Before the Public Utilities Commission

of the State of California

Application of Southern California Edison Company (E 3338-E) for Authority to Institute a Rate Stabilization Plan with a Rate Increase and End of Rate Freeze Tariffs.	**A. 00-11-038**
Emergency Application of Pacific Gas and Electric Company to Adopt a Rate Stabilization Plan. (U 39 E)	**A. 00-11-056**
Petition of The Utility Reform Network for Modification of Resolution E-3527.	**A. 00-10-028**

Revenue Allocation and Rate Design
Testimony and Exhibits

of

Alan Chalfant

On behalf of

California Industrial Users

April 2001
Project 6130

BRUBAKER & ASSOCIATES, INC.

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Direct Testimony of Alan Chalfant

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Alan Chalfant; 1215 Fern Ridge Parkway, Suite 208; St. Louis, Missouri, 63141-2000.

Q WHAT IS YOUR OCCUPATION?

A I am a consultant in the field of public utility regulation with Brubaker & Associates, Inc., energy, economic and regulatory consultants.

Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A This is included in Appendix A of my testimony.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am appearing on behalf of California Industrial Users (CIU), a group of large industrial customers of Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE).

Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A I will present CIU's recommended allocation of the three-cents per kWh surcharge authorized in Decision 01-03-082. I will also develop a recommended design of that surcharge applicable to PG&E's E-20 rates and SCE's TOU-8 rates which are the rates on which members of CIU take service.

Q WHAT METHOD DID YOU USE TO ALLOCATE THE AUTHORIZED SURCHARGE AMONG THE CUSTOMER CLASSES?

A I used the "top 100 hours" method that was adopted by the Commission for purposes of allocating ongoing CTC costs in Decision 00-06-034.

Q ON WHAT BASIS HAVE YOU CHOSEN TO EMPLOY THE TOP 100 HOURS METHOD IN PREPARING YOUR REVENUE ALLOCATION PROPOSAL?

A In deciding to apply the top 100 hours method, I relied principally upon the Commission's adoption of that method as the vehicle for allocation of ongoing transition costs in its June 2000 decision addressing post-transition period rate issues. (Decision 00-06-034).

Q PLEASE DESCRIBE BRIEFLY THE COMMISSION'S STATED RATIONAL IN THAT DECISION FOR APPLICATION OF THE TOP 100 HOURS METHOD.

A Adopting the TURN and ORA argument that transition costs are appropriately assigned to generation since they are the uneconomic costs association with the generation function, the Commission determined that transition costs should be allocated based on energy consumption or demand. The Commission also noted the fact that generation or energy costs vary with time of use and, on that basis, adopted the TURN-proposed top 100 hours method, commenting as follows:

> "TURN proposed a transition cost allocation method that addresses cost causation in such a way as to directly link actual usage patterns and provide an appropriate proxy for actual generation costs. We believe such a methodology must be considered an analyzed for these purposes because it is the only proposal in the record which addresses cost causation in a way related to demands placed on the system."

Q ARE THE FACTORS PROMPTING THE COMMISSION TO ADOPT THE TOP 100 HOURS METHOD IN D.00-06-034 ALSO PRESENT IN THIS PROCEEDING?

A The situation here runs closely parallel to that addressed by the Commission in D.00-06-034. Most importantly, we are dealing here once again with generation costs. Moreover, assigned Commissioner Lynch's rulings of March 26, and April 11th, place major emphasis on the importance of sending appropriate time of use rate signals to all electricity consumers as a means of accomplishing the stated conservation goal for this proceeding.

Q WHAT WAS THE SOURCE OF THE TOP 100 HOURS ALLOCATION FACTORS THAT YOU HAVE USED?

A PG&E provided its top 100 hours allocation factors in the spreadsheets it agreed to supply at the April 3, 2001 workshop in this proceeding. SCE provided its top 100 allocation factors in its Response to FEA's First Data Request.

Q HOW DID YOU DETERMINE THE AMOUNT OF THE CARE SUBSIDY?

A After allocating costs to all classes including residential, based on the top 100 hours allocation factors, I apportioned the amount allocated to the residential class between CARE and non-CARE based on the relative consumption of those two groups. The amount so allocated to the CARE group is the CARE subsidy since none of the surcharge can be allocated to CARE customers.

Q HOW DID YOU ALLOCATE THE CARE SUBSIDY?

A I allocated this subsidy to all classes based on kWh consumption consistent with Commission policy.

Q DID YOU ALSO ALLOCATE THE EXEMPTION APPLICABLE TO CONSUMPTION UP TO 130% OF RESIDENTIAL BASELOAD USAGE TO OTHER CLASSES?

A No. In order to send high use residential customers a meaningful price signal concerning the costs they are imposing on the utility, it is critical that these costs be recovered within the residential class. Although this will result in very high charges for consumption in excess of the 130% threshold, it must be remembered that the customers that are paying those charges do not receive any surcharge at all on a large portion of their consumption.

Q UNDER YOUR PROPOSAL, WHICH CLASSES WOULD RECEIVE THE LARGEST PERCENTAGE INCREASES?

A Large industrial customers would receive the largest percentage increases under my recommendation for both PG&E and SCE. In the case of SCE, the GS-2 class would also receive a comparable percentage increase.

Q WHAT GUIDELINES DID YOU USE IN DEVELOPING YOUR RECOMMENDED LARGE INDUSTRIAL RATES APPLICABLE TO THE SURCHARGE REVENUES?

A In order to reflect the higher costs of summer usage, I assigned 75% of the surcharge revenues allocated to each of the large industrial rates to summer consumption. Similarly, in order to reflect the higher costs during peak hours, I assigned 75% of the amount allocated to summer usage to the peak summer periods. None of the additional revenues were assigned to off-peak periods.

Q WHAT WAS YOUR BASIS FOR THIS ASSIGNMENT BETWEEN PERIODS?

A The illustrative rates attached to the Assigned Commissioner's Ruling of March 26, 2001 made it clear that the Commission was looking for rate designs that would recover the largest portion of the increase during peak periods. Although there is nothing magic about my selection of 75%, I consider that to be a significant share of the costs without ignoring the cost increases that have also occurred during mid-peak periods.

Q WHAT LEVEL OF PEAK PERIOD ENERGY CHARGES DID THIS PRODUCE?

A In the case of PG&E this resulted in a peak surcharge of approximately 12¢ per kWh which produces a total peak energy charge of approximately 20¢ per kWh. For SCE, the peak surcharge is about 19¢ per kWh making the total peak energy charges more than

27¢ per kWh. These charges represent percentages increases generally in excess of 175% of current peak charges.

Q YOUR RECOMMENDED RATES MAINTAIN THE CURRENT STRUCTURE OF INDUSTRIAL RATES. DID YOU CONSIDER OTHER STRUCTURES?

A I was unable to do so in the context of this proceeding because existing data reflects only the existing rate structures. It may be reasonable to consider alternative structures in a proceeding where there is adequate time to analyze load data necessary to develop rates based on alternative structures.

Q HAVE YOU REVIEWED THE APRIL 11 ASSIGNED COMMISSIONER'S RULING IN THIS PROCEEDING CONCERNING POSSIBLE "TIERING" STRUCTURES FOR TOU RATES?

A Yes. Under the heading "Further Structural Changes", two suggestions are made concerning non-residential "tiering" proposals: (1) rates based on Standard Industrial Classification (SIC) Codes; and (2) rates somehow based on differences between an individual customer's current and previous year's usage "to encourage conservation". It is not appropriate to apply either of these rate structures to industrial customers.

Q WHAT IS WRONG WITH THE CONCEPT OF RATES BASED ON SIC CODES?

A There are no inherent cost or conservation differences between customers based on their SIC Code. Thus, the only conceivable use of such rate distinctions would be to subjectively discourage usage by particular industries that produce a product that the decision-maker feels is not as important as some other product. This can only lead to an inefficient allocation of resources.

Q WHAT IS WRONG WITH THE CONCEPT OF RATES BASED ON DIFFERENCES FROM PRIOR YEAR'S USAGE?

A This is the surest way to discourage the economic growth of a regional economy. Consider, for example, a manufacturer with operations in multiple states that is experiencing robust growth in the demand for its product. It must make a decision as to where it should manufacture its added production. If California were to have in place a rate structure that penalizes additional electricity usage (which would be required in order to support additional output) no rational manufacturer would add load in California. This is obvious since no other state has such rate structures that penalize economic growth. While I recognize that it is critical that no electricity in California should be used that isn't necessary, it would be a serious mistake to spread the current problems in the electricity industry to the rest of the economy through hastily devised measures to reduce consumption without regard to the long term and broader consequences of those measures.

Q DOES THIS COMPLETE YOUR TESTIMONY?

A Yes, it does.

Qualifications of Alan Chalfant

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Alan Chalfant. My business mailing address is P. O. Box 412000, 1215 Fern Ridge Parkway, Suite 208, St. Louis, Missouri 63141-2000.

Q WHAT IS YOUR OCCUPATION?

A I am a consultant in the field of public utility regulation and am a principal in the firm of Brubaker & Associates, Inc., energy, economic and regulatory consultants.

Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A I hold a Bachelor's Degree in Mathematics from Northern Illinois University and the degree of Master of Arts in Economics from Washington University. From 1968 to 1973, I was Assistant Professor of Economics at California State University at Northridge, California. Among other courses in economics and statistics, I taught courses in the economics of antitrust and regulation at both the graduate and undergraduate levels. I have also taught courses at both graduate and undergraduate levels at California Lutheran College.

In 1973, I accepted a position with the Public Service Commission of Wisconsin in the Utility Rates Division. While at the Commission, I designed the rates for electric and natural gas utilities and aided in the preparation for cross-examination of witnesses representing utilities and intervenors before the Commission.

I joined the firm of Drazen-Brubaker & Associates, Inc. in September 1974 and became a Principal in that firm in 1988. In April 1995 the firm of Brubaker & Associates, Inc. (BAI) was formed. It includes most of the former DBA principals and staff and

currently has its principal office in St. Louis, Missouri, with branch offices in Kerrville, Texas; Plano, Texas; Denver, Colorado; and Chicago, Illinois.

Since 1974, I have been engaged in the preparation of studies relating to utility rate matters and have participated in numerous electric and gas rate cases. In total, I have participated in cases involving more than 60 electric utilities, 30 gas distribution utilities and 20 interstate pipelines.

Q HAVE YOU PREVIOUSLY TESTIFIED BEFORE A REGULATORY COMMISSION OR A PUBLIC AUTHORITY?

A I have testified before the Federal Energy Regulatory Commission and more than thirty state public utility regulatory commissions including the California Public Utilities Commission (CPUC). I have appeared before CPUC in 34 proceedings over the last 22 years. In addition, I have appeared before a number of municipal regulatory bodies and courts.

Pacific Gas & Electric Company

CIU Recommended Revenue Allocation

Line	Rate Class/Schedule	Revenue at 1/5/2001 Rates (000)	Annual MWh	Top 100 Hours Allocation Factors	Top 100 Hours Allocation of Surcharge (000)	Percent Increase	New Revenue (000)	Average Rate
1	Residential Ex Care		26,814,573					
2	CARE		2,033,054					
3	Total Residential	$3,348,172	28,847,626	40.31%	$945,115	28.2%	$4,293,287	$0.1488
4	Small L&P	$979,808	7,997,331	11.10%	$279,951	28.6%	$1,259,759	$0.1575
5	Medium L&P	$1,410,605	12,950,499	16.70%	$422,049	29.9%	$1,832,654	$0.1415
	E-19 Class							
6	E-19 Transmission	$1,025	10,848	0.01%	$266	26.0%	$1,291	$0.1190
7	E-19 Primary	$68,394	783,953	0.75%	$19,196	28.1%	$87,591	$0.1117
8	E-19 Secondary	$1,001,118	10,220,577	10.60%	$269,736	26.9%	$1,270,854	$0.1243
9	Total E-19	$1,070,537	11,015,378	11.37%	$289,199	27.0%	$1,359,736	$0.1234
10	Streetlights	$46,482	351,292	0.08%	$2,226	4.8%	$48,708	$0.1387
11	Standby	$18,450	166,367	0.08%	$2,104	11.4%	$20,553	$0.1235
12	Agriculture	$407,575	3,422,874	5.01%	$126,147	31.0%	$533,721	$0.1559
	E-20 Class							
13	E-20 Transmission	$401,088	7,042,131	5.60%	$143,893	35.9%	$544,981	$0.0774
14	E-20 Primary	$487,568	6,260,946	5.83%	$148,766	30.5%	$636,334	$0.1016
15	E-20 Secondary	$294,669	3,187,593	3.26%	$82,951	28.2%	$377,620	$0.1185
16	Total E-20	$1,183,325	16,490,670	14.68%	$375,610	31.7%	$1,558,935	$0.0945
17	A-20 RTP	$29,251	356,394	0.36%	$9,255	31.6%	$38,506	$0.1080
	Contracts							
18	Transmission	$21,215	358,848	0.29%	$7,332	34.6%	$28,547	$0.0796
19	Primary	$0	-	0.00%	$0	-	$0	-
20	Secondary	$2,068	28,535	0.03%	$743	35.9%	$2,811	$0.0985
21	Total Contracts	$23,283	387,383	0.31%	$8,075	34.7%	$31,358	$0.0809
22	Total System	$8,517,488	81,985,813	100.00%	$2,459,729	28.9%	$10,977,217	$0.1339

Exhibit ____ (AC-1)
Schedule 1

Pacific Gas & Electric Company

CIU Recommended Rates

Line		Customer Group	Billing Determinants (kWh)	Current Rate ($/kWh)	Total Current Revenue	Revenue Increase	New Total Revenue	New Rates $/kWh	Surcharge $/kWh	Increase in Class Avg Rate (%)
	E-20T	Demand								
1		Smr On Peak	6,776,527	$7.50	$50,823,954	$0	$50,823,954	$7.50		0.0%
2		Part Peak	6,903,478	$0.60	$4,142,087	$0	$4,142,087	$0.60		0.0%
3		Max	7,255,756	$0.35	$2,539,515	$0	$2,539,515	$0.35		0.0%
4		Wtr Part Peak	6,597,566	$0.75	$4,948,174	$0	$4,948,174	$0.75		0.0%
5		Max	6,818,483	$0.35	$2,386,469	$0	$2,386,469	$0.35		0.0%
		Energy								
6		Smr On Peak	681,229,507	$0.06750	$45,982,992	$80,939,720	$126,922,711	$0.18631	$0.11881	176.0%
7		Part Peak	780,382,592	$0.05361	$41,836,311	$26,979,907	$68,816,217	$0.08818	$0.03457	64.5%
8		Off Peak	2,190,963,703	$0.05097	$111,673,420	$0	$111,673,420	$0.05097		0.0%
9		Wtr Part Peak	1,366,221,501	$0.06369	$87,014,647	$35,973,209	$122,987,856	$0.09002	$0.02633	41.3%
10		Off Peak	2,023,333,433	$0.05420	$109,664,672	$0	$109,664,672	$0.05420		0.0%
		Customer								
11		Smr	947	$715.00	$677,105	$0	$677,105	$715.00		0.0%
12		Wtr	944	$715.00	$674,960	$0	$674,960	$715.00		0.0%
13		Discounts, Credits & Non-allocated Revenue			($61,276,179)					
14		**Total**	**7,042,130,736**		**$401,088,127**	**$143,892,835**	**$544,980,962**	**$ 0.07739**	**$ 0.02043**	**35.88%**
	E-20P	Demand								
15		Smr On Peak	6,604,340	$11.80	$77,931,218	$0	$77,931,218	$11.80		0.0%
16		Part Peak	6,720,974	$2.65	$17,810,582	$0	$17,810,582	$2.65		0.0%
17		Max	7,009,063	$2.55	$17,873,111	$0	$17,873,111	$2.55		0.0%
18		Wtr Part Peak	6,412,673	$2.65	$16,993,583	$0	$16,993,583	$2.65		0.0%
19		Max	6,522,043	$2.55	$16,631,210	$0	$16,631,210	$2.55		0.0%
		Energy								
20		Smr On Peak	655,585,168	$0.07210	$47,267,691	$83,680,726	$130,948,417	$0.19974	$0.12764	177.0%
21		Part Peak	732,993,809	$0.05821	$42,667,570	$27,893,575	$70,561,145	$0.09626	$0.03805	65.4%
22		Off Peak	1,859,065,764	$0.05637	$104,795,537	$0	$104,795,537	$0.05637		0.0%
23		Wtr Part Peak	1,296,019,226	$0.06624	$85,848,314	$37,191,434	$123,039,747	$0.09494	$0.02870	43.3%
24		Off Peak	1,717,282,204	$0.05719	$98,211,369	$0	$98,211,369	$0.05719		0.0%
		Customer								
25		Smr	2,879	$310.00	$892,562	$0	$892,562	$310.00		0.0%
26		Wtr	2,868	$310.00	$889,042	$0	$889,042	$310.00		0.0%
27		Discounts, Credits & Non-allocated Revenue			($40,243,496)					
28		**Total**	**6,260,946,172**		**$487,568,292**	**$148,765,735**	**$636,334,027**	**$ 0.10164**	**$ 0.02376**	**30.51%**
	E-20S	Demand								
29		Smr On Peak	3,605,263	$13.35	$48,130,260	$0	$48,130,260	$13.35		0.0%
30		Part Peak	3,588,720	$3.70	$13,278,266	$0	$13,278,266	$3.70		0.0%
31		Max	3,732,261	$2.55	$9,517,265	$0	$9,517,265	$2.55		0.0%
32		Wtr Part Peak	3,414,885	$3.65	$12,464,331	$0	$12,464,331	$3.65		0.0%
33		Max	3,460,870	$2.55	$8,825,220	$0	$8,825,220	$2.55		0.0%
		Energy								
34		Smr On Peak	368,025,400	$0.09708	$35,727,906	$46,660,109	$82,388,015	$0.22387	$0.12679	130.6%
35		Part Peak	382,867,304	$0.06767	$25,908,630	$15,553,370	$41,462,000	$0.10829	$0.04062	60.0%
36		Off Peak	903,092,036	$0.06022	$54,384,202	$0	$54,384,202	$0.06022		0.0%
37		Wtr Part Peak	701,553,360	$0.07344	$51,522,079	$20,737,826	$72,259,905	$0.10300	$0.02956	40.3%
38		Off Peak	832,055,024	$0.06001	$49,931,622	$0	$49,931,622	$0.06001		0.0%
		Customer								
39		Smr	2,382	$385.00	$916,878	$0	$916,878	$385.00		0.0%
40		Wtr	2,372	$385.00	$913,028	$0	$913,028	$385.00		0.0%
41		Discounts, Credits & Non-allocated Revenue			($16,850,912)					
42		**Total**	**3,187,583,124**		**$294,668,774**	**$82,951,305**	**$377,620,079**	**$ 0.11847**	**$ 0.02602**	**28.15%**

Southern California Edison

CIU Recommended Revenue Allocation

Line	Rate Group	Revenue at 1/5/2001 Rates (000,000)	Annual MWh	Top 100 Hours Allocation Factors	Top 100 Hours Allocation of Surcharge (000,000)	Percent Increase	New Revenue (000,000)	Average Rate
	Summary							
1	Residential Non-Care	$3,156.1	22,261.8		841.8	26.67%	$3,997.9	
2	Care	$288.9	2,656.5		-	0.00%	$288.9	
3	Total Residential	$3,445.0	24,918.4	36.30%	841.8	24.4%	$4,286.8	$0.1720
	Small & Med. Commercial							
4	GS-1	$706.7	4,952.0	7.29%	189.2	26.77%	$895.9	$0.1809
5	TC-1	$15.6	186.2	0.13%	3.5	22.36%	$19.1	$0.1026
6	GS-2	$2,695.6	24,468.1	31.08%	810.5	30.07%	$3,506.1	$0.1433
7	TOU-GS-2 (Option B)	$85.7	765.4	0.64%	17.0	19.84%	$102.7	$0.1342
8	Total Small & Med. Commercial	$3,503.7	30,371.5	39.14%	1,020.2	29.12%	$4,523.8	$0.1489
	Large Power							
9	TOU-8-Sec	$888.1	8,890.5	8.99%	236.6	26.64%	$1,124.7	$0.1265
10	TOU-8-Pri (Includes special contracts sales)	$699.1	7,623.3	6.86%	181.6	25.97%	$880.7	$0.1155
11	TOU-8-Sub (Includes special contracts sales)	$557.1	8,331.1	6.06%	162.3	29.13%	$719.4	$0.0864
12	Total Large Power	$2,144.3	24,844.9	21.91%	580.5	27.07%	$2,724.8	$0.1097
	Agriculture & Pumping							
13	PA-1	$94.1	679.4	0.83%	21.7	23.04%	$115.8	$0.1704
14	PA-2	$68.2	709.4	0.67%	17.7	25.92%	$85.9	$0.1211
15	AG-TOU (Option B)	$102.7	1,112.9	0.63%	17.2	16.71%	$119.9	$0.1077
16	TOU-PA-5	$49.9	614.1	0.52%	13.8	27.69%	$63.7	$0.1037
17	Total Agriculture & Pumping	$314.9	3,115.9	2.65%	70.3	22.32%	$385.3	$0.1236
18	Street and Area Lighting	$78.2	529.3	0.00%	0.6	0.81%	$78.8	$0.1489
19	TOTAL SYSTEM	$9,486.1	83,780.0	100.00%	2,513.4	26.39%	$11,999.5	$0.1432

Exhibit ____ (AC-2)
Schedule 1

Southern California Edison

CIU Recommended Rates

Line	Rate Group	Billing Determinants (kWh)	Current Rate	Total Current Revenue (000,000)	Revenue Increase (000,000)	New Total Revenue (000,000)	New Rates $/kWh	Surcharge $/kWh	Increase in Class Avg Rate (%)
	TOU-8-Sec								
	Energy Charges								
1	Summer - On Peak	716.5	$0.1048	$75.1	$133.10	$208.22	0.29061	$0.18576	177.16%
2	Mid Peak	949.3	$0.0699	$66.3	$44.37	$110.71	0.11662	$0.04673	66.87%
3	Off-Peak	1,433.7	$0.0481	$69.0	0	$68.96	0.04810	-	
4	Winter - Mid Peak	2,785.3	$0.0834	$232.2	$59.15	$291.34	0.10460	$0.02124	25.48%
5	Off-Peak	3,005.7	$0.0493	$148.0		$148.03	0.04925	-	
	Fixed Charges								
6	Customer Charge - $/month	29,937	$298.65	$8.9	no change	no change	no change	no change	no change
7	Facility-Related - $/kW	22,038	$6.40	$141.0	no change	no change	no change	no change	no change
8	Time-Related (On Peak) - $/kW	7,213	$17.55	$126.6	no change	no change	no change	no change	no change
9	Time-Related (Mid Peak) - $/kW	7,458	$2.80	$20.9	no change	no change	no change	no change	no change
10	**Total TOU-8-Sec**	**8,890.5**	**$0.1000**	**$888.1**	**$236.6**	**$1,124.7**	**$0.12651**	**$0.02661**	**26.64%**
	TOU-8-Pri (Includes special contracts sales)								
	Energy Charges - ¢/kWh								
11	Summer - On Peak	542.1	$0.1042	$56.5	$100.08	$156.58	0.28886	$0.18464	177.16%
12	Mid Peak	768.4	$0.0685	$52.6	$36.08	$88.69	0.11543	$0.04696	68.59%
13	Off-Peak	1,324.0	$0.0476	$63.0	0	$62.99	0.04758	-	
14	Winter - Mid Peak	2,189.1	$0.0807	$176.7	$45.39	$222.07	0.10144	$0.02073	25.69%
15	Off-Peak	2,799.9	$0.0487	$136.5	0	$136.47	0.04874	-	
	Fixed Charges								
16	Customer Charge - $/month	10,438	$299.00	$3.1	no change	no change	no change	no change	no change
17	Facility-Related - $/kW	15,833	$6.60	$104.5	no change	no change	no change	no change	no change
18	Time-Related (On Peak) - $/kW	5,107	$17.95	$91.7	no change	no change	no change	no change	no change
19	Time-Related (Mid Peak) - $/kW	5,404	$2.70	$14.6	no change	no change	no change	no change	no change
20	**Total TOU-8-Pri**	**7,623.3**	**$0.9170**	**$699.1**	**$181.6**	**$880.7**	**$0.11552**	**$0.02382**	**25.97%**
	TOU-8-Sub (Includes special contracts sales)								
	Energy Charges - ¢/kWh								
21	Summer - On Peak	481.2	$0.0840	$40.4	$91.29	$131.70	0.27369	$0.18972	225.94%
22	Mid Peak	752.9	$0.0605	$45.6	$30.43	$76.00	0.10095	$0.04042	66.78%
23	Off-Peak	1,540.0	$0.0476	$73.2	0	$73.23	0.04755	-	
24	Winter - Mid Peak	2,196.8	$0.0709	$155.8	$40.58	$196.40	0.08940	$0.01847	26.04%
25	Off-Peak	3,360.2	$0.0487	$163.7	0	$163.71	0.04872	-	
	Fixed Charges								
26	Customer Charge - $/month	2,226	$349.45	$0.8	no change	no change	no change	no change	no change
27	Facility-Related - $/kW	13,879	$0.65	$9.0	no change	no change	no change	no change	no change
28	Time-Related (On Peak) - $/kW	3,621	$16.15	$58.5	no change	no change	no change	no change	no change
29	Time-Related (Mid Peak) - $/kW	4,118	$2.45	$10.1	no change	no change	no change	no change	no change
30	**Total TOU-8-Sub**	**8,331.1**	**$0.0669**	**$557.1**	**$162.3**	**$719.4**	**$0.08635**	**$0.01948**	**29.13%**
31	**Total Large Power**	**24,844.9**	**$0.0863**	**$2,144.3**	**$580.5**	**$2,724.8**	**$0.10967**	**$0.02336**	**27.07%**