

September 1, 2015

VIA ELECTRONIC FILING
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor – 1 North
Harrisburg, PA 17120

**Re: Pennsylvania Power Company Supplement No. 6 to Tariff Electric Pa. P.U.C. No. 36,
Docket No. R-2012-2428744 – Response to 52 Pa. Code § 53.52(a)**

Dear Secretary Chiavetta:

Transmitted herewith for filing with the Pennsylvania Public Utility Commission (“Commission”) are exhibits to support Pennsylvania Power Company (“Penn Power” or the “Company”) filing of Tariff Electric Pa. P.U.C. No 36, Supplement 6 which bears an issue date of August 7, 2015 and is proposed to be effective October 6, 2015 (“Supplement”). Specifically, the exhibits required to support the Supplement and which are enclosed herein include those in response to Section 53.52 (a) of the Commission’s regulations.

Copies have been served on all parties as indicated in the attached certificate of service. If you have any questions regarding the enclosed documents, please feel free to contact me.

Sincerely,



Charles V. Fullem

Director – Rates and Regulatory Affairs-PA

Enclosures
cc: per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA POWER COMPANY : **Docket No. R-2014-2428744**
:
v. :
:
PENNSYLVANIA PUBLIC UTILITY :
COMMISSION :

**Request for Approval of a General Base
Rate Case**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served copies of Supplement No. 6 to **Pennsylvania Power Company** Tariff No. 36, response to 52 Pa. Code § 53.52(a), upon the following persons in the matter specified in accordance with the requirement of 52 Pa. Code § 1.54:

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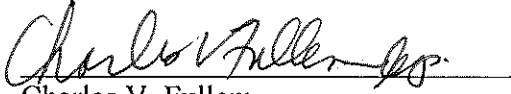
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Dated: September 1, 2015


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PENNSYLVANIA POWER COMPANY

Outlined below are the responses of Penn Power Company ("Penn Power") to those requirements of 52 Pa. Code § 53.52(a). Responses to subsections (b) through (d) of this section have not been provided as those subsections do not apply to the proposed tariff revisions as filed on August 7, 2015.

- (1) The specific reasons for each change.

Penn Power Electric Pa. P.U.C. No. 36, Supplement 6 was filed on August 7, 2015 ("August 7 Supplement") to revise the tariff originally issued on May 1, 2015 in compliance with the Pennsylvania Public Utility Commission's ("Commission") April 9, 2015 Opinion and Order at Docket No. R-2012-2428744. ("April 9 Order"). These revisions provide correction and clarification to the tariff as issued on May 1, 2015 in order to ensure its consistency with the terms and intent of the Joint Petition for Partial Settlement of Rate Investigation as filed on February 3, 2015 and approved by the Commission's April 9 Order ("Settlement"). More detailed explanations of each individual revision can be found in the matrix accompanying the August 7 Supplement, and which has been resubmitted as Schedule A to this response.

- (2) The total number of Customers served by the utility.

As of March 2014, the end of the historical test year contemplated by the Settlement, Penn Power served a total of 162,165 customers.

- (3) A calculation of the number of Customers, by tariff subdivision, whose bills could be affected by the change.

Any customer bill impacts that will result from these revisions are merely a result of corrections to misstated rates. No bill impacts are expected outside of those already contemplated under the Settlement.

- (4) The effect of the change on the utility's customers.

Any effects to customers that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No customer impacts are expected outside of those already contemplated under the Settlement.

- (5) The direct or indirect effect of the proposed change on the utility's revenue and expenses.

Any impacts to Penn Power's revenues or expenses that will result from these revisions are merely a result of corrections to misstated rates. No revenue or expense are expected outside of those already contemplated under the Settlement.

- (6) The effect of the change on the service rendered by the utility

Any effects to service rendered that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No impacts to service rendered by Penn Power are expected outside of those already contemplated under the Settlement.

- (7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).

Penn Power elected to file these revisions in order to make certain corrections and clarifications to ensure that Penn Power Electric Pa. P.U.C. No. 36 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.

No studies were required; the revisions only make certain corrections and clarifications to ensure that Penn Power Electric Pa. P.U.C. No. 36 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

No polls were taken; the revisions only make certain corrections and clarifications to ensure that Penn Power Electric Pa. P.U.C. No. 36 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

A. Penn Power communicated the impact of the Settlements to customers as relevant at the time its current tariff became effective. Because the revisions only make certain corrections and clarifications to ensure that Penn Power Electric Pa. P.U.C. No. 36 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission, no additional introduction or implementation is required.

(11) FCC, FERC or Commission orders or rulings applicable to the filing:

The following orders or rulings are applicable to the filing:

- Penn Power Rate Case order dated April 9, 2015 at Docket No. R-2014-2428744.

Penn Power Tariff Revisions						
Tariff No. 36						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
1	12	Definition of Commercial Customer Class	Commercial Customer Class – Rate Schedules GS (excluding GS Special Rule GSDS), PNP, GM, PLS, SV, SVD, SM, and LED.	Add GS Large to Commercial Customer Class.	Commercial Customer Class – Rate Schedules GS (excluding GS Special Rule GSDS), PNP, GM, GS-LARGE, PLS, SV, SVD, SM, and LED.	Missing rate schedule
2	15	Definition of Hourly Pricing Service Charges	Hourly Pricing Service Charges – For Customers served under Rate Schedules GS-Large, GP, GT, GS-Special Rule GSDS, GS-Small (on a voluntary basis) and GS-Medium (on a voluntary basis) Customers that elect this rate, the charges representing the Company's costs for providing energy, capacity, including the cost of complying with non-solar AEPS, transmission, and ancillary services for Default Service Customers.	Remove GS Large from Hourly Pricing Service Charges.	Hourly Pricing Service Charges – For Customers served under Rate Schedules GP, GT, GS-Special Rule GSDS, GS-Small (on a voluntary basis), GS-Medium (on a voluntary basis), and GS-Large (on a voluntary basis) Customers that elect this rate, the charges representing the Company's costs for providing energy, capacity, including the cost of complying with non-solar AEPS, transmission, and ancillary services for Default Service Customers.	Removing rate schedule
3	16	Definition of Industrial Customer Class	Industrial Customer Class – Rate Schedules GS-Large, GP, GT and Special Rule GSDS	Remove GS-Large from Industrial Customer Class.	Industrial Customer Class – Rate Schedules GP, GT and Special Rule GSDS	Removing rate schedule
4	22	Rule 1. Applications/Contracts	(limited to the portion that was for regulated service provided by the Company)	Remove language.		Consistency and irrelevance
5	58	Rate RS, Special Monthly Charges	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this Provision A, in addition to the General Monthly Charges.	Remove "A" after provision, no longer applies as there is no provision A.	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this provision, in addition to the General Monthly Charges.	Formatting/Grammar
6	59	Rate RS, Multifamily Dwellings	Where two or more families, with separate cooking facilities, occupy a residential dwelling, the wiring shall be arranged so that the service to each family can be metered and billed separately. If the wiring is not so arranged and two or more families are served through one meter, the Distribution Charges, as determined on a single-family basis, shall be multiplied by the number of families served.	Remove Multi Family Dwelling language.		Language was removed as PP does not bill
7	59, 64, 72	Rate RS, GS - Special Provision and GM	Special Provision: Customers that were previously on the Optional Controlled Service Rider prior to June 20, 1996 shall be allowed to combine their separate meter readings that were in place under the Optional Controlled Service Rider into one single meter reading for billing purposes.	Remove provision as there is no automated mechanism to combine the meters for billing.		Unable to provide service

Penn Power Tariff Revisions						
Tariff No. 36						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
8	61	GS-Small, Transformer Losses	Where a transformer installation is utilized solely to furnish service to a single customer, the Company may meter the service on the primary side of the transformers, and in such case the load and energy registrations shall each be reduced 2%.	Remove language.		Ensuring consistency with Rule 10
9	62	Rate GS - Special Rule GSDS	"will be placed on the Hourly Pricing Service Default Service Rider."	Remove first reference to "Service".	"will be placed on the Hourly Pricing Default Service Rider."	Formatting/Grammar
10	68	GS-Small, Billing Load	Billing Load: The billing load shall be the highest reading in kW each month of a thermal type meter or at the option of the Company, from a 15-minute block interval type meter, but not less than 5.0 kW. A load meter shall be installed when the customer's monthly use has exceeded 700 kWh in each of three consecutive months or at the discretion of the Company.	Remove Billing Load text and insert Special Monthly Charges Load in Excess of 25 kilowatts.	Special Monthly Charges Load in Excess of 25 kilowatts: The Company shall install a suitable demand meter to determine the maximum 15-minute integrated demand when (i) a Customer's service requires the installation of an individual transformer, (ii) a Customer's total monthly consumption exceeds 10,000 kilowatt-hours for two (2) consecutive months, or (iii) when the Customer's service entrance requirements exceed 600 amperes. If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this Provision, in addition to the General Monthly Charges. In no event shall the demand charge be based upon less than seventy-five percent (75%) of the highest excess demand during the preceding eleven (11) months.	Matching Volunteer Fire Co. rate with Residential rate per statute
11	69	GSM Availability	If an existing Customer's total consumption is less than 1,500 KWH per month for twelve (12) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium.	Remove "twelve (12)" and insert "two (2)".	If an existing Customer's total consumption is less than 1,500 KWH per month for two (2) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium.	Two consecutive months consistent with K.Siedt testimony, Statement 4, page 15, line 11.
12	69	GSM Availability	If an existing Customer's billing demand exceeds 400 kW for more than two (2) consecutive months in any 12-month period, then the Customer may no longer be eligible for service under this Rate Schedule GS-Medium, and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies.	Remove "more than" and "in any 12-month period".	If an existing Customer's billing demand exceeds 400 kW for two (2) consecutive months, then the Customer may no longer be eligible for service under this Rate Schedule GS-Medium, and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies.	Source: K.Siedt testimony, Statement 4, page 15, line 11.
13	69	GSM Energy Charge	Energy 0.000 cents per kWh for all kWh	Remove language.		Energy charge no longer applies.

Penn Power Tariff Revisions						
Tariff No. 36						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
14	71,74	kwh/200		Add language to calculate demand using a formula if customer does not have a demand meter.	Pending the installation of a demand meter, Customer's Demand shall be a formula demand determined by dividing the kilowatt-hour consumption by 200.	Source: K.Siedt testimony, Statement 4, page 19, line 6.
15	71, 74, 78,82	GM, GSL, GP, and GT, Billing Demand	A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-peak hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during Off-peak hours, as stated herein, (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months.	Capitalize On-Peak Hours and off-peak hours appropriately. Add Metering requirement (last sentence) for effectiveness to On Peak demand calculation.	A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-Peak Hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours, as stated herein, (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. The on-peak and off-peak hour provisions of this definition are only applicable for those customers who have installations of non-Interval Time-of-Use demand meters.	Meter limitations
16	76	GP, Transformer Losses	The Company reserves the right to install metering equipment on either the primary or secondary side of the customer's transformers, and when installed on the secondary side, 2% shall be added to the demand and energy quantities thus measured to correct for transformer losses.	Remove language.		Ensuring consistency with Rule 10
17	80	GT	The minimum billing demand shall be 200 kVa.	Change to kW.	The minimum billing demand shall be 200 kW.	Typo
18	82	GT, Ratchet	(v) the highest billing demand established during the preceding eleven (11) months.	Add "fifty percent (50%).	(v) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months.	Typo
19	82	GT, Reactive Billing Demand		Add reactive billing demand language.	Reactive Billing Demand: For installations metered with reactive energy metering, the reactive billing demand in kVA for the month shall be determined by multiplying the Billing Demand by the ratio of the measured lagging reactive kilovoltamperes hours to the measured kWh by the following formula: $kVA = \text{Billing Demand} \times (\text{measured lagging reactive kilovoltampere hours} \div \text{rate measured kWh})$. For all other installations, the Reactive Billing Demand shall be the integrated reactive demand occurring coincident with the Billing Demand.	Clarifying calculation of charge

Penn Power Tariff Revisions						
Tariff No. 36						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
20	99	PNP, Transformer Losses	Where a transformer installation is utilized solely to furnish service to a single customer, the Company may meter the service on the primary side of the transformers, and in such case the load and energy registrations shall each be reduced 2%.	Remove reference to 2%.		Ensuring consistency with Rule 10
21	113	Rider F, Phase II Energy Efficiency and Conservation Charge Rider	<u>Street Lighting Customer Class</u> (\$0.00486) cents per kWh	Remove dollar sign and convert from dollars into cents.	<u>Street Lighting Customer Class</u> (0.486) cents per kWh	Correction to rate per Schedule A from Penn Power Supplement 3, Street Lighting Schedule
22	113	Rider F, Phase II Energy Efficiency and Conservation Charge Rider	Commercial Customer Class (Rate GS, GS Special Rider GSDS, Rate GM, Rate GS-Large:	Add Private Outdoor Lighting Service and include the closing bracket.	Commercial Customer Class (Rate GS, GS Special Rider GSDS, Rate GM, Rate GS-Large and POL):	Adding rate schedule
23	123	Rider H, PTC Default Service Rider	Commercial Customer Class (Rate GS (excluding Special Rate GSDS), Rate GM, Rate PNP, PLS, SV, SVD, SM and LED)	Add GS Large.	Commercial Customer Class (Rate GS (excluding Special Rate GSDS), Rate GM, GS-Large, Rate PNP, PLS, SV, SVD, SM and LED)	Adding rate schedule
24	127	Rider H, PTC Default Service Rider	Any PJM related charges including capacity, operating reserve, transmission related costs other than Non-Market Based Services Transmission Charges identified in Rider J, and ancillary services acquisition of default service supply	Add "associated with the".	Any PJM related charges including capacity, operating reserve, transmission-related costs other than Non-Market Based Services Transmission Charges identified in Rider J, and ancillary services associated with the acquisition of default service supply	Formatting/Grammar
25	130	Rider I, Hourly Pricing Default Service Rider	These charges are also applicable to Customers on Rate Schedules GS, and GM on a voluntary basis	Add GS-Large to this category.	These charges are also applicable to Customers on Rate Schedules GS, GM and GS-Large on a voluntary basis	Adding rate schedule
26	130	Rider I, Hourly Pricing Default Service Rider		Add GS-Large loss multiplier.	GS-Large 1.0515	Adding rate schedule
27	132	Rider I, Hourly Pricing Default Service Rider	$E_{HP} = [(DS_{HP(On)} + DS_{HP(Off)}) - PTC_{HP(On)} + DS_{HP(On)}/DS_{HP(Off)}]$	Add gross up for taxes to formula.	$E_{HP} = [(DS_{HP(On)} + DS_{HP(Off)}) + PTC_{HP(On)} + DS_{HP(On)}/DS_{HP(Off)}] \times (1 / (1 - T))$	Correcting formula
28	133	Rider I, Hourly Pricing Default Service Rider	Any PJM related charges other than Non-Market Based services transmission charges identified in the Rider J	Change "that" to "than".	Any PJM related charges other than Non-Market Based Services Transmission Charges identified in Rider J	Formatting/Grammar
29	143	Rider K, Time of Use Default Service Rider	(1) have had smart meters installed pursuant to the Penn Power Smart Meter Technology Procurement and Installation Plan following approval of that plan by the Commission;	Remove "following approval of that plan by the Commission".	(1) have had smart meters installed pursuant to the Penn Power Smart Meter Technology Procurement and Installation Plan;	Update for current legal status
30	143	Rider K, Time of Use Default Service Rider	On-Peak = PTC X 1.28 Off-Peak = PTC X 0.82	Incorrect factors.	On-Peak = PTC X 1.41 Off-Peak = PTC X 0.78	Correcting cut/paste error. Penn Power Tariff 35 Original Sheet 73.1

Penn Power Tariff Revisions						
Tariff No. 36						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
31	144	Rider K, Time of Use Default Service Rider	The rates for TOU default service are different for On-Peak Hours and Off-Peak Hours during the months of June, July and August, and billed on a service rendered basis. The TOU default service rate for all other months will not reflect an On-Peak or Off-Peak differential. On-Peak Hours are all hours beginning 8:00 AM (800 hours) prevailing and ending 8:00 PM (2000 hours) prevailing each day from Monday through Friday excluding Independence Day. Off-Peak Hours are all hours not identified as On-Peak Hours.	Change on-peak hours and off-peak hours to lower case and align hours with previous tariff.	The rates for TOU default service are different for on-peak hours and off-peak hours during the months of June, July and August, and billed on a service rendered basis. The TOU default service rate for all other months will not reflect an on-peak or off-peak differential. On-peak hours are all hours beginning 12:00 PM (1200 hours) Eastern Standard Time and ending 9 PM (2100 hours) Eastern Standard Time each day from Monday through Friday excluding Independence Day. Off-peak hours are all hours not identified as on-peak hours.	Correcting cut/paste error.
	145	Rider K, Time of Use Default Service Rider	In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default rates shall be the rates set forth in such Price to Compare Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the PTCDefault rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during On-Peak Hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during Off-Peak Hours.	Change on-peak hours and off-peak hours to lower case since the hours in the Rider differ from the On Peak Hour definition.	In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default rates shall be the rates set forth in such Price to Compare Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the PTCDefault rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during on-peak hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during off-peak hours.	
32	150, 151	Rider L Partial Service Rider	C.2.	Move C.2 to be B.7, the paragraph was inadvertently moved.	B.7.	Formatting/Grammar