

A-00973953) R00973953C0001
C0007
Statement No. 7
Pnlca 11/18/97 etal

Petition of Enron Energy Services Power, Inc. for Approval of an
Electric Competition and Customer Choice Plan and for Authority
Pursuant to Section 2807 (e) (3) of the Public Utility Code to
Serve as the Provider of Last Resort in the Service Territory of
PECO Energy Company

Direct Testimony and Exhibits

of

Paul D. Reising

on Behalf of

Enron Energy Services Power, Inc.

concerning

Competitive Service Offerings Under Choice Plan

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I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Paul D. Reising, 550 Congressional Boulevard, Suite 290, Carmel, Indiana 46032.

Q. WHAT IS YOUR OCCUPATION?

A. I am a principal of the firm of R. W. Beck, Inc.

Q. PLEASE DESCRIBE R. W. BECK, INC.

A. R. W. Beck, Inc. is a corporation of engineers and consultants founded in 1942 for the purpose of rendering professional engineering and consulting services in planning, financing, operating and designing facilities for utilities and energy users. The Firm employs approximately 500 professional and support personnel to provide these services. Our general office is in Seattle, Washington, and we have offices in ten other cities including Indianapolis.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND YOUR EXPERIENCE IN THE ELECTRIC UTILITY INDUSTRY.

A. I have over 30 years experience in the electric utility industry with a broad range of responsibilities in such areas as planning, economic analysis, rate analysis and contract negotiations. Exhibit A is a brief summary of my educational background and my experience in the electric utility industry.

Q. ON WHOSE BEHALF DO YOU APPEAR IN THIS PROCEEDING?

A. I am appearing on behalf of Enron Energy Services Power, Inc. ("Enron").

1 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION
2 REGARDING THE RESTRUCTURING PLAN OF PECO ENERGY
3 COMPANY?

4 A. Yes. I previously submitted Direct and Surrebuttal Testimony on behalf of Enron
5 Power Marketing, Inc. ("EPMI"). I also submitted Supplemental Testimony
6 regarding the joint petition for approval of the partial settlement on behalf of the
7 Pennsylvania Electric Competition Coalition ("PECC"). I also provided oral Sur-
8 Rejoinder Testimony on behalf of EPMI and PECC.

9 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

10 A. I will explain the development of the Credits for Non-Wires Services included in
11 the Enron's proposed Electric Delivery Service Tariff (Exhibit 1 of the Enron
12 Petition for approval of the Electric Competition and Customer Choice Plan, the
13 "Petition.") I will also discuss the merits of permitting metering, billing and
14 collection, and other customer-related services to be provided on a competitive
15 basis.

16 **II. CREDIT FOR NON-WIRES SERVICES**

17 Q. AS A STARTING POINT, CAN YOU FIRST DESCRIBE THE
18 DIFFERENCES BETWEEN THE TRANSMISSION AND DISTRIBUTION
19 CHARGES INCLUDED IN ENRON'S PROPOSED ELECTRIC
20 DELIVERY SERVICE TARIFF AND THOSE INCLUDED IN APPENDIX
21 C TO THE PARTIAL SETTLEMENT?

22 A. Yes. The transmission and distribution charges stated in Exhibit 1 to the Enron

1 Petition are the same as those contained in the Partial Settlement except that (1)
2 the phase-in to retail competition has been advanced and (2) Enron has added the
3 Credit for Non-Wires Services.

4 **Q. DOES THE FACT THAT ENRON'S PROPOSED ELECTRIC DELIVERY**
5 **SERVICE TARIFF INCLUDES THE SAME TRANSMISSION AND**
6 **DISTRIBUTION CHARGES AS CONTAINED IN THE PARTIAL**
7 **SETTLEMENT MEAN THAT ENRON IS ENDORSING THE STATED**
8 **TRANSMISSION AND DISTRIBUTION CHARGES?**

9 A. No. As explained at page 20 of the Enron Petition (Footnote 28), Enron is not
10 waiving its right to challenge the justness and reasonableness of the transmission
11 and distribution charges as part of the PECO restructuring proceeding. In that
12 regard, I do not believe that the transmission and distribution charges stated in
13 Appendix C to the Partial Settlement are just and reasonable for the reasons stated
14 in my direct, surrebuttal, supplemental and sur-rejoinder testimony in Docket No.
15 R-00973953. On the assumption that the final transmission and distribution
16 charges will be established by the Commission on the basis of the record in Docket
17 No. R-00973953, I will not repeat that testimony here.

18 **Q. YOU STATED THAT YOU WOULD PROVIDE SUPPORT FOR THE**
19 **CREDITS FOR NON-WIRES SERVICES APPLICABLE TO EACH RATE**
20 **SCHEDULE INCLUDED IN ENRON'S PROPOSED ELECTRIC**
21 **DELIVERY SERVICE TARIFF. WHAT WAS YOUR INVOLVEMENT IN**
22 **THE DEVELOPMENT OF THE CREDITS?**

1 A. I was the person responsible for developing the Credits for Non-Wires Services for
2 each rate schedule appended to the Electric Delivery Service Tariff.

3 **Q. WHAT IS THE PURPOSE OF THE CREDIT?**

4 A. Enron has included a provision in each of the rate schedules in the Electric
5 Delivery Service Tariff which provides that Electric Generation Suppliers
6 (“ESGs”) who obtain non-wires services from entities other than PECO are
7 entitled to a credit of a stated amount for each kWh delivered under the applicable
8 rate schedule. Unbundling charges for non-wires services through the proposed
9 credit mechanism provides an opportunity for a competitive market to be
10 developed for these services.

11 **Q. WHAT SPECIFIC SERVICES ARE INCLUDED UNDER THE**
12 **CATEGORY OF “NON-WIRES SERVICES”?**

13 A. Charges for competitive, non-wires services, frequently referred to as “revenue
14 cycle services,” reflect that portion of the proposed settlement charges which
15 would no longer be provided by PECO once a competitive market for such
16 services is established. Services included in this category include the provision of
17 meters, meter reading, billing and collections, customer assistance and information,
18 sales and uncollectible accounts.

19 **Q. PLEASE EXPLAIN HOW YOU DERIVED THE PROPOSED CREDITS.**

20 A. Exhibit B provides a summary of the derivation of the Credits for Non-Wires
21 Services for each rate schedule.

- 1 • Column B shows by rate schedule the kWh energy sales as taken directly from
2 Appendix C of the Partial Settlement. (See table entitled "Derivation of CTC
3 and Market Energy/Capacity Revenue Requirements" for 1999.)
- 4 • Columns C and D, transmission and distribution revenue requirements, also
5 come directly from Partial Settlement Appendix C.
- 6 • Column E, non-wires charges, was derived by segregating total distribution
7 charges for each class of service between wires and non-wires charges in order
8 to establish a basis for the credit for competitive, non-wires services. Total
9 distribution charges were split between wires and non-wires charges on the
10 basis of Enron's analysis of the revenue requirements associated with each of
11 these services, as attributed to each class of service.
- 12 • Column F, wires charges, is simply the difference between total distribution
13 charges and non-wires charges.

14 The remaining columns are self-explanatory. Note that the average non-wires
15 charges, in dollars per kWh, shown in Column I of Exhibit B are the credits shown
16 for each rate schedule of the Electric Delivery Service Tariff and also summarized
17 in Exhibit A appended to Enron's Petition.

18 **Q. YOU STATED THAT THE SPLIT BETWEEN WIRES AND NON-WIRES**
19 **CHARGES SHOWN IN COLUMNS E AND F WERE DERIVED FROM**
20 **ENRON'S ANALYSIS OF THE REVENUE REQUIREMENTS**
21 **ASSOCIATED WITH EACH OF THE SERVICES. PLEASE DESCRIBE**

1 **THE PROCESS USED TO ARRIVE AT THE SPLIT BETWEEN WIRES**
 2 **AND NON-WIRES SERVICES.**

3 A. The computational steps required to derive the wires/non-wires split included the
 4 following:

5 1. The total revenue requirements for each of the services making up non-wires
 6 services were taken from Enron Exhibits 3, PDR-3, PDR-4 and PDR-5
 7 (Docket No. R-00973953) and the details underlying those exhibits. The
 8 revenue requirement for each component of non-wires services included the
 9 following:

10	Metering	\$ 30,807,000
11	Meter Reading	\$ 11,427,000
12	Billing and Collection	\$ 53,069,000
13	Customer Services and Information	\$ 33,381,000
14	Uncollectible Accounts	\$ 87,873,000
15	Sales	\$ 16,485,000
16	Lighting-Related Services	<u>\$ 7,589,000</u>
17	Total Non-Wires Services	\$240,631,000

18 2. Each component of non-wires revenue requirements was allocated to each
 19 class of service on the same basis on which PECO allocated the same cost
 20 elements in its class cost of service study (PECO Exhibit RAC-1).

- 1 3. The total revenue requirements for each of the services making up wires
2 services were taken from Enron Exhibits 3, PDR-2 and PDR-3 (Docket
3 No. R-00973953) and the details underlying those exhibits. The revenue
4 requirement for each component of wires services included the following:

5	Distribution Demand-Related	\$232,353,000
6	Distribution Customer-Related ¹	<u>\$279,092,000</u>
7	Total Wires Services	<u>\$511,445,000</u>
8	Total Wires and Non-Wires	<u>\$752,076,000</u>
9	Non-Wires % of Total	32.0%

- 10 4. Both components of wires revenue requirements (demand-related and
11 customer-related) were allocated to each class of service on the basis of the
12 allocation of such costs among customer classes resulting from PECO's
13 class cost of service study.

- 14 5. The percentages of non-wires to total distribution costs for each customer
15 class were computed for each class as the ratio of non-wires revenue-
16 requirements to the sum of wires and non-wires revenue requirements.

17 The resultant percentages are shown in Column L of Exhibit B.

18 **Q. YOU USED THE RESULTS OF YOUR ANALYSIS OF REVENUE**
19 **REQUIREMENTS COMPLETED FOR ENRON, YET THE TOTAL OF**
20 **THE T&D CHARGES ARE BASED ON THE RATES STATED IN**

¹ Exclusive of Metering and Lighting Services which were included in the Non-Wires category.

1 **APPENDIX C OF THE PARTIAL SETTLEMENT. CAN YOU**
2 **RECONCILE THIS DIFFERENCE?**

3 A. The Enron analysis (which I completed in preparing Enron Exhibits 3, PDR-2
4 through PDR-5) was used only to arrive at the percentage splits between wires and
5 non-wires charges and not to derive total T&D revenue requirements. As
6 described, interclass allocations were derived from PECO's cost of service
7 analysis. Further, total transmission and distribution revenue requirements match
8 the totals stemming from the Partial Settlement.

9 **III. COMPETITIVE MARKET FOR NON-WIRES SERVICES**

10 **Q. EARLIER IN THIS TESTIMONY YOU STATED THAT UNBUNDLING**
11 **CHARGES FOR NON-WIRES SERVICES THROUGH THE PROPOSED**
12 **CREDIT MECHANISM WILL PROVIDE AN OPPORTUNITY FOR A**
13 **COMPETITIVE MARKET TO BE DEVELOPED FOR THESE**
14 **SERVICES. WHAT ARE THE BENEFITS OF PERMITTING SUCH**
15 **SERVICES TO BE PROVIDED ON A COMPETITIVE BASIS?**

16 A. The Commission should promote competition in non-wire services because such
17 competition will lower the costs of these services to consumers and stimulate
18 innovative responses to customer specific requirements. Moreover, if the
19 Commission were to attempt to preserve PECO's monopoly in metering and billing
20 services, it would miss a dramatic opportunity to foster the growth of a technology
21 and information-based industry which can bring substantial benefits to consumers.
22

1 Pennsylvania businesses and consumers will receive the benefits of competition —
2 lower prices, new and innovative products — in these service areas, which will
3 enhance the overall value of direct access. Accordingly, requiring unbundling to
4 allow competition in the non-wire service areas will allow efficient electric
5 generation suppliers to differentiate themselves from their competitors and attract
6 customers to their products based on comprehensive and innovative service
7 offerings, while at the same time offering real value and benefits to Pennsylvania's
8 consumers.

9 **Q. COULDN'T COMPETITION DEVELOP IN NON-WIRE SERVICES**
10 **WITH THE UTILITIES' COSTS BUNDLED INTO A DISTRIBUTION**
11 **RATE?**

12 **A.** No. As a practical matter, it is hard to see how competition could begin without
13 the price being unbundled, *i.e.* separately stated. From an emerging competitive
14 market perspective, if the Commission permits meter services to be bundled with
15 PECO's distribution service, the Commission would actually limit access to the
16 metering market for new entrants because customers would have to pay twice for
17 meter and metering services and PECO would gain an unfair competitive
18 advantage.

19
20 Without unbundled metering charges on the customer's bill, the customer would
21 be forced to pay for the utility's metering as part of the "bundled" delivery service

1 rate. This is obviously unfair and not consistent with my understanding of the goal
2 of bringing competition to Pennsylvania's electric services industry.

3 **Q. WILL COMPETITION IN NON-WIRES SERVICES LEAD TO**
4 **DUPLICATION AND INCREASED COST?**

5 A. No. Once unbundled, service providers will be able to decide who will provide
6 these services, so there is no duplication. The proliferation of cost reduction
7 initiatives frequently results from the restructuring of customer account services,
8 including process redesign, outsourcing, and offerings of new products and
9 services. The existence of new sources of value have changed system economics
10 so as to encourage providers in other industries to absorb up-front customer
11 acquisition costs, with the result that products and services are more widely
12 available. Based on past experience with deregulated markets, Enron expects that
13 the unbundled market for billing and customer account services would exhibit
14 major cost reductions and value added enhancements by third party customer
15 service providers that focus upon one, or a few, services.

16
17 As a result of competition and innovation in these customer service areas, the
18 consumer will have expanded choice and enjoy the benefits of greater value at
19 lower costs. Just as importantly, the consumer will be offered new services which
20 were not available even a short time prior to restructuring.

21

1 The introduction of innovative metering and metering services also will
2 significantly expand choice for Pennsylvania consumers. The stimulation of the
3 market caused by competition will undoubtedly provide consumers with the option
4 to have their generation supplier install and utilize remote-read, time-of-use
5 meters. The use of these meters will allow cost sensitive consumers to manage
6 their demand for electricity to times of the day or the year when electricity prices
7 are at their lowest. Management of demand to take advantage of off-peak prices
8 will represent an important opportunity for consumers to reduce their overall
9 electric bills. The introduction of innovative metering technology will directly
10 result in new pricing options by electric generation suppliers who recognize
11 consumers' desires to achieve the lowest possible bill. Absent metering
12 competition, these and other dramatic developments and opportunities will not
13 occur in a timely manner and consumers will be denied many of the benefits of
14 competition.

15
16 The introduction of competition will also increase efficiency and reduce metering
17 costs. It is very possible that competitive forces in the marketplace will dictate
18 that suppliers will install and provide remote-read, time-of-use meters at no initial
19 cost to consumers. At a bare minimum, competition will drastically reduce the
20 costs of installing and providing consumers with sophisticated meters — which by
21 all accounts are critical to the development of full competition — as compared to

1 the costs incurred if PECO is either required or encouraged to install
2 technologically advanced meters throughout their service territories.

3 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4 **A. Yes.**

Educational Background:

Bachelor of Science Degree in Electrical Engineering
Purdue University, West Lafayette, Indiana. June, 1969
Masters Degree in Business Administration
Butler University. Indianapolis, Indiana, June, 1974

Professional Registration:

Registered as a Professional Engineer in the States of Indiana, Ohio, Kentucky,
Michigan and Illinois.

Professional Societies:

Senior Member - Institute of Electrical and Electronic Engineers
Member - National Society of Professional Engineers.

Experience:

1985-Present	Principal/Partner in the firm of R. W. Beck, Inc.
1974-1985	Employed by R. W. Beck. Responsible for studies conducted for numerous clients including distribution, transmission and power supply planning studies: economic feasibility studies; contract negotiations; and retail and wholesale revenue requirements, cost of service, and rate design studies. Presented testimony on numerous occasions before the Federal Energy Regulatory Commission, the Public Service Commission of Indiana and various other regulatory commissions or courts of law.
1969-1974	Employed by Indianapolis Power & Light Company. Developed transmission and distribution systems long-range plans and prepared economic evaluations of construction and operating methods. Responsible for development of a design manual for overhead distribution facilities, development of forecasting techniques for distribution load areas, analysis of customer load characteristics and analysis of system losses.
1965-1969	Employed as a Cooperative Education Student with Indianapolis Power & Light Company. Design of overhead and underground electric distribution facilities and assisted in long-range planning related to the Company's transmission and distribution system.

	A	B	C	D	E	F	G	H	I	J	K	L
1	Enron Energy Service Power, Inc.											
2	Petition for Electric Competition and Customer Choice Plan											
3	Computation of Credit for Non-Wires Services											
4	Based on Revenue Requirements per PECO Proposed Settlement											
5												
6	Current	Sales			Non-Wires	Wires	Total	Average	Non-Wires	Wires	T&D	Non-Wires
7	Rate	MWH	Transmission	Distribution	Charges	Charges	T&D	Transm	Charges	Charges	Total	as % of
8	Class				\$	\$	Charges	\$/kWh	\$/kWh	\$/kWh	\$/kWh	Total
9												
10	R	7,699,431	44,987,000	443,195,000	157,223,401	285,971,599	488,182,000	0.0058	0.0204	0.0371	0.0634	35.47%
11	RH	2,816,467	11,600,000	100,816,000	33,401,069	67,414,931	112,416,000	0.0041	0.0119	0.0239	0.0399	33.13%
12	OP	375,823	211,000	18,951,000	14,029,037	4,921,963	19,162,000	0.0006	0.0373	0.0131	0.0510	74.03%
13	GS	6,596,721	40,653,000	151,309,000	29,976,101	121,332,899	191,962,000	0.0062	0.0045	0.0184	0.0291	19.81%
14	PD	1,081,656	5,265,000	20,737,000	8,368,903	12,368,097	26,002,000	0.0049	0.0077	0.0114	0.0240	40.36%
15	HT	14,198,713	53,006,000	121,732,000	29,340,668	92,391,332	174,738,000	0.0037	0.0021	0.0065	0.0123	24.10%
16	SLE	47,017	89,000	7,895,000	75,535	7,819,465	7,984,000	0.0019	0.0016	0.1663	0.1698	0.96%
17	EP	638,800	2,436,000	7,935,000	585,390	7,349,610	10,371,000	0.0038	0.0009	0.0115	0.0162	7.38%
18	SLP	88,820	187,000	10,722,000	206,602	10,515,398	10,909,000	0.0021	0.0023	0.1184	0.1228	1.93%
19	Other	25,910	113,000	5,585,000	107,617	5,477,383	5,698,000	0.0044	0.0042	0.2114	0.2199	1.93%
20	Total	33,569,358	158,547,000	888,877,000	273,314,324	615,562,676	1,047,424,000	0.0047	0.0081	0.0183	0.0312	30.75%

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Statement No. 7-R

PHJ 11/18/97 et al

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1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. Paul D. Reising, 550 Congressional Boulevard, Suite 290, Carmel, IN 46032.

3

4 Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS
5 PROCEEDING?

6 A. Yes. I submitted direct testimony and exhibits in connection with the Choice
7 Plan proposed by Enron Energy Services Power, Inc. ("Enron").

8

9 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

10 A. I will be responding to the testimony of PECO Witness William F. Sundermeir
11 regarding the Enron Choice Plan.

12

13 Q. AT PAGE 30 OF HIS TESTIMONY, MR. SUNDERMEIR STATES THAT
14 THE ENRON NON-WIRES CREDIT WOULD PRODUCE AN UNFAIR
15 RESULT IF THE EGS CHOOSES TO PROVIDE ONLY ONE OF THE
16 NON-WIRES SERVICES. DO YOU HAVE ANY COMMENTS IN
17 RESPONSE TO THAT STATEMENT?

18 A. I agree that it would be inappropriate for the Electric Generation Supplier
19 ("EGS") to receive the full credit if it has not arranged for the provision of all of
20 the non-wires services by a party other than PECO. Mr. Sundermeir notes in
21 particular that Rule 14.1 of the Electric Delivery Service Tariff proposed by
22 Enron would allow the EGS to utilize PECO's meters. To remedy this

1 situation, I would have no objection to setting a non-wires credit which would
2 have two levels -- with and without meter costs. A two tier non-wires credit
3 can be readily derived from the data used to develop Exhibit B appended to my
4 direct testimony. My Exhibit C provides a computation of non-wires charges
5 which exclude a component for metering costs.

6
7 **Q. AT PAGES 30-31, MR. SUNDERMEIR STATES THAT UNDER THE**
8 **ENRON PLAN, PECO COULD NOT SHED THE COSTS ASSOCIATED**
9 **WITH NON-WIRES SERVICES BECAUSE PECO WOULD HAVE TO**
10 **STAND READY TO PROVIDE NON-WIRES SERVICES FOR ALL**
11 **DEFAULT SERVICE CUSTOMERS ("DSC"). WHAT IS YOUR**
12 **RESPONSE?**

13 **A.** Under the Enron plan, PECO would be required to provide non-wires services
14 for DSCs, but Mr. Sundermeir ignores the fact that Enron, as the Provider of
15 Last Resort ("PLR") would compensate PECO for providing all non-wires
16 services as is spelled out in the MBC Services Agreement.

17
18 **Q. MR. SUNDERMEIR STATES THAT PECO "MUST STAND READY TO**
19 **SERVICE A LARGE NUMBER OF CUSTOMERS AT ANY TIME" AND**
20 **AS A RESULT, PECO "WOULD BE FAR MORE LIKELY TO**
21 **CONTINUE TO INCUR COSTS ASSOCIATED WITH NON-WIRES**
22 **SERVICE AT NEAR CURRENT LEVELS." DO YOU HAVE ANY**
23 **RESPONSE TO THOSE CLAIMS?**

1 A. Yes. Throughout his testimony on this subject, Mr. Sundermeir attacks the
2 concepts embodied in the Enron Choice Plan with vague supposition regarding
3 the potential need to service a "large" number of customers and that PECO is
4 "far more likely" to incur costs at "near" current levels. PECO's unsupported
5 speculation should not be relied upon to dismiss the concepts advanced by
6 Enron. If it turns out to be true that a "large" number of customers will default
7 to the PLR, then PECO will be compensated for the non-wires services for such
8 "large" numbers of customers. In fact, under the Enron proposal, as contained
9 in Exhibit A, PECO would be compensated for such non-wires services at rates
10 that are far higher than what Mr. Sundermeir computes in his Exhibit WFS-15.

11 Moreover, Mr. Sundermeir is ignoring the costs that it will avoid when
12 it "avoids" providing a meter or a bill. Obviously, PECO will not lose costs
13 (beyond the variable costs) the moment that it stops providing a meter to a
14 customer, but over time the Company clearly will have the opportunity to
15 reduce its costs incrementally to reflect the reduced provisioning of service. If
16 Mr. Sundermeir's argument had any merit, PECO's customer costs would be
17 the same whether it was serving 500 customers or 500,000. This is obviously
18 incorrect.

1 Q. AT PAGE 33, MR. SUNDERMEIR STATES THAT UNDER THE
2 ELECTRIC DELIVERY TARIFF PECO WILL STILL HAVE
3 FINANCIAL OBLIGATIONS BECAUSE EGSs WILL BE ABLE TO
4 JETTISON NON-PAYING CUSTOMERS AND ARE LIKELY TO AVOID
5 INITIALLY SERVING CUSTOMERS WITH POOR CREDIT
6 HISTORIES. DO YOU HAVE ANY COMMENTS IN RESPONSE?

7 A. Yes, I do. To the extent that customers default to the PLR, whether or not they
8 have poor credit histories, PECO will be responsible for providing non-wires
9 services and will be compensated as such at charges under the MBC Services
10 Agreement. This is also the case for customers who return to default customer
11 status, whatever the reason.

12

13 Q. MR. REISING, DOES YOUR CREDIT FOR NON-WIRES SERVICES
14 INCLUDE A COMPONENT ASSOCIATED WITH UNCOLLECTIBLE
15 ACCOUNTS EXPENSE?

16 A. Yes, it does. Inclusion of uncollectible accounts in the credit is appropriate
17 because, as proposed by Enron, the credit will apply in those situations in which
18 the EGS, as agent for the customer, is responsible not only for providing all
19 non-wires services, but also for securing and billing all services needed by the
20 customer. As such, all of the risks and costs resulting from non-payment by the
21 customer is transferred fully from PECO to the MBC service provider, and in
22 turn, to the EGS. Because the T&D charges in the proposed settlement include
23 all costs associated with uncollectible accounts, it is appropriate that the credit

1 for non-wires services be computed inclusive of uncollectible accounts expense
2 and any related overhead costs.

3

4 **Q. YOUR ANSWER APPLIES IN THOSE SITUATIONS IN WHICH THE**
5 **CUSTOMER HAS CHOSEN AN EGS AND THE EGS TAKES**
6 **RESPONSIBILITY FOR ALL BILLING AND CUSTOMER FUNCTIONS.**
7 **HOW DOES THIS WORK IN THOSE SITUATIONS IN WHICH ENRON**
8 **IS THE PROVIDER OF LAST RESORT AS IT HAS PROPOSED IN ITS**
9 **CHOICE PLAN?**

10 A. Where Enron is the PLR for a customer, Enron will contract with PECO for
11 both firm energy and capacity supply and MBC services as required for DSCs.
12 For DSCs PECO will be responsible for all billing and collection functions. As
13 such, PECO will carry all risks associated with non-payment by the DSC, and
14 the payments it receives from Enron (as PLR) for MBC services rightfully
15 includes an allowance for the risks and costs resulting from non-payment by
16 DSCs. For this reason, Enron's proposal is symmetrical -- where PECO is the
17 MBC service provider, its "credit" for providing such service includes the costs
18 associated with uncollectible accounts; where the EGS (or a third party) is
19 responsible for MBC services, the EGS gets the credit.

1 Q. AT THE BOTTOM OF PAGE 36 OF HIS TESTIMONY, MR.
2 SUNDERMEIR STATES THAT YOU HAVE INCLUDED LIGHTING-
3 RELATED SERVICES EXPENSES IN THE NON-WIRES CREDIT. IS
4 HE CORRECT?

5 A. For the most part, no. If Mr. Sundermeir had examined my workpapers that
6 were submitted in response to PECO Interrogatory XIII-1, he would have seen
7 that I had computed a total company revenue requirement for lighting-related
8 expenses of about \$7.6 million, but that nearly all of this amount was allocated
9 to customer classes for which rates are not unbundled. For example, \$6.7
10 million of the total lighting-related revenue requirement was allocated to rate
11 class SLS which is not included in either PECO's nor Enron's plans for
12 restructured rates. There is only a small amount \$0.2 million assigned to rate
13 SLP and no lighting facility costs assigned to rate SLE. That there are little or
14 no street light facility costs included in the non-wires charge should be obvious
15 from the non-wires credit Enron proposed for rates SLE and SLP, the only
16 PECO lighting service rates classes for which unbundled services would be
17 provided. The non-wires charges for these rates are \$0.0016 and \$0.0023 per
18 kWh for rates SLE and SLP, respectively.

19 The \$0.2 million in lighting facility costs was assigned to rate SLP in the
20 same proportion as PECO assigns lighting facility costs among all lighting
21 classes. Under rate SLP, the customer must provide all utilization facilities, so
22 it is not clear what lighting facilities PECO assigns to rate SLP. At any rate, I
23 have no objection to making a slight adjustment to rate SLP to remove the small

1 amount of lighting facilities that might have been included. Making such an
2 adjustment would reduce the non-wires credit for rate SLP from \$0.0023 per
3 kWh to \$0.0007 per kWh. No adjustment is needed to rate SLE because no
4 street light facility costs were assigned to that rate. Of course no adjustment is
5 needed for any of the other rate schedules.

6
7 **Q. AT PAGE 37, MR. SUNDERMEIR STATES THAT YOUR NON-WIRES**
8 **REVENUE REQUIREMENTS AMOUNT OF \$240 MILLION IS MORE**
9 **THAN THREE TIMES HIGHER THAN THE TOTAL COSTS TO**
10 **PROVIDE NON-WIRES SERVICES. DO YOU AGREE?**

11 A. In actuality, Mr. Sundermeir has understated the difference between our
12 respective analyses of non-wires costs and credits. Mr. Sundermeir is
13 apparently comparing the amount shown on Page 6 of my testimony to his total
14 for non-wires costs of \$78.5 million shown in Exhibit WFS-15. The \$240
15 million amount shown on page 6 of my testimony was intended to summarize
16 the split of non-wires services costs by category based on my cost of service
17 study presented in my direct testimony in R-00973593 (Exhibit 3, PDR-2
18 through PDR-5). As I explained in my testimony regarding the Enron Choice
19 Plan, the breakdown of revenue requirements by category was used to
20 determine the relative percentage of distribution costs split between wires and
21 non-wires services. These relative splits were applied, by customer class, to
22 PECO's total distribution revenue requirement. As shown on Exhibit B
23 attached to my direct testimony regarding the Enron Choice Plan, the total

1 amount of charges for non-wires services was \$273.3 million, not \$240 million.
2 (See Exhibit B, Column E, Line 20.) As a result, my total non-wires revenue
3 requirement is nearly 3.5 times that amount shown in PECO Exhibit WFS-15.

4 Of course, as I pointed out previously with regard to uncollectible
5 accounts expenses, the non-wires credit applicable under the Enron Electric
6 Delivery Tariff is intended to be symmetrical with the compensation to PECO
7 for its providing MBC services to DSCs under the MBC Services Agreement.
8 To the extent that the non-wires credit under the Electric Delivery Tariff is
9 reduced, so also would the MBC Services charges paid to PECO be reduced.
10 PECO cannot have it both ways.

11

12 **Q. TO WHAT DO YOU EXPLAIN THE DIFFERENCE BETWEEN THE**
13 **AMOUNT YOU HAVE COMPUTED TO THE AMOUNT MR.**
14 **SUNDERMEIR HAS COMPUTED IN EXHIBIT WFS-15?**

15 **A.** Mr. Sundermeir has already identified several of the differences. For example,
16 his Exhibit WFS-15 excludes any allowance for uncollectible accounts expense,
17 sales expense or customer services and information. I continue to believe that
18 such expenses, if included in the T&D charge in the first place, should be
19 included in the non-wires credit and the MBC Services rates. In addition, Mr.
20 Sundermeir has failed to include: (1) taxes other than income taxes; (2)
21 expenses associated with customer accounts supervision (account 901); and (3)
22 indirect (overhead) expenses required to support the metering, meter reading
23 and billing and collection activities that he does include. These overhead costs,

1 referred to frequently as "common costs," include administrative and general
2 expenses and the carrying costs on general plant investment. They would also
3 include the carrying costs on working capital. Each of these cost elements were
4 included by PECO in its T&D charge and properly are included in the credit
5 for non-wires services provided by third parties, and in the payment PECO
6 receives for providing such services for DSCs.

7

8 **Q. AT PAGES 39-40, MR. SUNDERMEIR SUGGESTS THAT FOLLOWING**
9 **THE EXPIRATION OF THE NON-GENERATION CHARGES RATE**
10 **CAP PECO SHOULD BE ALLOWED TO SEEK RECOVERY OF THE**
11 **ACTUAL STRANDED AMOUNT OF NON-WIRES SERVICES COSTS**
12 **WHICH EXCEED THE AMOUNT CREDITED UNDER THE ENRON**
13 **CHOICE PLAN. PLEASE COMMENT.**

14 **A.** Mr. Sundermeir's proposal starts with the proposition that PECO should be
15 allowed to track non-wires costs. I do not have a problem with that, but if there
16 is to be a mechanism for PECO to recover costs not otherwise covered by non-
17 wires credits, then the reverse should also be true -- to the extent that revenue
18 from non-wires charges, including revenues for services provided by PECO to
19 DSCs under the MBC Services Agreement, exceed the tracked costs, then there
20 needs to be a flow back of excess revenues. Any such mechanism should be bi-
21 directional, not one-sided as suggested by Mr. Sundermeir.

1 Q. MR. SUNDERMEIR RECOMMENDS THAT THE NON-WIRES CREDIT
2 BE ESTABLISHED AS A FIXED CUSTOMER CREDIT RATHER THAN
3 AN ENERGY CHARGE AS YOU COMPUTED THEM IN YOUR
4 EXHIBIT B. PLEASE COMMENT?

5 A. As I have pointed out in this testimony, the non-wires credits under the Electric
6 Delivery Tariff and the non-wires services charges under the MBC Services
7 Agreement are symmetrical, the same energy-based rates were included in both
8 documents. My concern would be that if a fixed customer charge approach is
9 adopted, as proposed by Mr. Sundermeir, then small DSCs will be adversely
10 impacted.

11

12 Q. IN THE FINAL PORTION OF HIS TESTIMONY, MR. SUNDERMEIR
13 SUGGESTS THAT CUSTOMERS RECEIVE THE NON-WIRES CREDIT
14 RATHER THAN THE EGS. DO YOU AGREE?

15 A. No. Mr. Sundermeir suggests that giving the credit to the end-user would
16 permit the customer to "comparison shop" just as they would be able to shop for
17 energy under the proposed Partial Settlement. Of course, the idea under the
18 Enron Choice Plan is for the customer to be able to "comparison shop" for the
19 best total package of services.

20

21 Q. ARE THE T&D CHARGES IDENTIFIED IN YOUR EXHIBIT B THE
22 RATES YOU HAVE RECOMMENDED BE APPLIED UNDER THE
23 PECO RESTRUCTURING PLAN?

1 A. No. As I indicated previously in this testimony and in my direct testimony, the
2 T&D charges shown in Exhibit B are premised on the T&D charges proposed
3 by PECO under its restructuring plan, as revised. For the reasons stated in my
4 direct, rebuttal, supplemental and sur-rejoinder testimony in Docket No. R-
5 00973953, I believe that PECO's proposed T&D charges are substantially
6 overstated.

7
8 **Q. WHAT T&D CHARGES AND NON-WIRES CREDITS WOULD RESULT**
9 **IF YOUR RECOMMENDED T&D REVENUE REQUIREMENTS WERE**
10 **ADOPTED?**

11 A. Exhibit D attached to this testimony provides a breakdown of revenue
12 requirements for T&D services as well as my computation of non-wires credits
13 consistent with my testimony in R-00973953. Consistent with my comments
14 regarding a two-tiered non-wires credit, I have computed the non-wires credit
15 both including and excluding a metering component.

16
17 **Q. WHAT IS THE SOURCE FOR THE TOTAL REVENUE REQUIREMENT**
18 **FOR T&D SERVICES?**

19 A. The source for the total revenue requirements for T&D services was provided in
20 my supplemental testimony in Docket No. E-00973953. The total T&D
21 revenue requirement of \$877,091,000 ties directly to the total T&D revenue
22 requirement shown in Exhibit 3S, PDR-2 appended to my supplemental
23 testimony. Please note also that my adjustments to remove sales expenses and

1 the generation portion of uncollectible accounts expenses is consistent between
2 the two exhibits. The rationale for removal of these amounts was presented in
3 my supplemental testimony.

4

5 **Q. PLEASE EXPLAIN HOW YOU ALLOCATED THE TRANSMISSION**
6 **AND DISTRIBUTION REVENUE REQUIREMENT AMONG RATE**
7 **CLASSES.**

8 A. The total transmission revenue requirement of \$125 million was allocated to
9 each applicable rate class on the basis of the allocation of transmission costs in
10 PECO's class cost of service study. Similarly, the total distribution revenue
11 requirements of \$752 million were allocated among rate classes on the basis of
12 the allocation of distribution costs in PECO's class cost of service study. The
13 adjustment to remove sales expenses and the generation portion of uncollectible
14 accounts expense were allocated to each customer class using the same class
15 allocation factors used by PECO for these same cost elements.

16

17 **Q. HOW DID YOU DETERMINE THE SPLIT OF DISTRIBUTION**
18 **CHARGES BETWEEN WIRES AND NON-WIRES SERVICES?**

19 A. I used the same approach I described in my direct testimony in support of the
20 Enron Choice Plan. Each element of non-wires revenue requirements from my
21 functional cost of service study (meters, meter reading, billing and collections
22 and customer services and information -- "MBC" services) were allocated

1 among customer classes on the basis of the same class allocation factors used by
2 PECO.

3

4 **Q. YOUR EXHIBIT D SHOWS A TOTAL T&D AVERAGE SYSTEM**
5 **CHARGE OF \$0.0237, WHILE THE TOTAL T&D CHARGE**
6 **PRESENTED BY ENRON WITNESS MITNICK IN HIS TESTIMONY**
7 **REGARDING THE PROPOSED SETTLEMENT WAS \$0.0263 PER**
8 **KWH. PLEASE RECONCILE THIS DIFFERENCE.**

9 A. There are two differences. First, Mr. Mitnick's Exhibit SAM-3 inadvertently
10 left out the adjustment to remove sales expense. Had he made that adjustment,
11 as I recommended, the amount shown on his exhibit would have been \$0.0258
12 per kWh. The second difference stems from the fact that Mr. Mitnick's average
13 T&D charge was computed on the basis of the energy sales level taken from
14 PECO's proof of revenues statements, an amount of energy sales of 30,852,000
15 MWH. However, the proposed settlement and the Enron Choice Plan both use
16 energy sales of 33,569,000 MWH to calculate "system average" numbers.
17 Using the large energy sales base causes the average system T&D charge to
18 equate to \$0.0237 per kWh as shown in my Exhibit D.

19

20 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A. Yes, it does.

	A	B	C	D	E	F	G	H	I	J	K	L
1	Enron Energy Service Power, Inc.											
2	Petition for Electric Competition and Customer Choice Plan											
3	Computation of Credit for Non-Wires Services											
4	Based on Revenue Requirements per PECO Proposed Settlement											
5	Including Metering Component											
6	Including Metering Component											
7	Including Metering Component											
8	Including Metering Component											
9	Current	Sales	Transmission	Distribution	Non-Wires	Wires	Total	Average	Non-Wires	Wires	T&D	Non-Wires
10	Rate	MWH			Charges	Charges	T&D	Transmission	Charges	Charges	Total	as % of
11	Class				\$	\$	Charges	\$/kWh	\$/kWh	\$/kWh	\$/kWh	Total
12												
13	R	7,699,431	44,987,000	443,195,000	157,223,401	281,971,399	488,182,000	0.0038	0.0204	0.0371	0.0634	35.47%
14	RH	2,816,467	11,600,000	100,816,000	33,401,069	67,414,931	112,416,000	0.0041	0.0119	0.0239	0.0399	33.13%
15	OP	375,823	211,000	18,951,000	14,029,037	4,921,963	19,162,000	0.0006	0.0373	0.0131	0.0510	74.03%
16	GS	6,596,721	40,653,000	151,309,000	29,976,101	121,332,899	191,962,000	0.0062	0.0045	0.0184	0.0291	19.81%
17	PD	1,081,656	5,265,000	20,737,000	8,368,903	12,368,097	26,002,000	0.0049	0.0077	0.0114	0.0240	40.36%
18	HT	14,198,713	53,006,000	121,732,000	29,340,668	92,391,332	174,738,000	0.0037	0.0021	0.0065	0.0123	24.10%
19	SLR	47,017	89,000	7,895,000	75,535	7,819,465	7,984,000	0.0019	0.0016	0.1663	0.1698	0.96%
20	EP	638,800	2,436,000	7,935,000	585,390	7,349,610	10,371,000	0.0038	0.0009	0.0115	0.0162	7.34%
21	SLP	88,820	187,000	10,722,000	206,602	10,515,398	10,909,000	0.0021	0.0023	0.1184	0.1228	1.93%
22	Other	25,910	113,000	5,583,000	107,617	5,477,383	5,698,000	0.0044	0.0042	0.2114	0.2199	1.93%
23	Total	33,369,358	158,347,000	888,877,000	273,314,324	615,562,676	1,047,424,000	0.0047	0.0081	0.0183	0.0312	30.75%
24	Enron Energy Service Power, Inc.											
25	Petition for Electric Competition and Customer Choice Plan											
26	Computation of Credit for Non-Wires Services											
27	Based on Revenue Requirements per PECO Proposed Settlement											
28	Excluding Metering Component											
29	Excluding Metering Component											
30	Excluding Metering Component											
31	Excluding Metering Component											
32	Excluding Metering Component											
33	Current	Sales	Transmission	Distribution	Non-Wires	Wires	Total	Average	Non-Wires	Wires	T&D	Non-Wires
34	Rate	MWH			Charges	Charges	T&D	Transmission	Charges	Charges	Total	as % of
35	Class				\$	\$	Charges	\$/kWh	\$/kWh	\$/kWh	\$/kWh	Total
36												
37	R	7,699,431	44,987,000	443,195,000	144,848,324	298,346,676	488,182,000	0.0038	0.0188	0.0387	0.0634	32.68%
38	RH	2,816,467	11,600,000	100,816,000	31,462,902	69,353,098	112,416,000	0.0041	0.0112	0.0246	0.0399	31.21%
39	OP	375,823	211,000	18,951,000	12,146,555	6,804,445	19,162,000	0.0006	0.0323	0.0181	0.0510	64.09%
40	GS	6,596,721	40,653,000	151,309,000	24,555,436	126,753,564	191,962,000	0.0062	0.0037	0.0192	0.0291	16.23%
41	PD	1,081,656	5,265,000	20,737,000	6,375,707	14,341,293	26,002,000	0.0049	0.0059	0.0133	0.0240	30.75%
42	HT	14,198,713	53,006,000	121,732,000	28,335,875	83,396,125	174,738,000	0.0037	0.0020	0.0066	0.0123	23.28%
43	SLR	47,017	89,000	7,895,000	75,535	7,819,465	7,984,000	0.0019	0.0016	0.1663	0.1698	0.96%
44	EP	638,800	2,436,000	7,935,000	557,151	7,377,849	10,371,000	0.0038	0.0009	0.0115	0.0162	7.02%
45	SLP	88,820	187,000	10,722,000	65,167	10,656,833	10,909,000	0.0021	0.0007	0.1200	0.1228	0.61%
46	Other	25,910	113,000	5,583,000	33,945	5,551,055	5,698,000	0.0044	0.0013	0.2142	0.2199	0.61%
47	Total	33,369,358	158,347,000	888,877,000	248,436,596	640,430,404	1,047,424,000	0.0047	0.0074	0.0191	0.0312	27.95%

PECO Energy Company - 1996 Test Year
Computation of Average Charge for T&D Services
per EPRI T&D Functionalization
Total Distribution Assigned to Classes Based on PECO Class Ratios

Including Metering Component

Current Rate Class	Energy Sales MWH	Transmission	Distribution	Removal of Sales Expense	Remove Prod. Portion of Uncollectibles	Adjusted Total Distribution	Non-Wires MBC Charge	Non-Wires Uncoll. A/Cs Charge	Wires Charges	Adjusted Total T&D Charge	Average Transm. \$/kWh	Non-Wires Charges \$/kWh	Wires Charges \$/kWh	Adjusted Total \$/kWh
R	7,699,431	33,472,162	374,986,377	(9,274,159)	(46,104,463)	319,607,755	84,582,985	16,484,836	218,339,934	355,079,917	0.0046	0.0131	0.0284	0.0461
REH	2,816,467	9,146,577	83,909,210	(1,583,853)	(11,339,414)	72,356,943	11,908,491	3,990,093	56,658,339	81,703,521	0.0032	0.0056	0.0201	0.0290
CP	373,823	166,373	16,034,402	(64,647)	(1,239,165)	14,730,390	7,663,284	443,068	6,624,231	14,894,963	0.0004	0.0016	0.0176	0.0396
GS	6,596,721	32,054,811	128,022,233	(2,707,096)	(1,113,467)	124,201,671	13,691,180	398,125	101,111,666	156,254,483	0.0049	0.0024	0.0164	0.0237
PD	1,081,636	4,131,442	17,549,533	(263,975)	(1,665,747)	15,611,811	2,363,220	595,594	12,656,997	19,761,253	0.0038	0.0027	0.0117	0.0183
HT	14,198,713	41,793,128	102,997,193	(2,416,184)	(3,443,333)	97,137,676	3,970,194	1,231,178	83,936,304	138,932,803	0.0029	0.0005	0.0063	0.0091
SLR	47,017	70,176	6,879,943	(24,243)	-	6,655,701	38,348	-	6,397,153	6,725,877	0.0015	0.0012	0.1403	0.1431
EP	638,800	1,920,781	6,713,767	(117,173)	-	6,596,614	247,926	-	6,348,688	8,317,396	0.0030	0.0004	0.0099	0.0133
SLP	88,820	147,449	9,071,862	(33,670)	-	9,038,192	68,524	-	8,969,667	9,185,641	0.0017	0.0008	0.1010	0.1034
Other	25,910	89,100	4,725,457	-	-	4,725,457	35,827	-	4,689,630	4,814,537	0.0014	0.0014	0.1810	0.1838
Total all rates	33,569,358	125,014,000	751,077,000	(16,483,000)	(64,723,990)	670,866,410	128,610,243	21,142,893	319,112,673	795,886,410	0.0037	0.0043	0.0155	0.0237

PECO Energy Company - 1996 Test Year
Computation of Average Charge for T&D Services
per EPRI T&D Functionalization
Total Distribution Assigned to Classes Based on PECO Class Ratios

Excluding Metering Component

Current Rate Class	Energy Sales MWH	Transmission	Distribution	Removal of Sales Expense	Remove Prod. Portion of Uncollectibles	Adjusted Total Distribution	Non-Wires MBC Charge	Non-Wires Uncoll. A/Cs Charge	Wires Charges	Adjusted Total T&D Charge	Average Transm. \$/kWh	Non-Wires Charges \$/kWh	Wires Charges \$/kWh	Adjusted Total \$/kWh
R	7,699,431	33,472,162	374,986,377	(9,274,159)	(46,104,463)	319,607,755	84,582,985	16,484,836	236,830,363	355,079,917	0.0046	0.0108	0.0308	0.0461
REH	2,816,467	9,146,577	83,909,210	(1,583,853)	(11,339,414)	72,356,943	9,692,702	3,990,093	59,074,148	81,703,521	0.0032	0.0048	0.0210	0.0290
CP	373,823	166,373	16,034,402	(64,647)	(1,239,165)	14,730,390	4,146,606	443,068	10,140,913	14,894,963	0.0004	0.0012	0.0270	0.0396
GS	6,596,721	32,054,811	128,022,233	(2,707,096)	(1,113,467)	124,201,671	11,394,693	398,125	112,408,831	156,254,483	0.0049	0.0018	0.0170	0.0237
PD	1,081,636	4,131,442	17,549,533	(263,975)	(1,665,747)	15,611,811	682,361	595,594	14,337,956	19,767,253	0.0038	0.0012	0.0133	0.0183
HT	14,198,713	41,793,128	102,997,193	(2,416,184)	(3,443,333)	97,137,676	3,987,387	1,231,178	90,518,610	138,932,803	0.0029	0.0005	0.0064	0.0091
SLR	47,017	70,176	6,879,943	(24,243)	-	6,655,701	38,348	-	6,397,153	6,725,877	0.0015	0.0012	0.1403	0.1431
EP	638,800	1,920,781	6,713,767	(117,173)	-	6,596,614	247,926	-	6,348,688	8,317,396	0.0030	0.0004	0.0099	0.0133
SLP	88,820	147,449	9,071,862	(33,670)	-	9,038,192	68,524	-	8,969,667	9,185,641	0.0017	0.0008	0.1010	0.1034
Other	25,910	89,100	4,725,457	-	-	4,725,457	35,827	-	4,689,630	4,814,537	0.0014	0.0014	0.1810	0.1838
Total all rates	33,569,358	125,014,000	751,077,000	(16,483,000)	(64,723,990)	670,866,410	97,807,334	21,142,893	349,915,981	795,886,410	0.0037	0.0036	0.0164	0.0237