

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 16-E-0060 -- Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service

CASE 16-G-0061 -- Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Gas Service

**TIME WARNER CABLE INC.'S STATEMENT
IN SUPPORT OF JOINT PROPOSAL**

I. INTRODUCTION

While Time Warner Cable (TWC) supports the entire Joint Proposal (JP), it offers these comments to support two particular provisions in the JP, Sections G(3)(a) and P(1)(d), in which it has a unique interest in this case. Section G(3)(a) states:

- a. The existing monthly customer charge in SC 2 will be reduced by \$4.41 for customers with unmetered service to reflect the removal of SC2's allocated portion of metering costs in the 2013 ECOS study. Usage charges for all SC 2 customers will be increased to offset the resulting revenue shortfall.

Section P(1)(d) states:

- d. Nothing herein will preclude any Signatory Party from petitioning the Commission for approval of new services, the implementation of new service classifications and/or cancellation of existing service classifications, or rate design or revenue allocation changes within or among non-NYPA service classes, which are not contrary to the agreed upon terms and conditions set forth herein. All changes will be implemented on a revenue neutral and earnings neutral basis.

These provisions relate to the principal issue on which TWC actively participated in the proceeding, *i.e.*, whether the discounted customer charge in Special Provision D of Rate SC2 should be made applicable to unmetered service for cable TV (CATV) power supplies.¹ As

¹ SC2 Rate I specifies a monthly Customer Charge of \$26.01. Special Provision D states:
(D) When a Customer has an account for service at each of no fewer than 100 different locations, each

explained herein, these provisions meet the Commission's public interest standard for approval of settlements² since (a) they are consistent with State law and policies; (b) the result they reflect compares favorably with the likely result of full litigation; (c) they represent a fair balance among interests of customers and the Company; and (d) they are supported by a rational basis.

II. BACKGROUND

TWC has approximately 6,000 unmetered service accounts with Con Ed, all of which are subject to Con Ed's SC2 Rate I. The service that TWC takes at these account locations furnishes energy to TWC's power supplies, which are devices that step down and condition the voltage supplied by Con Ed (120 volts) to the operating voltage required for cable TV (CATV) equipment (60 volts) that delivers cable signals to customers. The cost to Con Ed of providing service to TWC at these locations is lower than for other SC2 customers generally, both because it doesn't require meters, and because CATV power supplies operate at a uniform, 100 percent load factor. For these reasons, and consistent with special tariff provisions for CATV power supplies of many other utilities, TWC intervened in this case to request a rate discount for its unmetered service accounts.

In support of its request, TWC submitted pre-filed testimony of Kenneth Eisdorfer, Senior Director of Strategy and Research for Regulated Rates of Accenture, LLC., a copy of which is Appendix A hereto. Relying on data from the company's Embedded Cost of Service (ECOS)

served under Rate I of this Service Classification, the Customer Charge per account will be reduced by 50 percent, provided all of the following criteria are met:

- (1) Service under each account is supplied exclusively for use of radio transceivers that are located on street lights or utility distribution poles.
- (2) Service under each account is unmetered.
- (3) The usage calculated for each location and to be billed on the corresponding account is less than 30 kilowatthours per month.

The Company will issue a single monthly bill for all the qualifying accounts eligible for a reduced Customer Charge under this provision.

² See Case 90-M-0255, *Proceeding on Settlement Procedures and Guidelines*, Opinion No. 92-2 (March 24, 1992).

Study, Mr. Eisdorfer demonstrated that the savings to Con Ed of providing service to TWC's unmetered accounts, relative to the cost of serving SC2 customers generally, exceeded the 50 percent monthly Customer Charge discount provided to unmetered radio transceivers under Special Provision D of Rate SC2.³ He included with his testimony tariffs of 17 other electric utilities providing overall discounts (including both customer charges and kWh charges) ranging from 14.7 to 67.8 percent.⁴

Mr. Eisdorfer also explained how the history of Special Provision D supported extending its applicability to CATV power supplies.⁵ Special Provision D came about as the result of a petition by an internet service provider seeking a discount in Rate SC2 for radio receivers. The internet provider, Metricom, argued that the full SC2 customer charge didn't make sense for these accounts because they didn't use all of the services funded by that charge. (Like CATV power supplies, they were unmetered and exhibited high load factors.) Con Ed resisted Metricom's petition, claiming that its rates should not have to be fine-tuned to meet the needs of individual customers. Granting the petition, the PSC rejected Con Ed's position, holding that the company's tariffs were not "adequately designed to capture the costs for the services that Metricom and similarly-situated customers within the SC2 small commercial class impose on the system."⁶

Mr. Eisdorfer concluded that extending the eligibility of the Customer Charge discount of Special Provision D was very much justified, and conversely that charging CATV power supplies the same rate as other SC2 Rate I customers is "clearly inappropriate."⁷

. In testimony filed on June 17, 2016 (excerpt attached hereto as Appendix B), Con Ed's

³ App. A, pp. 7-11 and Exhs. __ (KE-1), Schedules 2-7.

⁴ App. A, p. 4 ll. 16-24 and Exh __ (KE-1), Schedule 1, Pages 1-3 of 81.

⁵ App. A, pp. 4-5. Mr. Eisdorfer referred to extending Special Provision D to power supplies and antennae. The latter refer to WiFi access points, which in all cases are accompanied by power supplies.

⁶ App. A, p. 5, quoting from Case 99-E-1487. *Metricom Inc.—Petition for a Declaratory Ruling Regarding Rates for Electric Service from Consolidated Edison of New York, Inc., Order Directing Filing of a Proposed Tariff* (June 29, 2000) at 5.

⁷ App. A, p. 10.

Electric Rate Panel claimed that there were flaws in Mr. Eisdorfer’s cost analysis, and that “Rates are developed on an average basis for the class. Although revising average rates to accommodate a small group of customers may be helpful to the smaller group, it may not be fair to other customers within the class.”⁸ No other party filed testimony to rebut Mr. Eisdorfer

The JP settles the issue by recommending a discount to the monthly service charge of “\$4.41 for customers with unmetered service to reflect the removal of SC2’s allocated portion of metering costs in the 2013 ECOS study.” JP Sec. G(3)(a).⁹ As noted above, the JP also states that “[n]othing herein will preclude any Signatory Party from petitioning the Commission for approval of... rate design ... changes within or among non-NYPA service classes, which are not contrary to the agreed upon terms and conditions set forth herein.” JP Sec. P(1)(d).

III. ARGUMENT

THE JP PROVISIONS RECOMMENDING RESOLUTION OF TWC’S REQUEST FOR A DISCOUNT SATISFY THE PSC’S PUBLIC INTEREST STANDARD FOR APPROVING SETTLEMENTS

A. The Provisions are Consistent with State Law and Policies

The concept that rate design should reflect cost causation is a bedrock principle of State law and policy. *See* Case 14-M-0101 - *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision, Order Adopting a Ratemaking and Utility Revenue Model Policy Framework* (May 19, 2016) at 122 (“We will continue to observe the principle of cost causation as REV progresses...”); Case 99-E-1470, *Proceeding on Motion of the Commission as to the Reasonableness of the Rates, Terms and Conditions for the Provision of Electric Standby Service, Opinion and Order Approving Guidelines, App. A, Sec. II.A* (October 26, 2001)(“To the extent

⁸ Con Ed Electric Rate Panel Rebuttal Testimony filed June 17, 2016 at 28-31.

⁹ \$4.41 represents a discount of about 17 percent on the monthly \$26.01 Customer Charge (($\$4.41/\26.01)=0.16955).

standby service has cost causation characteristics that differentiate it from the balance of customers in the otherwise applicable service classification, rates reflective of those differences should be developed...”); New York Public Service Law §66(14)(“The commission shall have power to require each ...electric corporation to establish classifications of service based upon the quantity used, the time when used, the purpose for which used, the duration of use and upon any other reasonable consideration, and to establish in connection therewith just and reasonable graduated rates and charges...”).

The rate discount of \$4.41 on the monthly Customer Charge of \$26.01 for SC2 customers with unmetered accounts embodied in JP Sec. G(3)(a) clearly reflects cost causation. As Sec. G(3)(a) itself states, \$4.41 “ reflect[s] the removal of SC2’s allocated portion of metering costs in the 2013 ECOS study.” Mr. Eisdorfer derived essentially the same estimate of the cost avoided by Con Ed from not having meters on accounts.¹⁰ Con Ed’s rebuttal testimony did not take issue with this aspect of Mr. Eisdorfer’s testimony.

As the proposed rate discount reflects cost causation, and State law and policy embraces cost causation as a principle of rate design, the proposed rate discount is consistent with State law and policy.

¹⁰ App. A, Exh___(KE-1), Schedule 5, Page 1 of 1, lines 1-2 (indicating that the unit cost per month of customers with meters is \$38.11, while the unit cost without meters is \$33.71, or \$4.40 less).

B. The Result Embodied in the Settlement Provisions Compares Favorably with the Likely Result of Full Litigation

In its pre-filed testimony, TWC examined the cost of serving its unmetered power supply accounts relative to the cost of serving SC2 Rate I customers generally. The testimony showed that extending the SC2 Special Provision D 50 percent (equivalent to \$13.00 per month) Customer Charge discount to those accounts was amply justified.¹¹ Con Ed, on the other hand, questioned elements of the TWC analysis (although it did not claim that there were no savings in providing service to unmetered, high load factor customers).¹² The discount of \$4.41 per month on the Customer Charge represents 34 percent of the relief that TWC requested.¹³ While TWC of course would have preferred a larger reduction, the proposed discount is clearly within the range of outcomes that could have resulted from litigation of this issue. Given that the result allows for implementation of a modest discount without the need for litigation over the validity of TWC's cost analysis and Con Ed's challenges thereto, the result compares favorably with the likely result of full litigation.

While JP Section P(1)(d) does not foreclose the possibility of further petitions by signatory parties for rate design changes, it includes the caveat that those changes must not be "contrary to the agreed upon terms and conditions set forth herein." That should prevent any signatory party from petitioning to change the Customer Charge discount for unmetered service recommended in the JP.

¹¹ App. A, pp. 7-11 and Exhs. ____(KE-1), Schedules 2-7.

¹² Because settlement discussions ensued promptly after Con Ed filed its rebuttal testimony, TWC had no opportunity to cross-examine Con Ed's witnesses or otherwise challenge Con Ed's arguments.

¹³ $(\$4.41/\$13.00) = 0.34$.

C. The Settlement Provisions Represent a Fair Balance among Interests of Customers and the Company

The modest Customer Charge discount recommended in the JP is fair to customers in that it provides a better alignment of customer charges with the costs imposed on Con Ed by metered and unmetered accounts, respectively. While the discount benefits customers with unmetered accounts, and is being implemented on a revenue neutral basis, its impact on SC2 customers with metered accounts will be *de minimis*, since unmetered customers represent a miniscule fraction of SC2 customers.¹⁴

In matters of rate design, the company's chief interest lies in avoiding revenue erosion. The fact that the discount and any subsequent rate design changes are to be implemented on a revenue neutral basis ensures that they will have no impact, adverse or otherwise, on the company's revenue.

Accordingly, the settlement provisions represent a fair balance among interests of customers and the company.

D. The Settlement Provisions are Supported by a Rational Basis

The New York Court of Appeals has held that a rational basis exists for creating a subclass of customers with a separate rate structure where the classification is cost-justified. *New York State Council of Retail Merchants, Inc. v. Public Serv. Comm'n*, 45 N.Y.2d 661, 666-72, 384 N.E.2d 1282 (1978). The settlement provisions in essence create a subclass of SC2 for unmetered accounts and assign them a discounted Customer Charge based on the costs avoided by not having meters. As such, the settlement provisions are supported by a rational basis.

¹⁴ App. A, p. 2 ll. 11-16.

CONCLUSION

For the foregoing reasons, Sections G(3)(a) and P(1)(d) are in the public interest and should be included in the Joint Proposal if it is approved by the Commission.

Respectfully submitted,

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APPENDIX A

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 16-E-0060 - Proceeding on Motion of the Commission as to
the Rates, Charges, Rules and Regulations of
Consolidated Edison Company of New York, Inc.
for Electric Service.

Testimony of Kenneth Eisdorfer for Time Warner Cable Inc.

1 Q. Please state your name and business address.

2 A. Kenneth Eisdorfer, 5500 Shoal Brook Ct., Charlotte, North
3 Carolina 28277.

4 Q. By whom are you employed and what is your position?

5 A. I am employed by Accenture, LLC. I am Accenture's Sr.
6 Director of Strategy and Research for Regulated Rates. My
7 qualifications are described in the Appendix to this
8 testimony.

9 Q. On whose behalf are you testifying in this case?

10 A. Time Warner Cable Inc.

11 Q. What is the subject of your testimony?

12 A. I will propose appropriate rate design for unmetered
13 electric service for equipment that operates continuously
14 (i.e., electric consumption is at a 100% load factor) and
15 is currently served under Service Classification ("SC") 2.

16 Q. What equipment types are both unmetered and consume power
17 at a 100% load factor?

18 A. Cable TV (CATV) power supplies and antennae. Collectively
19 they account for 96.6% of the energy consumed by SC 2

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1 unmetered customers. The average CATV power supply and
2 antenna each consumes about 400 kWh per month.

3 Q. What is a CATV power supply?

4 A. A CATV power supply is a device that steps-down and
5 conditions the voltage delivered by ConEd (i.e., 120 Volts)
6 to the operating voltage required for CATV equipment that
7 delivers cable signals to customers(e.g., 60 Volts).

8 Q. What rate does ConEd currently use to bill unmetered CATV
9 power supplies and antennae accounts?

10 A. These accounts are billed on SC 2's Rate I.

11 Q. Are these customers unusual relative to other customers on
12 SC 2 Rate I?

13 A. Yes. There are only 19 SC 2 customers who are unmetered and
14 operate at 100% load factors (16 CATV customers and 3
15 antennae customers). These 19 customers represent 0.005% of
16 SC 2 Rate I customers.

17 Q. Please describe SC 2's Rate I.

18 A. Rate I consists of a Customer Charge, Energy Delivery
19 Charges, plus Additional Delivery Charges and Adjustments
20 as specified in ConEd's General Rule 26. The Customer
21 Charge is \$26.01 per month. (ConEd has proposed to maintain
22 the level of the customer charge in this case.) Rate I's
23 base energy delivery charges are differentiated by month,
24 with a higher charge in effect during June through
25 September, and a lower charge for all other months.
26 Notably, SC 2 does not contain demand charges. Instead,
27 demand-related costs are recovered in energy delivery
28 charges.

29

1 Q. Is there a reason why unmetered accounts should not pay the
2 same monthly customer charge as other SC 2 Rate I
3 customers?

4 A. Yes. Charging unmetered accounts the same customer charge
5 as other SC 2 Rate I customers ignores the fact that ConEd
6 does not incur meter investment for unmetered customers and
7 avoids meter-related operating costs for those customers.

8 Q. Does the lack of a demand charge in SC 2 pose a significant
9 problem for properly charging equipment that consumes power
10 at a 100% load factor?

11 A. Yes. ConEd's delivery system is sized to accommodate the
12 peak demands imposed by its customers. In the absence of a
13 separate demand charge, demand-related costs are recovered
14 through volumetric (kWh) charges. However, the demand-
15 related cost per kilowatt-hour to serve a 100% load factor
16 customer is dramatically different from that for other SC 2
17 customers. Consider two customers with identical peak
18 demands. Customer A has a 100% load factor. Customer B has
19 a 50% load factor (50% is roughly representative of the
20 load factor for the average SC 2 Rate I customer). Due to
21 their identical peak demands, but different load factors,
22 Customer A consumes twice as many kilowatt-hours as
23 Customer B. Consequently the demand cost incurred by ConEd
24 per kWh for Customer A is one-half that of Customer B.
25 However, the lack of demand charges in SC 2 dictates that
26 Customer A pays the same rate per kilowatt-hour as Customer
27 B. In essence, the lack of demand charges necessitates
28 charging *all* SC 2 Rate I customers kWh charges that reflect
29 the rate-class *average* demand cost per kWh even though 100
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1 percent load factor customers impose only about one half of
2 that cost per kWh.

3 Q. Has the Public Service Commission ("PSC") previously
4 approved a rate discount for SC 2 customers with high load
5 factors taking unmetered service?

6 A. Yes. The SC 2 tariff contains Special Provision (D), which
7 provides a 50 percent discount on customer charges for
8 certain customers with unmetered service and high load
9 factors. However, for historical reasons, it incorporates
10 restrictions that make it unavailable to either unmetered
11 CATV power supplies or antennae. As I explain below,
12 eliminating those restrictions is fully justified on a
13 cost-of-service basis. I therefore propose that the
14 applicability of Special Provision (D) be modified to
15 accommodate these two equipment types.

16 Q. What historical reasons are you referring to?

17 A. Special Provision D came into existence as a result of a
18 petition by a provider of internet service, Metricom, Inc.,
19 seeking relief from having to pay the full SC 2 rate for
20 unmetered service for radio transceivers attached to
21 utility poles and similar structures. Metricom argued that
22 the costs recovered by ConEd through the customer charge
23 were inapplicable to the service needed for its radio
24 transceivers. While ConEd conceded that perhaps Metricom
25 did not require all of the services subsumed in SC 2
26 customer charges, ConEd claimed that Metricom should have
27 to pay the SC 2 rate, and that such classifications need
28 not be adjusted or fine-tuned to meet the needs of a single
29 customer. In Case 99-E-1487, Metricom Inc.- Petition for a

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1 Declaratory Ruling Regarding Rates for Electric Service
2 from Consolidated Edison Company of New York, Inc., Order
3 Directing Filing of a Proposed Tariff (June 29, 2000), the
4 PSC rejected ConEd's position, holding that the company's
5 tariffs were not "adequately designed to capture the costs
6 for the services that Metricom and similarly-situated
7 customers within the S.C. 2 small commercial class impose
8 on the electric system." Order at p. 5. The PSC directed
9 ConEd to establish a rider to S.C. 2 for customers
10 establishing networks similar to Metricom's, and stated
11 that "The availability of the rider would be limited to
12 customers installing devices at a minimum of 100 different
13 locations, with monthly energy usage of less than 30 kWh at
14 each location." Order at pp. 5-6. That Order is the source
15 of Special Provision D.

16 Q. Have other states also approved electric utility tariffs
17 that reflect the reduced cost-of-service characteristics
18 associated with unmetered customers in general and those
19 who consume power at 100% load factors?

20 A. Yes. Tariffs reflecting reduced rates for customers with
21 those characteristics are common. Schedule 1 of Exhibit KE-
22 1() provides 17 examples of such tariff provisions that
23 have been instituted by other utilities and approved by
24 state regulators.

25 Q. What is the current language contained in Special Provision
26 (D)?

27 A. The following is the present Special Provision (D):
28

(D) When a Customer has an account for service at each of no fewer than 100 different locations, each served under Rate I of this Service Classification, the Customer Charge per account will be reduced by 50 percent, provided all of the following criteria are met:

- (1) Service under each account is supplied exclusively for use of radio transceivers that are located on street lights or utility distribution poles.
- (2) Service under each account is unmetered.
- (3) The usage calculated for each location and to be billed on the corresponding account is less than 30 kilowatthours per month.

The Company will issue a single monthly bill for all the qualifying accounts eligible for a reduced Customer Charge under this provision.

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2 Q. Are any customers currently on Special Provision (D)?

3 A. No. There has not been a customer on Special Provision (D)
4 since 2001.

5 Q. What is your proposal to modify Special Provision (D)?

6 A. I recommend that the language of Special Provision (D) be
7 modified as follows:

(D) When a Customer has an account for service at each of no fewer than 100 different locations, each served under Rate I of this Service Classification, the Customer Charge per account will be reduced by 50 percent, provided all of the following criteria are met:

- (1) Service under each account is supplied exclusively for *a) use of radio transceivers that are located on street lights or utility distribution poles, or b) CATV power supplies and antennae regardless of location.*
- (2) Service under each account is unmetered.
- (3) The usage calculated for each *radio transceiver* location and to be billed on the corresponding account is less than 30 kilowatthours per month. *There is no usage limitation for CATV power supplies and antennae.*

The Company will issue a single monthly bill for all the qualifying accounts eligible for a reduced Customer Charge under this provision.

1 Q. Special Provision (D) provides a 50 percent reduction in SC
2 2's customer charge. The dollar reduction per account at
3 ConEd's current and proposed customer charge level is
4 \$13.005 per month (50% of \$26.01). Have you conducted an
5 analysis to determine if this would be a reasonable
6 reduction for unmetered CATV power supplies and antennae?

7 A. Yes. The results indicate that the inclusion of unmetered
8 CATV power supplies and antennae in Special Provision (D)
9 is very much warranted.

10 Q. What is the foundation of your analysis?

11 A. The foundation of the analysis is the computation of unit
12 customer, demand and energy costs. The source underlying
13 each computation is ConEd's ECOS as it relates to the SC 2
14 rate class.

15 Q. Please describe the computation of customer unit costs for
16 unmetered accounts.

17 A. The computation is shown by the figures in Schedule 2 of
18 Exhibit KE-1(). The starting points were total customer-
19 related SC 2 figures for rate base and operating expenses
20 from the ECOS (lines 1 and 7 of Schedule 2, respectively).
21 Meter-related figures were then subtracted, which produced
22 customer-related rate base and operating expense figures
23 for unmetered SC 2 accounts (lines 6 and 13, respectively).
24 These figures were then incorporated in the computation of
25 total customer-related costs excluding meters (lines 14-

26

1 17). The methodology for this computation is identical to
2 that employed by ConEd in its ECOS for total customer-
3 related costs. The resulting customer-related costs for
4 unmetered accounts is **\$33.71 per month**. This is less than
5 the \$38.11 per month figure for the SC 2 class shown in the
6 ECOS.

7 Q. How were unit demand costs for the SC 2 rate class
8 calculated?

9 A. The computation is shown by the figures in Schedule 3, page
10 1 of Exhibit KE-1(). It uses demand-related rate base and
11 operating expenses to derive total demand-related costs
12 (line 5) in the same manner as the calculation of customer-
13 related costs. Dividing the total demand costs by the
14 annual billing demand produced a demand-related unit cost
15 for the SC 2 rate class of **\$31.73 per kW**.

16 Q. SC 2 is not billed on a demand basis. How did you develop
17 an annual billing demand figure for SC 2 that would apply
18 if the rate did have a demand component?

19 A. In order to develop a billing demand figure for SC 2
20 customers, I used as a proxy data for the SC 9 non-time-of-
21 day rate class (i.e., SC 9 Rate I). Like SC 2, these SC 9
22 customers are businesses. Consequently they have similar
23 consumption patterns to SC 2 accounts. (It should be noted
24 that although the tariff for SC 9 Rate I is titled
25 "General-Large", the average demand of accounts on the rate
26 is only about 31 kW per bill. So, while they are larger
27 than SC 2 accounts, the customers on SC 9 Rate I are also
28 small.) Specifically, I used the average billing load
29 factor for these SC 9 customers (49.7%), and applied it to
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1 the total energy consumption figure for SC 2 from the ECOS
2 to obtain a billing demand figure for SC 2. The derivation
3 is shown in Schedule 3, page 2 of Exhibit KE-1().

4 Q. What is the unit energy delivery cost for SC 2?

5 A. As shown in Schedule 4 of Exhibit KE-1(), the unit energy
6 delivery cost for SC 2 is **\$.0017 per kWh**. The derivation
7 shown in Schedule 4 is based upon figures contained in the
8 ECOS.

9 Q. Please discuss how you applied the above customer, demand
10 and energy unit cost figures to demonstrate that the
11 inclusion of unmetered CATV power supplies and antennae in
12 SC 2's Special Provision (D) is warranted.

13 A. Three applications of the unit cost figures were conducted
14 to demonstrate the appropriateness of including CATV power
15 supplies and antennae in SC 2's Special Provision (D). Each
16 application uses 400 kWh per month, the average consumption
17 level for both power supplies and antennae that are
18 unmetered.

19 The first application considered a scenario in which the
20 rate for SC 2 was set at unit costs. A monthly bill was
21 calculated for a metered account with the class average
22 billing load factor of 49.7% (i.e., 1.1 kW for 400 kWh).
23 The resulting monthly bill as shown in Schedule 5 of
24 Exhibit KE-1 () is **\$73.69**. The corresponding figure for
25 an unmetered CATV power supply and an antenna (i.e., 0.55
26 kW for 400 kWh at a 100% load factor) shown on Schedule 5
27 is **\$51.84, \$21.85 lower**. This justifiable rate discount for
28 the power supply and the antenna exceeds substantially the
29 \$13.01 discount provided by Special Provision (D).

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1 Q. Please discuss the second and third applications of the
2 unit cost figures.

3 A. The second application compared the aforementioned
4 mentioned monthly bill for an unmetered power supply and an
5 antenna reflective of unit costs (**\$51.84**) with the average
6 monthly bill at SC 2's current Rate I for an account that
7 consumes 400 kWh. (The bill under Rate I includes \$.01 per
8 kWh for Additional Delivery Charges and Adjustments as
9 specified in ConEd's General Rule 26. This is a
10 representative aggregate level for these charges and
11 adjustments.) As shown by the figures in Schedule 6 of
12 Exhibit KE-1 (), the Rate I bill is **\$68.89**. The
13 application of unit costs produces a value that is **\$17.05**
14 **lower**. Once again this indicated justifiable rate discount
15 is less than the \$13.01 per month provided by Special
16 Provision (D).

17 The third application is similar to the second except
18 ConEd's proposed Rate I was used in place of the current
19 rate. The proposed Rate I produces a bill of **\$74.89** as
20 shown in Schedule 7 of Exhibit KE-1(). The monthly bill
21 for an unmetered power supply and antenna reflective of
22 unit costs is **\$51.84, \$23.05 lower** and much less than the
23 Special Provision (D) discount.

24 The above results demonstrate that the inclusion of
25 unmetered CATV power supplies and antennae in SC 2's
26 Special Provision (D) is very justified. These unusual
27 accounts are dramatically less costly for ConEd to serve
28 relative to other SC 2 customers. Charging them the same
29 rate as other Rate I accounts is clearly inappropriate. I
30

1 propose that the availability of Special Provision (D) be
2 expanded to include unmetered CATV power supplies and
3 antennae.

4 Q. Does this conclude your testimony?

5 A. Yes, it does.

APPENDIX

Qualifications of Kenneth Eisdorfer

Mr. Eisdorfer is Accenture's Senior Director of Strategy and Research for Regulated Rates. His career in utility rate regulation and rate optimization encompasses thirty-nine years. His career began with Drazen-Brubaker & Associates, Inc. In 1981 he joined in the formation of Cook, Eisdorfer, Willer & Associates. At these two firms, Mr. Eisdorfer engaged in regulatory consulting, cost-of-service studies, the design of rates and contract negotiations.

In 1997, Mr. Eisdorfer joined DukeSolutions, an unregulated subsidiary of Duke Energy (purchased by Ameresco, Inc. in 2002) as Director of rate optimization activities. In 2011, he joined Utilities Analyses, Inc. as Senior Director for Strategy and Research for Regulated Rates. Utilities Analyses was purchased by Procurian, Inc. in 2013. Later that year, Procurian was purchased by Accenture, LLC.

In his current position, Mr. Eisdorfer is engaged in rate research, rate optimization and special projects.

Mr. Eisdorfer graduated from Washington University in St. Louis with a BS in Chemical Engineering. He holds a MBA with a Finance major from Baruch College.

**Examples of Tariffs for Utilities that are Applicable to Unmetered Service Generally and
Cable TV Power Supplies Specifically**

Numerous utilities have recognized the reduced cost-of-service associated with unmetered accounts in general and CATV power supplies in particular. The bill impact figures shown below are predicated on accounts that consume 400 kWh per month and have demands of 0.55 kW (100% load factor). Pages 1-3 of this Exhibit summarize examples of these tariffs. Pages 4-82 of the Exhibit provide the text of the tariffs in alphabetical order by company.

Atlantic City Electric: ACE's Rate DDC (Direct Distribution Connection) applies to "fixed, constant and predictable non-residential loads not to exceed one kilowatt". Relative to Rate MGS-Secondary (Monthly General Service), Rate DDC provides a 14.7% discount on delivery charges.

Connecticut Light & Power: CL&P's Unmetered Service rate (Rate 115) is applicable specifically to CATV. A power supply pays \$28.36 per month for delivery as compared to \$38.93 under the Small General Electric Service rate (Rate 30). The discount is \$10.57 per month (27.2%).

Consumers Energy: CATV power supplies qualify specifically for Consumers' General Service Unmetered Rate GU. The rate has lower customer and energy charges than the utility's General Service Secondary Rate GS. These reduced rate levels provide a monthly base bill discount of \$37.80 (50.9%).

Delmarva Power (MD): Delmarva's Telecommunications Network Service tariff (Service Classification TN) is available to CATV power supplies. Relative to an account billed under the Small General Service – Secondary Rate (Service Classification SGS-S), delivery charges are approximately \$16.86 per month (50.5%) lower under TN.

Duke Energy (FL): Rate Schedule GS-2 (General Service – Non-Demand 100% Load Factor Usage) applies specifically to both unmetered and metered power supplies. (The customer charges differ.) The unmetered base rate discount from Rate Schedule GS-1 General Service – Non-Demand) is 55.6% (\$18.47 per month) relative to a metered account at secondary voltage.

Duquesne Light: Rate UMS (Unmetered Service) is applicable to unmetered communication devices. Its distribution energy charge is lower than that for non-demand metered accounts on Rate GS/GM (General Service Small and Medium). Rate UMS' reduced energy charge yields a 47.5% discount on delivery charges (\$16.96 per month).

Entergy Arkansas: The utility's Community Antenna Power Supply rate (CTV) pertains to unmetered power supplies. Under Rate CTV, the monthly base bill is \$16.57 (35.4%) below what would be charged to an account on the Small General Service (SGS) rate.

Florida Power & Light: Rate Schedule GS-1 (General Service – Non Demand) has a reduced Customer Charge for unmetered accounts. The resulting base bill discount is 23.0%.

Georgia Power: The Unmetered Communication tariff (Schedule UC-10) has a monthly Basic Service Charge that is 50% below that for metered accounts on the General Service tariff. Schedule UC-10's base bill discount is 15.1%.

Houston Electric: Unmetered accounts on the "Secondary Service Less than or Equal to 10 kVA" tariff do not pay the monthly Metering Charge. This produces a discount on the tariff's Transmission and Distribution Charges of 34.8%.

Idaho Power: Applicability for Idaho Power's Schedule 40 (Non-Metered General Service) includes CATV power supplies. Unlike Schedule 7 (Small General Service), Schedule 40 does not have a monthly service charge. In addition, there is a reduced energy charge. The aggregate impact of Schedule 40 is a 27.2% base rate discount relative to Schedule 7 (\$12.39 per month).

Kansas City Power & Light: The Small General Service rates have reduced Customer Charges for unmetered service. The resulting base bill discounts for power supplies are 22.8% for Kansas accounts and 20.9% for Missouri accounts.

PECO: PECO has a rate (Rate TLCL Traffic Lighting Constant Load Service) that in addition to applying to municipalities, is applicable to non-municipal customers "for unmetered small constant load electronic devices with a demand of less than 1.2 kW". A power supply's monthly distribution bill under Rate TLCL is 67.8% (\$22.74) less than under the utility's Rate GS (General Service).

Public Service Oklahoma: The Limited Usage General Service Secondary tariff provides a 74.6% discount to the monthly Basic Service Charge for unmetered accounts (\$9.59 unmetered vs. \$37.75 metered). The impact is a discount on the base bill of 58.9%.

South Carolina Electric and Gas: The General Service tariff (Rate 9) has a customer charge for unmetered accounts that is \$13.85 lower (62.2%) lower than that for metered accounts. This produces a discount on base bills of 18.9%.

Wisconsin Power and Light: WP&L has a rate (Schedule Gs-4) for unmetered service. It provides a discount off the General Service rate (Gs-1) of 17.3%

ATLANTIC CITY ELECTRIC COMPANY

TARIFF

ATLANTIC CITY ELECTRIC COMPANY
BPU NJ No. 11 Electric Service – Section IV Sixtieth Revised Sheet Replaces Fifty-Ninth Revised Sheet No. 31

RATE SCHEDULE DDC
 (Direct Distribution Connection)

AVAILABILITY

Available at any point of the Company's existing distribution system where facilities of adequate character exist for the connection of fixed, constant and predictable non-residential loads not to exceed one kilowatt

MONTHLY RATES

Distribution:

Service and Demand (per day per connection)	\$0.168098
Energy (per day for each kW of effective load)	\$0.809664

Non-Utility Generation Charge (NGC) (\$/kWh)	See Rider NGC
Societal Benefits Charge (\$/kWh)	
Clean Energy Program	See Rider SBC
Universal Service Fund	See Rider SBC
Lifeline See Rider SBC	
Uncollectible Accounts	See Rider SBC
Transition Bond Charge (TBC) (\$/kWh)	See Rider SEC
Market Transition Charge Tax (MTC-Tax) (\$/kWh)	See Rider SEC
Transmission Rate (\$/kWh)	\$0.005349
Reliability Must Run Transmission Surcharge (\$/kWh)	\$0.000000
Transmission Enhancement Charge (\$/kWh)	See Rider BGS
Basic Generation Service Charge (\$/kWh)	See Rider BGS
Regional Greenhouse Gas Initiative Recovery Charge (\$/kWh)	See Rider RGGI
Infrastructure Investment Surcharge	See Rider IIS

CORPORATE BUSINESS TAX (CBT)

Charges under this rate schedule include a component for Corporate Business Taxes as set forth in Rider CBT.

NEW JERSEY SALES AND USE TAX (SUT)

Charges under this rate schedule include a component for New Jersey Sales and Use Tax as set forth in Rider SUT.

LOAD CONSUMPTION

Effective load shall be determined by the Company and be specified in the contract. Effective load is defined as the sum of the products of the connected load in kilowatts times the percent load on at one time. No changes in attached load may be made by the customer without the permission of the Company and customer shall allow the Company access to his premises to assure conformance with this provision.

Date of Issue: September 25, 2015

Effective Date: October 1, 2015

Issued by: David M. Velazquez, President – Atlantic City Electric Company
 Filed pursuant to Order of the Board of Public Utilities of the State of New Jersey as presented in Docket No. ER15070771

**CENTERPOINT ENERGY HOUSTON
ELECTRIC, LLC**

TARIFF

Chapter 6: Company Specific Items

Sheet No. 6.2
Page 1 of 2

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

CNP 8016

6.1.1.1.2 SECONDARY SERVICE LESS THAN OR EQUAL TO 10 KVA

AVAILABILITY

This schedule is applicable to Delivery Service for non-residential purposes at secondary voltage with demand less than or equal to 10 kVA when such Delivery Service is to one Point of Delivery and measured through one Meter and is not for shared or resale purposes.

TYPE OF SERVICE

Delivery Service will be single-phase, 60 hertz, at a standard secondary voltage. Delivery Service will be metered using Company's standard watt-hour Meter provided for this type of Delivery Service. Any other metering option(s) will be provided at an additional charge and/or will be provided by a Meter Owner other than the Company pursuant to Applicable Legal Authorities. Where Delivery Service of the type desired is not available at the Point of Delivery, additional charges and special contract arrangements may be required prior to Delivery Service being furnished, pursuant to Section 6.1.2.2, Construction Services, in this Tariff.

MONTHLY RATE

I. Transmission and Distribution Charges:

Customer Charge	\$2.14 per Retail Customer per Month
Metering Charge	\$1.74 per Retail Customer per Month
Transmission System Charge	\$.003945 per kWh
Distribution System Charge	\$.016845 per kWh

II. System Benefit Fund Charge: \$.000656 per kWh
See Rider SBF

III. Transition Charge: See Schedules TC and TC2

IV. Nuclear Decommissioning Charge: \$.000030 per kWh
See Rider NDC

V. Transmission Cost Recovery Factor: See Rider TCRF

VI. Excess Mitigation Credit: Not Applicable

VII. State Colleges and Universities Discount: See Rider SCUD

Chapter 6: Company Specific Items

Sheet No. 6.2
Page 2 of 2

CenterPoint Energy Houston Electric, LLC
Applicable: Entire Service Area

CNP 8016

- VIII. Competition Transition Charge:** See Rider CTC
- IX. Competitive Metering Credit:** See Rider CMC
- X. Other Charges or Credits:**
 - A. Municipal Account Franchise \$(.002190)
Per kWh Credit (see application and
explanation below)
 - B. Rate Case Expenses Surcharge See Rider RCE
 - C. Rider UCOS Retail Credit See Rider RURC

COMPANY SPECIFIC APPLICATIONS

Secondary Service Less Than or Equal to 10 kVA. This rate schedule is applicable only to Retail Customers whose current month's peak demand is 10 kVA or less and whose peak demand has not exceeded 10 kVA in any of the previous eleven months. If monthly peak demand is greater than 10 kVA, Retail Customer will be placed on the *Secondary Service Greater Than 10 kVA* Rate Schedule for a period of not less than twelve months. If this Rate Schedule is taken for Delivery Service for Electric Power and Energy supplied by Retail Customer's REP for standby or other intermittent purpose, Company may, at its sole discretion, require the Retail Customer to make additional contractual arrangements and/or require additional metering.

Service Voltages. Company's standard service voltages are described in 6.2.2, Standard Voltages and the Company's Service Standards.

Municipal Account Franchise Credit. A credit equal to the amount of franchise fees included in the Transmission and Distribution Charges will be applied to municipal accounts receiving service within the incorporated limits of such municipality which imposes a municipal franchise fee upon the Company based on the kWh delivered within that municipality and who have signed an appropriate Franchise Agreement.

Un-metered Service. Un-metered service is available for non-residential electric connection service at the discretion of the Company, Competitive Retailer, and Retail Customer, in limited situations when metering equipment is impractical or disproportionately expensive, and when the Retail Customer's electric load can be reasonably estimated or predicted from the nameplate or engineering studies of the installed equipment. Special protective devices may be required to be installed and/or paid for by customer. The "Metering Charge" contained in the monthly rate is not applicable to unmetered service.

NOTICE

**CONNECTICUT LIGHT AND POWER COMPANY,
DBA EVERSOURCE ENERGY**

TARIFF

CONNECTICUT LIGHT AND POWER COMPANY, DBA EVERSOURCE ENERGY

UNMETERED ELECTRIC SERVICE

RATE 115
Page 1 of 2

AVAILABLE for traffic, airfield, navigation, sign lighting, cable tv, and similar uses, where distribution facilities are suitable for the service requested, subject to the following conditions:

- (1) When such equipment is operated daily on a fixed schedule and the monthly demand and energy use of each installation can be accurately predicted.
- (2) The customer shall install, own, operate, and maintain all equipment.
- (3) The customer shall notify the Company, in writing, of all load changes within thirty (30) days.

A. MONTHLY RATE:

DEMAND CHARGE	\$11.59 per kW
CHARGE PER kWh	\$0.15338
MINIMUM MONTHLY BILL	\$6.45 per Unit

The determination of the MONTHLY RATE for an unmetered service is the greater of the MINIMUM MONTHLY BILL amount, or the bill amount based on the sum of the kW Demand times the DEMAND CHARGE and the kWh usage times the CHARGE PER kWh. The 30-minute kilowatthour demand and the kilowatthour usage used in the MONTHLY RATE calculation are based upon an engineering analysis of the load and operating characteristics of the unmetered service as submitted by the Customer, reviewed by the Company, and agreed to in a signed contract.

FMCC DELIVERY CHARGE:
(as per FMCC tariff)

CHARGE PER kWh	\$0.00551
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CHARGES INCLUDED IN THE ABOVE RATES, ON AN EQUIVALENT PER-KWH BASIS:

REVENUE ADJUSTMENT MECHANISM	\$0.00079 per kWh
TRANSMISSION	\$0.01623 per kWh
SYSTEMS BENEFITS CHARGE	\$0.00081 per kWh
COMPETITIVE TRANSITION ASSESSMENT	\$0.00116 per kWh
GENERATION SERVICE	\$0.09411 per kWh

CONSERVATION CHARGE	\$0.00300 per kWh
CONSERVATION ADJUSTMENT MECHANISM	\$0.00300 per kWh
RENEWABLE ENERGY CHARGE	\$0.00100 per kWh
DISTRIBUTION CHARGE equals the total charge less the above equivalent per kWh charges.	

Supersedes Rate 115
Effective December 1, 2015
by Letter Ruling dated November 18, 2015
Docket No. 14-05-06RE01

Effective January 1, 2016
by Letter Ruling dated December 23, 2015
Docket No. 16-01-01

CONNECTICUT LIGHT AND POWER COMPANY, DBA EVERSOURCE ENERGY

UNMETERED ELECTRIC SERVICE

RATE 115

Page 2 of 2

SUPPLIER SERVICE OPTIONS:
(as per the Generation Services tariff)

THIRD-PARTY SERVICE as per contract

FMCC GENERATION CHARGE:
(as per FMCC tariff – not applicable to
customers taking THIRD-PARTY SERVICE
above)

CHARGE PER kWh -\$0.00040

COMBINED PUBLIC BENEFITS CHARGE:

Pursuant to Conn. Agencies Regs. § 16-245-1(a)(2)(A) the Systems Benefits Charge, the Conservation Charge, the Conservation Adjustment Mechanism, and the Renewable Energy Charge are combined for billing purposes into the Combined Public Benefits Charge effective January 1, 2014.

RATE ADJUSTMENTS:

This rate will be adjusted as provided in the Company's Energy and Transmission Adjustment Clauses.

COMPETITIVE TRANSITION ASSESSMENT COST ADJUSTMENT:

Competitive Transition Assessment (CTA) charges and terms under this rate includes a CTA Cost Adjustment Charge set in accordance with the Company's CTA Cost Adjustment.

SYSTEMS BENEFITS COST ADJUSTMENT:

Systems Benefits service charges for all customers taking service under this rate shall be set in accordance with the Company's Systems Benefits Cost Adjustment.

ANNUAL REPORT:

The Company provides an annual unmetered services bill summary report by account for customer review. The report provides a summary of the number and types of equipment being billed.

by Letter Ruling dated November 18, 2015
Docket No. 14-05-06RE01

by Letter Ruling dated December 23, 2015
Docket No. 16-01-01

CONSUMERS ENERGY COMPANY

TARIFF

**President and Chief Executive Officer,
Jackson, Michigan**

**Issued under authority of the
Michigan Public Service Commission
dated November 19, 2015 in Case No.
U-17735**

M.P.S.C. No. 13 - Electric
Consumers Energy Company
(To revise rate structure)

Second Revised Sheet No. D-55.00
Cancels First Revised Sheet No. D-55.00

GENERAL SERVICE UNMETERED RATE GU
(Continued From Sheet No. D-54.10)

Monthly Rate: (Contd)

Determination of kWh:

The monthly charge shall be the per kWh total of the Power Supply and Delivery Charges as shown above based on the capacity requirements in Kilowatts of the lamp(s), associated ballast(s) and control equipment assuming 4,200 burning hours per year, adjusted by the ratio of the monthly kWh consumption to the total annual kWh consumption. At the Company's option, such service may be metered and the metered kWh used as the basis for billing. The capacity requirements of the lamp(s), associated ballast(s) and control equipment for each luminaire shall be determined by the Company from the specifications furnished by the manufacturers of such equipment, provided that the Company shall have the right to test such capacity requirements from time to time. In the event that said tests shall show capacity requirements different from those indicated by the manufacturers' specifications, the capacity requirements shown by said tests shall control. The customer shall not change the capacity requirements of the equipment owned by it without first notifying the Company in writing of such changes and the date that they shall be made.

For dusk to midnight service *for energy-only unmetered lighting*, the monthly charge per kWh shall be 130% of the sum of the *Secondary Energy Charge* and *Distribution Charge* per kWh *for secondary service*. The annual kWh shall be based on the actual burning hours. The monthly kWh for billing shall be the annual kWh adjusted by the ratio of the monthly kWh consumption to the total annual kWh consumption.

Monthly kWh shall be determined by multiplying the total connected load in kW (including the lamps, ballasts, transformers, amplifiers, and control devices) times 730 hours. The kWh for cyclical devices shall be 50% of the total kWh so calculated. The kWh for continuous, nonintermittent devices shall be 100% of the total kWh so calculated. No reduction in kWh shall be made for devices not operated 24 hours per day, or not operated every day.

The kWh of devices used for the control of school traffic, and operated not more than six hours per day during the school year only, shall be 10% of the continuous or cyclical kWh calculated.

The kWh for CATV Power Supply Units shall be 50% of the total kWh as determined from the manufacturer's rated input capacity of the Power Supply Units or the actual test load, whichever is greater.

The kWh for Wireless Access and Security Camera Power Supply Units shall be 100% of the total kWh as determined from the manufacturer's rated input capacity of the Power Supply Units or the actual test load, whichever is greater.

The Company may, at its option, install test meters for the purpose of determining the monthly kWh usage to be used for billing purposes.

Issued October 31, 2008 by
J. G. Russell,

Effective for service rendered on
and after December 1, 2008

**President and Chief Operating Officer,
Jackson, Michigan**

**Issued under authority of the
Michigan Public Service Commission
dated June 19, 2008 in Case No. U-
15245**

M.P.S.C. No. 13 - Electric
Consumers Energy Company
(To update Minimum Charge)

Sixth Revised Sheet No. D-56.00
Cancels Fifth Revised Sheet No. D-56.00

GENERAL SERVICE UNMETERED RATE GU
(Continued From Sheet No. D-55.00)

Monthly Rate (Contd)

Green Generation Program:

Customer contracts for participation in the Green Generation Program shall be available to any eligible customer as described in Rule C10.2, Green Generation Program.

A customer who participates in the Green Generation Program is subject to the provisions contained in Rule C10.2, Green Generation Program.

General Terms:

This rate is subject to all general terms and conditions shown on Sheet No. D-1.00.

Minimum Charge:

The applicable REP Surcharge and EE Surcharge shown on Sheet D-2.10, *the LIEAF Surcharge on Sheet D-3.00* and the System Access Charge included in the rate.

Due Date and Late Payment Charge:

The due date of the customer bill shall be 21 days from the date of mailing. A late payment charge of 2% of the unpaid balance, net of taxes, shall be assessed to any bill which is not paid on or before the due date shown thereon.

Special Terms and Conditions:

The Company reserves the right to make special contractual arrangements as to term or duration of contract, termination charges, contribution in aid of construction, monthly charges or other special considerations when the customer requests service, equipment or facilities not normally provided under this rate.

Term and Form of Contract:

Traffic Lighting, Wireless Access and Security Camera service under this rate may require a written contract for a term of reasonable duration.

All service under this rate to Community Antenna Television Service Companies shall require a written contract with a minimum term of one year.

**Issued December 1, 2015 by
J. G. Russell,
President and Chief Executive Officer,
Jackson, Michigan**

**Effective for service rendered on
and after December 1, 2015**

**Issued under authority of the
Michigan Public Service Commission dated
November 19, 2015 in Case No. U-17735**

DELMARVA POWER & LIGHT COMPANY
TARIFF

P.S.C. Md. No. 12 - Electric
Delmarva Power & Light Company

Fourth Revised Leaf No. 74

SERVICE CLASSIFICATION "TN"
TELECOMMUNICATIONS NETWORK SERVICE

A. Availability

This rate is available for Distribution Service and Standard Offer Service when modified by Rider "SOS" in the Maryland portion of the Company's service area for unmetered electric service to multiple telecommunications network devices and cable television power supply devices served directly by the Company and not exceeding 1,800 watts per device. The service supplied under this schedule normally will be alternating current, sixty hertz, single phase, 120 volts. This service classification is available beginning November 1, 2007.

B. Contract Term

Contracts, when required, are for an initial period of one (1) year with automatic month-to-month extensions until terminated. A contract for an initial period of more than (1) year may be required if special investment by the Company is necessary.

C. Monthly Rate

The Monthly Charges and Rates under this Service Classification are shown on Tariff Leaf No. 47a.

D. Standard Offer Service

Any Customer in this Service Classification who has not exercised their right to purchase its electric supply service from an Electricity Supplier shall be provided Standard Offer Service in accordance with the provisions of Rider SOS, subject to the Company's enrollment rules and tariff provisions.

E. Measurement of Electricity

At the customer's option monthly kilowatt-hour consumption will be computed on the basis of either the manufacturer's average wattage ratings of installed devices, with no allowance for outages, or on the basis of statistically valid sampling techniques. If the customer chooses the option to use statistically valid sampling techniques, the initial measurement of electricity will be based on the manufacturer's maximum rating. When historical data are available for the customer's devices, that data will be used for the sample estimate. If historical metered data are not available, sample usage data may be obtained by means of a handheld current probe. The charges under this rider are for electricity only.

F. Minimum Charge

The minimum monthly charge shall be the customer charge

Filed January 15, 2010

Effective December 2, 2009

Filed in Compliance with Order Nos. 83040 and 83085 in Case No. 9192
And as Approved at the MD PSC Admin Meeting on 12/16/2009

Delmarva Power & Light Company

P.S.C. Md. No. 12 - Electric
Sixth Revised Leaf No. 75

SERVICE CLASSIFICATION "TN"

TELECOMMUNICATIONS NETWORK SERVICE (Continued)

G. Public Service Company Franchise Tax

In addition to the charges provided for in this Service Classification, the Maryland Public Service Company Franchise Tax shall apply to all sales rendered hereunder before the application of the Maryland Sales Tax, unless the Customer is exempt from such tax.

H. Rules and Regulations

The Rules and Regulations set forth in this tariff shall govern the provision of service under this Service Classification.

Filed January 15, 2010

Effective December 2, 2009

DUKE ENERGY TARIFF



**SECTION NO. VI
TWENTY-EIGHTH REVISED SHEET NO. 6.165
CANCELS TWENTY-SEVENTH REVISED SHEET NO. 6.165**

Page 1 of 2

**RATE SCHEDULE GS-2
GENERAL SERVICE – NON-DEMAND
100% LOAD FACTOR USAGE**

Availability:

Available throughout the entire territory served by the Company.

Applicable:

To any customer, other than residential, with fixed wattage loads operating continuously throughout the billing period (such as traffic signals, cable TV amplifiers and gas transmission substations).

Character of Service:

Continuous service, alternating current, 60 cycle, single-phase or three-phase, at the Company's standard distribution voltage available. **Limitation of Service:**

Standby or resale service not permitted hereunder. Service under this rate is subject to the Company's currently effective and filed "General Rules and Regulations for Electric Service."

Rate per Month:

Customer Charge:

Unmetered Account:	\$ 6.54
Metered Account:	\$ 11.59

Energy and Demand Charges:

Non-Fuel Energy Charge:	2.048¢ per kWh
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Plus the Cost Recovery Factors listed in Rate Schedule BA-1, <i>Billing Adjustments</i> , except the Fuel Cost Recovery Factor	See Sheet No. 6.105 and 6.106
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Premium Distribution Service Charge:

Where Premium Distribution Service has been established after 12/15/98 in accordance with Subpart 2.05, General Rules and Regulations Governing Electric Service, the customer shall pay a monthly charge determined under Special Provision No. 2 of this rate schedule for the costs of all additional equipment, or the customer's allocated share thereof, installed to accomplish a automatic delivery transfer including all line costs necessary to connect to an alternate distribution circuit.

In addition, the Non-Fuel Energy Charge included in the Rate per Month section of this rate schedule shall be increased by 0.149¢ per kWh for the cost of reserving capacity in the alternate distribution circuit.

Additional Charges:

Fuel Cost Recovery Factor:	See Sheet No. 6.105
Gross Receipts Tax Factor:	See Sheet No. 6.106

Right-of-Way Utilization Fee:	See Sheet No. 6.106
Municipal Tax:	See Sheet No. 6.106
Sales Tax:	See Sheet No. 6.106

ISSUED BY: Javier J. Portuondo, Director Rates & Regulatory Strategy – FL

EFFECTIVE: January 1, 2014



**SECTION NO. VI
EIGHTH REVISED SHEET NO. 6.166
CANCELS SEVENTH REVISED SHEET NO. 6.166**

**RATE SCHEDULE GS-2
GENERAL SERVICE – NON-DEMAND
100% LOAD FACTOR USAGE
(Continued from Page No. 1)**

Minimum Monthly Bill:

The minimum monthly bill shall be the Customer Charge. Where special equipment to serve the customer is required, the Company may require a specified minimum charge.

Terms of Payment:

Bills rendered hereunder are payable within the time limit specified on the bill at Company-designated locations.

Term of Service:

From billing period to billing period, until receipt of notice by the Company from the customer to disconnect, or upon disconnect by the Company under Florida Public Service Commission or Company Rules.

Where special equipment to serve the customer is required, the Company may require a specified term of service contract.

Special Provisions:

1. The Company may, under the provisions of this rate, require a contract with the customer upon the Company's filed contract form. Whenever the customer increases his electrical load, which increase requires the Company to increase facilities installed for the specific use of the customer, a new Term of Service may be required.
2. The Company will furnish service under this rate at a single voltage. Equipment to supply additional voltages or additional facilities for the use of the customer shall be furnished and maintained by the customer. The customer may request the Company to furnish such additional equipment, and the Company, at its sole option, may furnish, install, and maintain such additional equipment, charging the customer for the use thereof at the rate of 1.67% per month of the installed cost of such additional equipment.
3. The calculated kWh usage at each unmetered point shall be determined by operating test or utilization of manufacturer's rating and specifications. The monthly operation shall be based on a standard of 730 hours. For cable TV amplifiers or similar equipment, the input wattage used to calculate kWh usage shall be:

$$\text{Input Wattage} = \frac{\text{Output Amperage} \times \text{Output Voltage}}{\text{Manufacturer's Rated Efficiency}}$$

where, such above values are established by the Manufacturer.

ISSUED BY: Javier J. Portuondo, Director Rates & Regulatory Strategy – FL

EFFECTIVE: April 29, 2013

DUQUESNE LIGHT COMPANY

TARIFF

DUQUESNE LIGHT COMPANY

**SUPPLEMENT NO. 91
TO ELECTRIC – PA. P.U.C. NO. 24
SEVENTH REVISED PAGE NO. 74
CANCELLING SIXTH REVISED PAGE NO. 74**

RATE UMS – UNMETERED SERVICE

AVAILABILITY

Available to customers using unmetered standard service at each point of connection for customer-owned and maintained equipment such as traffic signals, communication devices and billboard lighting.

MONTHLY RATE

DISTRIBUTION CHARGES

Customer Charge \$10.00
Energy Charge 1.5836cents per kilowatt hour

SUPPLY CHARGES

Customers who elect to purchase their electric supply requirements from the Company will do so under the provisions of Rider No. 8 – Default Service Supply and will be billed in accordance with the terms contained therein.

ELECTRIC CHARGES

The Supply Charges for Rate UMS – Unmetered Service customers will be updated through competitive requests for proposal as described in Rider No. 8 – Default Service Supply. The Supply rate shall be determined based on the formula described in the “Calculation of Rate” section in Rider No. 8. Applicability of the Supply rate to Rate UMS customers shall be as described in Rider No. 8 and for the effective period defined in Rider No. 8.

The Company will provide and charge for transmission service consistent with the PJM Open Access Transmission Tariff approved or accepted by the Federal Energy Regulatory Commission for customers who receive Default Service from the Company. The Transmission Service Charges are included, for informational purposes, in Appendix A of this Tariff.

Customers who elect to purchase their electric energy supply requirements from an EGS will be charged the Distribution Charges by the Company and must purchase their transmission and supply requirements from their selected EGS. Customers may change suppliers or return to the Company for electric supply requirements as defined in Rule No. 45.

For customers who elect to purchase their supply from an EGS, the customer is responsible for any other charges from the EGS. Any month in which the EGS becomes unavailable or during which the customer has not chosen an EGS, the Company will supply electricity at the above Distribution Charges, the Supply Charges in Rider No. 8 and the Transmission Service Charges in Appendix A.

Customers who choose an EGS may elect Consolidated Billing or Separate Billing as defined in Rule No. 20.1.

DUQUESNE LIGHT COMPANY

**SUPPLEMENT NO. 72
TO ELECTRIC – PA. P.U.C. NO. 24
SECOND REVISED PAGE NO. 75**

CANCELLING FIRST REVISED PAGE NO. 75

RATE UMS – UNMETERED SERVICE - (Continued)

MONTHLY RATE - (Continued)

RIDERS

Bills rendered under this schedule are subject to the charges stated in any applicable rider.

LATE PAYMENT CHARGE

Bills will be calculated on the rates stated herein, and are due and payable on or before thirty days from the date of mailing of the bill to the ratepayer. The bill is overdue when not paid on or before the due date indicated on the bill. An overdue bill is subject to a Late Payment Charge of 1.25% interest per month on the full unpaid and overdue balance of the Company charges on the bill. The Charge shall be calculated on the overdue portions of the Company charges on the bill and shall not be charged against any sum that falls due during a current billing period.

SPECIAL TERMS AND CONDITIONS

Energy usage for customers using this service shall be estimated by the Company on the basis of equipment wattage and operating hours. The customer shall notify the Company whenever any change is made in the equipment or the operating hours, so that the Company may revise the estimated energy usage.

ISSUED: MARCH 22, 2013

EFFECTIVE: JUNE 1, 2013

ENTERGY ARKANSAS

TARIFF

ARKANSAS PUBLIC SERVICE COMMISSION

7th Revised Sheet No. 16.1 Schedule Sheet 1 of 3

Replacing: 6th Revised Sheet No. 16.1

Entergy Arkansas, Inc.

Name of Company

Kind of Service: Electric

Class of Service: Commercial

Docket No.: 15-015-U

Order No.: 19

Effective: 3/31/16 **16.0**

Part III. Rate Schedule No. 16

Title: Community Antenna TV Power Supply (CTV)

PSC File Mark Only

COMM

UNITY ANTENNA TV POWER SUPPLY SERVICE

16.1. REGULATORY AUTHORITY

The Arkansas Legislature has delegated authority to the Arkansas Public Service Commission ("APSC" or the "Commission") to regulate public utilities in the State of Arkansas, including Entergy Arkansas, Inc. ("EAI" or the "Company"). The APSC's regulatory authority over the provision of electric service applies not only in the Distribution Service area allocated to EAI by the APSC but also extends to service to customers who have been released to EAI by other electric distribution utilities, when such release for service has been approved by the Commission pursuant to Rule 6.07(b) or (c) of the Commission's Rules of Practice and Procedure. Similarly, the Tennessee Regulatory Authority exercises such authority delegated to it by the Tennessee legislature in areas of the State of Tennessee served by EAI.

16.2. AVAILABILITY

Available for un-metered electric service to community antenna television power supplies. Customers preferring metered service may be served under Rate Schedule No. 4, Small General Service when the customer provides and installs a meter base and meter loop either on customer's free-standing pole, or free-standing power supply unit all to Company's specifications. Not applicable to temporary, standby, supplementary, breakdown, resale or shared service.

16.3. CHARACTER OF SERVICE

Single-phase, 60 cycles at approximately 120/240 Volts.

16.4. NET MONTHLY RATE

16.4.1. The kWh consumption to which provisions of this Net Monthly Rate apply will be determined by multiplying the nameplate rating of the power supply in watts by 0.73.

16.4.2. Rate

<u>Billing Item:</u>	<u>Rate</u>
All kWh	\$0.07557
Energy Charge per kWh: All kWh	\$0.07557

ARKANSAS PUBLIC SERVICE COMMISSION

8th Revised Sheet No. 16.2 Schedule Sheet 2 of 3

Replacing: 7th Revised Sheet No. 16.2

Entergy Arkansas, Inc.
 Name of Company

Kind of Service: Electric Class of Service: Commercial

Part III. Rate Schedule No. 16

Title: Community Antenna TV Power Supply (CTV)

Docket No.: 15-015-U
 Order No.: 19
 Effective: 3/31/16

1

PSC File Mark Only

16.4.3

Minimum

Billing

<u>Item</u>	<u>Rate</u>
Charge per installation:	\$1.70

16.4.4. Billing Amount

The Billing Amount will be the greater of the amounts calculated in § 16.4.2 and § 16.4.3 above plus the Energy Cost Recovery factor times the energy consumed as determined in § 16.4.1 plus all other Adjustments required by § 16.4.6 below.

16.4.5. Billing Procedure

One bill will be rendered monthly to the customer for each power supply. The minimum billing period for any single installation is one month and no monthly bill will be prorated because an amplifier or power supply is connected or disconnected during a billing cycle. Collective Billing may be made available to CTV customers pursuant to Rate Schedule No. 19, Collective Billing Rider (CBR).

16.4.6. Adjustments

Applicable Riders which adjust this Rate Schedule are listed in Rate Schedule No. 17, Table of Riders Applicable to Rate Schedules.

16.5. OTHER PROVISIONS

If additional facilities are necessary or if it is necessary to rearrange existing facilities, customer will pay to Company the cost of such additional facilities or rearrangement.

Customer agrees not to change the connected load or the character of its facilities at each installation without notifying Company in writing of its intention to do so.

Company reserves the right to test customer's installation from time to time and to adjust the wattage rating for billing purposes to conform with the results of such tests.

16.6. PAYMENT

The monthly bill shall be computed in accordance with the Net Monthly Rate, other provisions of the rate schedule and all applicable riders. Payment shall be made in accordance with Rate Schedule No. 29, Charges Related to Customer Activity (CAC), § 29.19.1.

ARKANSAS PUBLIC SERVICE COMMISSION

5th Revised

Sheet No. 16.3

Schedule Sheet 3 of 3

Replacing: 4th Revised Sheet No. 16.3

Entergy Arkansas, Inc.

Name of Company

Kind of Service: Electric

Class of Service: Commercial

Docket No.: 15-015-U

Order No.: 19

Effective: 3/31/16

Part III. Rate Schedule No. 16

Title: Community Antenna TV Power Supply (CTV)

PSC File Mark Only

16.7. CONTRACT PERIOD

Not less than one year.

16.8. SERVICE REGULATIONS

Service under this schedule is subject to Policy Schedule No. 9, Service Regulations, of the Company as it is now on file, and as it may in the future be filed, with the APSC and the rules of the Commission.

FLORIDA POWER & LIGHT COMPANY

TARIFF

FLORIDA POWER & LIGHT COMPANY
No. 8.101

Forty- Fourth Revised Sheet No. 8.101
Cancels Forty-Third Revised Sheet

GENERAL SERVICE - NON DEMAND

RATE SCHEDULE: GS-1

AVAILABLE:

In all territory served.

APPLICATION:

For electric service required for commercial or industrial lighting, power and any other purpose with a demand of 20 kW or less.

SERVICE:

Single phase, 60 hertz and at any available standard voltage. Three phase service will be provided without additional charge unless the Company's line extension policy is applicable thereto. All service required on premises by Customer shall be furnished through one meter. Resale of service is not permitted hereunder.

MONTHLY RATE:

Customer Charge:	\$7.75
Non-Fuel Energy Charges:	
Base Energy Charge	5.384¢ per kWh
Conservation Charge	See Sheet No. 8.030
Capacity Payment Charge	See Sheet No. 8.030
Environmental Charge	See Sheet No. 8.030
Additional Charges:	
General Service Load Management	
Program (if applicable)	See Sheet No. 8.109
Fuel Charge	See Sheet No. 8.030
Storm Charge	See Sheet No. 8.040
Franchise Fee	See Sheet No. 8.031
Tax Clause	See Sheet No. 8.031
Minimum:	\$7.75

Non-Metered Accounts: A Customer Charge of \$1.00 will apply to those accounts which are billed on an estimated basis and, at the Company's option, do not have an installed meter for measuring electric service. The minimum charge shall be \$1.00.

SPECIAL PROVISIONS:

Energy used by commonly owned facilities of condominium, cooperative and homeowners' associations may qualify for the residential rate schedule as set forth on Sheet No. 8.211, Rider CU.

TERM OF SERVICE:

Not less than one (1) billing period.

RULES AND REGULATIONS

Service under this schedule is subject to orders of governmental bodies having jurisdiction and to the currently effective "General Rules and Regulations for Electric Service" on file with the Florida Public Service Commission. In case of conflict between any provision of this schedule and said "General Rules and Regulations for Electric Service" the provision of this schedule shall apply.

**Issued by: S. E. Romig, Director, Rates
and Tariffs Effective: April 1, 2016**

GEORGIA POWER

TARIFF

ELECTRIC SERVICE TARIFF:

**UNMETERED COMMUNICATION
 SCHEDULE: "UC-10"**



PAGE	EFFECTIVE DATE	REVISION	PAGE NO.
1 of 2	With Bills Rendered for the Billing Month of January, 2016	Original	3.40

AVAILABILITY:

Throughout the Company's service area from existing lines of adequate capacity.

APPLICABILITY:

Applicable to all electric service for Commercial customers, at one standard voltage received at one point, required by a customer of which primary usage is:

1. Defined under the North American Industry Classification System (NAICS) as:
 - a. NAICS 515 for industries in the broadcasting (except internet) subsector
 - b. NAICS 517 for Industries in the telecommunications subsector
 - c. NAICS 518 for industries in the internet service providers, web search portals, and data processing services subsector
2. Less than 3,000 kWh monthly, has a maximum 30-minute measured demand of less than 30 kW and DOES NOT require the installation of metering equipment and service drops, such that the monthly energy and demand may be estimated by the Company.

TYPE OF SERVICE:

Single phase, 60 hertz, at 120V and 240V.

MONTHLY RATE:

Basic Service Charge\$9.00

Energy Charge:

First 25 kWh or less Included in Basic Service Charge
Over 25 kWh..... 10.4346¢ per kWh

Minimum Bill: \$9.00 Basic Service Charge plus Environmental Compliance Cost Recovery, plus Nuclear Construction Cost Recovery, plus appropriate Demand Side Management Commercial Schedule, plus Fuel Cost Recovery (FCR) as applied to the current month kWh, plus Municipal Franchise Fee.

(Monthly energy will be estimated for these applications and charged at the above rate.)

ENVIRONMENTAL COMPLIANCE COST RECOVERY:

The amount calculated at the above rate will be increased under the provisions of the Company's effective Environmental Compliance Cost Recovery Schedule, including any applicable adjustments.

ELECTRIC SERVICE TARIFF:
UNMETERED COMMUNICATION
SCHEDULE: "UC-10"



PAGE	EFFECTIVE DATE	REVISION	PAGE NO.
2 of 2	With Bills Rendered for the Billing Month of January, 2016	Original	3.40

NUCLEAR CONSTRUCTION COST RECOVERY:

The amount calculated at the above rate will be increased under the provisions of the Company's effective Nuclear Construction Cost Recovery Schedule, including any applicable adjustments.

DEMAND SIDE MANAGEMENT SCHEDULE:

The amount calculated at the above rate will be increased under the provisions of the Company's effective Demand Side Management Commercial Schedule, including any applicable adjustments.

FUEL COST RECOVERY:

The amount calculated at the above rate will be increased under the provisions of the Company's effective FCR, including any applicable adjustments.

MUNICIPAL FRANCHISE FEE:

The bill calculated under this tariff will be increased under the provisions of the Company's effective Municipal Franchise Fee Schedule, including any applicable adjustments.

INSTALLATION WHERE ADDITIONAL FACILITIES ARE REQUIRED:

Where additional facilities must be installed to specifically serve the customer, the customer may be required to pay for the additional capital facilities and perpetual maintenance thereof.

TERM OF CONTRACT:

One (1) year.

GENERAL TERMS & CONDITIONS:

The bill calculated under this tariff is subject to change in such an amount as may be approved and/or amended by the Georgia Public Service Commission under the provisions of applicable riders and other schedules.

Service hereunder is subject to the Rules and Regulations for Electric Service on file with the Georgia Public Service Commission.

IDAHO POWER COMPANY

TARIFF

Idaho Power Company

Second Revised Sheet No. 40-1
Cancels

I.P.U.C. No. 29, Tariff No. 101

First Revised Sheet No. 40-1

IDAHO PUBLIC UTILITIES COMMISSION

Approved Effective

Dec. 30, 2011 Jan. 1, 2012

Per O.N. 32426

Jean D. Jewell Secretary

SCHEDULE 40
NON-METERED GENERAL SERVICE

AVAILABILITY

Service under this schedule is available at points on the Company's interconnected system within the State of Idaho where existing secondary distribution facilities of adequate capacity, phase and voltage are available adjacent to the Customer's Premises and the only investment required by the Company is an overhead service drop.

APPLICABILITY

Service under this schedule applies to Electric Service for the Customer's single- or multiple-unit loads up to 1,800 watts per unit where the size of the load and period of operation are fixed and, as a result, actual usage can be accurately determined. Service may include, but is not limited to, security lighting, telephone booths and CATV power supplies which serve line amplifiers. Equipment or loads constructed or operated in such a way as to allow for the potential or actual variation in energy use are not eligible for service under this schedule. Facilities to supply service under this schedule shall be installed so that service cannot be extended to the Customer's loads served under other schedules. Service under this schedule is not applicable to shared or temporary service. On or after June 1, 2006, new service under this schedule is also not applicable to the Customer's loads on Premises which have metered service.

SPECIAL TERMS AND CONDITIONS

The Customer shall pay for all Company investment, except the overhead service drop, required to provide service requested by the Customer. The Customer is responsible for installing, owning and maintaining all equipment, including necessary underground circuitry and related facilities to connect with the Company's facilities at the Company designated Point of Delivery. If the Customer's equipment is not properly maintained, service to the specific equipment will be terminated.

Energy used by CATV power supplies which serve line amplifiers will be determined by the power supply manufacturer's nameplate input rating assuming continuous operation.

The Customer is responsible for notifying the Company of any changes or additions to the equipment or loads being served under this schedule. Failure to notify the Company of such changes or additions will result in the termination of service under this schedule and the requirement that service be provided under one of the Company's metered service schedules.

If the Customer modifies existing equipment being served under this schedule in a way that allows for the potential or actual variation in energy usage or installs additional equipment that allows for the potential or actual variation in energy usage, service under this schedule will be terminated and the Customer will be required to receive service under one of the Company's metered service schedules.

With Company approval, municipalities or agencies of federal, state, or county governments may install equipment that allows for the potential intermittent variation in energy usage at authorized Points of Delivery. Under these circumstances, the Customer's bill will include fixed units of the Intermittent Usage Charge in addition to the Customer's other Monthly Charges.

The Company is only responsible for supplying energy to the Point of Delivery and, at its expense, may check energy consumption at any time.

IDAHO
Issued per Order No. 32426
Effective – January 1, 2012

Issued by IDAHO POWER COMPANY
Gregory W. Said, Vice President, Regulatory Affairs
1221 West Idaho Street, Boise, Idaho

Idaho Power Company

Ninth Revised Sheet No. 40-2

Cancels

IDAHO PUBLIC UTILITIES COMMISSION

I.P.U.C. No. 29, Tariff No. 101

Eighth Revised Sheet No. 40-2

Approved

Effective

June 3, 2014 June 1, 2014

Per O.N. 33049

Jean D. Jewell Secretary

SCHEDULE 40

NON-METERED GENERAL SERVICE

(Continued)

MONTHLY CHARGE

The average monthly kWh of energy usage shall be estimated by the Company, based on the Customer's electric equipment and one-twelfth of the annual hours of operation thereof. Since the service provided is non-metered, failure of the Customer's equipment will not be reason for a reduction in the Monthly Charge. The Monthly Charge shall be computed at the following rate, and may also include charges as set forth in Schedule 55 (Power Cost Adjustment), Schedule 91 (Energy Efficiency Rider), and Schedule 95 (Adjustment for Municipal Franchise Fees).

Energy Charge, per kWh	8.134¢
Minimum Charge, per month	\$1.50

ADDITIONAL CHARGES

Applicable only to municipalities or agencies of federal, state, or county governments with an authorized Point of Delivery having the potential of intermittent variations in energy usage.

Intermittent Usage Charge, per unit, per month	\$1.00
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PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

I Issued by IDAHO POWER COMPANY
Issued per Order No. 33049
Effective – June 1, 2014

Gregory W. Said, Vice President, Regulatory Affairs
1221 West Idaho Street, Boise, Idaho

**KANSAS CITY POWER & LIGHT COMPANY
(KANSAS)
TARIFF**

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 1

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 8, 2006

No supplement or separate understanding shall modify the tariff as shown hereon.

Sheet 1 of 6 Sheets

**SMALL GENERAL SERVICE
 Schedule SGS**

AVAILABILITY:

For electric service through one meter to a customer using electric service for purposes other than those included in the availability provisions of the Residential Service Rate Schedule. At the Company's discretion, service may be provided through more than one meter where it is economical for the Company to do so.

For electric service through a separately metered circuit for water heating connected prior to March 1, 1999.

For secondary electric service through a separately metered circuit for electric space heating purposes. Electric space heating equipment may be supplemented by or used as a supplement to wood burning fireplaces, wood burning stoves, active or passive solar heating, and in conjunction with fossil fuels where the combination of energy sources results in a net economic benefit to the customer. Electric space heating equipment shall be permanently installed, thermostatically controlled, and of a size and design approved by the Company. In addition to the electric space heating equipment, only permanently installed all electric equipment, used to cool or air condition the same space which is electrically heated, may be connected to the separately metered circuit.

Standby, breakdown, or supplementary service will not be supplied under this schedule unless the customer first enters into a special contract which includes technical and safety requirements. These requirements, and the associated interconnection costs, shall be reasonable and assessed on a nondiscriminatory basis with respect to other customers with similar load characteristics. Temporary service supplied under this schedule will be connected and disconnected in accordance with the General Rules and Regulations.

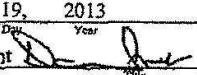
APPLICABILITY:

Applicable to multiple-occupancy buildings when the tenants or occupants of the building are furnished with electric service on a rent inclusion basis and the customer qualifies under Sections 9.03 – 9.08 of Company's General Rules and Regulations pertaining to Metering.

This rate also will be applied to the combined use of a customer at the premises where two or more classes of service (such as one-phase and three-phase services) to the customer at such premises are measured by separate meters, but only in the case of customers connected prior to August 25, 1976. Monthly Maximum Demand will be computed as the sum of the individual meters' monthly maximum 30-minute interval demand. Customers with more than one class of service connected on or after August 25, 1976 will be billed separately for each class of service.

TERM OF CONTRACT:

Contracts under this schedule shall be in accordance with the General Rules and Regulations, generally for a period of not less than one year from the effective date thereof, except in the case of temporary service.

Issued:	<u>October 11, 2013</u> Month Day Year
Effective:	<u>December 19, 2013</u> Month Day Year
By:	<u>Darrin R. Ives, Vice-President</u>  Title

14-KCPE-172-TAR 
 Approved
 Kansas Corporation Commission
 December 19, 2013
 /S/ Kim Christiansen

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 2

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 9, 2013

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 2 of 6 Sheets

**SMALL GENERAL SERVICE
 Schedule SGS**

(Continued)

RATE FOR SERVICE AT SECONDARY VOLTAGE: 2SGHE, 2SGHH, 2SGSE, 2SGSH, 2SUSE, 2SUSH,

A. CUSTOMER CHARGE:

(i) For Metered Service:

(a) Customer pays one of the following charges per month based upon the Facilities Demand:

0-24 kW	\$18.46
25 kW or above	\$48.24

(b) plus, additional meter charge for Customers with separately metered space heat: \$2.18

(ii) For Unmetered Service Customer pays: \$7.92

B. FACILITIES CHARGE:

Per kW of Facilities Demand per month	
First 25 kW	\$0.00
All kW over 25 kW	\$2.843

C. ENERGY CHARGE:

kWh associated with:	Summer Season	Winter Season
First 180 Hours Use per month	\$0.14504 per kWh	\$0.11544 per kWh
Next 180 Hours Use per month	\$0.06369 per kWh	\$0.05441 per kWh
Over 360 Hours Use per month	\$0.05692 per kWh	\$0.04290 per kWh

D. SEPARATELY METERED SPACE HEAT: 2SGHE, 2SGHH

When the customer has separately metered electric space heating equipment of a size and design approved by the Company, the kWh used for electric space heating shall be billed as follows:

- (i) Applicable during the Winter Season:
 \$0.04162 per kWh per month.
- (ii) Applicable during the Summer Season:
 The demand established and energy used by equipment connected to the space heating circuit will be added to the demands and energy measured for billing under the rates above and for the determination of the Minimum Monthly Bill.

Issued: September 10, 2015
Month Day Year

Effective: October 1, 2015
Month Day Year

By: /s/ Darrin R. Ives Vice President
Title

15-KCPE-116-RTS *RHG*
 Approved
 Kansas Corporation Commission
 September 11, 2015
 /S/ Amy L. Green

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 3

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 9, 2013

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 3 of 6 Sheets

**SMALL GENERAL SERVICE
 Schedule SGS**

(Continued)

RATE FOR SERVICE AT PRIMARY VOLTAGE: 2SGSF, 2SGSG

A. CUSTOMER CHARGE:

For Metered Service:

Customer pays one of the following charges per month based upon the Facilities Demand:

0-24 kW	\$18.46
25 kW or above	\$48.24

B. FACILITIES CHARGE:

Per kW of Facilities Demand per month

First 26 kW	\$0.00
All kW over 26 kW	\$2.405

C. ENERGY CHARGE:

kWh associated with:

	Summer Season	Winter Season
First 180 Hours Use per month	\$0.14140 per kWh	\$0.11249 per kWh
Next 180 Hours Use per month	\$0.06194 per kWh	\$0.05307 per kWh
Over 360 Hours Use per month	\$0.05543 per kWh	\$0.04172 per kWh

Issued: September 10, 2015
Month Day Year

Effective: October 1, 2015
Month Day Year

By: /s/ Darrin R. Ives Vice President
Title

15-KCPE-116-RTS *Rug*
 Approved
 Kansas Corporation Commission
 September 11, 2015
 /S/ Amy L. Green

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 4

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 9, 2013

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 4 of 6 Sheets

SMALL GENERAL SERVICE
Schedule SGS

(Continued)

REACTIVE DEMAND ADJUSTMENT (Secondary and Primary Service):

Company may determine the customer's monthly maximum 30-minute reactive demand in kilovars. In each month a charge of \$0.668 per month shall be made for each kilovar by which such maximum reactive demand is greater than fifty percent (50%) of the customer's Monthly Maximum Demand (kW) in that month. The maximum reactive demand in kilovars shall be computed similarly to the Monthly Maximum Demand as defined in the Determination of Demands section.

MINIMUM MONTHLY BILL:

The Minimum Monthly Bill shall be equal to the sum of the Customer Charge, Facilities Charge, and Reactive Demand Adjustment.

UNMETERED SERVICE:

Unmetered secondary service refers to electric service which is not measured by a kWh meter or by a kWh/demand meter. This type of service usually applies to delivery points for which it is impractical or difficult to install and read meters. The usage and demand are calculated by using typical hours of use and rated equipment loads.

SUMMER AND WINTER SEASONS:

The Summer Season is four consecutive months, beginning and effective May 16 and ending September 15, inclusive. The Winter Season is eight consecutive months, beginning and effective September 16 and ending May 15. Customer bills for meter reading periods including one or more days in both seasons will reflect the number of days in each season.

CUSTOMER DEFINITIONS:

Secondary Voltage Customer - Receives service on the low side of the line transformer.

Primary Voltage Customer - Receives service at Primary voltage of 12,000 volts or over but not exceeding 69,000 volts. Customer will own all equipment necessary for transformation including the line transformer.

Water Heating Customer - Customer connected prior to March 1, 1999, that receives service through a separately metered circuit as the sole means of water heating with an electric water heater of a size and design approved by the Company.

Issued:	<u>September 10, 2015</u> Month Day Year
Effective:	<u>October 1, 2015</u> Month Day Year
By:	<u>/s/ Darrin R. Ives</u> Vice President Title

15-KCPE-116-RTS *RHG*
 Approved
 Kansas Corporation Commission
 September 11, 2015
 /S/ Amy L. Green

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 5

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 21, 1998

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 5 of 6 Sheets

SMALL GENERAL SERVICE
Schedule SGS (Continued)

DETERMINATION OF DEMANDS:

Demand will be determined by demand instruments or, at the Company's option, by demand tests.

MONTHLY MAXIMUM DEMAND:

The Monthly Maximum Demand is defined as the sum of:

- a. The highest demand indicated in any 30-minute interval during the month on all non-space heat and non-water heat meters.
- b. Plus, the highest demand indicated in any 30-minute interval during the month on the space heat meter, if applicable.
- c. Plus, the highest demand indicated in any 30-minute interval during the month on the water heat meter, if applicable.

FACILITIES DEMAND:

Facilities Demand shall be equal to the highest Monthly Maximum Demand occurring in the last twelve (12) months including the current month.

06-KCPE-828-RTS
 Approved
 Kansas Corporation Commission
 December 4, 2006
 /s/ Susan K. Duffy



Issued: <u>December 8, 2006</u> <small>Month Day Year</small>	FILED
Effective: <u>January 1, 2007</u> <small>Month Day Year</small>	THE STATE CORPORATION COMMISSION OF KANSAS
By: <u>Chris B. Giles, Vice-President</u> <small>Title</small>	By: _____ <small>Secretary</small>

THE STATE CORPORATION COMMISSION OF KANSAS

SCHEDULE 31

KANSAS CITY POWER & LIGHT COMPANY

(Name of Issuing Utility)

Replacing Schedule 31 Sheet 6

Rate Areas No. 2 & 4

(Territory to which schedule is applicable)

which was filed December 13, 2012

No supplement or separate understanding shall modify the tariff as shown hereon. Sheet 6 of 6 Sheets

**SMALL GENERAL SERVICE
 Schedule SGS**

(Continued)

DETERMINATION OF HOURS USE:

Total Hours Use in the Summer Season shall be determined by dividing the total monthly kWh on all meters by the Monthly Maximum Demand in the current month. Total Hours Use in the Winter Season shall be determined by dividing the total monthly kWh on all meters (excluding separately metered space heat kWh) by the Monthly Maximum Demand (excluding separately metered space heat kW) in the current month. The kWh associated with a given number of Hours Use is computed by multiplying the Monthly Maximum Demand (excluding separately metered space heat kW in the Winter Season) by that number of Hours Use.

METERING AT DIFFERENT VOLTAGES:

The Company may, at its option, install metering equipment on the secondary side of a Primary Voltage Customer's transformer. In that event, the customer's metered demand and energy shall be increased either by the installation of compensation metering equipment, or by 2.34% if metering equipment is not compensated.

The Company may also, at its option, install metering equipment on the primary side of the transformer for a Secondary Voltage Customer. In this case, the customer's metered demand and energy shall be decreased by 2.29%, or alternatively, compensation metering may be installed.

ADJUSTMENTS AND SURCHARGES:

The rates hereunder are subject to adjustment as provided in the following schedules:

- Energy Cost Adjustment (ECA)
- Energy Efficiency Rider (EER)
- Property Tax Surcharge (PTS)
- Tax Adjustment (TA)
- Transmission Delivery Charge (TDC)

REGULATIONS:

Subject to Rules and Regulations filed with the State Regulatory Commission.

Issued: September 10, 2015
Month Day Year

Effective: October 1, 2015
Month Day Year

By: /s/ Darrin R. Ives Vice President
Title

15-KCPE-116-RTS **249**
 Approved
 Kansas Corporation Commission
 September 11, 2015
 /S/ Amy L. Green

**KANSAS CITY POWER & LIGHT COMPANY
(MISSOURI)
TARIFF**

KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Third () Original Sheet No. 9
(X) Revised
Cancelling P.S.C. MO. No. 7 Second () Original Sheet No. 9
(X) Revised

For Missouri Retail Service Area

**SMALL GENERAL SERVICE
Schedule SGS**

AVAILABILITY:

For electric service through one meter to a customer using electric service for purposes other than those included in the availability provisions of the Residential Service Rate Schedule. At the Company's discretion, service may be provided through more than one meter where it is economical for the Company to do so.

For electric service through a separately metered circuit for water heating connected prior to July 9, 1996.

For secondary electric service through a separately metered circuit for existing customers for electric space heating purposes. Electric space heating equipment may be supplemented by or used as a supplement to wood burning fireplaces, wood burning stoves, active or passive solar heating, and in conjunction with fossil fuels where the combination of energy sources results in a net economic benefit to the customer. Electric space heating equipment shall be permanently installed, thermostatically controlled, and of a size and design approved by the Company. In addition to the electric space heating equipment, only permanently installed all electric equipment, used to cool or air condition the same space which is electrically heated, may be connected to the separately metered circuit.

Service will not be supplied where the ultimate use is primarily for residential purposes.

Standby, breakdown or supplementary service is available under this schedule if the customer seeking such service first enters into a special contract which includes technical and safety requirements similar to those required for qualifying facilities in 4 CSR 240-20.060(2)(C). These requirements, and the associated interconnection costs, shall be reasonable and assessed on a nondiscriminatory basis with respect to other customers with similar load characteristics. Temporary service supplied under this schedule will be connected and disconnected in accordance with the General Rules and Regulations.

The Separately Metered Space Heat rate of this schedule is available only to Customers' physical locations currently taking service under such Separately Metered Space Heat rate and who are served under such rate continuously thereafter.

APPLICABILITY:

Applicable to multiple-occupancy buildings when the tenants or occupants of the building are furnished with electric service on a rent inclusion basis

This rate also will be applied to the combined use of a customer at the premise where two or more classes of service (such as one-phase and three-phase services) to the customer at such premise are measured by separate meters, but only in the case of such customers connected prior to May 5, 1986. Monthly Maximum Demand will be computed as the sum of the individual meters' monthly maximum 30-minute interval demand at each service. Customers with more than one class of service connected on or after May 5, 1986 will be billed separately for each class of service.

TERM OF CONTRACT:

Contracts under this schedule shall be for a period of not less than one year from the effective date thereof, except in the case of temporary service.

DATE OF ISSUE: December 13, 2007
ISSUED BY: Chris B. Giles
Vice-President

DATE EFFECTIVE: January 1, 2008
1201 Walnut Kansas City Mo. 64106



KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 Eighth Revised Sheet No. 9A
 Canceling P.S.C. MO. No. 7 Seventh Revised Sheet No. 9A
 For Missouri Retail Service Area

Small General Service Schedule SGS

RATE FOR SERVICE AT SECONDARY VOLTAGE, 1SGSE, 1SGSH, 1SSSE, 1SUSE

A. CUSTOMER CHARGE:

Customer pays one of the following charges per month based upon the Facilities Demand:

Metered Service:	
0-24 kW	\$18.37
25-199 kW	\$50.92
200-999 kW	\$103.45
1000 kW or above	\$883.30
Unmetered Service:	\$7.71

ADDITIONAL METER CHARGE (FROZEN):	
Separately metered space heat:	\$2.37

B. FACILITIES CHARGE:

Per kW of Facilities Demand per month	
First 25 kW	\$0.000
All kW over 25 kW	\$2.959

C. ENERGY CHARGE:

	<u>Summer Season</u>	<u>Winter Season</u>
First 180 Hours Use per month:		
Next 180 Hours Use per month:	\$0.16395 per kWh	\$0.12739 per kWh
Over 360 Hours Use per month:	\$0.07779 per kWh	\$0.06220 per kWh
	\$0.06931 per kWh	\$0.05614 per kWh

D. SEPARATELY METERED SPACE HEAT (FROZEN), 1SGHE 1SGHH, 1SSHE

When the customer has separately metered electric space heating equipment of a size and design approved by the Company, the kWh used for electric space heating shall be billed as follows:

- (i) Applicable during the Winter Season:
 \$0.06822 per kWh per month.
- (ii) Applicable during the Summer Season:
 The demand established and energy used by equipment connected to the space heating circuit will be added to the demands and energy measured for billing under the

rates above and for the determination of the Minimum Monthly Bill.

Issued: September 8, 2015
Issued by: Darrin R. Ives, Vice President

FILED

Missouri Public
Service Commission
ER-2014-0370; YE-2016-0078

Effective: November 1
1200 Main, Kansas City, MO 64105

KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 Eighth Revised Sheet No. 9B
 Canceling P.S.C. MO. No. 7 Seventh Revised Sheet No. 9B

For Missouri Retail Service Area

Small General Service Schedule SGS

RATE FOR SERVICE AT PRIMARY VOLTAGE, 1SGSF, 1SGSG, 1SSSF

A. CUSTOMER CHARGE:

Customer pays one of the following charges per month based upon the Facilities Demand:

Metered Service:

0-24 kW	\$18.37
25-199 kW	\$50.92
200-999 kW	\$103.45
1000 kW or above	\$883.30

Unmetered Service: \$7.71

B. FACILITIES CHARGE:

Per kW of Facilities Demand per month

First 26 kW	\$0.000
All kW over 26 kW	\$2.890

C. ENERGY CHARGE:

First 180 Hours Use per month:	<u>Summer Season</u>	
Next 180 Hours Use per month:	\$0.16020 per kWh	
Over 360 Hours Use per month:	\$0.07601 per kWh	<u>Winter Season</u>
	\$0.06771 per kWh	\$0.12449 per kWh
		\$0.06077 per kWh
		\$0.05483 per kWh

KANSAS CITY POWER & LIGHT COMPANY

P.S.C. MO. No. 7 Second

Original Sheet No. 9C

X Revised

Cancelling P.S.C. MO. No. 7 First

Original Sheet No. 9C

X Revised

For Missouri Retail Service
Area

**SMALL GENERAL SERVICE
Schedule SGS**

(Continued)

MINIMUM MONTHLY BILL:

The Minimum Monthly Bill shall be equal to the sum of the Customer Charge and Facilities Charge.

UNMETERED SERVICE:

Unmetered secondary service refers to electric service which is not measured by a kWh meter or by a kWh/demand meter. This type of service usually applies to delivery points for which it is impractical or difficult to install and read meters. The usages and demands are calculated by using typical hours of use and rated equipment loads.

SUMMER AND WINTER SEASONS:

The Summer Season is four consecutive months, beginning and effective May 16 and ending September 15, inclusive. The Winter Season is eight consecutive months, beginning and effective September 16 and ending May 15. Customer bills for meter reading periods including one or more days in both seasons will reflect the number of days in each season.

SECONDARY AND PRIMARY VOLTAGE CUSTOMER DEFINITIONS:

Secondary voltage customer - Receives service on the low side of the line transformer.

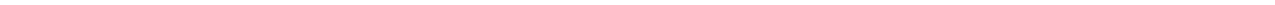
Primary voltage customer - Receives service at Primary voltage of 12,000 volts or over but not exceeding 69,000 volts. Customers receiving service at 4160 volts as of May 5, 1986 are also classified as Primary voltage customers. Customer will own all equipment necessary for transformation including the line transformer.

Filed

ER-2006-0314

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ISSUED BY: Chris B. Giles
Vice-President

DATE EFFECTIVE: January 20, 2007 Jan. 1, 07
1201 Walnut, Kansas City, Mo. 64106



KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7 Second Revised Sheet No. 9D
Canceling P.S.C. MO. No. 7 First Revised Sheet No. 9D
For Missouri Retail Service Area

Small General Service
Schedule SGS

DETERMINATION OF DEMANDS

Demand will be determined by demand instruments or, at the Company's option, by demand tests.

MONTHLY MAXIMUM DEMAND

The Monthly Maximum Demand is defined as the sum of:

- a. The highest demand indicated in any 30-minute interval during the month on all non-space heat and non-water heat meters.
- b. Plus, the highest demand indicated in any 30-minute interval during the month on the space heat meter, if applicable.
- c. Plus, the highest demand indicated in any 30-minute interval during the month on the water heat meter, if applicable.

FACILITIES DEMAND

Facilities Demand shall be equal to the highest Monthly Maximum Demand occurring in the last twelve (12) months including the current month. The following exception applies to the Facilities Demand used for the billing of the Facilities Charge only:

For customers receiving service under the School and Church rate schedules (1SSSE, 1SSHE) prior to July 9, 1996, the Monthly Maximum Demand used for the determination of the Facilities Demand shall be based on On-Peak hours only. The Company shall either install hourly metering equipment to measure the Maximum On-Peak Demand or estimate such On-Peak demand based upon the overall maximum demand. On-Peak hours are defined to be the hours between 11:00 a.m. and 7:00 p.m., Monday through Friday, during the period of June 1 through September 30 and the hours between 8:00 a.m. and 8:00 p.m., Monday through Friday, during the period of December 1 through February 28 (February 29 in Leap Years). Holiday and weekend hours are excluded from the On-Peak hours definition. Holidays are New Year's Day, Independence Day, Labor Day, and Christmas Day.

September 29, 2015

Issued: September 8, 2015
Issued by: Darrin R. Ives, Vice President

Effective: October 8, 2015
FILED 1200 Main, Kansas City, MO 64105
Missouri Public
Service Commission
ER-2014-0370; YE-2016-0078

Fourth

Revised Sheet No.

9E

Third

Revised Sheet No.

9E

KANSAS CITY POWER AND LIGHT COMPANY

P.S.C. MO. No. 7

Canceling P.S.C. MO. No. 7

For Missouri Retail Service Area

**SMALL GENERAL SERVICE
Schedule SGS**

(Continued)

MINIMUM MONTHLY BILL:

The Minimum Monthly Bill shall be equal to the sum of the Customer Charge and Facilities Charge.

UNMETERED SERVICE:

Unmetered secondary service refers to electric service which is not measured by a kWh meter or by a kWh/demand meter. This type of service usually applies to delivery points for which it is impractical or difficult to install and read meters. The usages and demands are calculated by using typical hours of use and rated equipment loads.

SUMMER AND WINTER SEASONS:

The Summer Season is four consecutive months, beginning and effective May 16 and ending September 15, inclusive. The Winter Season is eight consecutive months, beginning and effective September 16 and ending May 15. Customer bills for meter reading periods including one or more days in both seasons will reflect the number of days in each season.

SECONDARY AND PRIMARY VOLTAGE CUSTOMER DEFINITIONS:

Secondary voltage customer - Receives service on the low side of the line transformer.

Primary voltage customer - Receives service at Primary voltage of 12,000 volts or over but not exceeding 69,000 volts. Customers receiving service at 4160 volts as of May 5, 1986 are also classified as Primary voltage customers. Customer will own all equipment necessary for transformation including the line transformer.

DATE ISSUE: December 28, 2006

DATE EFFECTIVE: January 20, 2007

ISSUED BY: Chris B. Giles

SMALL GENERAL SERVICE

Schedule SGS

DETERMINATION OF HOURS USE

Hours Use shall be determined by dividing the total monthly kWh on all meters by the Monthly Maximum Demand in the current month. Determination of Hours Use in the Winter Season excludes any separately metered space heat kW and kWh in the current month.

METERING AT DIFFERENT VOLTAGES

The Company may, at its option, install metering equipment on the secondary side of a primary voltage customer's transformer. In that event, the customer's metered demand and energy shall be increased either by the installation of compensation metering equipment, or by 2.34% if metering equipment is not compensated.

The Company may also, at its option, install metering equipment on the primary side of the transformer for a secondary voltage customer. In this case, the customer's metered demand and energy shall be decreased by 2.29%, or alternatively, compensation metering may be installed.

DEMAND SIDE INVESTMENT MECHANISM RIDER & NON-MEEIA OPT-OUT PROVISIONS

Subject to Schedule DSIM and Rules and Regulations filed with the State Regulatory Commission (Section 8.09, Sheet 1.28).

FUEL ADJUSTMENT

Fuel Adjustment Clause, Schedule FAC, shall be applicable to all customer billings under this schedule.

TAX ADJUSTMENT

Tax Adjustment Schedule TA shall be applicable to all customer billings under this schedule.

REGULATIONS

Subject to Rules and Regulations filed with the State Regulatory Commission.

September 29, 2015

Issued: September 8, 2015
Issued by: Darrin R. Ives, Vice President

Effective: ~~October 8, 2015~~ –
FILED 1200 Main, Kansas City, MO 64105
Missouri Public
Service Commission
ER-2014-0370: YE-2016-0078

PECO ENERGY COMPANY
TARIFF

PECO Energy Company

Original Page No. 64

RATE TLCL TRAFFIC LIGHTING CONSTANT LOAD SERVICE

AVAILABILITY.

To any municipality using the Company's standard service for (a) electric traffic signal lights installed, owned and maintained by the municipality, and/or (b) unmetered traffic control cameras or other small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the municipality.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically separate from any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account.

To any non-municipal non-residential customer using the Company's standard service for unmetered small constant load electronic devices with a demand of less than 1.2 kW, owned and maintained by the non-municipal customer, which are electrically integrated with any other facilities, whether municipally-owned or non-municipally-owned, that are receiving service from PECO as a separate account, but only if the non-municipal customer meets the conditions of the Special Termination Rights provision of this Rate.

CURRENT CHARACTERISTICS.

Standard single phase secondary service.

RATE TABLE.

SERVICE LOCATION CHARGE: \$3.37 PER LOCATION

VARIABLE DISTRIBUTION SERVICE CHARGE: \$0.01857 per kWh (as defined below)*

*The Variable Distribution charge includes an Energy Efficiency Program Surcharge of \$0.0030 per kWh

ENERGY SUPPLY CHARGE: Refer to the Generation Supply Adjustment Procurement Class 2.

TRANSMISSION SERVICE FOR CUSTOMERS RECEIVING DEFAULT SERVICE: Transmission Service Charge shall apply.

STATE TAX ADJUSTMENT CLAUSE, PROVISION FOR THE RECOVERY OF CONSUMER EDUCATION PLAN COSTS, PROVISION FOR THE RECOVERY OF ENERGY EFFICIENCY, NON-BYPASSABLE TRANSMISSION CHARGE, CONSERVATION PROGRAM COSTS, PROVISION FOR THE TAX ACCOUNTING REPAIR CREDIT AND NUCLEAR DECOMMISSIONING COST ADJUSTMENT APPLY TO THIS RATE.

SPECIAL RULES AND REGULATIONS.

The use of energy will be estimated by the Company on the basis of the size of lamps and controlling apparatus and the burning hours. The customer shall immediately notify the Company whenever any change is made in the equipment or the burning hours or constant load devices, so that the Company may forthwith revise its estimate of the energy used.

The Company shall not be liable for damage to person or property arising, accruing or resulting from the attachment of the signal equipment to its poles, wires, or fixtures. The customer shall be responsible to determine the amount, location and sufficiency of illumination, including conducting all studies of luminosity, lighting location, and traffic.

SPECIAL TERMINATION RIGHTS

Some facilities that receive service under Rate TLCL may be electrically configured such that it is not possible to terminate service to the Rate TLCL facility without also terminating service to a facility that is receiving service under a separate account, Rate or Rider. In the event of non-payment of bills for service to such a Rate TLCL facility, PECO will provide a termination notice to the customer. The customer may then, at its discretion, notify PECO that it intends to engage in self-termination by removing its facilities from the PECO system within 30 days. If the customer has not removed its facilities within 30 days, then PECO may, at its sole discretion and upon 72-hour notice, physically remove the customer facility as a means of terminating service to that facility. Taking service under Rate TLCL constitutes full customer permission for PECO to engage in such removals. Notwithstanding any removal of such facilities by either the customer or PECO, the customer shall remain fully obligated to PECO for payment of all charges incurred under Rate TLCL. In addition, the customer shall pay to PECO its full cost of removing the facilities, including direct and indirect labor costs, use of truck or other equipment, fuel costs, and costs of storing the customer equipment, all at PECO's normal rates for such work at such time as it may perform such removals. PECO shall not be liable for damage, if any, to the customer equipment that occurs during removal or storage.

TERM OF CONTRACT.

The initial contract term for each signal light installation and constant load device shall be for at least one year.

PAYMENT TERMS. Standard.

PUBLIC SERVICE COMPANY OF OKLAHOMA
TARIFF

PUBLIC SERVICE COMPANY OF OKLAHOMA
P.O. BOX 201
TULSA, OKLAHOMA 74102-0201
PHONE: 1-888-216-3523
KIND OF SERVICE: ELECTRIC

SHEET NO. 8 - 2A
REPLACES SHEET NO. 8 - 2
EFFECTIVE DATE 4/30/2015

SCHEDULE: LIMITED USAGE GENERAL SERVICE SECONDARY (LUGS) RATE CODE 261, 262, 264, 265, 267

MONTHLY RATES

Base Service Charge _____ \$37.75

Base Service Charge — Unmetered Service (RATE CODE 267) _____ \$ 9.59

Base Service Charge — Single-Phase 100 kWh or less (RATE CODE 261) \$21.00

Energy Charge

On-Peak Season

2.96 0 per kWh for the first 1.500 kWh

3.45 0 per kWh for all additional kWh

Off-Peak Season

2.21 0 per kWh for the first 1.200 kWh

1.23 0 per kWh for all additional kWh

Reactive Power Charges

See Reactive Power Schedule.

DETERMINATION OF ON-PEAK AND OFF-PEAK SEASONS

The On-Peak Season is the Company's billing months of June through October, inclusive. The Off-y's billing months of November through May, inclusive.

Rates Authorized by the Oklahoma Corporation Commission

Effective	Order Number	Cause / Docket Number
April 30, 2015	639314	PUD 201300217
January 31, 2011	581748	PUD 201000050
January 29, 2009	564437	PUD 200800144

PUBLIC SERVICE COMPANY OF OKLAHOMA
P.O. BOX 201
TULSA, OKLAHOMA 74102-0201
PHONE: 1-888-216-3523
KIND OF SERVICE: ELECTRIC

SHEET NO. 8 - 3A
REPLACES SHEET NO. 8 - 3
EFFECTIVE DATE 4/30/2015

**SCHEDULE: LIMITED USAGE GENERAL SERVICE SECONDARY (LUGS) RATE CODE 261, 262,
264, 265, 267**

OPTIONAL UNMETERED SERVICE PROVISION (267)

Under certain circumstances where a customer's load has little variation and can be reasonably estimated, a customer may, at the Company's discretion, be eligible to receive unmetered service under this provision. The monthly kWh usage for billing purposes shall be mutually agreed upon by the Company and the customer. The maximum load cannot exceed 20 kW. Service under this provision will continue for a minimum period of twelve consecutive months. The Company may, at its option, install test meters or use metered data from similar loads to verify monthly kWh usage for billing purposes. The Base Service Charge will (for customers taking service under this provision) be reduced to \$9.59.

DETERMINATION OF MINIMUM MONTHLY BILL

The Minimum Monthly Bill is the *Base Service Charge*. The Minimum Monthly Bill shall be adjusted according to *Adjustments to Billing*. If the customer's load is highly fluctuating to the extent that it causes interference with standard quality service to other loads, the customer will be required to pay the Company's cost to install transformer capacity necessary to correct such interference.

ADJUSTMENTS TO BILLING

Fuel Cost Adjustment

The amount calculated at the above rate is subject to adjustment under the provisions of the Company's Fuel Cost Adjustment Rider and Purchased Power Capacity Rider.

Tax Adjustment

The amount calculated at the above rate is subject to adjustment under the provisions of the Company's Tax Adjustment Rider.

Rates Authorized by the Oklahoma Corporation Commission

Effective	Order Number	Cause / Docket Number
April 30, 2015	639314	PUD 201300217
January 31, 2011	581748	PUD 201000050
January 29, 2009	564437	PUD 200800144

**P.O. BOX 201
TULSA, OKLAHOMA 74102-0201
PHONE: 1-888-216-3523
KIND OF SERVICE: ELECTRIC**

**SHEET NO. 8-4A
REPLACES SHEET NO. 8-4
EFFECTIVE DATE: 4/30/2015**

TERMS OF PAYMENT

Monthly bills are due and payable by the due date. Monthly bills unpaid by the due date will be assessed a late payment charge of 1____% percent of the total amount due.

Rates Authorized by the Oklahoma Corporation Commission

Effective	Order Number	Cause / Docket Number
April 30, 2015	639314	PUD 201300217
January 31, 2011	581748	PUD 201000050
January 29, 2009	564437	PUD 200800144

DIRECTOR OF PUBLIC UTILITY

SOUTH CAROLINA ELECTRIC & GAS COMPANY
TARIFF

South Carolina Electric & Gas Company**AVAILABILITY**

This rate is available to customers using the Company's standard service which is specified as a single point of delivery per premises from an existing overhead distribution system for general light and/or power purposes such as commercial, industrial, religious, charitable and eleemosynary institutions. It is not available for resale service.

CHARACTER OF SERVICE

Alternating Current, 60 hertz. Voltage and phase at the option of the Company.

RATE PER MONTH

	<u>Summer</u> (Billing Months June-September)	<u>Winter</u> (Billing Months October-May)
i. Basic Facilities Charge:	\$22.25	\$ 22.25
ii. Demand Charge:		
First 250 KVA of Billing Demand	No Charge	No Charge
Excess over 250 KVA of Billing Demand @	\$ 3.92 per KVA	No Charge
The Billing Demand (to the nearest whole KVA) shall be the maximum integrated fifteen (15) minute demand measured during the billing months of June through September.		
iii. Energy Charge:		
First 3,000 kWh @	\$ 0.12801 per kWh	\$ 0.12801 per kWh
Over 3,000 kWh @	\$ 0.13672 per kWh	\$ 0.11863 per kWh

MINIMUM CHARGE

The monthly minimum charge shall be the basic facilities charge as stated above, and the Distributed Energy Resource Program charge, as stated below, provided however, when construction costs exceed four (4) times the estimated annual revenue excluding fuel revenue to be derived by the Company, the customer may make a contribution in aid of construction of the excess cost or pay the Company's standard facility rate on the excess construction cost in addition to the rate charges above.

ADJUSTMENT FOR FUEL, VARIABLE ENVIRONMENTAL & AVOIDED CAPACITY, AND DISTRIBUTED ENERGY RESOURCE COSTS

Fuel costs of \$.02483 per kWh are included in the energy charge and are subject to adjustment by order of the Public Service Commission of South Carolina. A charge of \$1.27 per account per month will be added to the charges above for the recovery of approved Distributed Energy Resource Program incremental costs.

DEMAND SIDE MANAGEMENT COMPONENT

The energy charges above include a DSM component of \$.00200 per kWh for Demand Side Management expenses.

PENSION COSTS COMPONENT

The energy charges above include a Pension Costs component of \$.00087 per kWh as approved by the Public Service Commission of South Carolina.

STORM DAMAGE COMPONENT

Inclusion of a storm damage component has been indefinitely suspended until further order of the Public Service Commission of South Carolina.

SALES AND FRANCHISE TAX

To the above will be added any applicable sales tax, franchise fee or business license tax which may be assessed by any state or local governmental body.

POWER FACTOR

If the power factor of the Customer's installation falls below 85%, the Company may adjust the billing to a basis of 85% power factor.

TEMPORARY SERVICE

Temporary service for construction and other purposes will be supplied under this rate in accordance with the Company's Terms and Conditions covering such service.

PAYMENT TERMS

All bills are net and payable when rendered.

SPECIAL PROVISIONS

This rate is available for residential service where more than one dwelling unit is supplied through a single meter, provided service to such dwelling unit was established prior to July 1, 1980.

The Company will furnish service in accordance with its standard specifications. Non-standard service will be furnished only when the customer pays the difference in costs between non-standard service and standard service or pays to the Company its normal monthly facility charge based on such difference in costs.

UNMETERED SERVICE PROVISION

When customer's usage can be determined and in the sole opinion of the Company, installation of metering equipment is impractical or uneconomical, monthly kWh may be estimated by the Company and billed at the above rate per month, except that the basic facilities charge shall be \$8.40.

TERM OF CONTRACT

Contracts for installation of a permanent nature shall be written for a period of not less than one (1) year. A separate contract shall be written for each meter at each location.

GENERAL TERMS AND CONDITIONS

The Company's General Terms and Conditions are incorporated by reference and are a part of this rate schedule

WISCONSIN POWER & LIGHT
TARIFF



Volume III, 12th Revision, Sheet No. 4.80
 Amendment 521, Schedule Gs-4

GENERAL SERVICE UNMETERED RATE

ELECTRIC

1. Effective In

All territory served by the company.

2. Availability

This schedule is optional to any customer, at the discretion of the Company, that has energy usage that can be estimated with relative reliability and whose annual usage does not exceed 12,000 kWh. These items are generally considered to have a small level of predictable usage that do not warrant meter investment. Applications can include but are not limited to service to billboards, public telephone booths, flasher signal lights, and Wide Area Network/Local Area Network Radio Transceivers..

(R)
 |
 (R)

3. Rate

(D)

a. Customer Charge

\$0.1874 per day per delivery point

b. Energy Charge

All estimated kWh used per month

June 1 through September 30

\$0.12009 per kWh

October 1 through May 31

\$0.10858 per kWh

The kWh consumed in each month shall be determined by multiplying the kW of connected load (including any auxiliary equipment) as estimated by company on the basis of appropriate tests or rated capacity of the connected load, by one-twelfth of the annual hours of operation as estimated by the company.

(D)



GENERAL SERVICE UNMETERED RATE	ELECTRIC
4. <u>Miscellaneous Provisions</u>	(D)
The customer will inform the company in writing prior to changing the connected load at any unmetered location. The company shall have the right to test customer's equipment and customer shall permit company access to its premises for such purposes.	(D) (D)
5. <u>Waiver</u>	
Any customer choosing to be served on this rate schedule thereby waives all rights to any billing adjustment arising from a claim that the bill for the customer's service would be cheaper on any alternative rate schedule for any period of time, including any rights under Wisconsin Administrative Code Section PSC 113.0406 (4).	
6. <u>Minimum Term Provision</u>	
A customer can transfer to Rate Gs-1 before the completion of 12 months, provided he/she pays \$76.61 for the cost to install a meter. A customer can transfer to rate Gs-1 after 12 continuous months of service at no cost.	

CONSOLIDATED EDISON COMPANY OF NEW YORK

SC 2 Unit Customer Costs per Month Excluding Meters

<u>Line</u>	<u>Customer Rate Base</u>	<u>SC 2</u>
1	From ECOS (Table 2, Page 34)	\$ 501,240,307
	<u>Less</u>	
2	Meter Service Provider (Table 2, Page 34)	\$ 1,879,747
3	Meter Installation (Table 2, Page 34)	\$ 26,342,837
4	Meter Ownership (Table 2, Page 34)	\$ 21,067,243
5	Meter Data Service Provider (Table 2, Page 34)	\$ 7,430,213
6	Customer Rate Base Excluding Meters	\$ 444,520,267
	 <u>Customer Operating Expenses</u>	 <u>SC 2</u>
7	From ECOS (Table 3, Page 18)	\$ 124,661,812
	<u>Less</u>	
8	Meter Service Provider (Table 3, Page 18)	\$ 2,210,374
9	Meter Installation (Table 3, Page 18)	\$ 1,667,172
10	Meter Ownership (Table 3, Page 18)	\$ 1,333,192
11	Utility Metering (Table 3, Page 18)	\$ 948,836
12	Meter Data Service Provider (Table 3, Page 18)	\$ 8,325,735
13	Customer Operating Expenses Excluding Meters	\$ 110,176,503
		 <u>SC 2</u>
14	Return at 6.10% of Rate Base Excluding Meters	\$ 27,115,736
15	Income Tax	\$ 9,194,144
16	Customer Operating Expenses Excluding Meters	\$ 110,176,503
17	Customer Costs Excluding Meters	\$ 146,486,383
18	Number of SC 2 Customers (Table 7, Page 4)	362,154
19	Monthly Unit Customer Costs Excluding Meters -- L.17/(L.18 x 12)	\$ 33.71

CONSOLIDATED EDISON COMPANY OF NEW YORK

SC 2 Unit Demand Costs per Kilowatt

<u>Line</u>	<u>Description</u>	<u>SC 2</u>
1	ECOS Demand Rate Base (Table 2, Page 34)	\$ 612,085,650
2	Return at 6.10%	\$ 37,337,225
3	Income Tax	\$ 12,659,948
4	ECOS Demand Operating Expenses (Table 3, Page 18)	<u>\$ 138,895,317</u>
5	Total Demand Costs	\$ 188,892,490
6	SC 2 Annual Billing Demand (Schedule 3, Page 2)	5,953,712 kW
7	Unit Demand Costs per kW	\$ 31.73

CONSOLIDATED EDISON COMPANY OF NEW YORK

Derivation of SC 2 Annual Billing Demand

Line SC 9 Non-TOD

1	Annual kWh Sales (ECOS Table 7, Page 6)	18,408,285,118
2	Annual kW Billing Demand (ECOS Table 7, Page 6)	50,705,465
3	SC 9 Average Billing Load Factor	49.7%

SC 2

4	Annual Kilowatthour Sales (ECOS Table 7, Page 4)	2,160,066,228
5	SC 9 Average Billing Load Factor	49.7%
6	SC 2 Annual Billing Demand (kW)	5,953,712

CONSOLIDATED EDISON COMPANY OF NEW YORK

SC 2 Unit Energy Delivery Costs per Kilowatt-Hour

<u>Line</u>	<u>Description</u>	<u>SC 2</u>
1	ECOS Energy Rate Base (Table 2, Page 34)	\$ 2,809,523
2	Return at 6.10%	\$ 171,381
3	Income Tax	\$ 58,110.19
4	ECOS Energy Operating Expenses (Table 3, Page 18)	<u>\$ 3,421,009</u>
5	Total Energy Costs	\$ 3,650,500
6	SC 2 Annual Kilowatthour Sales (ECOS Table 7, Page 4)	2,160,066,228
7	Unit Energy Delivery Costs per kWh	\$ 0.0017

CONSOLIDATED EDISON COMPANY OF NEW YORK

SC 2 Monthly Billings if Rate Was Set at Class Unit Costs

Customer with Average Load Factor vs. Unmetered Cable TV Power Supply & Antenna
Basis: 400 kWh

Line **SC 2 Unit Costs**

1	Customer, per month with Meters	\$	38.11
2	Customer, per month without Meters	\$	33.71
3	Demand, per kW	\$	31.73
4	Energy, per kWh	\$	0.0017

	Metered Customer at Average Load Factor	CATV Power Supply & Antenna
5 Billing Load Factor	49.7%	100.0%
<u>Monthly Billing Units</u>		
6 Energy, kWh	400	400
7 Demand, kW	1.10	0.55
8 Monthly Billings at Unit Cost	\$ 73.69	\$ 51.84
9 Indicated CATV & Antenna Rate Discount		\$ 21.85

CONSOLIDATED EDISON COMPANY OF NEW YORK

Unmetered Cable TV Power Supply & Antenna

**Average Monthly Billing Under Current SC 2 Rate I
vs. Billing if Rate Was Set at Class Unit Costs**

Basis: 400 kWh

Line Current Rate I

1 Customer Charge, per month \$ 26.01

Energy Charges, per kWh

2 June - September \$ 0.1087

3 All Other Months \$ 0.0914

4 Annual Average \$ 0.0972

5 Rule 26 Additional Delivery Charges and Adjustments, per kWh \$ 0.0100

SC 2 Unit Costs

6 Customer, per month without Meters \$ 33.71

7 Demand, per kW \$ 31.73

8 Energy, per kWh \$ 0.0017

	Billing at Current Rate I	Billing at Unit Costs
9 Billing Load Factor	n/a	100.0%
<u>Monthly Billing Units</u>		
10 Energy, kWh	400	400
11 Demand, kW	n/a	0.55
12 Monthly Billings	\$ 68.89	\$ 51.84
13 Indicated CATV & Antenna Rate Discount		\$ 17.05

CONSOLIDATED EDISON COMPANY OF NEW YORK

Unmetered Cable TV Power Supply & Antenna

**Average Monthly Billing Under ConEd's Proposed SC 2 Rate I
vs. Billing if Rate Was Set at Class Unit Costs**

Basis: 400 kWh

Line Proposed Rate I

1	Customer Charge, per month	\$	26.01
<u>Energy Charges, per kWh</u>			
2	June - September	\$	0.1256
3	All Other Months	\$	0.1055
4	Annual Average	\$	0.1122
5	Rule 26 Additional Delivery Charges and Adjustments, per kWh	\$	0.0100
<u>SC 2 Unit Costs</u>			
6	Customer, per month without Meters	\$	33.71
7	Demand, per kW	\$	31.73
8	Energy, per kWh	\$	0.0017

	Billing at Proposed Rate I	Billing at Unit Costs
9 Billing Load Factor	n/a	100.0%
<u>Monthly Billing Units</u>		
10 Energy, kWh	400	400
11 Demand, kW	n/a	0.55
12 Monthly Billings	\$ 74.89	\$ 51.84
13 Indicated CATV & Antenna Rate Discount		\$ 23.05

APPENDIX B

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

ELECTRIC RATE PANEL REBUTTAL TESTIMONY

1 A. Yes. Changing the mix of residential use allowed
2 under SC 9 low-tension accounts would alter the load
3 characteristics of SC 9 buildings, potentially require
4 the Company to transfer some existing SC 8 customers
5 to SC 9, and meld the load characteristics of SC 9
6 customers with those billed under SC 8. Mr. Dowling
7 has not demonstrated that such changes are necessary.
8 Therefore, this proposal should be rejected.

9 NYC/TWC

10 Q. Do you agree with TWC witness Eisdorfer's proposal to
11 expand the current SC 2 Special Provision (D), which
12 provides reduced customer charges to qualified
13 customers, to include unmetered Cable TV ("CATV")
14 power supplies and antennae regardless of their
15 monthly usage?

16 A. No. Mr. Eisdorfer presents an analysis of SC 2
17 "bills" for unmetered CATV Power Supply & Antenna
18 based on unit costs derived from the Company's filed
19 ECOS study, and compares these bills to those of the
20 metered SC 2 customers under his proposed usage
21 characteristics. His analysis shows that bills for

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ELECTRIC RATE PANEL REBUTTAL TESTIMONY

1 unmetered SC 2 customers are lower than those of
2 metered customers, thereby justifying a discount for
3 TWC accounts provided by the current SC 2 Special
4 Provision (D).

5 Q. Please continue.

6 A. There are several flaws in Mr. Eisdorfer's analysis
7 that we would like to point out. First, he calculates
8 an "average billing load factor" (p. 8) for SC 9 Rate
9 I customers and applies it to SC 2 customers based on
10 an assumption that "Like SC 2, these SC 9 customers
11 are businesses. Consequently, they have similar
12 consumption patterns to SC 2 accounts." (p. 8).
13 Without even challenging the calculation of the load
14 factor, it is plain to see that such borrowing is
15 inaccurate. The SC 9 Rate I service classification
16 contains commercial customers with demands ranging
17 from 10 kW to 1,500 kW. It is inappropriate to assume
18 that SC 2 customers, defined in the Company's tariff
19 as not exceeding 10 kW, would have similar usage
20 characteristics to much larger SC 9 commercial
21 customers just because they are both businesses.

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

ELECTRIC RATE PANEL REBUTTAL TESTIMONY

1 Q. Are there other flaws in Mr. Eisdorfer's analysis.

2 A. Yes. Mr. Eisdorfer uses the Company's ECOS study to
3 calculate the "unit energy delivery cost for SC 2"
4 (p.9) of \$0.0017 per kWh. Exhibit (KE-1),
5 Schedule 4, indicates that the value used for energy
6 delivery cost is the rate base portion of the merchant
7 function included in the ECOS study. The merchant
8 function does not represent the cost of energy, rather
9 it is the cost the Company incurs to procure and
10 collect commodity for and from its full service
11 customers. In fact, just correcting Mr. Eisdorfer's
12 analysis for this inaccuracy and using his proposed
13 annual average energy charge of \$0.0972 per kWh for
14 both metered and unmetered SC 2 customers found on
15 Exhibit (KE-1), Schedule 6, eliminates his
16 purported rate difference between the two sets of
17 customers entirely.

18 Q. Please continue.

19 A. Even this cursory review of Mr. Eisdorfer's analysis
20 highlights the many inaccurate assumptions inherent in
21 it. Therefore, his conclusion that "These unusual

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

ELECTRIC RATE PANEL REBUTTAL TESTIMONY

1 accounts are dramatically less costly for ConEd to
2 serve relative to other SC 2 customers" should be
3 dismissed. There is no cost-based, verifiable
4 evidence that TWC's CATV power supplies accounts
5 should be treated any differently than other SC 2
6 customers at this time.

7 Q. Does the Company have any other concerns regarding Mr.
8 Eisdorfer's proposal?

9 A. Yes. Although Mr. Eisdorfer argues that only 19 (or
10 0.005 percent of the class) unmetered SC 2 customers
11 operate at 100 percent load factor, the Company
12 cautions that creating separate rate treatment for any
13 customer group, particularly smaller groups, can be
14 problematic. Rates are developed on an average basis
15 for the class. Although revising average rates to
16 accommodate a small group of customers may be helpful
17 to the smaller group, it may not be fair to other
18 customers within the class. Customer characteristics
19 will vary within a service class, and separate rates
20 to represent all the variations within customer

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ELECTRIC RATE PANEL REBUTTAL TESTIMONY

1 classes is not appropriate. Based on the above, Mr.
2 Eisdorfer's proposal should be rejected.