

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's  
Own Motion to Conduct a Comprehensive  
Examination of Investor Owned Electric Utilities'  
Residential Rate Structures, the Transition to Time  
Varying and Dynamic Rates, and Other Statutory  
Obligations.

Rulemaking 12-06-013  
(Filed June 21, 2012)

**PHASE 1 ADDITIONAL SUPPLEMENTARY TESTIMONY OF SAN DIEGO GAS &  
ELECTRIC COMPANY (U902E) PURSUANT TO ALJ RULING**

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Dated: July 23, 2014

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own Motion to Conduct a Comprehensive Examination of Investor Owned Electric Utilities' Residential Rate Structures, the Transition to Time Varying and Dynamic Rates, and Other Statutory Obligations.

Rulemaking 12-06-013  
(Filed June 21, 2012)

**PHASE 1 ADDITIONAL SUPPLEMENTARY TESTIMONY OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E) PURSUANT TO ALJ RULING**

San Diego Gas & Electric Company ("SDG&E") hereby submits its Additional Supplementary Testimony pursuant to the Ruling of ALJ McKinney, issued July 11, 2014. In that Ruling, SDG&E was directed to answer the following question by no later than July 23, 2014:

- (5) Energy Efficiency, Demand Response and Distributed Generation Programs:
  - d. Estimate total load reduction and peak period reduction or load shifting using the "Conservation Tab" of the PG&E RROIR Bill Impact Calculator or an equivalent tool. Use an appropriate elasticity assumption and justify and explain your choice of elasticity assumption.

SDG&E's Additional Supplementary Testimony to the ALJ's Order is set forth herein as Appendix "A." SDG&E appreciates the opportunity to submit this Supplementary Testimony.

Dated: July 23, 2014

San Diego Gas & Electric Company

*/s/ Thomas R. Brill*

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**APPENDIX A**  
**SAN DIEGO GAS AND ELECTRIC COMPANY**  
**IN SUPPORT OF JULY 23, 2014 ADDITIONAL SUPPLEMENTAL TESTIMONY**  
**RULEMAKING 12-06-013 PHASE 1**

In accordance with the ruling issued by Administrative Law Judge (ALJ) Jeanne M. McKinney on July 11, 2014 seeking additional supplementary testimony, San Diego Gas & Electric Company (SDG&E) hereby provides an answer to the following question:

(5) Energy Efficiency, Demand Response and Distributed Generation Programs:  
d. Estimate total load reduction and peak period reduction or load shifting using the “Conservation Tab” of the PG&E RROIR Bill Impact Calculator or an equivalent tool. Use an appropriate elasticity assumption and justify and explain your choice of elasticity assumption.

In this response, SDG&E provides its estimate of conservation related to the current residential rate reform efforts. Details of this estimate are provided in the attached spreadsheet. Please note that this additional response supplements SDG&E’s response submitted on May 16, 2014.

SDG&E has provided its estimate of conservation related to rate residential rate reform with the ruling and has provided its response in the attached spreadsheet. SDG&E estimates the residential price elasticity to be close to  $-0.1$ . Residential elasticity estimates are based on residential sales models developed to submit residential sales forecasts to the California Energy Commission’s Integrated Energy Policy Report (IEPR) process. Therefore SDG&E’s preferred elasticity is  $-0.1$ . The elasticity was applied to both California Alternate Rates for Energy (CARE) and non-CARE customers for Schedules DR and DRLI. SDG&E provided responses for its current baseline and the proposed baseline in its Rate Design Window application (RDW). Additionally SDG&E included a scenario of  $-0.2$  elasticity so that a more direct comparison can be made with the response of Pacific Gas and Electric Company (PG&E) labeled as “PG&E Conservation Tab” in PG&E’s RROIR Bill Impact Calculator.

SDG&E provides a “Summary” tab and has each scenario labeled as a separate tab. For instance: “Conservation Tab 1 ( $-0.1$ )” provides SDG&E’s scenario 1 that uses and elasticity of  $-0.1$ . SDG&E also has created a separate tab labeled “TOU Conservation Tab” to provide its estimates of load reduction based on its default TOU rates to become effective in 2018.

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RULEMAKING 12-06-013 PHASE 1**

Results indicate that when applying an elasticity of (-.1) that SDG&E would expect an overall load growth of about .4% to .5% for all residential customers over the 2015-2017 timeframe – while holding everything else constant<sup>1</sup>.

The percentages of annual kWh change for CARE versus Non-CARE are as follows:

Current Baseline:	Non-CARE	CARE
(-.1) elasticity	.67%	-.59%
(-.2) elasticity	1.35%	-1.19%
 Proposed RDW Baseline:		
(-.1) elasticity	.78%	-.47%
(-.2) elasticity	1.56%	-.93%

SDG&E is providing its default Time-of-Use (TOU) example for its non-CARE and CARE customers. The proposed default TOU rate has a monthly service fee as well as a baseline credit. CARE customers receive a discounted TOU rate, and therefore there is no separate TOU rate for CARE. To simplify the analysis a weighted average Schedule DR and Schedule DRLI rates have been calculated using tier usage and accompanying rates. This weighted average rate is then compared to the proposed default TOU rates (see TOU Conservation Tab). An elasticity of -.2 has also been assumed for the non-CARE TOU example and a conservative elasticity of -.1 is being used for the CARE TOU example. The summer on-peak to off-peak price ratio is approximately 1.4 for both non-CARE and CARE TOU rates. The effect of the non-CARE elasticity shows a summer peak period reduction of 3.5%. This level of reduction is consistent with SDG&E’s prior estimates of summer on-peak load reduction being between 3%-5%.

The effect of the CARE elasticity assumption shows kWh reductions (conservation) in all TOU periods for both summer and winter. The reason for this lies in the current CARE discount being closer to 40%, and the desired discount being closer to 34% in 2018. That change along with the TOU differential creates kWh reductions in all TOU periods – which is not the typical

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<sup>1</sup>Other rate changes or changes to SDG&E’s revenue requirements are not included, as economic and weather effects are also unknown.

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result when applying TOU rates. Normally, the off-peak period shows kWh increases, and the on and semi-peak periods show kWh reductions.

SDG&E is providing the best elasticity assumptions it is able to provide based on currently available information. However, the exact elasticity that will be experienced once residential rate reforms have been implemented as a result of this proceeding, is currently unknown, and will depend on a number of factors. For example, under a scenario where the Net Energy Metering (NEM) program limit, established in Public Utilities Code Section 2827(c)(4)(B), is met in 2017, total residential consumption will go down by 7% when the NEM program limit has been realized (see Conservation Tab -.1 with NEM adj). Under this scenario, the upper tiers could show reductions of 14% and the bottom tiers could be reduced by 3%. However, the usage reductions will not be a direct result of rate design or rate reform, but instead result from other factors, many of which will not be under SDG&E's control.

Note: SDG&E is using its authorized sales from D.14-01-002. SDG&E did not apply its sales forecast to this response

**Elasticity Assumption of -.1**

	2015-2017 kWh Change	2015-2017 kWh Total	Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	37,510,285	5,566,762,291	0.67%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(8,436,478)	1,419,814,967	-0.59%
	<b>29,073,807</b>	<b>6,986,577,259</b>	<b>0.42%</b>
Total non-CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	43,282,684	5,566,762,291	0.78%
Total CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	(6,623,727)	1,419,814,967	-0.47%
	<b>36,658,958</b>	<b>6,986,577,259</b>	<b>0.52%</b>

**Elasticity Assumption of -.2**

	2015-2017 kWh Change	2015-2017 kWh Total	Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	75,020,571	5,566,762,291	1.35%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(16,872,956)	1,419,814,967	-1.19%
	<b>58,147,615</b>	<b>6,986,577,259</b>	<b>0.83%</b>
Total non-CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	86,565,369	5,566,762,291	1.56%
Total CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	(13,247,454)	1,419,814,967	-0.93%
	<b>73,317,915</b>	<b>6,986,577,259</b>	<b>1.05%</b>

**Elasticity Assumption of -.1 with NEM Cap reached**

Assumption that NEM Cap is reached , effect is that total consumption is reduced by 7% -- no conservation

	kWh total	kWh Change	New Annual kWh	Change in total consumption
Bottom Tiers (1 & 2)	4,660,836,287	139,313,503	4,521,522,785	-3%
Upper Tiers (3 & 4)	2,325,740,971	325,064,839	2,000,676,132	-14%
Total	6,986,577,259	464,378,342	6,522,198,917	-7%

	2015-2017 kWh Change	2015-2017 kWh Total	Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	29,989,510	5,195,259,618	0.58%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(8,743,676)	1,326,939,299	-0.66%
	<b>21,245,834</b>	<b>6,522,198,917</b>	<b>0.33%</b>
Total non-CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	35,433,263	5,195,259,618	0.68%
Total CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	(7,037,441)	1,326,939,299	-0.53%
	<b>28,395,822</b>	<b>6,522,198,917</b>	<b>0.44%</b>

**TOU Elasticity Assumption of -.2**

	2015-2017 kWh Change	2015-2017 kWh Total	Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	46,235,601	5,566,762,291	0.83%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(40,351,397)	1,419,814,967	-2.84%
	<b>5,884,203</b>	<b>6,986,577,259</b>	<b>0.08%</b>

## SDG&E 2015-2017 Price Elasticity of Energy - non CARE

Energy (Tiers)	Non-CARE (Schedule DR) Determinants	Current Rate	Proposed Rate	Change in Price	Price Elasticity of Demand (E <sub>d</sub> )	Estimated Change in quantity %	Estimated Change in annual kWh	Estimated New kWh Quantity	
	(kWh)	(\$/kWh)	(\$/kWh)	%	$\frac{(dQ/Q)}{(dP/P)}$		$(dP/P) \times E_d \times Q$		
<b>Summer</b>									
Tier 1	1,445,135,097	0.15396	0.18375	19%	(0.10)	-1.93%	(27,962,181)	1,473,097,278	
Tier 2	293,387,123	0.17778	0.18375	3%	(0.10)	-0.34%	(985,218)	294,372,341	
Tier 3	457,471,011	0.33323	0.23888	-28%	(0.10)	2.83%	12,952,732	444,518,279	
Tier 4	677,029,294	0.35323	0.23888	-32%	(0.10)	3.24%	21,917,249	655,112,045	
							<b>Total</b>	<b>37,510,285</b>	<b>0.67%</b>
<b>Winter</b>									
Tier 1	1,562,553,827	0.15396	0.15469	0%	(0.10)	-0.05%	(740,884)	1,563,294,710	
Tier 2	282,330,795	0.17778	0.15469	-13%	(0.10)	1.30%	3,666,902	278,663,893	
Tier 3	405,933,950	0.29351	0.20110	-31%	(0.10)	3.15%	12,780,606	393,153,344	
Tier 4	442,921,195	0.31351	0.20110	-36%	(0.10)	3.59%	15,881,079	427,040,116	
							<b>Total</b>	<b>37,510,285</b>	<b>0.67%</b>

Note: Using SDG&E's Current Baseline

## SDG&E 2015-2017 Price Elasticity of Energy CARE

Energy (Tiers)	CARE (Schedule DRLI) Determinants	Current Rate	Proposed Rate	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> )	Estimated Change in quantity %	Estimated Change in annual kWh	Estimated New kWh Quantity	
	(kWh)	(\$/kWh)	(\$/kWh)		$\frac{(dQ/Q)}{(dP/P)}$		$(dP/P) \times E_d \times Q$		
<b>Summer</b>									
Tier 1	433,534,801	0.10051	0.12480	24%	(0.10)	2.42%	(10,477,393)	423,057,408	
Tier 2	73,848,096	0.11762	0.12480	6%	(0.10)	-0.61%	(450,727)	73,397,369	
Tier 3	98,315,652	0.17344	0.16501	-5%	(0.10)	0.49%	477,944	98,793,597	
Tier 4	94,883,848	0.17344	0.16501	-5%	(0.10)	0.49%	461,261	95,345,109	
							<b>Total</b>	<b>(8,436,478)</b>	<b>0.59%</b>
<b>Winter</b>									
Tier 1	500,461,047	0.10051	0.10361	3%	(0.10)	-0.31%	(1,540,672)	498,920,375	
Tier 2	69,585,502	0.11762	0.10361	-12%	(0.10)	1.19%	829,279	70,414,781	
Tier 3	85,636,691	0.16204	0.13745	-15%	(0.10)	1.52%	1,299,497	86,936,188	
Tier 4	63,549,330	0.16204	0.13745	-15%	(0.10)	1.52%	964,332	64,513,662	
							<b>Total</b>	<b>(8,436,478)</b>	<b>0.59%</b>

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Tab Name: Conservation Tab 1. (-.1)  
SDGE Model March 21, 2013

	2015-2017 kWh		Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	75,020,571	5,566,762,291	1.35%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(15,872,956)	1,419,814,967	-1.19%
	58,147,615	6,986,577,259	0.83%
Total non-CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	86,565,369	5,566,762,291	1.56%
Total CARE annual kWh change over the three year period with SDG&E's proposed RDW Baseline:	(13,247,454)	1,419,814,967	-0.93%
	73,317,915	6,986,577,259	1.05%

Note: SDG&E is using its authorized sales from D-14-01-002. SDG&E did not apply its sales forecast to this response.

### SDG&E 2015-2017 Price Elasticity of Energy - non CARE

Energy (Tiers)	Non-CARE (Schedule DR) Determinants (kWh)	Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/Q) / (dP/P)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
Summer								
Tier 1	1,445,135,097	0.15396	0.18375	19%	(0.20)	-3.87%	(55,924,363)	1,501,059,460
Tier 2	293,387,123	0.17778	0.18375	3%	(0.20)	-0.67%	(1,970,437)	295,357,559
Tier 3	457,471,011	0.33323	0.23888	-28%	(0.20)	5.66%	25,905,465	431,565,546
Tier 4	677,029,294	0.35323	0.23888	-33%	(0.20)	6.47%	43,834,459	631,194,796
Winter								
Tier 1	1,562,553,827	0.15396	0.15469	0%	(0.20)	-0.09%	(1,481,767)	1,564,035,594
Tier 2	282,330,795	0.17778	0.15469	-13%	(0.20)	2.60%	7,333,804	274,996,991
Tier 3	405,931,950	0.29351	0.20110	-31%	(0.20)	6.30%	25,561,212	380,722,238
Tier 4	442,921,195	0.31351	0.20110	-36%	(0.20)	7.17%	31,762,158	411,159,036
	5,566,762,291					Total	75,020,571	1.35%

Note: Using SDG&E's Current Baseline

### SDG&E 2015-2017 Price Elasticity of Energy CARE

Energy (Tiers)	CARE (Schedule DR) Determinants (kWh)	Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/Q) / (dP/P)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
Summer								
Tier 1	433,534,801	0.10051	0.12480	24%	(0.20)	-4.83%	(20,955,786)	412,580,015
Tier 2	73,848,096	0.11762	0.12480	6%	(0.20)	-1.22%	(901,254)	72,946,843
Tier 3	98,315,652	0.17344	0.16501	-5%	(0.20)	0.97%	958,889	99,271,541
Tier 4	94,883,848	0.17344	0.16501	-5%	(0.20)	0.97%	922,523	95,806,371
Winter								
Tier 1	500,461,047	0.10051	0.10361	3%	(0.20)	-0.62%	(3,081,344)	497,379,703
Tier 2	69,585,502	0.11762	0.10361	-12%	(0.20)	2.38%	1,458,558	71,044,060
Tier 3	85,636,691	0.16204	0.13745	-15%	(0.20)	3.03%	2,598,995	88,235,686
Tier 4	63,549,330	0.16204	0.13745	-15%	(0.20)	3.03%	1,928,664	65,477,994
	1,419,814,967					Total	(16,872,956)	-1.19%

Note: Using SDG&E's Current Baseline

6,986,577,259 6,986,577,259 7,056,443,031

### SDG&E 2015-2017 Price Elasticity of Energy - non CARE

Energy (Tiers)	Non-CARE (Schedule DR) Determinants (kWh)	Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/Q) / (dP/P)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
Summer								
Tier 1	1,445,135,097	0.15396	0.18187	18%	(0.20)	-3.63%	(52,395,064)	1,497,530,161
Tier 2	293,387,123	0.17778	0.18187	2%	(0.20)	-0.46%	(1,349,931)	294,737,053
Tier 3	457,471,011	0.33323	0.23643	-29%	(0.20)	5.81%	26,578,156	430,892,855
Tier 4	677,029,294	0.35323	0.23643	-33%	(0.20)	6.61%	44,713,672	632,255,622
Winter								
Tier 1	1,562,553,827	0.15396	0.15281	-1%	(0.20)	0.15%	2,334,291	1,560,219,536
Tier 2	282,330,795	0.17778	0.15281	-14%	(0.20)	2.81%	7,930,926	274,399,869
Tier 3	405,931,950	0.29351	0.19865	-32%	(0.20)	6.46%	26,236,898	379,695,052
Tier 4	442,921,195	0.31351	0.19865	-37%	(0.20)	7.23%	32,454,427	410,465,773
	5,566,762,291					Total	86,565,369	1.56%

Note: Using SDG&E's RDW Baseline

### SDG&E 2015-2017 Price Elasticity of Energy CARE

Energy (Tiers)	CARE (Schedule DR) Determinants (kWh)	Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/Q) / (dP/P)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
Summer								
Tier 1	433,534,801	0.10051	0.12342	23%	(0.20)	-4.58%	(19,765,538)	413,769,263
Tier 2	73,848,096	0.11762	0.12342	5%	(0.20)	-0.99%	(728,140)	73,119,948
Tier 3	98,315,652	0.17344	0.16322	-6%	(0.20)	1.08%	1,158,491	99,474,144
Tier 4	94,883,848	0.17344	0.16322	-6%	(0.20)	1.08%	1,118,053	96,001,901
Winter								
Tier 1	500,461,047	0.10051	0.10223	2%	(0.20)	-0.34%	(1,708,505)	498,752,542
Tier 2	69,585,502	0.11762	0.10223	-13%	(0.20)	2.62%	1,821,671	71,407,173
Tier 3	85,636,691	0.16204	0.13566	-16%	(0.20)	3.26%	2,787,685	88,424,576
Tier 4	63,549,330	0.16204	0.13566	-16%	(0.20)	3.26%	2,068,835	65,618,165
	1,419,814,967					Total	(13,247,454)	-0.93%

Note: Using SDG&E's RDW Baseline





	2015-2017 kWh		
	2015-2017 kWh Change	Total	Total Percent Change
Total non-CARE annual kWh change over the three year period with SDG&E's current Baseline:	46,235,601	5,566,762,291	0.83%
Total CARE annual kWh change over the three year period with SDG&E's current Baseline:	(40,351,397)	1,419,814,967	-2.84%
	5,884,203	6,986,577,259	0.08%

Note: SDG&E is using its authorized sales from D.14-01-002. SDG&E did not apply its sales forecast to this response.

### SDG&E 2015-2017 Price Elasticity of Energy - non CARE (TOU example)

Energy (Tiers)	Non-CARE (Schedule DR) Determinants		Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/dP)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
	(kWh)								
Summer	On-peak	637,811,000	0.23190	0.27279	18%	(0.20)	-3.53%	(22,495,334)	660,306,335
	Semi-peak	821,684,442	0.23190	0.22758	-2%	(0.20)	0.37%	3,058,375	818,626,067
	Off-peak	1,413,527,082	0.23190	0.19682	-15%	(0.20)	3.03%	42,760,962	1,370,766,120
Winter	On-peak	217,861,292	0.20372	0.21351	5%	(0.30)	-0.96%	(3,054,943)	320,916,235
	Semi-peak	985,908,755	0.20372	0.20196	-1%	(0.20)	0.17%	1,703,795	984,204,960
	Off-peak	1,389,969,720	0.20372	0.18594	-9%	(0.20)	1.75%	24,262,746	1,365,706,974
		5,566,762,291				Total		46,235,601	0.83%

Note: Using SDG&E's Current Baseline

### SDG&E 2015-2017 Price Elasticity of Energy CARE (TOU example)

Energy (Tiers)	CARE (Schedule DRL) Determinants		Current Rate (\$/kWh)	Proposed Rate (\$/kWh)	Change in Price %	Price Elasticity of Demand (E <sub>d</sub> ) (dQ/dP)	Estimated Change in quantity %	Estimated Change in annual kWh (dP/P) x E <sub>d</sub> x Q	Estimated New kWh Quantity
	(kWh)								
Summer	On-peak	164,704,259	0.12243	0.19914	63%	(0.10)	-6.27%	(10,319,933)	154,384,326
	Semi-peak	201,385,120	0.12243	0.16613	36%	(0.20)	-3.97%	(7,189,417)	194,195,702
	Off-peak	353,143,192	0.12243	0.14368	17%	(0.20)	-1.74%	(6,130,030)	347,013,162
Winter	On-peak	79,866,393	0.11493	0.15586	35%	(0.10)	-3.56%	(2,844,444)	77,021,949
	Semi-peak	258,514,905	0.11493	0.14743	28%	(0.20)	-2.83%	(7,310,498)	251,204,407
	Off-peak	362,201,099	0.11493	0.13574	18%	(0.10)	-1.81%	(6,597,075)	355,644,024
		1,419,814,967				Total		(40,351,397)	-2.84%