New York City
Economic Development
Corporation

OGC
OE+E
Comments

110 William Street
New York, NY 10038
212.619.5000
www.nycedc.com

June 18, 2007

Via hand delivery

Hon. Jaclyn A. Brilling
Secretary
New York Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Re: **I.D. Number PSC-18-07-00012-P, Proposed Con Edison Tariff for Delivery Service Rider I**

Dear Secretary Brilling:

The City of New York and the Cooperative Coalition to Prevent Blackouts hereby submit comments in the above-captioned matter in response to a May 2, 2007 State Register Notice. An original and five (5) copies of the comments are enclosed.

Very truly yours,

Michael J. Delaney, Esq.

Enclosures

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Comments on Proposed Con Edison Tariff for Delivery Service
Rider I – Experimental Rate Program for Multiple Dwellings
I.D. No. PSC-18-07-00012-P

Comments of:
City of New York
Cooperative Coalition to Prevent Blackouts

June 18, 2007

I. Introduction

The City of New York ("City"), acting through its Economic Development Corporation ("EDC"), as well as the Cooperative Coalition to Prevent Blackouts ("CCPB"), hereby submit comments on the provisions of the proposed Con Edison Tariff Rider I noticed for public comment in the New York State Register on May 2, 2007.

The CCPB was established in 2001 to facilitate demand response actions by New York City's Cooperative and Condominium community, which encompasses more than 600,000 apartments or living units in multi-family buildings, with an estimated total population of some two million residents. In the interest of reducing the likelihood of future electric power emergencies, CCPB was instrumental in establishing the City's first three Real Time Pricing ("RTP") demonstrations, each conducted in a building where one of the CCPB founding members resides. The CCPB has worked closely with the Staff of the Commission, the City of New York, and EDC, and has also attempted to do so with the New York State Energy Research and Development Authority ("NYSERDA") to promote workable RTP rate structures, energy curtailment initiatives, wider use of interval meters, advanced load shedding technologies, and appropriate governmental incentives to facilitate the wider use of RTP.

For its part, the City in its recently issued program for long-term sustainability, *PlaNYC*, specifically noted in promoting Initiative 6 thereof entitled Expand Peak Load Management that "We will support expansion of real-time pricing across the city," and that "the City will advocate for new incentives to expand RTP pilots in the city and encourage residential participation."[1]

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[1] New York City *PlaNYC* pp. 108-109 (issued April 22, 2007), accessible at nyc.gov

In fact, this statement reflects existing City policy. The City and its Economic Development Corporation have over the last several years advocated at NYSERDA and before the Commission for the wider use of advanced metering technology, and for tariffs and NYSERDA incentive programs that are realistic, practicable, and calculated to actually facilitate the wider use of RTP. In this effort, EDC in 2004 established a public-private Residential Energy Working Group, and has sought to increase public awareness of the potential value that a robust RTP effort has to consumers who take electric service on such a program, and also to the City's electric system at large.

The latter effect, as the Commission has previously recognized, is a reflection of the potential of even the limited use of RTP-associated measures to reduce peak demand, and to thereby lower both market-wide energy prices, and reduce the harmful air emissions generated by the least efficient power plants, which are the plants that operate at the periods of highest demand. To the extent demand reductions can appreciably reduce the peak summer load, the least efficient and dirtiest plants will be less subject to dispatch by the New York Independent System Operator ("NYISO"), and accordingly, will run less frequently. And in the NYISO wholesale market – in which the last generation source needed to balance peak load sets the price in a given hour of the day for all generation providers – a clear economic multiplier effect would be seen in reducing the use of such inefficient and costly plants.

The City and CCPB have already identified a number of building owners and managers who have expressed a genuine interest in exploring the potential of RTP, but who have expressed disappointment over the absence in recent years of a NYSERDA

incentive program to support such parties willing to go on an RTP tariff.[2] Parties who wish to explore going on RTP also need assurance that an RTP tariff would be designed to be revenue neutral, so that their willingness to expose themselves to pricing in the day-ahead market would not place them in a disadvantageous position relative to those who are on a conventional Con Edison SC-8 multifamily customer electric service tariff.[3]

It is against this background that the proposed Rider I pilot delivery tariff should be evaluated: whether it advances the Commission's long-standing policy in favor of the wider use of RTP and dynamic pricing measures, and to the extent it does not, what modifications to Rider I are needed to properly reflect the Commission's and the City's stated energy public policy goals.

II. Comments on Proposed Rider I

a. Contract Demand Charge

Contract demand as proposed by Con Edison uses the highest demand charge that a participating building has had at any period during the previous twenty-four (24) months. This form of a charge is not warranted, as it will effectively penalize buildings that presumably are participating in a voluntary program to help reduce demand in a manner beneficial to the overall system. A high previous peak demand charge in effect

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[2] *PlaNYC* noted at page 109 that NYSERDA incentives for residential RTP pilot programs have not been offered since 2005.

[3] For example, to the extent that the Con Edison market supply charge ("MSC") for the commodity portion of the electric bill does not in fact actually correlate with real-time or day-ahead market prices, revenue neutrality is not achieved, and RTP structures would be jeopardized. This could raise issues concerning the acceptability of RTP for Mandatory Hourly Pricing participants as well as those who may choose voluntarily to go on an RTP tariff such as Rider M or proposed Rider I. While the MSC calculation issue will need to be addressed in the pending Con Edison electric rate case (PSC # 07-E-0523) rather than in this matter, it is nevertheless directly relevant to the ultimate viability of the delivery tariff proposed herein, at least for Con Edison's full-service RTP customers, who are paying for both the commodity and the delivery thereof.

burdens the building going forward for demand which was already billed and paid for, typically in a summer heat wave or other period of uncharacteristic system stress.

Moreover, as the demand charge peak would invariably have occurred during such a summer period, it makes little sense to apply such a demand charge to all months in the year, as Con Edison proposes to do here. The company itself recognizes the summer demand period as comprising only four months, as in its Rider "O" curtailment tariff, which is in effect only for the period of June through September. The Commission should therefore reject this aspect of the tariff as being overbroad and unwarranted.

b. Monthly Customer Charge of $189.30

This proposed charge in Rider I is potentially regressive as its fixed nature has the effect of treating very large buildings in a disparate manner from the treatment of the smaller buildings that are more prevalent in the residential sector. By definition, larger buildings can spread a fixed cost over many more units, and over many kilowatt hours, than can a smaller structure. Thus, if a building uses 20,000 kilowatt hours in a month, the prorated cost of the customer charge would be nearly 1 cent per kWh, while a building using 200,000 kWh in a month would see its residents affected by less than $1/10^{th}$ of a cent per kWh of usage. There is no discernible rationale for such a uniform flat fee, particularly in Rider I as a small-scale scale experimental tariff, and it should be rejected by the Commission. Should it be deemed appropriate to have such a customer charge imposed, it should at a minimum be scaled in a fashion that recognizes tiers of appreciably lower charges for buildings characterized by far lower usage.

c. Demand Charges Applicable from June through September Period 1, or 8:00 a.m. to 6:00 p.m.

This demand charge unaccountably overlaps the entire proposed Rider I, Section 2(a) demand charge period, which itself extends from 10:00 a.m. to 5:00 p.m. – an unnecessarily broad time frame. The 8:00 a.m. to 6:00 p.m. demand charge period does not make sense if the objective of the tariff is to correct the inconsistent price signals between RTP-based prices for the commodity and existing demand charges. The primary objection that the undersigned note here is that the proposed charge conflicts with the 5:00 p.m. to 9:00 p.m. demand charge period.

Essentially, such a structure would compel participating pilot program buildings to pay demand charges from 8:00 a.m. to 9:00 p.m. during summer months – thirteen (13) hours of the day – and during the winter months, an even more onerous period from 8:00 a.m. to 10:00 p.m., or fully fourteen (14) hours. What should be unacceptable to the Commission in such a broadly over-inclusive demand charge period is that it financially disadvantages consumers even if they carefully utilize electricity in a manner consistent with existing public policy as consistently expressed by the State and the City. For example, Con Edison recognizes that none of their area networks peaks earlier than 11:00 a.m., and that only four (4) networks peak as early as that, as reflected in Appendix 1 hereto, a chart furnished to DPS Staff and to the undersigned at our request.[4]

Importantly, the NYISO day-ahead or real time market rarely peaks before noon, and typically does so considerably later in the afternoon. Therefore, participating RTP

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[4] The Appendix 1 table sets out the 2006 network peak times, and by the use of a self-explanatory letter code describes which phase of the proposed Rider I charges would apply to each area. As can readily be seen in Appendix I, daytime peaking areas greatly predominate, and among such networks, only a very few peak as early as 11:00 a.m. Source: Con Edison Rates

customers should be encouraged to perform most discretionary energy-intensive tasks between 8:00 a.m. and 12:00 p.m. This is actually a very advantageous time for residential sector consumers to do so, and it also strikes a critical balance with what is actually feasible for customers – a critical consideration, particularly in a voluntary program. This is a principal failing in a proposed RTP program demand charge period that stretches for 13 to 14 hours, depending on the season. It is highly unrealistic to expect participating consumers to perform electricity-intensive tasks only before 8:00 a.m. or after 9:00 or 10:00 p.m.

One other consideration applies here: Con Edison's area network peaks. The company and DPS Staff have observed in discussions with the undersigned and others that while the system almost invariably peaks in the afternoon or very early evening, some of the company networks peak later in the evening. This is clearly true, as page 2 of Appendix 1 beginning with the "Brighton Beach" entry reflects – there are a number of networks that had 2006 demand peaks as late as 9:00 p.m. However, the same chart shows that there are clearly far fewer such networks than those that crest during the day, *i.e.*, those that peak by 5:00 p.m.

More importantly, a second level of inquiry is critical: are the evening peaking networks under any appreciable strain when they peak? If not, that fact that an area peak may occur at 8:00 or 9:00 p.m. is of little significance. There are a number of networks that have adequate capacity, and for those networks the peak is largely of only theoretical interest. Con Edison has itself recognized this distinction, most notably in its targeted DSM program, which seeks load reduction efforts precisely in the limited number of networks that are under strain now, or are expected to be so in the near future.

A similar process should be undertaken to assess which of the evening peaking company networks are under current or imminent stress. For those that are, a later demand charge period may be appropriate to reflect that fact, but they are undoubtedly only a subset of a minority of the late-peaking networks listed in Appendix 1. The Commission should ask Con Edison to provide particularized data on this issue in order to inform any judgment to be made concerning the need for very lengthy demand charge periods for RTP pilot program participants. If inconvenient periods for load reduction efforts are necessary – and they may be in limited areas of the company's service territory – such a circumstance would by implication identify other areas where more reasonable and manageable targeted efforts can be made. This is particularly true in a pilot program proposed to be limited to only thirty-five (35) buildings, as is the case with Rider I.

In contrast, system-wide power emergencies or curtailment requests are most likely to occur in late afternoon to early evening. By encouraging usage earlier or later than that narrow period, a properly designed tariff will encourage shifting from the most expensive periods of system stress on the day-ahead market to those that are far less expensive. In particular, use earlier in the day is environmentally advantageous because a preponderance of more efficient power plants will satisfy the lower morning demand. A rate structure should support the City's view expressed in *PlaNYC* that RTP-related consumer conduct can benefit the environment, and reduce carbon emissions. In order to do so, it must have a more manageable and realistic period of application.

d. Term of Service

The term for Rider I as proposed by the company is a minimum period of one year, and as written is only permitted to end earlier than that period upon customer termination from a NYSERDA program. To date, no such NYSERDA program exists. While we expect at least a limited NYSERDA program to go into effect this summer, it seems entirely reasonable to allow the customer to determine if and for how long Rider I is appropriate. This is not a radical or unprecedented concept – it has been the practice under Rider M, which permits a two-week notice period for entry or termination of customers on that tariff.

The NYSERDA program, once it is offered, may have positive aspects that do not require participation in Rider I. NYSERDA program participants should be able to elect other forms of service if equally beneficial results can be projected for them. The company's proposed imposition of an obligation to participate in Rider I for a full year is also very problematic. An absolute requirement to maintain participation in the NYSERDA program, or to drop from the RTP Pilot, does not appear calculated to best use our potential RTP resources, and is inadvisable. These rates are inherently experimental, and buildings with no actual experience using a potentially confusing schedule that may in some instances conflict with the day-ahead market pricing pattern should not be mandated into participating in this NYSERDA pilot program, particularly when there may well be other programs developed that can complement Rider I. Nor should voluntary participants, who provide a useful service in assessing novel programs, be under an inflexible one-year pilot requirement.

III. Analysis of Real Time Pricing Experience, and Implications for Future Use of Rider I

The first multifamily building in the City to voluntarily go on the Con Edison RTP tariff Rider M was a cooperative located at 322 Central Park West ("322 CPW")in Manhattan. This action took place largely because of the leadership of the cooperative board, which included as its then President a founding member of the CCPB. The transition to RTP from conventional service was facilitated by Energy Investment Systems, Inc, ("EIS"), which was then operating under a NYSERDA contract to provide real time pricing services, and to collect and analyze data from the pilot program in order to assess the workability of RTP pricing practices in the residential realm. The City's *PlaNYC* document referenced above specifically recognized the role played by 322 CPW and EIS in demonstrating the feasibility of real time pricing for the residential multifamily sector.[5] That is why a discussion of the EIS findings related to 322 CPW as a leading RTP participant may be particularly useful here.

There is now a wealth of RTP billing and usage data from 322 CPW, providing a useful benchmark against which to evaluate the feasibility of the elements of proposed Rider I. Attached hereto are Appendices 2 through 5 inclusive, which were made available to the undersigned by EIS. These Appendix sheets contrast the charges under SC-8 service, (Rider M) in 2006 with those expected to apply under proposed Rider I. A brief description of the Appendices and their significance follows.

Appendix 2 is a graphical representation of the projected Rider I delivery bill based on the actual billing from the July 2006 period of peak usage, reflecting the distribution of charges under Rider I. Its legend reflects the components of the presumed

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[5] *PlaNYC, supra,* discussion in Sidebar, p. 109

bill. Appendix 3 is similarly a chart reflecting the distribution of charges under SC 8, which applied during that peak demand period. Appendix 4 reflects multiple components: 1) the derivation of the contact demand as noted above, the highest demand seen in the preceding 24 months, which as the table shows occurred between June 3d and July 5th of 2005;[6] and 2) two parallel depictions of the effect on delivery bill components if Rider I – one based on Con Edison's proposed period 2a (Monday-Friday 10:00 a.m.- 5:00 p.m.), and a second based on proposed period 2b (Monday-Friday 5:00 p.m.- 9:00 p.m.). Finally, Appendix 5 provides an analysis of the elements of the transmission and distribution charges seen on the July 2006 SC-8 bill applicable to 322 CPW under the then applicable Rider M tariff.

As can be seen in a review of the Appendices and the calculations contained therein, Rider I results in higher bills, at least for prototypical RTP participant 322 CPW, under either applicable time period – the only question being the degree by which they are higher than those that would be applicable under Rider M. Period 2a results in a monthly delivery service charge some $683 higher, while period 2b results in a higher charge of more than $336.

While bills will of course differ widely, and the 322 CPW experience may not be universal, this data starkly illustrates the effects of the proposed components of Rider I, such as the contract demand charge, which itself exceeds both of the differential numbers in the preceding paragraph by a considerable margin.

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[6] The 174 seen in that period is multiplied by 4.33 as provided for in proposed Rider I, yielding a monthly contract demand charge of $753.42

IV. Conclusion

For all of the foregoing reasons, the undersigned urge the Commission to make appropriate changes to the terms of the proposed Rider I so that it will be more equitable and less onerous, particularly in recognition of those parties willing to volunteer for RTP programs in order to assist in advancing the electric system policy goals that the City and the Commission share and seek to promote.

Respectfully submitted,

Jordi Reyes-Montblanc
Chairman
Cooperative Coalition to
Prevent Blackouts

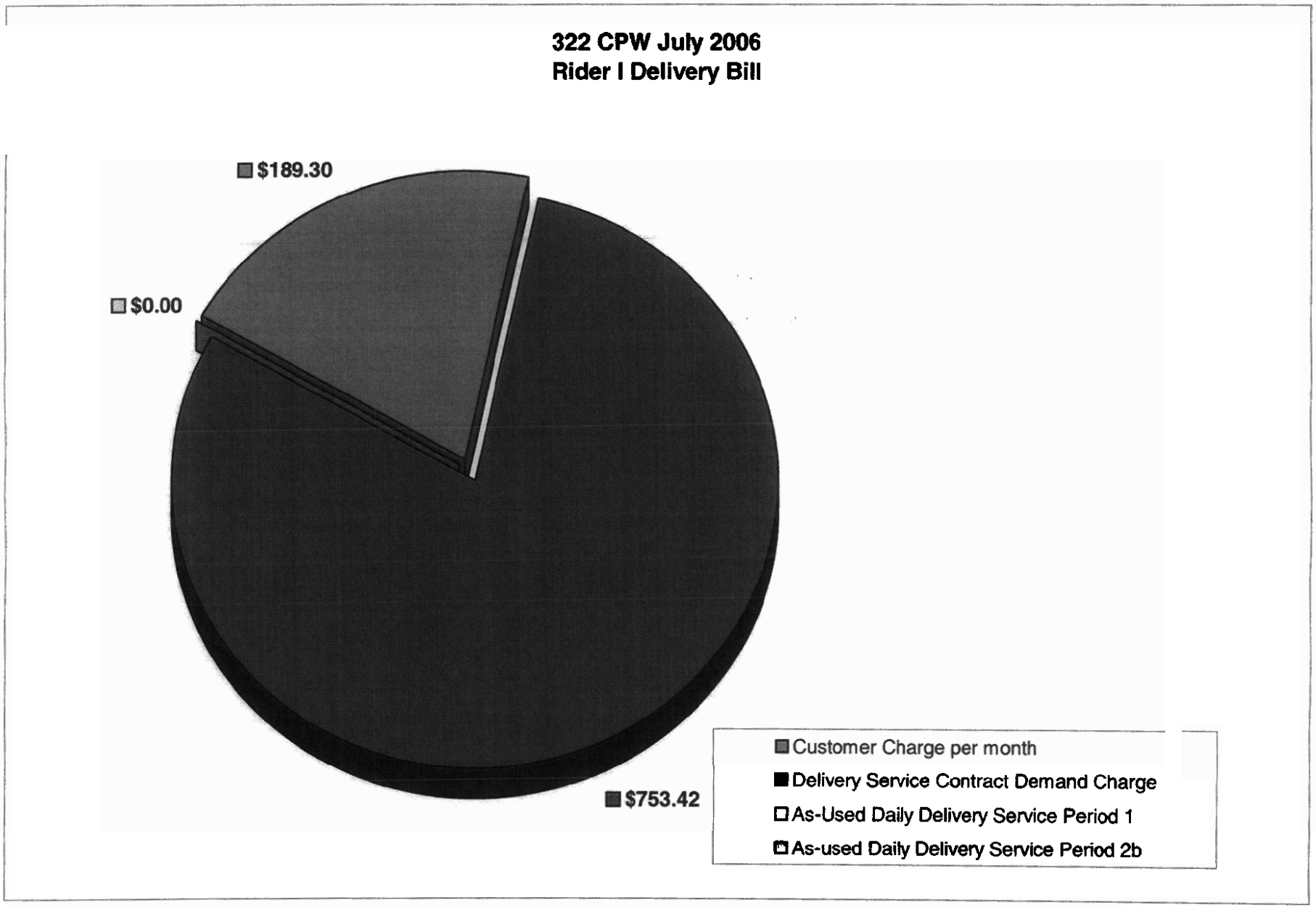
Michael J. Delaney, Esq.
Vice President – Regulatory Affairs
Energy & Telecommunications Department
New York City Economic Development Corp
110 William Street
New York, NY 10038
Ph: 212-312-3787
E-mail: mdelaney@nycedc.com

Network	Date	New Time	Time	Actual Peak Loads	Period
Battery Park City	08/03/06	11:00 AM	11 AM	61	D
Bay Ridge	08/01/06	4:00 PM	4 PM	220	D
Beekman	07/18/06	12:00 PM	12 PM	138	D
Borough Hall	08/02/06	12:00 PM	12 PM	273	D
Bowling Green	08/01/06	2:00 PM	2 PM	133	D
Buchanan	08/02/06	5:00 PM	5 PM	110	D
Canal	07/18/06	3:00 PM	3 PM	103	D
Cedar St.	08/02/06	4:00 PM	4 PM	92	D
Central Bronx	08/02/06	12:00 PM	12 PM	119	D
Chelsea	08/01/06	1:00 PM	1 PM	202	D
City Hall	07/18/06	12:00 PM	12 PM	171	D
Columbus Circle	07/18/06	5:00 PM	5 PM	144	D
Cooper Square	08/01/06	5:00 PM	5 PM	243	D
Cortlandt	08/02/06	11:00 AM	11 AM	48	D
Crown Heights	08/03/06	4:00 PM	4 PM	200	D
Elmsford #2	08/02/06	4:00 PM	4 PM	172	D
Fashion	08/02/06	2:00 PM	2 PM	66	D
Fordham	08/01/06	5:00 PM	5 PM	261	D
Fox Hills	08/03/06	4:00 PM	4 PM	197	D
Fulton	08/01/06	12:00 PM	12 PM	125	D
Grand Central	08/02/06	11:00 AM	11 AM	211	D
Granite Hill	08/01/06	5:00 PM	5 PM	295	D
Grasslands	08/02/06	1:00 PM	1 PM	91	D
Greeley Square	08/01/06	1:00 PM	1 PM	116	D
Greenwich	07/18/06	5:00 PM	5 PM	61	D
Harrison	08/02/06	4:00 PM	4 PM	246	D
Herald Square	08/03/06	11:00 AM	11 AM	105	D
Hudson	08/03/06	2:00 PM	2 PM	49	D
Hunter	07/18/06	3:00 PM	3 PM	82	D
Kips Bay	07/18/06	12:00 PM	12 PM	116	D
Lenox Hill	07/18/06	3:00 PM	3 PM	251	D
Long Island City	07/17/06	4:00 PM	4 PM	381	D
Madison Square	08/02/06	12:00 PM	12 PM	250	D
Millwood West	08/02/06	3:00 PM	3 PM	84	D
Ossining West	08/01/06	5:00 PM	5 PM	78	D
Park Place	08/01/06	12:00 PM	12 PM	75	D
Pennsylvania	08/02/06	11:00 AM	11 AM	232	D
Plaza	08/02/06	11:00 AM	11 AM	175	D
Pleasantville	08/02/06	4:00 PM	4 PM	95	D
Ridgewood	08/03/06	4:00 PM	4 PM	186	D
Rockefeller Center	07/17/06	12:00 PM	12 PM	87	D
Roosevelt	07/18/06	3:00 PM	3 PM	80	D

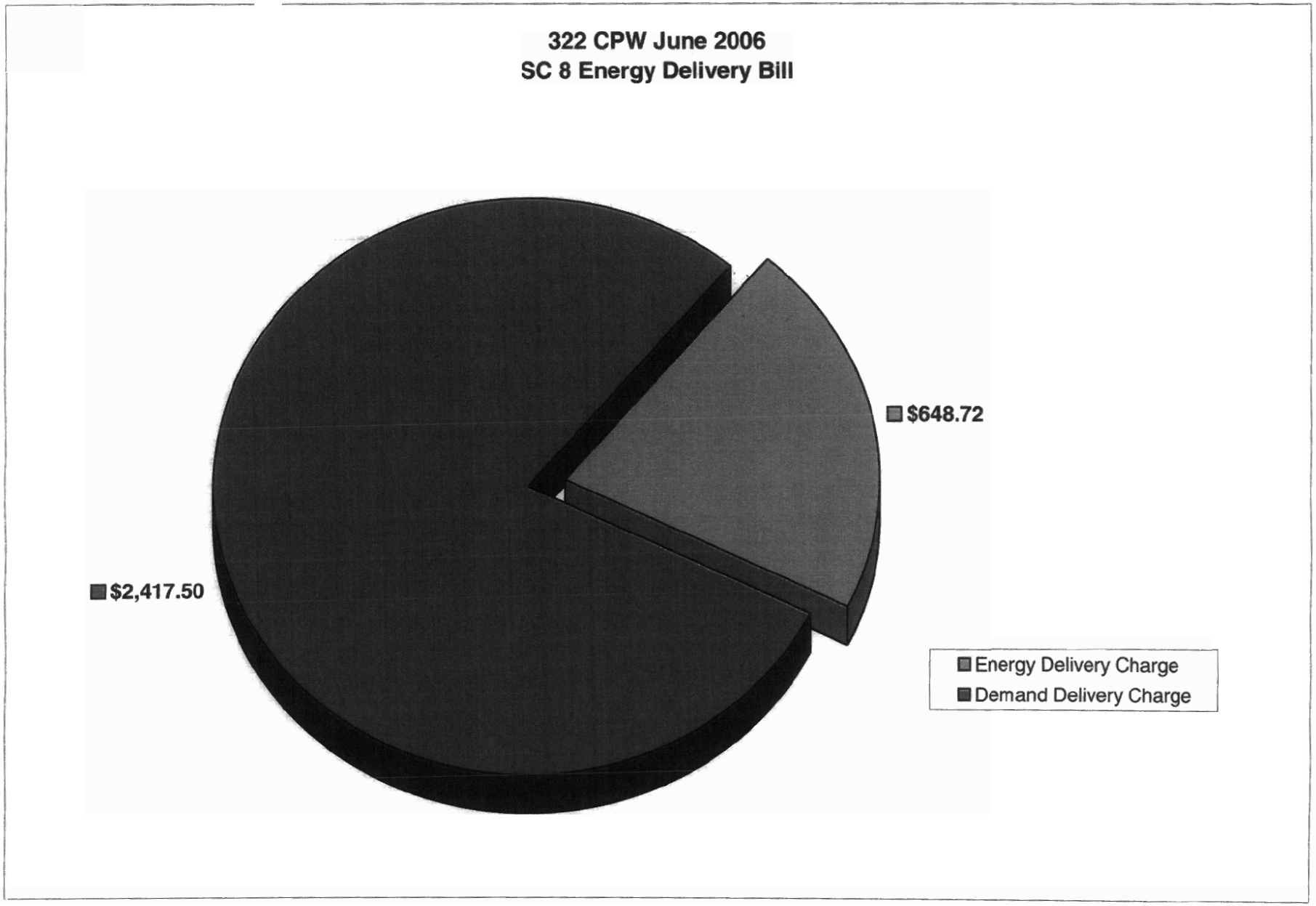
D=10 a.m. to 5 p.m.
E= 5 p.m. to 9 p.m.

Sheridan Square	08/02/06	12:00 PM	12 PM	172	D
Sutton	08/02/06	12:00 PM	12 PM	152	D
Times Square	07/18/06	12:00 PM	12 PM	162	D
Turtle Bay	07/27/06	2:00 PM	2 PM	135	D
Washington Heigh	08/02/06	2:00 PM	2 PM	184	D
West Bronx	08/02/06	2:00 PM	2 PM	203	D
White Plains	08/02/06	4:00 PM	4 PM	251	D
Williamsburg	08/02/06	2:00 PM	2 PM	209	D
Brighton Beach	08/01/06	8:00 PM	8 PM	106	E
Central Park	08/02/06	9:00 PM	9 PM	235	E
Flatbush	08/01/06	9:00 PM	9 PM	268	E
Flushing	08/02/06	8:00 PM	8 PM	381	E
Fresh Kills	07/17/06	6:00 PM	6 PM	192	E
Harlem	08/01/06	8:00 PM	8 PM	273	E
Jackson Heights	08/01/06	9:00 PM	9 PM	187	E
Jamaica	08/01/06	9:00 PM	9 PM	452	E
Lincoln Square	08/01/06	8:00 PM	8 PM	147	E
Maspeth	08/01/06	9:00 PM	9 PM	229	E
Northeast Bronx	07/17/06	9:00 PM	9 PM	95	E
Ocean Parkway	08/01/06	9:00 PM	9 PM	170	E
Park Slope	08/01/06	8:00 PM	8 PM	265	E
Rego Park	08/01/06	9:00 PM	9 PM	274	E
Richmond Hill	08/01/06	9:00 PM	9 PM	290	E
Riverdale	07/17/06	9:00 PM	9 PM	93	E
Sheepshead Bay	08/01/06	9:00 PM	9 PM	169	E
Southeast Bronx	08/01/06	9:00 PM	9 PM	208	E
Wainwright	08/03/06	6:00 PM	6 PM	92	E
Washington St.	08/02/06	9:00 PM	9 PM	215	E
Willowbrook	08/02/06	6:00 PM	6 PM	94	E
Woodrow	08/03/06	6:00 PM	6 PM	110	E
Yorkville	08/02/06	9:00 PM	9 PM	341	E

APPENDIX 2: CHART REFLECTING DISTRIBUTION OF CHARGES FOR RIDER I BILL (w/o MSC,MAC, SBC and Renewable Portfolio Charges)



APPENDIX 3: CHART 8 BILL SBC and Renewable Portfolio Charges)



APPENDIX 4 : RIDER I vs SC-8 BILL

CONTRACT DEMAND (24 months) = 174

Account Number: **471103114000013**

Customer Name: **322 REALTY CORP**

Service Address: **322 CENTRAL PARK W SUBM**

From Date	To Date	Elec Use	Elec Demand	Electric Bill Amt	Gas Use	Gas Bill Amt	Total Bill Amt
5/3/2007	6/4/2007	45,120	110	$3,007.57	230	$406.37	$3,413.94
4/4/2007	5/3/2007	36,960	98	$2,552.47	233	$401.20	$2,953.67
3/6/2007	4/4/2007	38,400	92	$2,140.59	235	$403.37	$2,543.96
2/2/2007	3/6/2007	44,880	96	$3,220.94	251	$442.43	$3,663.37
1/3/2007	2/2/2007	41,280	100	$2,890.32	256	$416.92	$3,307.24
12/4/2006	1/3/2007	39,120	100	$2,476.71	240	$380.56	$2,857.27
10/31/2006	12/4/2006	43,920	92	$3,374.45	279	$433.70	$3,808.15
10/2/2006	10/31/2006	36,480	88	$3,506.92	226	$298.53	$3,805.45
8/31/2006	10/2/2006	37,920	94	$3,821.97	218	$312.21	$4,134.18
8/2/2006	8/31/2006	46,560	144	$5,310.93	151	$224.59	$5,535.52
7/3/2006	8/2/2006	63,600	150	$5,431.33	178	$259.70	$5,691.03
6/2/2006	7/3/2006	50,640	136	$5,828.49	--	--	$5,828.49
5/3/2006	6/2/2006	36,720	112	$4,497.40	224	$354.56	$4,851.96
4/5/2006	5/3/2006	31,440	84	$3,040.93	207	$334.04	$3,374.97
3/7/2006	4/5/2006	35,760	92	$3,084.93	233	$349.87	$3,434.80
2/3/2006	3/7/2006	41,520	94	$5,186.72	263	$412.90	$5,599.62
1/4/2006	2/3/2006	39,120	94	$1,475.57	--	--	$1,475.57
12/5/2005	1/4/2006	41,040	96	$2,528.40	--	--	$2,528.40
11/1/2005	12/5/2005	46,320	98	$1,995.28	243	$447.09	$2,442.37
10/3/2005	11/1/2005	37,440	98	$1,441.14	253	$458.11	$1,899.25
9/1/2005	10/3/2005	55,200	138	$3,697.37	277	$430.33	$4,127.70
8/3/2005	9/1/2005	58,080	134	$4,399.75	151	$219.68	$4,619.43
7/5/2005	8/3/2005	61,200	156	$4,267.63	179	$247.06	$4,514.69
6/3/2005	7/5/2005	63,360	174	$6,695.99	221	$292.75	$6,988.74

RIDER I

Elec Bill DELIVERY ONLY	Jul-06	
Customer Charge per month		$189.30
Delivery Service Contract Demand Charge	$4.33	$753.42 (=4.33x 174)
As-used Daily Delivery Service		
Period 1		#REF!
Period 2a		
Period 2b		#REF!
TOTAL		#REF!

SC8 Bill

Energy Delivery Charge	$648.72
Demand Delivery Charge	$2,417.50
TOTAL	$3,066.22
Difference	#REF!

RIDER I (if the network peak occurred between M-F 10 AM- 5PM)

Elec Bill DELIVERY ONLY	Jul-06	
Customer Charge per month		$189.30
Delivery Service Contract Demand Charge	$4.33	$753.42 (=4.33x 174)
As-used Daily Delivery Service		
Period 1		$756.69
Period 2a		#REF!
Period 2b		
TOTAL		#REF!

SC8 Bill

Energy Delivery Charge	$648.72
Demand Delivery Charge	
TOTAL	$3,066.22
Difference	#REF!

APPENDIX 5 : BREAKDOWN OF 322 CPW's SC-8 BILL (Transmission and Distribution Only)

July 2006 SC-8 Bill

Month	From	To	# ofdays	kWh	Demand	SC-8 Electric Bill	
Jul-06	7/3/2006	8/2/2006	30	63,600	150	$5,431.33	-$3.27

ENERGY CHARGE

MSC Charge	Mo. Adj Charge	surcharge	Energy Delivery Charge	Sys Benefit Charge	MAC Adj Factor	MSC Adj Factor	Renewable Portfolio	TOTAL ENERGY & FUEL USAGE
	(0.00008)		0.0102	0.002	(0.001189)		0.0002	
$0.00	($5.09)	$0.00	$648.72	$127.20	($75.62)	$0.00	$12.72	$707.93

DEMAND CHARGE

	Market Supply	Mo. Adj Charge	Charge		TOT	
			First 100	Over 100	DEMAND	PRORATED DEMAND CHARGE
	$12.83	-0.1187	$16.53	$15.29	CHARGE	
	$1,924.20	-$17.80	$1,653.00	$764.50	$4,323.90	$4,323.90
prorated demand	$1,924.20	-$17.80	$1,653.00	$764.50	$4,323.90	

TOTAL BASIC CHARGE				**$5,031.83**
GRT Commodity Tax Charge	$1,924.20	@	2.5248% =	$48.58
GRT T &D Tax Charge	$3,107.63	@	4.6711% =	$145.16
SUBTOTAL				**$5,225.57**
Sales Tax @ 4.0000%				$209.02
TOTAL				$5,434.60

COMMODITY SECTION (RTP)

Commodity Charge	63,600	@ $	0	$0.00
Commodity GRT	$0.00	@	2.5248%	$0.00
SUBTOTAL				$0.00
Commodity Sales Tax @		4.0000%		$0.00
TOTAL COMMODITY CHARGE				$0.00

TOTAL BILL

TOTAL TRANSMISSION & DISTRIBUTION CHARGE	$5,434.60
TOTAL COMMODITY CHARGE	$0.00
TOTAL BILL	$5,434.60

MSC Charge	7/3/2006	8/2/2006	30
	Jul-06	Aug-06	
	28	2	30
MSC			0
MAC	-0.0004	0.0044	-0.00008
SBC	0.002	0.002	0.002
			0
MSC	12.85	12.52	12.828
MAC	-0.23	1.44	-0.11866667
T&D 1st 100			0
T&D >100			0