total number of applications
19 received. In FY 2022 we budgeted an amount of \$500,000 in contracted costs from the
20 mail imaging company.

21 **Q. A line item in Exhibit MM-31 is titled Indirect Costs. What are Indirect Costs?**

22 A. The Department of Energy (“DOE”) approves the percentage of payroll that OCA pays to

1 Development as a contribution to Development's general operating costs. This
2 percentage of payroll is referred to as Indirect Costs. The specified payroll percentage
3 for FY 2021 was 60.37 percent. However, applying this percentage to the PIPP-related
4 payroll cost for FY 2021 will not produce the PIPP-related Indirect Costs actually
5 incurred during FY 2021 because these payments are not made to Development until the
6 quarter following the quarter in which the payroll costs are incurred. Accordingly, the
7 \$905,550 figure shown in Exhibit MM-31 represents the total payments for PIPP-related
8 Indirect Costs actually made to Development during FY 2021 with reasonable
9 adjustments made based on anticipated cost changes, and is not the product of applying
10 the specified percentage to the OCA PIPP-related payroll costs incurred during that
11 period.

12 **Q. What costs are included in the Maintenance category?**

13 A. The Maintenance category includes the cost of supplies, communications services,
14 equipment such as computer hardware/software replacement or upgrade and
15 maintenance, printing, communications, supplies, Ohio Shared Services processing fees,
16 travel, computer software license renewal fees and the like necessary for OCA's day-to-
17 day operations. The \$258,255.00 shown in Exhibit MM-31 for this line item is the
18 portion of OCA's total maintenance costs coded to PIPP administration during FY 2021
19 with reasonable adjustments made based on anticipated cost changes.

20 **Q. What was the total cost actually incurred during FY 2021 in the OCA internal cost**
21 **categories in connection with its administration of the PIPP program?**

22 A. As shown in Exhibit MM-31 to my testimony, the total actual cost coded to PIPP

administration in these internal OCA categories during FY 2021 was \$4,952,980.30.

Q. Exhibit MM-31 also includes a line item entitled PIPP ADM/ OP GRANTS. What do these costs represent?

A. As Development explained in testimony in Case No. 10-725-EL-USF, OCA has grant agreements in place with 53 Local LIHEAP Providers, the vast majority of which are Community Action Agencies. These agreements represent a total cost of some \$30 million. These agreements provide that the agencies will assume responsibility for essentially all customer intake, enrollment, reverification, and education activities relating to the PIPP and LIHEAP programs. Prior to FY 2011, OCA was able to utilize other sources of funding to meet its total contractual obligations to these agencies. However, subsequent reductions in the funding available through these other sources, particularly LIHEAP, forced OCA to rely on USF rider revenues to pay the portion of the total obligation that relates specifically to the enrollment, reverification, and educational activities associated with these programs. Thus, in Case No. 10-725-EL-USF, Development developed an alternative basis for determining an appropriate allowance for these electric PIPP-specific costs. OCA charged the state's natural gas utilities an \$8 fee per application for re-verification of a customer's eligibility for the gas PIPP program, which was consistent with the fee charged by the third-party vendor that manages the low-income customer assistance programs offered by certain Ohio electric distribution utilities. Because electric PIPP customers also have to re-verify annually, Development multiplied the then-current number of electric PIPP households by \$8 to produce the allowance for this item proposed in Case No. 10-725-EL-USF. Development used this

1 same methodology in its 2011 through 2017 USF rider rate adjustment proceedings to
2 identify the PIPP-related portion of the total agency obligation.

3 **Q. Have you used this methodology again in this case?**

4 A. I used a similar methodology to calculate the portion of the total agency contract
5 obligation relating to the electric PIPP and LIHEAP activities described above.
6 Multiplying the projected number of electric PIPP households in FY 2022 by \$11
7 produces an indicated FY 2022 cost of \$2,799,984 for these activities. LIHEAP funding
8 will be utilized to partially meet obligations. Thus, the \$2,099,988 shown in Exhibit
9 MM-31 to my testimony is the FY 2022 allocated expense for Local LIHEAP Providers
10 Costs.

11 **Q. You indicated that, under the approved methodology, the proposed allowance for**
12 **administrative costs is to be based on costs actually incurred during the test period,**
13 **subject to such adjustment(s), plus or minus, for reasonably anticipated post-test**
14 **period cost changes as may be necessary to assure, to the extent possible, that the**
15 **administrative cost component of the USF rider revenue requirement will reflect the**
16 **administrative costs incurred during the collection year. Are you proposing any**
17 **such adjustments in this case?**

18 A. As I indicated, the costs shown in the FY 2021 Actual Expenses column in Exhibit MM-
19 31 are the costs actually incurred by OCA in connection with PIPP administration during
20 FY 2021, which is the twelve-month period ending June 30, 2021. However, if the
21 administrative cost components of the USF rider rates established in this case are to
22 reflect the costs that will be incurred during the period the new USF rider rates will be in

effect, reasonably anticipated post-June 30, 2021 cost changes must be recognized. To accomplish this, I have relied on the OCA budget for PIPP-related costs for the state's 2022 fiscal year as the starting point for determining the proposed allowance for administrative costs in this case.

Q. Why is it appropriate to utilize the FY 2021 budget amount for PIPP administration as the starting point for the proposed allowance for OCA administrative costs for purposes of this case?

A. The goal in preparing the budget is to project, as accurately as possible, the cost OCA will incur for PIPP administration over the next year. This is the same goal we are trying to achieve in developing the allowance for administrative costs to be included in the USF rider revenue requirements in this case. The FY 20221 budget amount for PIPP administrative costs represents our best estimate of those costs, and, thus, is the appropriate starting point for establishing the administrative cost component of the USF rider revenue requirement.

Q. How did OCA develop the FY 2022 budget for Payroll and Indirect Costs?

A. OCA has used the projected PIPP-related Payroll cost, \$1,500,000. This is an increase from the FY 2021 actual amount of \$1,421,586.43. Therefore, as I previously explained, the Indirect Costs are tied to the Payroll cost, so the \$905,550 FY 2022 budget amount for Indirect Cost is simply the result of applying the projected FY 2022 DOE 60.37 percent contribution factor to the \$1,500,000 budgeted for PIPP-related payroll.

Q. What is the total amount of the OCA's FY 2022 budget for its internal PIPP-related administrative cost categories?

1 A. As shown in Exhibit MM-31, the total FY 2022 budget for these costs is \$3,136,805
2 which is consistent with the \$2,810,144.77 in costs actually incurred in these categories
3 in FY 2021.

4 **Q. Exhibit MM-31 indicates that OCA expects a decrease in PIPP ADM/OP Grants**
5 **Costs – \$2,099,988 budgeted for FY 2022, versus \$2,142, 835.53 actually incurred in**
6 **FY 2021. Please explain the reason for this decrease.**

7 A. As I previously explained, the Local LIHEAP Providers Costs listed in the FY 2021
8 actual expense column is the result of multiplying the average monthly number of active
9 PIPP households during FY 2021 by an estimated cost of \$11 per application and
10 allocating to the revenue requirement OCAs share of the cost of LIHEAP. OCA used the
11 projected number of PIPP households in FY 2022 and multiplied the resulting 254,544
12 households by \$11, which produced an indicated FY 2022 agency obligation for the cost
13 of customer intake, enrollment, reverification, and education activities relating to the
14 PIPP and LIHEAP programs of \$2,099,988.

15 **Q. How was the total allowance for PIPP-related administrative costs proposed in**
16 **Development's application in this case determined?**

17 A. As shown in Exhibit MM-31, the total proposed allowance of \$4,749,241 is the sum of
18 the FY 2022 budgeted amounts for the internal OCA cost categories and the estimate of
19 the FY 2022 Local LIHEAP Providers contract costs attributable to electric PIPP-
20 specific activities.

21 **Q. Is the total allowance proposed in this case for OCA PIPP-related administrative**
22 **costs the minimum amount necessary to support these administrative functions?**

1 A. Yes. Exhibit MM-31 breaks down costs into two broad components: (1) OCA Internal
2 Costs and (2) Local LIHEAP Provider Costs. The proposed FY 2022 budget is less than
3 the FY 2021 budget.

4 **Q. How has Development allocated the administrative cost component of USF rider**
5 **revenue requirement among the EDUs?**

6 A. As in all previous USF rider rate adjustment applications, Development allocated
7 responsibility for the administrative costs to the EDUs based on the relative number of
8 PIPP customers. Specifically, as shown in Exhibit C to the application, this revenue
9 requirement component is allocated among the EDUs based on the number of PIPP
10 accounts in June 2021, the test-period month exhibiting the highest PIPP customer
11 account total.

12 **E. Projected Year-End USF PIPP Account Balances**

13 **Q. You have identified the projected December 31, 2021 USF PIPP account balance as**
14 **an element of the EDU's USF rider revenue requirement. Why is this component**
15 **included?**

16 A. The USF rider rate is calculated with reference to historical annual kWh sales. Because
17 actual sales will vary from sales during the test period, and because other factors bearing
18 on the cost of PIPP also change, the EDU's rider rate will, in actual practice, either over-
19 recover or under-recover its associated revenue requirement during the collection period.
20 All else being equal, over-recovery will result in a positive year-end USF account balance
21 for the EDU in question, while under-recovery will create a negative balance. A positive
22 USF account balance reduces the amount needed to satisfy the USF rider revenue

1 requirement on a going-forward basis, while a negative balance means that there will be
2 insufficient cash available for Development to make the monthly PIPP reimbursement
3 payments due the EDU in question if the revenue requirement does not recognize the
4 existing deficit. To synchronize the new USF rider with each EDU's existing USF PIPP
5 account cash position, the revenue target must be adjusted by the amount of the USF
6 account balance as of the rider's effective date. Thus, a positive balance must be
7 deducted from the revenue requirement, while a negative balance must be added to the
8 revenue target the rider is designed to generate. Because Development is requesting that
9 the proposed USF riders be made effective January 1, 2022 on a bills-rendered basis, I
10 have adjusted each EDU's rider revenue target by the amount of the EDU's projected
11 December 31, 2021 USF PIPP account balance. The projected balance amounts are
12 displayed in Exhibit H of the application. The workpapers showing the calculation of the
13 projected December 31, 2021 balances are attached to my testimony as Exhibits MM-7
14 through MM-12. Development reconciled the beginning year account balances with the
15 cash account balance and utilized that amount to determine the projected end of year
16 account balance.

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

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

1 **Q. If this component of the USF rider rate remains in effect for longer than one year,**
2 **would not an EDU with a projected December 31, 2021 USF PIPP account balance**
3 **surplus begin to under-recover its USF rider revenue requirement?**

4 A. Because a December 31, 2021 balance surplus will be remitted on an annual basis, the
5 reimbursement will, in theory, be complete after the new USF rider has been in place for
6 one year. This means that, all else being equal, this component of the revenue
7 requirement element should come out of their USF riders at that time.

8 **Q. Is Development proposing that the USF riders be automatically adjusted on**
9 **January 1, 2022 to recognize that the amortization of the December 31, 2021**
10 **balance surplus will have been completed at that time?**

11 A. No. Although Development will be monitoring the monthly EDU USF balances very
12 closely, Development will also continue to examine all the other elements of the USF
13 rider revenue requirement, and will keep a watchful eye on whether, in practice, riders
14 are generating the necessary level of revenue. Rather than proposing an automatic
15 adjustment for one component of the USF riders on the anniversary date, Development
16 believes the better approach is to revisit all elements of the rider before January 1, 2022,
17 so that, if it reasonably appears that additional adjustments are required, all proposed
18 adjustments can be incorporated in a single filing with the Commission. Thus, while
19 Development agrees that the component reflecting the December 31, 2021 USF PIPP
20 account balance surpluses, should be eliminated once the balance has been fully
21 amortized, that adjustment should be made in the context of this broader evaluation.
22 Indeed, the parties to the stipulations in all previous USF rider adjustment cases have

1 recognized that this annual review process is necessary by requiring that Development
2 file a new application on or before October 31 of each year. Development continues to
3 support this approach.

4 **Are there any additional items included in the account balance?**

5 In case number 1:21-cr-86 for the United States District Court Southern District of Ohio
6 Western Division, FirstEnergy Corporation was required to pay \$115,000,000 to
7 Development's "Percentage of Income Payment Plan Plus program for the benefit of
8 Ohio electric-utility customers". The \$115,000,000.00 was included in the account
9 balance calculation and therefore reduced the overall revenue requirement by said
10 amount.

11 **F. Reserve Allowance**

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

14 A. As explained in the application, PIPP-related cash flows can fluctuate significantly
15 throughout the year, due in large measure to the weather-sensitive nature of electricity
16 sales and PIPP enrollment behavior. The graph attached to the application as Exhibit E
17 plots the historical consolidated net USF PIPP account balance. As the graph shows, the
18 month-to-month cash flow fluctuations had, in the past resulted in negative USF PIPP
19 account balances, which means that, in those months, Development will have insufficient
20 cash to satisfy its reimbursement obligations to the EDUs on a timely basis. To address
21 this problem, Development historically has included an allowance to create a cash reserve
22 as an element of the USF rider revenue requirement.

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

3 A. Yes. In Case No. 06-751-EL-UNC, Development calculated the reserve
4 component based on the highest monthly deficit for each EDU during the test period. The
5 Commission approved this approach in that proceeding and in subsequent USF rider rate
6 adjustment cases. In the NOI approved in Case No. 16-1223-EL-USF and subsequent
7 proceedings, the PUCO approved a modification to the calculation of the reserve to allow
8 more flexibility. The modification permitted consideration of the highest monthly deficit
9 during the test period for the EDUs in the aggregate, because the funds are deposited in
10 one USF account. The modification also permitted consideration of the aggregate projected
11 year end account balance to determine whether a reserve allowance is needed.
12 Development considered the projected aggregate account balance of \$123,110,882, as
13 shown in Exhibit H. Each EDU's largest monthly deficit occurred in August, making the
14 sum of the individual highest monthly reserves the same as the aggregate amount,
15 \$39,496,476. Development adopted the full reserve amount, and did not reduce it by the
16 projected account balance, considering the potential effects of the Special Reconnect Order
17 and the ongoing pandemic. The reserve component is \$39,496,476, as set forth in attached
18 Exhibit F.

19
20 **G. Allowance for Undercollection**

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

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

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

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

12 **Q. How was the proposed allowance for undercollection calculated?**

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

1 The workpapers supporting this analysis are attached to my testimony as Exhibits MM-13
2 through MM-18.

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

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

6 A. Yes, In the NOI, Development stated that it is anticipating proposing an
7 allowance for EDU agreed upon procedures costs, or other third-party analyses related to
8 the Universal Service Fund. This request is consistent with the recommendation of the
9 USF Rider Working Group. Development has previously caused agreed upon procedures
10 to be conducted of each EDU's PIPP-related accounting and reporting to assure that
11 Development-EDU interface was functioning in accordance with Development's
12 expectations and to identify any systemic problems that could indicate that the cost of PIPP
13 recovered from ratepayers through the USF riders of the respective EDUs had been
14 overstated. In the NOI in this proceeding, Development proposed an allowance of \$99,000
15 to conduct the similar audits of AEP, AES, and Duke. Based on the actual costs for the
16 2021 agreed upon procedures, Development estimates the cost to be \$69,000. Each EDU
17 (AEP, AES, and Duke) will be charged based on a fixed cost. The allocation of this cost
18 to the utilities is shown in Exhibit D.

19 **I. Revenue Requirements Summary**

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

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

1 **Q. How does the total USF rider revenue requirement proposed in this case compare to**
2 **total USF rider revenue requirement approved in Case No. 20-1103-EL-USF?**

3 A. The aggregated revenue requirement of \$164,872,879 proposed in this proceeding is
4 above the \$118,134,842 total revenue requirement approved in last year's amended case.
5 On an individual EDU basis, the USF rider revenue requirements of each EDU are more
6 than the revenue requirements approved in Case No. 20-1103-EL-USF.

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

8 A. Obviously, the level of the USF rider revenue requirement of a particular EDU is simply
9 a function of the sum of all the revenue requirement components and the manner in
10 which certain components are allocated among the EDUs. All EDUs will see an increase
11 in the revenue requirement. This can be partly attributed to a higher projected enrollment
12 compared to last years projected enrollment, a higher cost of PIPP and the inclusion of a
13 higher reserve component.

14 **III. USF RIDER RATE DESIGN**

15 **Q. How does Development propose to recover the annual USF rider revenue**
16 **requirement for each EDU?**

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

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

1 As shown in Exhibit J to the application, I began by dividing the respective revenue
2 requirements by the EDU's test-period kWh sales to determine the per kWh rate which
3 would apply if the EDU's annual USF rider revenue requirement were to be recovered
4 through a uniform per kWh rate. The sales information came from each EDU and is
5 attached to my testimony as Exhibits MM-19 through MM-24. Under the Commission-
6 approved USF rider rate design methodology, the first block of the rate applies to all
7 monthly consumption up to and including 833,000 kWh (*i.e.*, one-twelfth of an annual
8 consumption of 10,000,000 kWh). The second block applies to all consumption above
9 833,000 kWh per month. The rate per kWh for the second block is set at the lower of the
10 PIPP rider rate in effect in October 1999 or the per-kWh rate that would apply if the
11 EDU's annual USF rider revenue requirement were to be recovered through a single
12 block per-kWh rate, with the first block rate set at the level necessary to produce the
13 remainder of the EDU's annual USF rider revenue requirement. In this case, this cap is in
14 play for AEP, CEI, Duke OE, and TE so the two-tier declining block structure will be in
15 effect as shown in the Table II of the application. AES will be utilizing the uniform rate.
16 The workpapers supporting the rate calculations are attached to my testimony as Exhibits
17 MM-25 through MM-30.

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

20 A. Line 19 shows the dollar difference per-kWh between the first block rate under the
21 approved two-tier rate design and a uniform per-kWh rate. Line 20 expresses this
22 difference as a percentage. Line 21 shows the annual cost impact on the average

1 residential customer of the EDU in question resulting from the use of the declining block
2 rate structure as opposed to a uniform rate per kWh. As in prior cases, this analysis is
3 being presented purely for informational purposes.

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

5 A. Table II of the application compares the current and proposed rider rates. As indicated in
6 Table I of the application, the revenues produced by the current USF riders of all EDUs
7 would under collect their indicated revenue targets. Thus, all EDU rider rates will
8 increase.

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

10 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 first class mail, postage prepaid, and electronic mail this 29th day of October 2021.



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Universal Service Fund
Current Rider Mechanism
Cost of PIPP

		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	TOTAL
American Electric Power - Ohio Power	A.													
	1. USF Rider Collected on All Customers	\$10,481,067.67	\$8,560,084.87	\$8,171,666.51	\$9,970,017.76	\$7,871,161.94	\$5,369,714.72	\$5,219,427.33	\$4,382,736.70	\$4,193,065.52	\$4,912,989.02	\$5,559,647.44	\$5,527,491.99	\$80,219,071.47
	2. Non-USF Rider Funds													
	a. Customer Payments	\$6,600,832.58	\$6,777,792.57	\$5,803,215.34	\$6,042,238.90	\$5,785,640.30	\$5,622,957.04	\$6,987,772.59	\$6,271,116.05	\$5,612,024.13	\$6,513,497.40	\$6,312,364.04	\$6,228,709.72	\$74,558,160.66
	b. Other Customer Payments	\$2,942,868.44	\$2,760,319.36	\$2,034,352.57	\$2,019,679.18	\$2,683,381.09	\$2,538,112.62	\$3,760,059.53	\$2,767,448.10	\$2,333,658.30	\$2,510,406.05	\$2,257,389.54	\$2,175,782.51	\$30,783,457.29
	c. Agency Payments	\$647,406.85	\$745,637.24	\$1,223,818.85	\$550,338.46	\$3,245,734.99	\$1,090,351.15	\$1,211,952.52	\$723,039.39	\$473,701.71	\$246,675.66	\$227,486.99	\$665,172.09	\$11,051,315.90
	3. Total Payments	\$10,191,107.87	\$10,283,749.17	\$9,061,386.76	\$8,612,256.54	\$11,714,756.38	\$9,251,420.81	\$11,959,784.64	\$9,761,603.54	\$8,419,384.14	\$9,270,579.11	\$8,797,240.57	\$9,069,664.32	\$116,392,933.85
	4. Payments Applied to Arrearages	\$254,035.31	\$252,815.52	\$1,116,119.74	\$272,338.56	\$3,050,033.43	\$729,844.42	\$959,662.85	\$607,614.48	\$405,657.92	\$305,538.02	\$201,617.20	\$243,370.56	\$8,398,648.01
	5. Total Amount of Remittance	\$10,735,102.98	\$8,812,900.39	\$9,287,786.25	\$10,242,356.32	\$10,921,195.37	\$6,099,559.14	\$6,179,090.18	\$4,990,351.18	\$4,598,723.44	\$5,218,527.04	\$5,761,264.64	\$5,770,862.55	\$88,617,719.48
	B. OCS Admin	\$180,712.29	\$180,712.29	\$180,712.29	\$180,712.26	\$180,712.26	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$2,210,332.03
	C. EPP/TEE Program	\$425,915.69	\$425,915.69	\$425,915.69	\$425,915.65	\$425,915.65	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$5,308,814.78
	D. Available Balance (A4-B-C)	\$10,735,102.98	\$8,812,900.39	\$9,287,786.25	\$10,242,356.32	\$10,921,195.37	\$6,099,559.14	\$6,179,090.18	\$4,990,351.18	\$4,598,723.44	\$5,218,527.04	\$5,761,264.64	\$5,770,862.55	\$88,617,719.48
	E. Total Costs	\$13,221,813.00	\$11,476,374.30	\$12,192,097.58	\$17,239,575.64	\$19,398,091.03	\$19,235,834.83	\$17,424,444.00	\$13,523,901.57	\$11,765,912.28	\$13,554,266.03	\$15,385,861.86	\$15,360,556.85	\$179,778,728.97
	F. Active PIPP and Grad PIPP Bill	\$6,409,125.35	\$6,391,904.39	\$6,372,244.80	\$6,123,893.64	\$6,133,223.03	\$6,259,124.44	\$6,437,204.68	\$6,493,881.36	\$6,502,247.06	\$6,516,587.72	\$6,527,896.47	\$6,573,708.35	\$76,741,041.29
	G. Reimbursement Due	\$6,812,687.65	\$5,084,469.91	\$5,819,852.78	\$11,115,682.00	\$13,264,868.00	\$12,976,710.39	\$10,987,239.32	\$7,030,020.21	\$5,263,665.22	\$7,037,678.31	\$8,857,965.39	\$8,786,848.50	\$103,037,687.68
	H. Surplus/Deficit (D-G)	\$3,922,415.33	\$3,728,430.48	\$3,467,933.47	(\$873,325.68)	(\$2,343,672.63)	(\$6,877,151.25)	(\$4,808,149.14)	(\$2,039,669.03)	(\$664,941.78)	(\$1,819,151.27)	(\$3,096,700.75)	(\$3,015,985.95)	(\$14,419,968.20)
	I. Cost to USF	\$6,558,652.34	\$4,831,654.39	\$4,703,733.04	\$10,843,343.44	\$10,214,834.57	\$12,246,865.97	\$10,027,576.47	\$6,422,405.73	\$4,858,007.30	\$6,732,140.29	\$8,656,348.19	\$8,543,477.94	\$94,639,039.67

Cost of PIPP:	\$94,639,040
Adjustment Test-Period Cost of PIPP:	\$5,965,816
Enrollment Adjustment Test-Period Cost of PIPP:	\$4,114,149
Total Adjusted Cost of PIPP:	\$104,719,005

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

Dayton Power and Light Company	A.		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	Total
		1. USF Rider Collected on All Customers	\$2,063,523.27	\$1,670,147.98	\$1,520,233.71	\$1,912,708.66	\$579,036.70	\$493,820.91	\$502,371.81	\$443,718.69	\$395,289.34	\$473,731.66	\$539,911.67	\$554,330.70	\$11,148,825.10
		2. Non-USF Rider Funds													
		a. Customer Payments	\$1,367,358.40	\$1,216,381.75	\$1,104,221.05	\$1,062,297.80	\$1,273,927.83	\$1,163,129.75	\$1,347,228.02	\$1,182,243.01	\$1,107,672.65	\$1,174,857.29	\$1,149,852.23	\$1,156,766.76	\$14,305,936.54
		b. Other Customer Payments	\$246,821.84	\$218,526.65	\$131,051.31	\$153,486.24	\$212,434.31	\$185,812.75	\$274,518.39	\$245,341.96	\$265,651.00	\$238,031.39	\$220,765.29	\$203,551.52	\$2,595,992.65
		c. Agency Payments	\$143,429.50	\$138,783.00	\$605,872.95	\$80,012.61	\$560,737.91	\$117,444.40	\$60,261.15	\$58,884.24	\$20,762.87	\$117,543.48	\$120,839.78	\$79,696.20	\$2,104,268.09
		3. Total Payments	\$1,757,609.74	\$1,573,691.40	\$1,841,145.31	\$1,295,796.65	\$2,047,100.05	\$1,466,386.90	\$1,682,007.56	\$1,486,469.21	\$1,394,086.52	\$1,530,432.16	\$1,491,457.30	\$1,440,014.48	\$19,006,197.28
		4. Payments Applied to Arrearages	\$211,131.28	\$187,413.65	\$249,644.74	\$82,128.34	\$165,491.48	\$96,666.31	\$298,970.45	\$139,874.62	\$171,677.00	\$162,935.62	\$154,261.56	\$206,571.85	\$2,126,766.90
		5. Total Amount of Remittance	\$2,274,654.55	\$1,857,561.63	\$1,769,878.45	\$1,994,837.00	\$744,528.18	\$590,487.22	\$801,342.26	\$583,593.31	\$566,966.34	\$636,667.28	\$694,173.23	\$760,902.55	\$13,275,592.00
	B.	OCS Admin	\$37,623.48	\$37,623.48	\$37,623.48	\$37,623.46	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$464,692.14
	C.	EPP/TEE Program	\$75,144.28	\$75,144.28	\$75,144.28	\$75,144.25	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$626,815.57
	D.	Available Balance (A4-B-C)	\$2,274,654.55	\$1,857,561.63	\$1,769,878.45	\$1,994,837.00	\$744,528.18	\$590,487.22	\$801,342.26	\$583,593.31	\$566,966.34	\$636,667.28	\$694,173.23	\$760,902.55	\$13,275,592.00
	E.	Total Costs	\$2,044,532.43	\$1,750,537.99	\$1,873,595.15	\$2,315,728.69	\$2,666,234.91	\$2,539,367.08	\$2,473,987.78	\$1,837,210.99	\$1,495,383.85	\$1,949,562.57	\$2,349,893.84	\$2,374,957.46	\$25,670,992.74
	F.	Active PIPP and Grad PIPP Bill	\$1,234,482.69	\$1,217,000.72	\$1,216,130.36	\$1,218,505.86	\$1,215,855.72	\$1,218,581.89	\$1,214,410.96	\$1,208,144.44	\$1,198,587.03	\$1,185,738.39	\$1,170,951.89	\$1,157,024.81	\$14,455,414.76
	G.	Reimbursement Due	\$810,049.74	\$533,537.27	\$657,464.79	\$1,097,222.83	\$1,450,379.19	\$1,320,785.19	\$1,259,576.82	\$629,066.55	\$296,796.82	\$763,824.18	\$1,178,941.95	\$1,217,932.65	\$11,215,577.98
	H.	Surplus/Deficit (D-G)	\$1,464,604.81	\$1,324,024.36	\$1,112,413.66	\$897,614.17	(\$705,851.01)	(\$730,297.97)	(\$458,234.56)	(\$45,473.24)	\$270,169.52	(\$127,156.90)	(\$484,768.72)	(\$457,030.10)	\$2,060,014.02
	I.	Cost to USF	\$598,918.46	\$346,123.62	\$407,820.05	\$1,015,094.49	\$1,284,887.71	\$1,224,118.88	\$960,606.37	\$489,191.93	\$125,119.82	\$600,888.56	\$1,024,680.39	\$1,011,360.80	\$9,088,811.08

Cost of PIPP: \$	9,088,811
Adjustment Test-Period Cost of PIPP: \$	3,961,893
Enrollment Adjustment Test-Period Cost of PIPP: \$	675,808
Total Adjusted Cost of PIPP: \$	13,726,512

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	Total
Duke Energy	A.													
	1. USF Rider Collected on All Customers	\$1,486,637.21	\$1,286,307.02	\$1,223,713.57	\$1,466,260.61	\$584,750.11	\$586,552.82	\$577,789.00	\$455,699.59	\$500,477.98	\$534,817.07	\$675,387.71	\$607,688.57	\$9,986,081.26
	2. Non-USF Rider Funds													
	a. Customer Payments	\$1,044,511.43	\$985,630.39	\$845,965.21	\$962,810.27	\$1,039,267.64	\$992,495.51	\$1,150,387.78	\$972,886.44	\$892,704.69	\$990,354.23	\$1,054,077.66	\$1,083,183.50	\$12,014,274.75
	b. Other Customer Payments	\$118,327.21	\$118,042.52	\$119,671.50	\$122,491.02	\$116,444.71	\$107,170.18	\$184,008.06	\$142,435.08	\$135,707.25	\$151,578.84	\$136,820.55	\$131,200.62	\$1,583,897.54
	c. Agency Payments	\$51,803.02	\$27,280.46	\$88,744.84	\$69,016.83	\$299,873.49	\$69,338.05	\$68,090.12	\$50,159.72	\$24,018.92	\$15,770.05	\$19,932.88	\$16,128.73	\$800,157.11
	3. Total Payments	\$1,214,641.66	\$1,130,953.37	\$1,054,381.55	\$1,154,318.12	\$1,455,585.84	\$1,169,003.74	\$1,402,485.96	\$1,165,481.24	\$1,052,430.86	\$1,157,703.12	\$1,210,831.09	\$1,230,512.85	\$14,398,329.40
	4. Payments Applied to Arrearages	\$223,245.94	\$196,495.14	\$246,291.44	\$290,950.97	\$549,845.32	\$282,756.82	\$333,361.48	\$236,755.09	\$199,990.14	\$266,938.88	\$285,814.52	\$258,460.39	\$3,370,906.13
	5. Total Amount of Remittance	\$1,709,883.15	\$1,482,802.16	\$1,470,005.01	\$1,757,211.58	\$1,134,595.43	\$869,309.64	\$911,150.48	\$692,454.68	\$700,468.12	\$801,755.95	\$961,202.23	\$866,148.96	\$13,356,987.39
	B. OCS Admin	\$32,567.94	\$32,567.94	\$32,567.94	\$32,567.94	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$392,802.56
	C. EPP/TEE Program	\$60,201.00	\$60,201.00	\$60,201.00	\$60,201.04	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$629,275.64
	D. Available Balance (A4-B-C)	\$1,709,883.15	\$1,482,802.16	\$1,470,005.01	\$1,757,211.58	\$1,134,595.43	\$869,309.64	\$911,150.48	\$692,454.68	\$700,468.12	\$801,755.95	\$961,202.23	\$866,148.96	\$13,356,987.39
	E. Total Costs	\$2,270,210.64	\$1,869,987.24	\$2,027,446.04	\$2,563,567.85	\$2,971,916.79	\$2,856,325.22	\$2,821,879.74	\$2,228,765.95	\$1,928,854.40	\$2,418,976.05	\$2,797,770.12	\$2,765,587.26	\$29,521,287.30
	F. Active PIPP and Grad PIPP Bill	\$1,071,847.66	\$1,053,348.57	\$1,095,839.49	\$1,112,717.78	\$1,153,397.31	\$1,115,167.91	\$1,243,833.88	\$1,176,572.74	\$1,111,775.74	\$1,076,171.92	\$1,082,108.65	\$1,085,312.07	\$13,378,093.72
	G. Reimbursement Due	\$1,198,362.98	\$816,638.67	\$931,606.55	\$1,450,850.07	\$1,818,519.48	\$1,741,157.31	\$1,578,045.86	\$1,052,193.21	\$817,078.66	\$1,342,804.13	\$1,715,661.47	\$1,680,275.19	\$16,143,193.58
	H. Surplus/Deficit (D-G)	\$511,520.17	\$666,163.49	\$538,398.46	\$306,361.51	(\$683,924.05)	(\$871,847.67)	(\$666,895.38)	(\$359,738.53)	(\$116,610.54)	(\$541,048.18)	(\$754,459.24)	(\$814,126.23)	(\$2,786,206.19)
	I. Cost to USF	\$975,117.04	\$620,143.53	\$685,315.11	\$1,159,899.10	\$1,268,674.16	\$1,458,400.49	\$1,244,684.38	\$815,438.12	\$617,088.52	\$1,075,865.25	\$1,429,846.95	\$1,421,814.80	\$12,772,287.45

Cost of PIPP: \$12,772,287

Adjustment Test-Period Cost of PIPP: \$701,986

Enrollment Adjustment Test-Period Cost of PIPP: \$715,323

Total Adjusted Cost of PIPP: \$14,189,597

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	Total
Cleveland Electric Illuminating Company	A.													
	1. USF Rider Collected on All Customers	\$3,192,095.15	\$2,711,616.90	\$2,571,691.53	\$2,803,572.20	\$1,399,752.56	\$1,155,348.96	\$1,113,821.92	\$908,778.98	\$1,093,156.34	\$1,013,423.55	\$1,242,639.20	\$1,205,081.14	\$20,410,978.43
	2. Non-USF Rider Funds													
	a. Customer Payments	\$1,577,164.87	\$1,632,476.36	\$1,381,259.08	\$1,589,100.40	\$1,657,379.14	\$1,550,694.31	\$1,947,705.81	\$1,805,320.01	\$1,617,499.04	\$1,780,796.84	\$1,697,325.86	\$1,726,031.45	\$19,962,753.17
	b. Other Customer Payments	\$352,983.12	\$342,906.45	\$202,149.70	\$191,184.79	\$211,023.94	\$167,814.95	\$237,892.58	\$232,306.62	\$230,521.47	\$246,629.23	\$281,488.40	\$312,794.12	\$3,009,695.37
	c. Agency Payments	\$173,321.86	\$87,257.87	\$131,555.10	\$114,569.28	\$340,691.54	\$190,184.31	\$138,387.65	\$93,543.68	\$71,485.85	\$59,645.18	\$96,560.76	\$109,607.84	\$1,606,810.92
	3. Total Payments	\$2,103,469.85	\$2,062,640.68	\$1,714,963.88	\$1,894,854.47	\$2,209,094.62	\$1,908,693.57	\$2,323,986.04	\$2,131,170.31	\$1,919,506.36	\$2,087,071.25	\$2,075,375.02	\$2,148,433.41	\$24,579,259.46
	4. Payments Applied to Arrearages	\$84,084.55	\$81,933.82	\$69,567.60	\$65,172.38	\$185,074.34	\$116,371.13	\$121,301.11	\$96,850.79	\$101,711.25	\$100,871.35	\$119,192.14	\$108,490.69	\$1,250,621.15
	5. Total Amount of Remittance	\$3,276,179.70	\$2,793,550.72	\$2,641,259.13	\$2,868,744.58	\$1,584,826.90	\$1,271,720.09	\$1,235,123.03	\$1,005,629.77	\$1,194,867.59	\$1,114,294.90	\$1,361,831.34	\$1,313,571.83	\$21,661,599.58
	B. OCS Admin	\$64,923.05	\$64,923.05	\$64,923.05	\$64,923.06	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$775,685.81
	C. EPP/TEE Program	\$122,769.22	\$122,769.22	\$122,769.22	\$122,769.18	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$1,269,730.04
	D. Available Balance (A4-B-C)	\$3,276,179.70	\$2,793,550.72	\$2,641,259.13	\$2,868,744.58	\$1,584,826.90	\$1,271,720.09	\$1,235,123.03	\$1,005,629.77	\$1,194,867.59	\$1,114,294.90	\$1,361,831.34	\$1,313,571.83	\$21,661,599.58
	E. Total Costs	\$3,830,168.10	\$3,581,390.20	\$3,460,600.84	\$3,902,607.35	\$4,469,505.60	\$4,943,894.92	\$4,678,524.18	\$3,906,700.99	\$3,550,028.83	\$3,903,591.68	\$4,363,864.93	\$4,117,920.13	\$48,708,797.75
	F. Active PIPP and Grad PIPP Bill	\$1,728,075.60	\$1,745,376.10	\$1,750,849.00	\$1,763,135.78	\$1,790,756.64	\$1,835,866.49	\$1,836,812.74	\$1,840,193.00	\$1,827,898.03	\$1,866,346.42	\$1,814,629.16	\$1,806,323.87	\$21,606,262.83
	G. Reimbursement Due	\$2,102,092.50	\$1,836,014.10	\$1,709,751.84	\$2,139,471.57	\$2,678,748.96	\$3,108,028.43	\$2,841,711.44	\$2,066,507.99	\$1,722,130.80	\$2,037,245.26	\$2,549,235.77	\$2,311,596.26	\$27,102,534.92
	H. Surplus/Deficit (D-G)	\$1,174,087.20	\$957,536.62	\$931,507.29	\$729,273.01	(\$1,093,922.06)	(\$1,836,308.34)	(\$1,606,588.41)	(\$1,060,878.22)	(\$527,263.21)	(\$922,950.36)	(\$1,187,404.43)	(\$998,024.43)	(\$5,440,935.34)
	I. Cost to USF	\$2,018,007.95	\$1,754,080.28	\$1,640,184.24	\$2,074,299.19	\$2,493,674.62	\$2,991,657.30	\$2,720,410.33	\$1,969,657.20	\$1,620,419.55	\$1,936,373.91	\$2,430,043.63	\$2,203,105.57	\$25,851,913.77

Cost of PIPP: \$25,851,914

Adjustment Test-Period Cost of PIPP: \$2,534,839

Enrollment Adjustment Test-Period Cost of PIPP: \$1,249,540

Total Adjusted Cost of PIPP: \$29,636,293

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	Total
Ohio Edison	A.													
	1. USF Rider Collected on All Customers	\$6,216,246.51	\$5,174,851.90	\$4,884,527.12	\$5,274,493.14	\$2,672,921.56	\$2,166,357.40	\$1,979,562.20	\$1,758,770.01	\$1,803,742.15	\$2,032,146.93	\$2,265,038.36	\$2,220,441.78	\$38,449,099.06
	2. Non-USF Rider Funds													
	a. Customer Payments	\$3,092,148.27	\$3,305,030.19	\$2,708,474.53	\$3,041,816.05	\$3,332,074.56	\$2,867,358.42	\$3,626,237.45	\$3,286,068.59	\$2,845,479.81	\$3,248,251.56	\$3,049,272.44	\$3,165,597.98	\$37,567,809.85
	b. Other Customer Payments	\$602,483.17	\$536,816.55	\$379,468.82	\$399,636.78	\$369,941.31	\$287,675.18	\$441,429.93	\$410,674.63	\$358,791.57	\$377,843.60	\$398,049.25	\$451,031.71	\$5,013,842.50
	c. Agency Payments	\$304,549.95	\$116,208.96	\$303,122.93	\$256,338.49	\$829,753.73	\$320,813.03	\$424,353.79	\$224,873.12	\$133,050.34	\$131,752.99	\$205,737.69	\$202,724.69	\$3,453,279.71
	3. Total Payments	\$3,999,181.39	\$3,958,055.70	\$3,391,066.28	\$3,697,791.32	\$4,531,769.60	\$3,475,846.63	\$4,492,021.17	\$3,921,616.34	\$3,337,321.72	\$3,757,848.15	\$3,653,059.38	\$3,819,354.38	\$46,034,932.06
	4. Payments Applied to Arrearages	\$115,484.00	\$94,011.31	\$167,450.85	\$181,789.80	\$446,941.12	\$255,492.55	\$288,123.84	\$210,694.08	\$151,278.00	\$150,815.23	\$139,720.78	\$118,015.97	\$2,319,817.53
	5. Total Amount of Remittance	\$6,331,730.51	\$5,268,863.21	\$5,051,977.97	\$5,456,282.94	\$3,119,862.68	\$2,421,849.95	\$2,267,686.04	\$1,969,464.09	\$1,955,020.15	\$2,182,962.16	\$2,404,759.14	\$2,338,457.75	\$40,768,916.59
	B. OCS Admin	\$102,627.61	\$102,627.61	\$102,627.61	\$102,627.57	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$1,263,894.32
	C. EPP/TEE Program	\$212,925.13	\$212,925.13	\$212,925.13	\$212,925.08	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$2,247,805.35
	D. Available Balance (A4-B-C)	\$6,331,730.51	\$5,268,863.21	\$5,051,977.97	\$5,456,282.94	\$3,119,862.68	\$2,421,849.95	\$2,267,686.04	\$1,969,464.09	\$1,955,020.15	\$2,182,962.16	\$2,404,759.14	\$2,338,457.75	\$40,768,916.59
	E. Total Costs	\$7,077,356.79	\$6,230,327.69	\$6,144,398.17	\$7,179,683.39	\$8,675,909.46	\$9,179,024.11	\$8,528,926.03	\$6,914,340.64	\$6,321,671.75	\$6,854,987.02	\$8,129,653.07	\$7,945,967.89	\$89,182,246.01
	F. Active PIPP and Grad PIPP Bill	\$3,139,091.97	\$3,164,555.85	\$3,153,824.79	\$3,173,722.08	\$3,247,537.50	\$3,246,070.72	\$3,305,093.59	\$3,302,470.94	\$3,303,265.71	\$3,335,075.69	\$3,284,920.89	\$3,273,725.65	\$38,929,355.38
	G. Reimbursement Due	\$3,938,264.82	\$3,065,771.84	\$2,990,573.38	\$4,005,961.31	\$5,428,371.96	\$5,932,953.39	\$5,223,832.44	\$3,611,869.70	\$3,018,406.04	\$3,519,911.33	\$4,844,732.18	\$4,672,242.24	\$50,252,890.63
	H. Surplus/Deficit (D-G)	\$2,393,465.69	\$2,203,091.37	\$2,061,404.59	\$1,450,321.63	(\$2,308,509.28)	(\$3,511,103.44)	(\$2,956,146.40)	(\$1,642,405.61)	(\$1,063,385.89)	(\$1,336,949.17)	(\$2,439,973.04)	(\$2,333,784.49)	(\$9,483,974.04)
	I. Cost to USF	\$3,822,780.82	\$2,971,760.53	\$2,823,122.53	\$3,824,171.51	\$4,981,430.84	\$5,677,460.84	\$4,935,708.60	\$3,401,175.62	\$2,867,128.04	\$3,369,096.10	\$4,705,011.40	\$4,554,226.27	\$47,933,073.10

Cost of PIPP:	\$	47,933,073
Adjustment Test-Period Cost of PIPP:	\$	5,017,677
Enrollment Adjustment Test-Period Cost of PIPP:	\$	(493,371)
Total Adjusted Cost of PIPP:	\$	52,457,379

Universal Service Fund
Current Rider Mechanism
Cost of PIPP

		9/2020	10/2020	11/2020	12/2020	1/2021	2/2021	3/2021	4/2021	5/2021	6/2021	7/2021	8/2021	Total
Toledo Edison/First Energy	A.													
	1. USF Rider Collected on All Customers	\$1,986,767.49	\$1,632,198.27	\$1,541,734.23	\$1,701,873.69	\$888,419.46	\$667,566.02	\$600,130.42	\$580,820.03	\$568,527.60	\$653,370.69	\$699,481.69	\$713,900.35	\$12,234,789.94
	2. Non-USF Rider Funds													
	a. Customer Payments	\$944,118.31	\$971,709.20	\$809,596.94	\$847,468.42	\$978,363.24	\$902,418.99	\$1,158,719.34	\$1,008,583.69	\$923,106.22	\$984,525.67	\$941,574.38	\$1,008,950.43	\$11,479,134.83
	b. Other Customer Payments	\$195,001.64	\$183,873.98	\$122,132.68	\$101,544.80	\$117,681.75	\$109,866.61	\$160,644.86	\$153,765.33	\$121,170.45	\$140,483.05	\$159,019.34	\$204,750.69	\$1,769,935.18
	c. Agency Payments	\$88,858.16	\$31,790.40	\$117,301.94	\$109,825.84	\$353,838.46	\$89,537.43	\$122,276.19	\$66,546.29	\$53,903.76	\$46,554.02	\$65,580.17	\$69,720.65	\$1,215,733.31
	3. Total Payments	\$1,227,978.11	\$1,187,373.58	\$1,049,031.56	\$1,058,839.06	\$1,449,883.45	\$1,101,823.03	\$1,441,640.39	\$1,228,895.31	\$1,098,180.43	\$1,171,562.74	\$1,166,173.89	\$1,283,421.77	\$14,464,803.32
	4. Payments Applied to Arrearages	\$35,465.41	\$29,712.18	\$56,017.50	\$53,507.25	\$161,508.68	\$82,527.85	\$81,544.61	\$63,399.66	\$54,423.12	\$62,334.92	\$54,255.73	\$64,096.59	\$798,793.50
	5. Total Amount of Remittance	\$2,022,232.90	\$1,661,910.45	\$1,597,751.73	\$1,755,380.94	\$1,049,928.14	\$750,093.87	\$681,675.03	\$644,219.69	\$622,950.72	\$715,705.61	\$753,737.42	\$777,996.94	\$13,033,583.44
	B. OCS Admin	\$30,617.01	\$30,617.01	\$30,617.01	\$30,616.95	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$380,381.50
	C. EPP/TEE Program	\$64,732.73	\$64,732.73	\$64,732.73	\$64,732.70	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$688,994.17
	D. Available Balance (A4-B-C)	\$2,022,232.90	\$1,661,910.45	\$1,597,751.73	\$1,755,380.94	\$1,049,928.14	\$750,093.87	\$681,675.03	\$644,219.69	\$622,950.72	\$715,705.61	\$753,737.42	\$777,996.94	\$13,033,583.44
	E. Total Costs	\$2,213,527.02	\$2,015,817.48	\$1,983,554.85	\$2,314,864.26	\$2,740,839.95	\$3,101,865.58	\$2,766,108.06	\$2,241,871.59	\$1,966,298.23	\$2,166,887.95	\$2,567,182.99	\$2,528,023.16	\$28,606,841.12
	F. Active PIPP and Grad PIPP Bill	\$1,009,937.22	\$1,013,537.11	\$1,013,186.65	\$1,024,248.06	\$1,036,023.99	\$1,039,981.14	\$1,054,133.82	\$1,049,147.67	\$1,048,950.78	\$1,043,772.70	\$1,028,929.94	\$1,028,443.87	\$12,390,292.95
	G. Reimbursement Due	\$1,203,589.80	\$1,002,280.37	\$970,368.20	\$1,290,616.20	\$1,704,815.96	\$2,061,884.44	\$1,711,974.24	\$1,192,723.92	\$917,347.45	\$1,123,115.25	\$1,538,253.05	\$1,499,579.29	\$16,216,548.17
	H. Surplus/Deficit (D-G)	\$818,643.10	\$659,630.08	\$627,383.53	\$464,764.74	(\$654,887.82)	(\$1,311,790.57)	(\$1,030,299.21)	(\$548,504.23)	(\$294,396.73)	(\$407,409.64)	(\$784,515.63)	(\$721,582.35)	(\$3,182,964.73)
	I. Cost to USF	\$1,168,124.39	\$972,568.19	\$914,350.70	\$1,237,108.95	\$1,543,307.28	\$1,979,356.59	\$1,630,429.63	\$1,129,324.26	\$862,924.33	\$1,060,780.33	\$1,483,997.32	\$1,435,482.70	\$15,417,754.67

Cost of PIPP:	\$	15,417,755
Adjustment Test-Period Cost of PIPP:	\$	1,103,708
Enrollment Adjustment Test-Period Cost of PIPP:	\$	(187,202)
Total Adjusted Cost of PIPP:	\$	16,334,261

Universal Service Fund
Projection of December 31, 2021 Balance
Jan 2021- Dec 2021
AEP

AEP

Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
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For Monthly Billing Cycle Ending:

A. Remittance (Form USF-301-00)

1. USF Rider Collected on All Customers II a.	\$ 7,871,161.94	\$ 5,369,714.72	\$ 5,219,427.33	\$ 4,382,736.70	\$ 4,193,065.52	\$ 4,912,989.02	\$ 5,559,647.44	\$ 5,527,491.99	\$ 10,481,067.67	\$ 8,560,084.87	\$ 8,171,666.51	\$ 9,970,017.76	\$ 115,406,426.83
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20-0602-EL-UNC Refund (Applies to January 2021) **\$2,100,000.00**
17-1382-EL-UNC Refund (Applies to 2019 Only)

Actual Collection From 2019 Rider **\$5,771,161.94**

2. Non-USF Rider Funds

III A. + B. Customer Payments	\$5,785,640.30	\$5,622,957.04	\$6,987,772.59	\$6,271,116.05	\$5,612,024.13	\$6,513,497.40	\$6,312,364.04	\$6,228,709.72	\$6,600,832.58	\$6,777,792.57	\$5,803,215.34	\$6,042,238.90	\$ 73,501,820.80
III C. + D. Other Customer Payments	\$2,683,381.09	\$2,538,112.62	\$3,760,059.53	\$2,767,448.10	\$2,333,658.30	\$2,510,406.05	\$2,257,389.54	\$2,175,782.51	\$2,942,868.44	\$2,760,319.36	\$2,034,352.57	\$2,019,679.18	\$ 29,268,965.95
III E. 1 + 2 + 3 Agency Payments	\$3,245,734.99	\$1,090,351.15	\$1,211,952.52	\$723,039.39	\$473,701.71	\$246,675.66	\$227,486.99	\$665,172.09	\$647,406.85	\$745,637.24	\$1,223,818.85	\$550,338.46	\$ 10,789,578.95

3. Total Payments, 301 III F.	\$11,714,756.38	\$9,251,420.81	\$11,959,784.64	\$9,761,603.54	\$8,419,384.14	\$9,270,579.11	\$8,797,240.57	\$9,069,664.32	\$10,191,107.87	\$10,283,749.17	\$9,061,386.76	\$8,612,256.54	\$ 113,560,365.70
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4. Payments Applied to Arrearages II b.	\$3,050,033.43	\$729,844.42	\$959,662.85	\$607,614.48	\$405,657.92	\$305,538.02	\$201,617.20	\$243,370.56	\$254,035.31	\$252,815.52	\$1,116,119.74	\$272,338.56	\$ 9,739,046.98
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5. Total Amount of Remittance II c.	\$10,921,195.37	\$ 6,099,559.14	\$ 6,179,090.18	\$ 4,990,351.18	\$ 4,598,723.44	\$ 5,218,527.04	\$ 5,761,264.64	\$ 5,770,862.55	\$10,735,102.98	\$8,812,900.39	\$ 9,287,786.25	\$10,242,356.32	\$ 125,145,473.81
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B. OCS Admin	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.52	\$186,681.56	\$ 2,168,547.45
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C. EPP Program	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.63	\$454,176.67	\$ 5,110,988.24
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D. Available Balance (A5-B-C)	\$10,280,337.22	\$5,458,700.99	\$5,538,232.03	\$4,349,493.03	\$3,957,865.29	\$4,577,668.89	\$5,120,406.49	\$5,130,004.40	\$10,094,244.83	\$8,172,042.24	\$8,646,928.10	\$9,601,498.09	\$ 117,865,938.12
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E. Total Cost: (302, VIII)	\$19,398,091.03	\$19,235,834.83	\$17,424,444.00	\$13,523,901.57	\$11,765,912.28	\$13,554,266.03	\$15,385,861.86	\$15,360,556.85	\$13,221,813.00	\$11,476,374.30	\$12,192,097.58	\$17,239,575.64	\$ 170,093,674.70
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F. Active PIPP and Grad PIPP Bill (302, X)	\$6,133,223.03	\$6,259,124.44	\$6,437,204.68	\$6,493,881.36	\$6,502,247.06	\$6,516,587.72	\$6,527,896.47	\$6,573,708.35	\$6,409,125.35	\$6,391,904.39	\$6,372,244.80	\$6,123,893.64	\$ 77,374,230.17
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G. Reimbursement Due: (302, XI)	\$13,264,868.00	\$12,976,710.39	\$10,987,239.32	\$7,030,020.21	\$5,263,665.22	\$7,037,678.31	\$8,857,965.39	\$8,786,848.50	\$6,812,687.65	\$5,084,469.91	\$5,819,852.78	\$11,115,682.00	\$ 92,719,444.53
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H. Surplus/Deficit (D-E)	(\$2,984,530.78)	(\$7,518,009.40)	(\$5,449,007.29)	(\$2,680,527.18)	(\$1,305,799.93)	(\$2,460,009.42)	(\$3,737,558.90)	(\$3,656,844.10)	\$3,281,557.18	\$3,087,572.33	\$2,827,075.32	(\$1,514,183.91)	\$ 25,146,493.59
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I. Cumulative Deficit	\$14,113,061.93	\$6,595,052.53	\$1,146,045.24	(\$1,534,481.94)	(\$2,840,281.87)	(\$5,300,291.29)	(\$9,037,850.19)	(\$12,694,694.29)	(\$9,413,137.11)	(\$6,325,564.78)	(\$3,498,489.46)	(\$5,012,673.38)	
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J. Monthly Reconciliation	\$39,615,574.63	\$36,110,493.71	\$35,226,007.01	\$34,753,468.40	\$29,120,019.79	\$17,184,468.33	\$5,992,263.11	\$8,319,355.15	\$4,629,807.08	\$940,259.01	(\$2,749,289.06)	\$53,356,256.07	
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**Universal Service Fund
Projection of December 31, 2021 Balance
Jan 2021- Dec 2021
Dayton Power and Light**

For Monthly Billing Cycle Ending:													
	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
A. Remittance (Form USF-301-00)													
1. USF Rider Collected on All Customers II a.	\$579,036.70	\$493,820.91	\$502,371.81	\$443,718.69	\$395,289.34	\$473,731.66	\$539,911.67	\$554,330.70	\$2,063,523.27	\$1,670,147.98	\$1,520,233.71	\$1,912,708.66	\$22,694,629.80
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$1,273,927.83	\$1,163,129.75	\$1,347,228.02	\$1,182,243.01	\$1,107,672.65	\$1,174,857.29	\$1,149,852.23	\$1,156,766.76	\$1,367,358.40	\$1,216,381.75	\$1,104,221.05	\$1,062,297.80	\$14,636,017.96
III C. + D. Other Customer Payments	\$212,434.31	\$185,812.75	\$274,518.39	\$245,341.96	\$265,651.00	\$238,031.39	\$220,765.29	\$203,551.52	\$246,821.84	\$218,526.65	\$131,051.31	\$153,486.24	\$2,688,263.95
III E. 1 + 2 + 3 Agency Payments	\$560,737.91	\$117,444.40	\$60,261.15	\$58,884.24	\$20,762.87	\$117,543.48	\$120,839.78	\$79,696.20	\$143,429.50	\$138,783.00	\$605,872.95	\$80,012.61	\$2,310,576.41
3. Total Payments, 301 III F.	\$2,047,100.05	\$1,466,386.90	\$1,682,007.56	\$1,486,469.21	\$1,394,086.52	\$1,530,432.16	\$1,491,457.30	\$1,440,014.48	\$1,757,609.74	\$1,573,691.40	\$1,841,145.31	\$1,295,796.65	\$19,634,858.32
4. Payments Applied to Arrearages II b.	\$165,491.48	\$96,666.31	\$298,970.45	\$139,874.62	\$171,677.00	\$162,935.62	\$154,261.56	\$206,571.85	\$211,131.28	\$187,413.65	\$249,644.74	\$82,128.34	\$2,365,939.69
5. Total Amount of Remittance II c.	\$744,528.18	\$590,487.22	\$801,342.26	\$583,593.31	\$566,966.34	\$636,667.28	\$694,173.23	\$760,902.55	\$2,274,654.55	\$1,857,561.63	\$1,769,878.45	\$1,994,837.00	\$25,060,569.49
B. OCS Admin 0.0163698000	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$39,274.78	\$451,481.74
C. TEE Program 0.0447309160	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$40,779.81	\$901,731.33
D. Available Balance (A5-B-C)	\$664,473.59	\$510,432.63	\$721,287.67	\$503,538.72	\$486,911.75	\$556,612.69	\$614,118.64	\$680,847.96	\$2,194,599.96	\$1,777,507.04	\$1,689,823.86	\$1,914,782.41	\$23,707,356.42
E. Total Costs: (302, VIII)	\$2,666,234.91	\$2,539,367.08	\$2,473,987.78	\$1,837,210.99	\$1,495,383.85	\$1,949,562.57	\$2,349,893.84	\$2,374,957.46	\$2,044,532.43	\$1,750,537.99	\$1,873,595.15	\$2,315,728.69	\$26,548,241.11
F. Active PIPP and Grad PIPP Bill (302, X)	\$1,215,855.72	\$1,218,581.89	\$1,214,410.96	\$1,208,144.44	\$1,198,587.03	\$1,185,738.39	\$1,170,951.89	\$1,157,024.81	\$1,234,482.69	\$1,217,000.72	\$1,216,130.36	\$1,218,505.86	\$15,026,332.52
G. Reimbursement Due, (302, XI)	\$1,450,379.19	\$1,320,785.19	\$1,259,576.82	\$629,066.55	\$296,796.82	\$763,824.18	\$1,178,941.95	\$1,217,932.65	\$810,049.74	\$533,537.27	\$657,464.79	\$1,097,222.83	\$11,521,908.59
H. Surplus/Deficit (D-E)	(\$785,905.60)	(\$810,352.56)	(\$538,289.15)	(\$125,527.83)	\$190,114.93	(\$207,211.49)	(\$564,823.31)	(\$537,084.69)	\$1,384,550.22	\$1,243,969.77	\$1,032,359.07	\$817,559.58	\$12,185,447.83
I. Cumulative Monthly Deficit	\$6,808,160.99	\$5,997,808.43	\$5,459,519.28	\$5,333,991.45	\$5,524,106.38	\$5,316,894.89	\$4,752,071.58	\$4,214,986.89	\$5,599,537.11	\$6,843,506.88	\$7,875,865.95	\$8,693,425.53	
J. Monthly Reconciliation	\$3,904,885.44	\$3,559,391.54	\$3,472,208.17	\$3,425,630.30	\$2,870,344.36	\$1,693,863.61	\$590,654.08	\$820,034.27	\$460,088.02	\$100,141.77	(\$259,804.49)	\$5,259,296.86	

Universal Service Fund
Projection of December 31, 2021 Balance
Jan 2021 - Dec 2021
Duke Energy Ohio

For Monthly Billing Cycle Ending:															
		Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total	
A. Remittance (Form USF-301-00)															
1. USF Rider Collected on All Customers II a.		\$584,750.11	\$586,552.82	\$577,789.00	\$455,699.59	\$500,477.98	\$534,817.07	\$675,387.71	\$607,688.57	\$1,486,637.21	\$1,286,307.02	\$1,223,713.57	\$1,466,260.61	\$16,762,102.22	
2. Non-USF Rider Funds															
III A. + B. Customer Payments		\$1,039,267.64	\$992,495.51	\$1,150,387.78	\$972,886.44	\$892,704.69	\$990,354.23	\$1,054,077.66	\$1,083,183.50	\$1,044,511.43	\$985,630.39	\$845,965.21	\$962,810.27	\$11,256,822.78	
III C. + D. Other Customer Payments		\$116,444.71	\$107,170.18	\$184,008.06	\$142,435.08	\$135,707.25	\$151,578.84	\$136,820.55	\$131,200.62	\$118,327.21	\$118,042.52	\$119,671.50	\$122,491.02	\$1,570,019.67	
III E. 1 + 2 + 3 Agency Payments		\$299,873.49	\$69,338.05	\$68,090.12	\$50,159.72	\$24,018.92	\$15,770.05	\$19,932.88	\$16,128.73	\$51,803.02	\$27,280.46	\$88,744.84	\$69,016.83	\$1,130,822.34	
3. Total Payments, 301 III F.		\$1,455,585.84	\$1,169,003.74	\$1,402,485.96	\$1,165,481.24	\$1,052,430.86	\$1,157,703.12	\$1,210,831.09	\$1,230,512.85	\$1,214,641.66	\$1,130,953.37	\$1,054,381.55	\$1,154,318.12	\$13,957,664.79	
4. Payments Applied to Arrearages II b.		\$549,845.32	\$282,756.82	\$333,361.48	\$236,755.09	\$199,990.14	\$266,938.88	\$285,814.52	\$258,460.39	\$223,245.94	\$196,495.14	\$246,291.44	\$290,950.97	\$3,379,266.59	
5. Total Amount of Remittance II c.		\$1,134,595.43	\$869,309.64	\$911,150.48	\$692,454.68	\$700,468.12	\$801,755.95	\$961,202.23	\$866,148.96	\$1,709,883.15	\$1,482,802.16	\$1,470,005.01	\$1,757,211.58	\$20,141,368.81	
B. OCS Admin	0.0197569390	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$32,816.35	\$390,815.28	
C. EPP Program	0.0475136010	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$48,558.95	\$722,412.04	
D. Available Balance (A5-B-C)		\$1,053,220.13	\$787,934.34	\$829,775.18	\$611,079.38	\$619,092.82	\$720,380.65	\$879,826.93	\$784,773.66	\$1,628,507.85	\$1,401,426.86	\$1,388,629.71	\$1,675,836.28	\$19,028,141.49	
E. Total Cost: (302, VIII)		\$2,971,916.79	\$2,856,325.22	\$2,821,879.74	\$2,228,765.95	\$1,928,854.40	\$2,418,976.05	\$2,797,770.12	\$2,765,587.26	\$2,270,210.64	\$1,869,987.24	\$2,027,446.04	\$2,563,567.85	\$25,116,773.86	
F. Active PIPP & Grad PIPP Bill (302, X)		\$1,153,397.31	\$1,115,167.91	\$1,243,833.88	\$1,176,572.74	\$1,111,775.74	\$1,076,171.92	\$1,082,108.65	\$1,085,312.07	\$1,071,847.66	\$1,053,348.57	\$1,095,839.49	\$1,112,717.78	\$12,654,635.96	
G. Reimbursement Due, (302, XI)		\$1,818,519.48	\$1,741,157.31	\$1,578,045.86	\$1,052,193.21	\$817,078.66	\$1,342,804.13	\$1,715,661.47	\$1,680,275.19	\$1,198,362.98	\$816,638.67	\$931,606.55	\$1,450,850.07	\$12,462,137.90	
H. Surplus/Shortfall (D-E)		(\$765,299.35)	(\$953,222.97)	(\$748,270.68)	(\$441,113.83)	(\$197,985.84)	(\$622,423.48)	(\$835,834.54)	(\$895,501.53)	\$430,144.87	\$584,788.19	\$457,023.16	\$224,986.21	\$6,566,003.59	
I. Monthly Cumulative Deficit		\$1,937,515.91	\$984,307.05	\$236,050.48	(\$205,049.24)	(\$403,020.97)	(\$1,025,430.34)	(\$1,861,250.77)	(\$2,756,738.19)	(\$2,326,579.21)	(\$1,741,776.91)	(\$1,284,739.64)	(\$1,059,739.32)		
J. Monthly Reconciliation		\$5,571,225.83	\$5,078,298.55	\$4,953,911.23	\$4,887,457.08	\$4,095,212.75	\$2,416,689.77	\$842,705.21	\$1,169,969.30	\$782,465.68	\$394,962.05	\$7,458.42	\$7,503,608.23		

Universal Service Fund
Projected December 31, 2021 Balance
Jan 2021-Dec 2021
Cleveland Electric Illuminating

For Monthly Billing Cycle Ending:													
	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
A. Remittance (Form USF-301-00)													
1. USF Rider Collected on All Customers II a.	\$1,399,752.56	\$1,155,348.96	\$1,113,821.92	\$908,778.98	\$1,093,156.34	\$1,013,423.55	\$1,242,639.20	\$1,205,081.14	\$3,192,095.15	\$2,711,616.90	\$2,571,691.53	\$2,803,572.20	\$34,758,935.89
2. Non-USF Rider Funds													
III A. + B. Customer Payments	\$1,657,379.14	\$1,550,694.31	\$1,947,705.81	\$1,805,320.01	\$1,617,499.04	\$1,780,796.84	\$1,697,325.86	\$1,726,031.45	\$1,577,164.87	\$1,632,476.36	\$1,381,259.08	\$1,589,100.40	\$18,286,455.13
III C. + D. Other Customer Payments	\$211,023.94	\$167,814.95	\$237,892.58	\$232,306.62	\$230,521.47	\$246,629.23	\$281,488.40	\$312,794.12	\$352,983.12	\$342,906.45	\$202,149.70	\$191,184.79	\$5,274,301.67
III E. 1 + 2 + 3 Agency Payments	\$340,691.54	\$190,184.31	\$138,387.65	\$93,543.68	\$71,485.85	\$59,645.18	\$96,560.76	\$109,607.84	\$173,321.86	\$87,257.87	\$131,555.10	\$114,569.28	\$1,895,661.42
3. Total Payments, 301 III F.	\$2,209,094.62	\$1,908,693.57	\$2,323,986.04	\$2,131,170.31	\$1,919,506.36	\$2,087,071.25	\$2,075,375.02	\$2,148,433.41	\$2,103,469.85	\$2,062,640.68	\$1,714,963.88	\$1,894,854.47	\$25,456,418.22
4. Payments Applied to Arrearages II b.	\$185,074.34	\$116,371.13	\$121,301.11	\$96,850.79	\$101,711.25	\$100,871.35	\$119,192.14	\$108,490.69	\$84,084.55	\$81,933.82	\$69,567.60	\$65,172.38	\$1,569,050.59
5. Total Amount of Remittance II c.	\$1,584,826.90	\$1,271,720.09	\$1,235,123.03	\$1,005,629.77	\$1,194,867.59	\$1,114,294.90	\$1,361,831.34	\$1,313,571.83	\$3,276,179.70	\$2,793,550.72	\$2,641,259.13	\$2,868,744.58	\$36,327,986.48
B. OCS Admin 0.0127841030	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$64,499.20	\$779,076.61
C. TEE Program 0.0275052340	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$97,331.65	\$1,473,230.60
D. Available Balance (A5-B-C)	\$1,422,996.05	\$1,109,889.24	\$1,073,292.18	\$843,798.92	\$1,033,036.74	\$952,464.05	\$1,200,000.49	\$1,151,740.98	\$3,114,348.85	\$2,631,719.87	\$2,479,428.28	\$2,706,913.73	\$34,075,679.27
E. Total Cost: (302, VIII)	\$4,469,505.60	\$4,943,894.92	\$4,678,524.18	\$3,906,700.99	\$3,550,028.83	\$3,903,591.68	\$4,363,864.93	\$4,117,920.13	\$3,830,168.10	\$3,581,390.20	\$3,460,600.84	\$3,902,607.35	\$43,774,581.97
F. Active PIPP & Grad PIPP Bill (302, X)	\$1,790,756.64	\$1,835,866.49	\$1,836,812.74	\$1,840,193.00	\$1,827,898.03	\$1,866,346.42	\$1,814,629.16	\$1,806,323.87	\$1,728,075.60	\$1,745,376.10	\$1,750,849.00	\$1,763,135.78	\$20,555,499.13
G. Reimbursement Due, (302, XI)	\$2,678,748.96	\$3,108,028.43	\$2,841,711.44	\$2,066,507.99	\$1,722,130.80	\$2,037,245.26	\$2,549,235.77	\$2,311,596.26	\$2,102,092.50	\$1,836,014.10	\$1,709,751.84	\$2,139,471.57	\$23,219,082.84
H. Surplus/Shortfall (D-E)	(\$1,255,752.91)	(\$1,998,139.19)	(\$1,768,419.26)	(\$1,222,709.07)	(\$689,094.06)	(\$1,084,781.21)	(\$1,349,235.28)	(\$1,159,855.28)	\$1,012,256.35	\$795,705.77	\$769,676.44	\$567,442.16	\$10,856,596.43
I. Cumulative Monthly Deficit	\$4,174,089.30	\$2,175,950.11	\$407,530.85	(\$815,178.22)	(\$1,504,272.28)	(\$2,589,053.49)	(\$3,938,288.77)	(\$5,098,144.05)	(\$4,085,887.70)	(\$3,290,181.93)	(\$2,520,505.49)	(\$1,953,063.33)	
J. Monthly Reconciliation	\$11,702,773.46	\$10,667,343.12	\$10,406,058.32	\$10,266,466.45	\$8,602,298.42	\$5,076,436.27	\$1,770,164.85	\$2,457,607.38	\$1,724,117.84	\$990,628.30	\$257,138.75	\$15,761,886.17	

**Universal Service Fund
Projection of December 31, 2021 Balance
Jan 2021-Dec. 2021
Ohio Edison**

For Monthly Billing Cycle Ending:		Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
A.	Remittance (Form USF-301-00)													
1.	USF Rider Collected on All Customers II a.	\$2,672,921.56	\$2,166,357.40	\$1,979,562.20	\$1,758,770.01	\$1,803,742.15	\$2,032,146.93	\$2,265,038.36	\$2,220,441.78	\$6,216,246.51	\$5,174,851.90	\$4,884,527.12	\$5,274,493.14	\$66,045,935.53
2.	Non-USF Rider Funds													
III A. + B.	Customer Payments	\$3,332,074.56	\$2,867,358.42	\$3,626,237.45	\$3,286,068.59	\$2,845,479.81	\$3,248,251.56	\$3,049,272.44	\$3,165,597.98	\$3,092,148.27	\$3,305,030.19	\$2,708,474.53	\$3,041,816.05	\$34,834,382.58
III C. + D.	Other Customer Payments	\$369,941.31	\$287,675.18	\$441,429.93	\$410,674.63	\$358,791.57	\$377,843.60	\$398,049.25	\$451,031.71	\$602,483.17	\$536,816.55	\$379,468.82	\$399,636.78	\$7,687,297.76
III E. 1 + 2 + 3	Agency Payments	\$829,753.73	\$320,813.03	\$424,353.79	\$224,873.12	\$133,050.34	\$131,752.99	\$205,737.69	\$202,724.69	\$304,549.95	\$116,208.96	\$303,122.93	\$256,338.49	\$3,996,774.17
3.	Total Payments, 301 III F.	\$4,531,769.60	\$3,475,846.63	\$4,492,021.17	\$3,921,616.34	\$3,337,321.72	\$3,757,848.15	\$3,653,059.38	\$3,819,354.38	\$3,999,181.39	\$3,958,055.70	\$3,391,066.28	\$3,697,791.32	\$46,518,454.51
4.	Payments Applied to Arrearages II b.	\$446,941.12	\$255,492.55	\$288,123.84	\$210,694.08	\$151,278.00	\$150,815.23	\$139,720.78	\$118,015.97	\$115,484.00	\$94,011.31	\$167,450.85	\$181,789.80	\$2,658,537.18
5.	Total Amount of Remittance II c.	\$3,119,862.68	\$2,421,849.95	\$2,267,686.04	\$1,969,464.09	\$1,955,020.15	\$2,182,962.16	\$2,404,759.14	\$2,338,457.75	\$6,331,730.51	\$5,268,863.21	\$5,051,977.97	\$5,456,282.94	\$68,704,472.71
B.	OCS Admin 0.0104224565	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$106,672.99	\$1,231,531.28
C.	EPP Program 0.0247582170	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$174,513.11	\$2,555,101.51
D.	Available Balance (A5-B-C)	\$2,838,676.58	\$2,140,663.85	\$1,986,499.94	\$1,688,277.99	\$1,673,834.05	\$1,901,776.06	\$2,123,573.04	\$2,057,271.65	\$6,050,544.41	\$4,987,677.11	\$4,770,791.87	\$5,175,096.84	\$64,917,839.92
E.	Total Cost: (302, VIII)	\$8,675,909.46	\$9,179,024.11	\$8,528,926.03	\$6,914,340.64	\$6,321,671.75	\$6,854,987.02	\$8,129,653.07	\$7,945,967.89	\$7,077,356.79	\$6,230,327.69	\$6,144,398.17	\$7,179,683.39	\$81,650,185.22
F.	Active PIPP & Grad PIPP Bill (302, X)	\$3,247,537.50	\$3,246,070.72	\$3,305,093.59	\$3,302,470.94	\$3,303,265.71	\$3,335,075.69	\$3,284,920.89	\$3,273,725.65	\$3,139,091.97	\$3,164,555.85	\$3,153,824.79	\$3,173,722.08	\$37,433,285.04
G.	Reimbursement Due, (302, XI)	\$5,428,371.96	\$5,932,953.39	\$5,223,832.44	\$3,611,869.70	\$3,018,406.04	\$3,519,911.33	\$4,844,732.18	\$4,672,242.24	\$3,938,264.82	\$3,065,771.84	\$2,990,573.38	\$4,005,961.31	\$44,216,900.18
H.	Surplus/Shortfall (D-E)	(\$2,589,695.38)	(\$3,792,289.54)	(\$3,237,332.50)	(\$1,923,591.71)	(\$1,344,571.99)	(\$1,618,135.27)	(\$2,721,159.14)	(\$2,614,970.59)	\$2,112,279.59	\$1,921,905.27	\$1,780,218.49	\$1,169,135.53	\$20,700,939.74
I.	Cumulative Monthly Deficit	\$893,118.41	(\$2,899,171.13)	(\$6,136,503.63)	(\$8,060,095.34)	(\$9,404,667.33)	(\$11,022,802.60)	(\$13,743,961.74)	(\$16,358,932.33)	(\$14,246,652.74)	(\$12,324,747.47)	(\$10,544,528.98)	(\$9,375,393.45)	(\$75,884,003.44)
J.	Monthly Reconciliation	\$23,212,679.22	\$21,158,882.97	\$20,640,619.48	\$20,363,736.27	\$17,062,826.54	\$10,069,210.28	\$3,511,156.48	\$4,874,712.14	\$3,621,686.19	\$2,368,660.24	\$1,115,634.28	\$31,264,008.37	

Universal Service Fund
Projection of December 31, 2021 Balance
Jan 2021- Dec 2021
Toledo Edison

For Monthly Billing Cycle Ending:		Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Total
A. Remittance (Form USF-301-00)														
1. USF Rider Collected on All Customers II a.		\$888,419.46	\$667,566.02	\$600,130.42	\$580,820.03	\$568,527.60	\$653,370.69	\$699,481.69	\$713,900.35	\$1,986,767.49	\$1,632,198.27	\$1,541,734.23	\$1,701,873.69	\$20,688,139.37
2. Non-USF Rider Funds														
III A. + B. Customer Payments		\$978,363.24	\$902,418.99	\$1,158,719.34	\$1,008,583.69	\$923,106.22	\$984,525.67	\$941,574.38	\$1,008,950.43	\$944,118.31	\$971,709.20	\$809,596.94	\$847,468.42	\$10,621,232.47
III C. + D. Other Customer Payments		\$117,681.75	\$109,866.61	\$160,644.86	\$153,765.33	\$121,170.45	\$140,483.05	\$159,019.34	\$204,750.69	\$195,001.64	\$183,873.98	\$122,132.68	\$101,544.80	\$2,567,924.20
III E. 1 + 2 + 3 Agency Payments		\$353,838.46	\$89,537.43	\$122,276.19	\$66,546.29	\$53,903.76	\$46,554.02	\$65,580.17	\$69,720.65	\$88,858.16	\$31,790.40	\$117,301.94	\$109,825.84	\$1,502,657.95
3. Total Payments, 301 III F.		\$1,449,883.45	\$1,101,823.03	\$1,441,640.39	\$1,228,895.31	\$1,098,180.43	\$1,171,562.74	\$1,166,173.89	\$1,283,421.77	\$1,227,978.11	\$1,187,373.58	\$1,049,031.56	\$1,058,839.06	\$14,691,814.62
4. Payments Applied to Arrearages II b.		\$161,508.68	\$82,527.85	\$81,544.61	\$63,399.66	\$54,423.12	\$62,334.92	\$54,255.73	\$64,096.59	\$35,465.41	\$29,712.18	\$56,017.50	\$53,507.25	\$996,121.50
5. Total Amount of Remittance II c.		\$1,049,928.14	\$750,093.87	\$681,675.03	\$644,219.69	\$622,950.72	\$715,705.61	\$753,737.42	\$777,996.94	\$2,022,232.90	\$1,661,910.45	\$1,597,751.73	\$1,755,380.94	\$21,684,260.87
B. OCS Admin 0.0084963130		\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$32,239.19	\$367,404.06
C. EPP Program 0.0214163350		\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$53,757.91	\$776,792.73
D. Available Balance (A5-B-C)		\$963,931.04	\$664,096.77	\$595,677.93	\$558,222.59	\$536,953.62	\$629,708.51	\$667,740.32	\$691,999.84	\$1,936,235.80	\$1,575,913.35	\$1,511,754.63	\$1,669,383.84	\$20,540,064.08
E. Total Cost: (302, VIII)		\$2,740,839.95	\$3,101,865.58	\$2,766,108.06	\$2,241,871.59	\$1,966,298.23	\$2,166,887.95	\$2,567,182.99	\$2,528,023.16	\$2,213,527.02	\$2,015,817.48	\$1,983,554.85	\$2,314,864.26	\$26,049,187.84
F. Active PIPP & Grad PIPP Bill (302, X)		\$1,036,023.99	\$1,039,981.14	\$1,054,133.82	\$1,049,147.67	\$1,048,950.78	\$1,043,772.70	\$1,028,929.94	\$1,028,443.87	\$1,009,937.22	\$1,013,537.11	\$1,013,186.65	\$1,024,248.06	\$12,050,046.01
G. Reimbursement Due, (302, XI)		\$1,704,815.96	\$2,061,884.44	\$1,711,974.24	\$1,192,723.92	\$917,347.45	\$1,123,115.25	\$1,538,253.05	\$1,499,579.29	\$1,203,589.80	\$1,002,280.37	\$970,368.20	\$1,290,616.20	\$13,999,141.83
H. Surplus/Shortfall (D-E)		(\$740,884.92)	(\$1,397,787.67)	(\$1,116,296.31)	(\$634,501.33)	(\$380,393.83)	(\$493,406.74)	(\$870,512.73)	(\$807,579.45)	\$732,646.00	\$573,632.98	\$541,386.43	\$378,767.64	\$6,540,922.25
I. Cumulative Monthly Deficit		(\$175,079.75)	(\$1,572,867.42)	(\$2,689,163.73)	(\$3,323,665.06)	(\$3,704,058.89)	(\$4,197,465.63)	(\$5,067,978.36)	(\$5,875,557.81)	(\$5,142,911.81)	(\$4,569,278.83)	(\$4,027,892.40)	(\$3,649,124.76)	
J. Monthly Reconciliation		\$7,399,355.71	\$6,744,680.36	\$6,579,476.85	\$6,491,216.58	\$5,439,006.93	\$3,209,697.07	\$1,119,228.65	\$1,553,880.48	\$1,176,980.37	\$800,080.27	\$423,180.16	\$9,965,825.86	

American Electric Power - Ohio Power

Calculation of Allowance for Undercollection

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	4,033,780,210	5,911,488.79	7,871,161.94	133.15 %
	Feb-21	3,603,294,929	5,372,181.61	5,369,714.72	99.95 %
	Mar-21	3,886,820,423	5,479,779.30	5,219,427.33	95.25 %
	Apr-21	3,081,131,297	4,425,272.53	4,382,736.70	99.04 %
	May-21	3,258,155,259	4,363,589.16	4,193,065.52	96.09 %
	Jun-21	3,699,032,700	5,224,390.20	4,912,989.02	94.04 %
	Jul-21	3,922,488,240	5,603,752.53	5,559,647.44	99.21 %
	Aug-21	3,894,957,182	5,724,902.68	5,527,491.99	96.55 %
	Sep-20	3,721,196,666	10,528,735.17	10,481,067.67	99.55 %
	Oct-20	3,276,240,034	9,003,356.49	8,560,084.87	95.08 %
	Nov-20	2,997,719,249	8,423,209.53	8,171,666.51	97.01 %
	Dec-20	3,684,988,059	10,215,087.06	9,970,017.76	97.60 %
	Total:	43,059,804,248	80,275,745.05	80,219,071.47	100.21 %

Target Revenue:
 Total Cost: (Target Revenue/Average Collection)
 Allowance: (Total Cost-Target Revenue)

\$	69,636,216.90
\$	69,409,913.15
\$	(226,303.75)

MM-13

Dayton Power and Light Company

Calculation of Allowance for Undercollection

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	1,296,717,933	546,307.27	579,036.70	105.99 %
	Feb-21	1,206,927,896	508,478.72	493,820.91	97.12 %
	Mar-21	1,194,456,218	503,224.40	502,371.81	99.83 %
	Apr-21	1,054,247,221	444,154.35	443,718.69	99.90 %
	May-21	938,644,034	395,450.73	395,289.34	99.96 %
	Jun-21	1,125,737,698	474,273.29	473,731.66	99.89 %
	Jul-21	1,281,366,278	539,839.61	539,911.67	100.01 %
	Aug-21	1,319,445,791	555,882.51	554,330.70	99.72 %
	Sep-20	1,244,761,403	2,063,165.63	2,063,523.27	100.02 %
	Oct-20	1,005,677,221	1,669,770.24	1,670,147.98	100.02 %
	Nov-20	923,714,801	1,520,045.76	1,520,233.71	100.01 %
	Dec-20	1,128,227,031	1,910,254.07	1,912,708.66	100.13 %
	Total:	13,719,923,525	11,130,846.59	11,148,825.10	100.22 %

Target Revenue:	\$	6,803,286.86
Total Cost: (Target Revenue/Average Collection)	\$	5,219,971.10
Allowance: (Total Cost-Target Revenue)	\$	(1,583,315.76)
		MM-14

Duke Energy

Calculation of Allowance for Undercollection

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	1,692,603,650	588,518.29	584,750.11	99.36 %
	Feb-21	1,710,816,393	594,850.86	586,552.82	98.61 %
	Mar-21	1,688,488,261	587,087.37	577,789.00	98.42 %
	Apr-21	1,330,770,036	462,708.74	455,699.59	98.49 %
	May-21	1,461,267,530	508,082.72	500,477.98	98.50 %
	Jun-21	1,562,564,844	543,303.80	534,817.07	98.44 %
	Jul-21	1,970,457,148	685,127.95	675,387.71	98.58 %
	Aug-21	1,787,640,458	621,562.59	607,688.57	97.77 %
	Sep-20	1,617,022,605	1,504,262.25	1,486,637.21	98.83 %
	Oct-20	1,529,535,963	1,300,798.02	1,286,307.02	98.89 %
	Nov-20	1,452,497,502	1,263,704.93	1,223,713.57	96.84 %
	Dec-20	1,664,586,377	1,478,623.10	1,466,260.61	99.16 %
	Total:	19,468,250,767	10,138,630.62	9,986,081.26	98.49 %

Target Revenue:

Total Cost: (Target Revenue/Average Collection)

Allowance: (Total Cost-Target Revenue)

\$9,641,972.48

\$9,791,581.30

\$149,608.82

MM-15

Cleveland Electric Illuminating Company

Calculation of Allowance for Undercollection

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	1,482,330,971	1,137,488.61	1,399,752.56	123.06 %
	Feb-21	1,519,977,018	1,164,143.97	1,155,348.96	99.24 %
	Mar-21	1,466,065,085	1,115,280.90	1,113,821.92	99.87 %
	Apr-21	1,228,916,718	924,748.85	908,778.98	98.27 %
	May-21	1,483,659,683	1,091,620.51	1,093,156.34	100.14 %
	Jun-21	1,302,492,417	983,101.35	1,013,423.55	103.08 %
	Jul-21	1,637,361,057	1,253,799.28	1,242,639.20	99.11 %
	Aug-21	1,597,764,435	1,215,472.85	1,205,081.14	99.15 %
	Sep-20	1,554,071,470	3,219,893.75	3,192,095.15	99.14 %
	Oct-20	1,352,636,006	2,721,694.93	2,711,616.90	99.63 %
	Nov-20	1,288,305,355	2,580,831.46	2,571,691.53	99.65 %
	Dec-20	1,382,578,447	2,816,359.52	2,803,572.20	99.55 %
	Total:	17,296,158,662	20,224,435.99	20,410,978.43	101.66 %

Target Revenue: \$ 21,413,856.33

Total Cost: (Target Revenue/Average Collection) \$ 21,475,976.29

Allowance: (Total Cost-Target Revenue) \$ 62,119.96

MM-16

Ohio Edison

Calculation of Allowance for Undercollection

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	2,011,616,436	2,153,860.44	2,672,921.56	124.10 %
	Feb-21	2,025,776,085	2,168,707.00	2,166,357.40	99.89 %
	Mar-21	1,870,869,210	2,002,791.54	1,979,562.20	98.84 %
	Apr-21	1,664,231,967	1,779,706.07	1,758,770.01	98.82 %
	May-21	1,699,969,267	1,818,244.63	1,803,742.15	99.20 %
	Jun-21	1,919,585,742	2,054,122.38	2,032,146.93	98.93 %
	Jul-21	2,138,929,319	2,288,789.33	2,265,038.36	98.96 %
	Aug-21	2,097,994,443	2,244,832.96	2,220,441.78	98.91 %
	Sep-20	2,133,454,066	6,279,688.99	6,216,246.51	98.99 %
	Oct-20	1,791,320,314	5,226,908.47	5,174,851.90	99.00 %
	Nov-20	1,694,926,253	4,934,437.22	4,884,527.12	98.99 %
	Dec-20	1,794,731,384	5,328,006.98	5,274,493.14	99.00 %
	Total:	22,843,404,486	38,280,096.01	38,449,099.06	101.14 %

Target Revenue:	\$	41,574,086.16
Total Cost: (Target Revenue/Average Collection)	\$	41,103,237.78
Allowance: (Total Cost-Target Revenue)	\$	(470,848.38)
		MM-17

Toledo Edison/First Energy

		Kw H	KWh sales X current rider = Rider Expected Revenue	Actual Collection	Expected Revenue / Rider Collection
	Jan-21	903,675,287	658,505.24	888,419.46	134.91 %
	Feb-21	919,583,664	670,200.78	667,566.02	99.61 %
	Mar-21	840,195,219	608,542.51	600,130.42	98.62 %
	Apr-21	823,789,812	586,938.17	580,820.03	98.96 %
	May-21	800,626,893	572,404.70	568,527.60	99.32 %
	Jun-21	908,081,532	659,832.21	653,370.69	99.02 %
	Jul-21	960,927,165	706,614.33	699,481.69	98.99 %
	Aug-21	982,773,695	721,170.09	713,900.35	98.99 %
	Sep-20	967,675,153	2,157,569.42	1,986,767.49	92.08 %
	Oct-20	832,613,622	1,648,679.94	1,632,198.27	99.00 %
	Nov-20	811,408,829	1,558,624.99	1,541,734.23	98.92 %
	Dec-20	842,690,840	1,719,986.49	1,701,873.69	98.95 %
	Total:	10,594,041,711	12,269,068.86	12,234,789.94	101.45 %

Target Revenue:	\$	13,292,373.49
Total Cost: (Target Revenue/Average Collection)	\$	13,023,814.91
Allowance: (Total Cost-Target Revenue)	\$	(268,558.58)

MM-18

OP KWH Sales	Oct
2020- Sept 2021	

KWH	
Jan	4,033,780,210
Feb	3,603,294,929
Mar	3,886,820,423
Apr	3,081,131,297
May	3,258,155,259
June	3,699,032,700
July	3,922,488,240
Aug	3,894,957,182
Sept	4,274,154,836
Oct	3,276,240,034
Nov	2,997,719,249
Dec	3,684,988,059
Total	43,612,762,418

MM-19

DPL KWH Sales
Oct 2020- Sept 2021

KWH	
Jan	1,296,717,933
Feb	1,206,927,896
Mar	1,194,456,218
Apr	1,054,247,221
May	938,644,034
June	1,125,737,698
July	1,281,366,278
Aug	1,319,445,791
Sept	1,311,516,332
Oct	1,005,677,221
Nov	923,714,801
Dec	1,128,227,031
Total	13,786,678,454

MM-20

Duke KWH Sales
Oct 2020- Sept 2021

KWH	
Jan	1,692,603,650
Feb	1,710,816,393
Mar	1,688,488,261
Apr	1,330,770,036
May	1,461,267,530
June	1,562,564,844
July	1,970,457,148
Aug	1,787,640,458
Sept	1,950,948,260
Oct	1,529,535,963
Nov	1,452,497,502
Dec	1,664,586,377
Total	19,802,176,422

MM-21

CEI KWH Sales
Oct 2020- Sept 2021

KWH	
Jan	1,482,330,971
Feb	1,519,977,018
Mar	1,466,065,085
Apr	1,228,916,718
May	1,483,659,683
June	1,302,492,417
July	1,637,361,057
Aug	1,597,764,435
Sept	1,645,297,966
Oct	1,352,636,006
Nov	1,288,305,355
Dec	1,382,578,447
Total	17,387,385,158

MM-22

OE KWH Sales
Oct 2020- Sept 2021

KWH	
Jan	2,011,616,436
Feb	2,025,776,085
Mar	1,870,869,210
Apr	1,664,231,967
May	1,699,969,267
June	1,919,585,742
July	2,138,929,319
Aug	2,097,994,443
Sept	2,204,130,523
Oct	1,791,320,314
Nov	1,694,926,253
Dec	1,794,731,384
Total	22,914,080,943

MM-23

TE KWH Sales
Oct 2020- Sept 2021

KWH	
Jan	903,675,287
Feb	919,583,664
Mar	840,195,219
Apr	823,789,812
May	800,626,893
June	908,081,532
July	960,927,165
Aug	982,773,695
Sept	1,008,321,376
Oct	832,613,622
Nov	811,408,829
Dec	842,690,840
Total	10,634,687,934

MM-24

Two-Tiered Rider AEP

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0021502
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	\$	71,456,682.10
3	Total kWh Used in Calculation		43,059,804,248
4	Uniform per Kwh rate	\$	0.0016595
5	Accounts with Annual kWh Greater than 10,000,000 kWh		298
6	Total Kwh of Accounts Over 10,000,000 kWh Annually		13,683,412,211
7	First Block Annual kWh (833,334 Monthly)		10,000,000
8	Total kWh in First Block (5) x (7)		2,982,500,000
9	Revenue First Block Rate x (8)	\$	6,412,975.86
10	Total Second Block kWh (6) - (8)		10,700,912,211
11	Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$	0.0001756
12	Second Block Revenue (11) x (10)	\$	1,878,545.14
13	Total First and Second Block Revenue (9) + (12)	\$	8,291,521.00
14	Revenue @ ODOD Proposed Rate (6) x (4)	\$	22,707,284.75
15	Revenue shortfall (13) - (14)	\$	(14,415,763.75)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$	63,165,161.10
17	Adjusted kWh (3) - (6)		29,376,392,037
18	Adjusted First Block Rate (16)/(17)		\$0.0021502
19	Change (18) - (4)	\$	0.0004907
20	% Change		29.6%
21	<u>Annual</u> Cost to Consumer Using 975 kWh per Month (19) x 1008.50 x 12	\$	5.94

Two-Tiered Rider
DPL

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0005134
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate (4)]	\$	0.0005134

Calculation

1	10/99 USF Rider	<div>\$ 0.0005700</div>
2	USF Rider Revenue Requirement	\$7,043,534.16
3	Total kWh Used in Calculation	13,719,923,525
4	Uniform per Kwh Rate (2) / (3)	<div>\$ 0.0005134</div>

Two-Tiered Rider Duke

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0005271
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	\$ 10,048,725.66
3	Total kWh Used in Calculation	19,468,250,767
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0005162
5	Accounts with Annual kWh Greater than 10,000,000 kWh	115
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	4,811,163,328
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,150,000,000
9	Revenue First Block Rate x (8)	\$ 606,144.94
10	Total Second Block kWh (6) - (8)	3,661,163,328
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0004690
12	Second Block Revenue (11) x (10)	\$ 1,717,085.60
13	Total First and Second Block Revenue (9) + (12)	\$ 2,323,230.54
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 2,483,328.42
15	Reduction in Total Revenue (13) - (14)	\$ (160,097.88)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 7,725,495.12
17	Adjusted kWh (3) - (6)	14,657,087,439
18	Adjusted USF (16)/(17)	\$ 0.0005271
19	Change (18) - (4)	\$ 0.0000109
20	% Change	2.1%
21	<u>Annual</u> Cost to Consumer Using 1046 kWh per Month (19) x 1046 x 12	\$ 0.14

Two-Tiered Rider CEI

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0013945
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	\$ 21,108,646.42
3	Total kWh Used in Calculation	17,296,158,662
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0012204
5	Accounts with Annual kWh Greater than 10,000,000 kWh	136
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,002,855,792
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,360,000,000
9	Revenue First Block Rate x (8)	\$ 1,896,517.36
10	Total Second Block kWh (6) - (8)	3,642,855,792
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0005680
12	Second Block Revenue (11) x (10)	\$ 2,069,142.09
13	Total First and Second Block Revenue (9) + (12)	\$ 3,965,659.45
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 6,105,605.07
15	Reduction in Total Revenue (13) - (14)	(\$2,139,945.62)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 17,142,986.97
17	Adjusted kWh (3) - (6)	12,293,302,870
18	Adjusted USF (16)/(17)	\$ 0.0013945
19	Change (18) - (4)	\$0.0001741
20	% Change	14.3%
21	<u>Annual</u> Cost to Consumer Using 716 kWh per Month (19) x 716 x 12	\$ 1.50

Two-Tiered Rider Ohio Edison

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$	0.0019748
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh Rate	\$	0.0010461

Calculation

1	10/99 USF Rider	\$ 0.0010461
2	USF Rider Revenue Requirement	\$ 41,869,018.68
3	Total kWh Used in Calculation	22,843,404,486
4	Uniform per Kwh Rate (2) / (3)	\$ 0.0018329
5	Accounts with Annual kWh Greater than 10,000,000 kWh	171
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,200,574,614
7	First Block Annual kWh (833,000 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	1,710,000,000
9	Revenue First Block Rate x (8)	\$ 3,376,869.13
10	Total Second Block kWh (6) - (8)	3,490,574,614
11	Lower of 10/99 Rate (1) or Uniform Per Kwh Rate (4)	\$ 0.0010461
12	Second Block Revenue (11) x (10)	\$ 3,651,490.10
13	Total First and Second Block Revenue (9) + (12)	\$ 7,028,359.24
14	Revenue @ Uniform per Kwh Rate (6) x (4)	\$ 9,531,983.54
15	Reduction in Total Revenue (13) - (14)	\$ (2,503,624.31)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 34,840,659.44
17	Adjusted kWh (3) - (6)	17,642,829,872
18	Adjusted USF (16)/(17)	\$ 0.0019748
19	Change (18) - (4)	\$ 0.0001419
20	% Change	7.7%
21	Annual Cost to Consumer Using 857 kWh per Month (19) x 857 x 12	\$ 1.46

Two-Tiered Rider Toledo Edison

Proposal

First Block 833,000 kWh (10,000,000 per Year) (18)	\$ 0.0018178
Over 833,000 kWh [Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$ 0.0005610

Calculation

1	10/99 USF Rider	\$ 0.0005610
2	USF Rider Revenue Requirement	\$ 13,346,271.72
3	Total kWh Used in Calculation	10,594,041,711
4	Uniform per Kwh rate	\$ 0.0012598
5	Accounts with Annual kWh Greater than 10,000,000 kWh	65
6	Total Kwh of Accounts Over 10,000,000 kWh Annually	5,353,700,437
7	First Block Annual kWh (833,334 Monthly)	10,000,000
8	Total kWh in First Block (5) x (6)	650,000,000
9	Revenue First Block Rate x (8)	\$ 1,181,573.69
10	Total Second Block kWh (6) - (8)	4,703,700,437
11	Lower of 10/99 Rate (1) or Uniform per Kwh rate	\$ 0.0005610
12	Second Block Revenue (11) x (10)	\$ 2,638,775.95
13	Total First and Second Block Revenue (9) + (12)	\$ 3,820,349.63
14	Revenue @ ODOD Proposed Rate (6) x (4)	\$ 6,744,540.25
15	Revenue shortfall (13) - (14)	\$ (2,924,190.62)

Adjustment to Calculation

16	Adjusted Cost (2) - (9) - (12)	\$ 9,525,922.09
17	Adjusted kWh (3) - (6)	5,240,341,274
18	Adjusted First Block Rate (16)/(17)	\$ 0.0018178
19	Change (18) - (4)	\$ 0.0005580
20	% Change	44.3%
21	<u>Annual</u> Cost to Consumer Using 792 kWh per Month (19) x 792 x 12	\$ 5.30

OFFICE OF COMMUNITY ASSISTANCE (OCA)

USF Administration & PIPP ADM/OP

Agreed Upon Procedures

		RC 2020 & RC 2021		
	DESCRIPTION	RC 2020 (6 months) RC 2021 (6 months) Collected	Actuals 7/1/2020- 6/30/2021	Over/Under
A	PAYROLL		\$ 1,421,586.43	
B	CONSULTANTS		\$ 241,518.52	
C	INDIRECT COST		\$ 930,934.60	
D	MAINTENANCE		\$ 216,105.22	
E	PIPP Adm/OP Grant (PY2020)		\$2,142,835.53	
F	TOTAL OF USF ADMIN	\$ 5,467,532.46	\$4,952,980.30	\$514,552.16

	# OF MONTH	MONTHLY	TOTAL COLLECTED
RC 2020	6	\$ 449,071.38	\$ 2,694,428.28
RC 2021	6	\$ 462,184.03	\$ 2,773,104.18
			\$ 5,467,532.46

		RC 2021 Collected	RC 2021 Actuals	Over/Under Budget
G	Agreed Upon Procedures	\$99,000.00	\$67,140.00	\$31,860.00

		RC 2022	
	DESCRIPTION	State Fiscal Year 2022 Budget	REMARKS
	PAYROLL	\$1,500,000.00	USF Payroll = 27.40% of Office Total Payroll
	CONSULTANTS	\$500,000.00	OCEAN/SalesForce Migration Project, Bricker & Eckler & Mail Services.
	INDIRECT COST	\$905,550.00	Indirect Cost 60.37%
	MAINTENANCE	\$258,255.00	Supplies, Communication, Travel, Computer Licenses, Upgrades, Replacement, Printing Costs on Letters/Brochures, Ohio Shared Services, Telephone, Maintenance, IVR etc..
	TOTAL OF OCA ADMIN	\$3,163,805.00	Total RC 2022 OCA ADM
	PIPP ADM/OP GRANTS	\$2,099,988.00	HEAP Local Providers - Intake for Enrollment, Re-Verification, Education. Total number of Housholds @ \$11 per Application (PIPP Plus Related Costs). Estimated number for SFY2022 is 254,544. 75% chargeable to USF & 25% to LIHEAP.
	ADJUSTMENTS	(\$514,552.00)	Round to the nearest dollar
	TOTAL OF USF ADMIN	\$4,749,241.00	Total RC 2022 USF ADM

RC 2022
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10/29/2021 2:56:27 PM

in

Case No(s). 21-0659-EL-USF

Summary: Testimony of Meghan Meadows electronically filed by Dane Stinson on
behalf of Ohio Department of Development