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May 5, 2023

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: PA Public Utility Commission v. Philadelphia Gas Works 2023 PGW Base Rate Case Filing
– Docket No. R-2023-3037933, C-2023-3038846, C-2023-3038885, C-2023-3039059,
C-2023-3038727

Dear Secretary Chiavetta:

On behalf of Philadelphia Gas Works ("PGW") enclosed for electronic filing please find the Supplemental Direct Testimony of Constance Heppenstall (PGW St. No. 5-SD); Florian Teme (PGW St. No. 6-SD); and the Direct Testimony of Ryan E. Reeves ("PGW St. No. 8) in the above-referenced matter. These materials are being filed in accordance with the April 20, 2023 Order of the Public Utility Commission in Docket No. C-2021-3029259. In that Order, PGW was directed to file proposed rates, rules and regulations to govern gas service provided to Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. The Tariff for the proposed new Rate (Rate GS-XLT) is an Exhibit to PGW St. 6-SD (Exhibit FT-6). PGW will incorporate that Tariff page into its Gas Tariff in its compliance filing, after the PUC has made its determination on PGW's base rate case. In addition to the testimony and exhibits supporting proposed Rate GS-XLT, PGW has attached revised filing requirements to reflect modifications in those data that were necessary as a result of PGW's proposed new rate.

Copies of this filing will be served in accordance with the attached Certificate of Service. Please feel free to contact me if you have any questions.

Sincerely

A handwritten signature in blue ink that reads "Daniel Clearfield".

Daniel Clearfield
DC/lww
Enclosure

cc: Hon. Eranda Vero w/enc.
Hon. Arlene Ashton w/enc w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PGW's Supplemental Direct Testimony upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

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Philadelphia, PA 19132

Date: May 5, 2023



Daniel Clearfield, Esq.

Revised Exhibit A-III.A.17

PHILADELPHIA GAS WORKS
STATEMENT OF PROJECTED INCOME AT PRESENT AND PROPOSED RATES
TWELVE MONTHS ENDING AUGUST 31, 2024

	(1) Annualized Twelve Months Ended August 31, 2024	(2) Adjustments Under Annualized Rates	(3) Annualized Twelve Months Ended August 31, 2024	(4) Adjustments Under Proposed Rates	(5) Adjusted Twelve Months Ended August 31, 2024
<u>Operating Revenues</u>					
Gas Service Revenues	724,828,000	-	724,828,000	\$78,696,000	\$803,524,000
Transportation Revenues	75,685,000	-	75,685,000	3,703,000	79,388,000
Other Operating Revenue	31,857,000	-	31,857,000	1,320,000	33,177,000
Total Operating Revenue	832,370,000	-	832,370,000	83,719,000	916,089,000
<u>Operating & Maintenance Expenses</u>					
Natural Gas Costs	323,533,000	-	323,533,000	-	323,533,000
Other Expenses	326,773,000	-	326,773,000	-	326,773,000
Depreciation	72,141,000	-	72,141,000	-	72,141,000
Total Operating & Maintenance Expenses	722,447,000	-	722,447,000	-	722,447,000
<u>Revenue From Non-Operating Operations</u>					
Interest Gain / (Loss) and Other Income	7,211,000	-	7,211,000	-	7,211,000
Federal Grant Revenue (PHMSA)	10,752,000	-	10,752,000	-	10,752,000
<u>Interest Expense</u>					
Long Term Debt	62,738,000	-	62,738,000	-	62,738,000
Other Interest Expense	(1,776,000)	-	(1,776,000)	-	(1,776,000)
AFUDC	-	-	-	-	-
Loss From Extinguishment of Debt	3,348,000	-	3,348,000	-	3,348,000
Total Interest Expense	64,310,000	-	64,310,000	-	64,310,000
Net Earnings	\$63,576,000	\$0	\$63,576,000	\$83,719,000	\$147,295,000

Revised PGW – III.E.6 Supply

III. BALANCE SHEET AND OPERATING STATEMENT

III.E.6 Supply, by classification, Operating Revenues—Miscellaneous for test year.

RESPONSE:

Please see below:

PHILADELPHIA GAS WORKS
OPERATING REVENUE AND OTHER INCOME
TWELVE MONTHS ENDED AUGUST 31, 2022

OPERATING REVENUES

SALES OF GAS

480.0	Residential Sale	\$ 553,112,493
481.0	Commercial & Industrial Sales	115,550,586
482.0	Public Authority Sales	16,757,525
483.0	Sales for Resale	2,013
489.3	Gas Transportation Service Sales	70,055,822
495.0	Other Gas Revenues	<u>43,811,808</u>
	Total Gas Revenues	\$ 799,290,247

OTHER OPERATING REVENUE

487.0	Forfeited Discounts	14,282,408
488.0	Miscellaneous Service Revenue	<u>10,495,307</u>
	Total Other Revenue	\$ 24,777,715

PLUS APPLIANCE & OTHER REVENUE

403.0	Appliance Repair & Other Revenues	6,656,324
879.0	Customer Installation Expense	-
903.0	Customer Records & Collection Expense	<u>-</u>
	Total OPEX Credits	\$ 6,656,324
904.0	Appropriation for Uncollectible Reserve	\$ (25,287,000)

	TOTAL OPERATING REVENUE	<u><u>\$ 805,437,286</u></u>
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PHILADELPHIA GAS WORKS
OPERATING REVENUE AND OTHER INCOME
TWELVE MONTHS ENDED AUGUST 31, 2023

OPERATING REVENUES

SALES OF GAS

480.0	Residential Sale	\$ 662,042,000
481.0	Commercial & Industrial Sales	135,953,000
482.0	Public Authority Sales	26,718,000
483.0	Sales for Resale	24,000
489.3	Gas Transportation Service Sales	76,183,000
495.0	Other Gas Revenues	<u>(8,960,000)</u>
	Total Gas Revenues	\$ 891,960,000

OTHER OPERATING REVENUE

487.0	Forfeited Discounts	13,848,000
488.0	Miscellaneous Service Revenue	<u>11,183,000</u>
	Total Other Revenue	\$ 25,031,000

PLUS APPLIANCE & OTHER REVENUE

403.0	Appliance Repair & Other Revenues	6,641,000
879.0	Customer Installation Expense	-
903.0	Customer Records & Collection Expense	<u>-</u>
	Total OPEX Credits	\$ 6,641,000
904.0	Appropriation for Uncollectible Reserve	\$ (36,037,000)

		<u><u>\$ 887,595,000</u></u>
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PHILADELPHIA GAS WORKS
OPERATING REVENUE AND OTHER INCOME
TWELVE MONTHS ENDED AUGUST 31, 2024

OPERATING REVENUES

SALES OF GAS

480.0	Residential Sale	\$ 695,252,000
481.0	Commercial & Industrial Sales	122,281,000
482.0	Public Authority Sales	23,985,000
483.0	Sales for Resale	21,000
489.3	Gas Transportation Service Sales	78,292,000
495.0	Other Gas Revenues	<u>-</u>
	Total Gas Revenues	\$ 919,831,000

OTHER OPERATING REVENUE

487.0	Forfeited Discounts	14,187,000
488.0	Miscellaneous Service Revenue	<u>11,183,000</u>
	Total Other Revenue	\$ 25,370,000

PLUS APPLIANCE & OTHER REVENUE

403.0	Appliance Repair & Other Revenues	7,807,000
879.0	Customer Installation Expense	-
903.0	Customer Records & Collection Expense	<u>-</u>
	Total OPEX Credits	\$ 7,807,000
904.0	Appropriation for Uncollectible Reserve	\$ (36,919,000)

		<u><u>\$ 916,089,000</u></u>
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Revised 53.52(b)(4)

**Philadelphia Gas Works
FY 24
Base Rate Revenue at Current Rates**

	FY 2023-2024			Current PUC Approved Tariff Rates				Amounts in \$000s				Total Full Base Rate Revenue
	No. of Customers	No. of Annual Bills	Annual Deliveries (mcf)	Monthly Cust. Charge	Delivery Charge	Merchant Function Charge (MCF)	Gas Procurement Charge (GPC)	Cust. Charge Revenue	Delivery Charge Revenue	Merchant Function Charge (MCF) Revenue	Gas Procurement Charge (GPC) Revenue	
1 Non-Heating:												
2 Residential	12,860	154,325	327,215	\$14.90	\$7.2955	\$0.2732	\$0.0400	2,299	2,387	89	13	4,789
3 Residential-Senior	248	2,976	6,004	\$14.90	\$7.2955	\$0.2732	\$0.0400	44	44	2	0	90
4 Commercial	3,209	38,503	909,717	\$25.35	\$5.1908	\$0.0687	\$0.0400	976	4,722	62	36	5,797
5 Industrial	90	1,085	92,252	\$75.90	\$5.1668	\$0.0317	\$0.0400	82	477	3	4	566
6 Municipal/MS	240	2,880	211,257	\$25.35	\$4.7765	\$ -	\$0.0400	73	1,009	0	8	1,091
7 NGV	2	24	1,785	\$35.00	\$1.2833	\$ -	\$0.0400	1	2	0	0	3
8 <i>Total Non-Heat Firm</i>	16,649	199,793	1,548,231					3,476	8,641	156	62	12,336
9												
10 Heating:												
11 Residential	442,832	5,313,988	31,688,029	\$14.90	\$7.2955	\$0.2732	\$0.0400	79,178	231,180	8,657	1,268	320,283
12 Residential-Senior	5,642	67,698	465,766	\$14.90	\$7.2955	\$0.2732	\$0.0400	1,009	3,398	127	19	4,553
13 Commercial	18,366	220,389	5,842,292	\$25.35	\$5.1908	\$0.0687	\$0.0400	5,587	30,326	401	234	36,548
14 Industrial	359	4,307	349,376	\$75.90	\$5.1668	\$0.0317	\$0.0400	327	1,805	11	14	2,157
15 Municipal/MS	606	7,272	705,218	\$25.35	\$4.7765		\$0.0400	184	3,368	0	28	3,581
16 PHA Rate 8	1,035	12,420	418,601	\$25.35	\$5.4534		\$0.0400	315	2,283	0	17	2,614
17 PHA/GS	1,947	23,364	166,172	\$14.90	\$6.5393	\$0.2732	\$0.0400	348	1,087	45	7	1,487
18 PHA/GS- Senior	13	156	1,188	\$14.90	\$6.5393	\$0.2732	\$0.0400	2	8	0	0	10
19 <i>Total Heat Firm</i>	470,800	5,649,594	39,636,642					86,951	273,455	9,243	1,585	371,234
20 Total Heat & Non-Heat Firm	487,449	5,849,387	41,184,873					90,427	282,096	9,399	1,647	383,569
21												
22 Firm Transport												
23 Non-Heating:												
24 Residential	1,090	13,075	34,440	\$14.90	\$7.2955	\$ -	\$ -	195	251	0	0	446
25 Commercial	553	6,631	442,942	\$25.35	\$5.1908	\$ -	\$ -	168	2,299	0	0	2,467
26 Industrial	37	440	158,092	\$75.90	\$5.1668	\$ -	\$ -	33	817	0	0	850
27 Municipal/MS	2	24	772	\$25.35	\$4.7765	\$ -	\$ -	1	4	0	0	4
28 NGV	1	12	18,337	\$35.00	\$1.2833	\$ -	\$ -	0	24	0	0	24
29 <i>Total Non Heat FT</i>	1,682	20,182	654,583					397,338	3,394,531	0	0	3,792
30												
31 Heating:												
32 Residential	25,534	306,408	2,302,690	\$14.90	\$7.2955	\$ -	\$ -	4,565	16,799	0	0	21,365
33 Commercial	2,552	30,628	3,122,912	\$25.35	\$5.1908	\$ -	\$ -	776	16,210	0	0	16,987
34 Industrial	86	1,028	245,570	\$75.90	\$5.1668	\$ -	\$ -	78	1,269	0	0	1,347
35 Municipal/MS	15	180	40,276	\$25.35	\$4.7765	\$ -	\$ -	5	192	0	0	197
36 PHA/GS	185	2,220	18,045	\$14.90	\$6.5393	\$ -	\$ -	33	118	0	0	151
37 <i>Total Heat FT</i>	28,372	340,464	5,729,492					5,458	34,589	0	0	40,046
38 <i>Total FT</i>	30,054	360,646	6,384,075					5,855	37,983	0	0	43,838
39												
40 Total Interruptible Sales	2	24	395,979					9				306
41 Total PGW (Sales & FT)	517,505	6,210,057	47,964,926					96,290	320,080	9,399	1,647	427,713
42 GTS/IT Revenue												13,902
43 BUS	36	432	2,370					161	12	0	0	173
44 TED	3	36	21,966					9	51	2	1	63
45 NGS	1	12	21,973					5	60	2	1	68
46 WNA Revenue												
47 LNG Sales Margin			20,000									76
48 Total Full Tariff Revenue								96,465	320,204	9,402	1,649	441,995

**Philadelphia Gas Works
FY 24
Base Rate Revenue at Proposed Rates**

	FY 2023-2024			Proposed Rates				Amounts in \$000s				Total Full Base Rate Revenue
	No. of Customers	No. of Annual Bills	Annual Deliveries (mcf)	Monthly Cust. Charge	Delivery Charge	Merchant Function Charge (MCF)	Gas Procurement Charge (GPC)	Cust. Charge Revenue	Delivery Charge Revenue	Merchant Function Charge (MCF) Revenue	Gas Procurement Charge (GPC) Revenue	
1 Non-Heating:												
2 Residential	12,860	154,325	327,215	\$19.50	\$8.2611	\$0.3982	\$0.0400	3,009	2,703	130	13	5,856
3 Residential-Senior	248	2,976	6,004	\$19.50	\$8.2611	\$0.3982	\$0.0400	58	50	2	0	110
4 Commercial	3,209	38,503	909,717	\$34.00	\$5.9169	\$0.1062	\$0.0400	1,309	5,383	97	36	6,825
5 Industrial	90	1,085	92,252	\$100.00	\$6.0521	\$0.0275	\$0.0400	109	558	3	4	673
6 Municipal/MS	240	2,880	211,257	\$34.00	\$6.0976		\$0.0400	98	1,288	0	8	1,395
7 NGV	2	24	1,785	\$46.50	\$1.6510	\$ -	\$0.0400	1	3	0	0	4
8 <i>Total Non-Heat Firm</i>	16,649	199,793	1,548,231					4,584	9,985	232	62	14,863
9												
10 Heating:												
11 Residential	442832	5,313,988	31,688,029	\$19.50	\$8.2611	\$0.3982	\$0.0400	103,623	261,778	12,618	1,268	379,286
12 Residential-Senior	5642	67,698	465,766	\$19.50	\$8.2611	\$0.3982	\$0.0400	1,320	3,848	185	19	5,372
13 Commercial	18366	220,389	5,842,292	\$34.00	\$5.9169	\$0.1062	\$0.0400	7,493	34,568	621	234	42,916
14 Industrial	359	4,307	349,376	\$100.00	\$6.0521	\$0.0275	\$0.0400	431	2,114	10	14	2,569
15 Municipal/MS	606	7,272	705,218	\$34.00	\$6.0976	\$ -	\$0.0400	247	4,300	0	28	4,576
16 PHA Rate 8	1035	12,420	418,601	\$34.00	\$6.0047		\$0.0400	422	2,514	0	17	2,953
17 PHA/GS	1947	23,364	166,172	\$19.50	\$7.7984	\$0.3982	\$0.0400	456	1,296	66	7	1,824
18 PHA/GS- Senior	13	156	1,188	\$19.50	\$7.7984	\$0.3982	\$0.0400	3	9	0	0	13
19 <i>Total Heat Firm</i>	470,800	5,649,594	39,636,642					113,995	310,427	13,500	1,585	439,508
20 Total Heat & Non-Heat Firm	487,449	5,849,387	41,184,873					118,579	320,412	13,732	1,647	454,371
21												
22 Firm Transport												
23 Non-Heating:												
24 Residential	1,090	13,075	34,440	\$19.50	\$8.2611	\$ -	\$ -	255	285	0	0	539
25 Commercial	553	6,631	442,942	\$34.00	\$5.9169	\$ -	\$ -	225	2,621	0	0	2,846
26 Industrial	37	440	158,092	\$100.00	\$6.0521	\$ -	\$ -	44	957	0	0	1,001
27 Municipal/MS	2	24	772	\$34.00	\$6.0976	\$ -	\$ -	1	5	0	0	6
28 NGV	1	12	18,337	\$46.50	\$1.6510	\$ -	\$ -	1	30	0	0	31
29 <i>Total Non Heat FT</i>	1,682	20,182	654,583					525,791	3,897,128	0	0	4,423
30												
31 Heating:												
32 Residential	25,534	306,408	2,302,690	\$19.50	\$8.2611	\$ -	\$ -	5,975	19,023	0	0	24,998
33 Commercial	2,552	30,628	3,122,912	\$34.00	\$5.9169	\$ -	\$ -	1,041	18,478	0	0	19,519
34 Industrial	86	1,028	245,570	\$100.00	\$6.0521	\$ -	\$ -	103	1,486	0	0	1,589
35 Municipal/MS	15	180	40,276	\$34.00	\$6.0976	\$ -	\$ -	6	246	0	0	252
36 PHA/GS	185	2,220	18,045	\$19.50	\$7.7984	\$ -	\$ -	43	141	0	0	184
37 <i>Total Heat FT</i>	28,372	340,464	5,729,492					7,169	39,373	0	0	46,542
38 <i>Total FT</i>	30,054	360,646	6,384,075					7,694	43,270	0	0	50,965
39												
40 Total Interruptible Sales	2	24	395,979					9				306
41 Total PGW (Sales & FT)	517,505	6,210,057	47,964,926					126,282	363,683	13,732	1,647	505,641
42 GTS/IT Revenue												21,795
43 BUS	36	432	2,370					161	12	0	0	173
44 TED	3	36	21,966					9	51	2	1	63
45 NGS	1	12	21,973					5	60	2	1	68
46 WNA Revenue												76
47 LNG Sales Margin			20,000									
48 Total Full Tariff Revenue								126,457	363,807	13,735	1,649	527,816

Proposed Increase

85,820

Revised Exh. A III.E.20

**FY 2024 Base Rate Case
Typical Monthly Bill**

February 1, 2023

September 1, 2023

Residential Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	71	Mcf	\$ 8.2282
Gas Cost Adjustment	71	Mcf	\$ 0.1265
Distribution Charge	71	Mcf	\$ 9.4223
Customer Charge	12	Months	\$ 14.90
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 1,504.55
Effect on Average Monthly Bill			\$ 125.38

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.3359		\$ 0.1077
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 10.3879		\$ 0.9656
Customer Charge	\$ 19.50		\$ 4.60
DSIC	<u>7.50%</u>		0.00%
	\$ 1,645.24	\$ 140.69	9.4%
	\$ 137.10	\$ 11.72	

Commercial Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	333	Mcf	\$ 8.0107
Gas Cost Adjustment	333	Mcf	\$ 0.1265
Distribution Charge	333	Mcf	\$ 7.3461
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 5,666.42
Effect on Average Monthly Bill			\$ 472.20

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.0439		\$ 0.0332
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.0722		\$ 0.7261
Customer Charge	\$ 34.00		\$ 8.65
DSIC	<u>7.50%</u>		0.00%
	\$ 6,048.99	\$ 382.57	6.8%
	\$ 504.08	\$ 31.88	

Industrial Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	957	Mcf	\$ 7.9714
Gas Cost Adjustment	957	Mcf	\$ 0.1265
Distribution Charge	957	Mcf	\$ 7.2755
Customer Charge	12	Months	\$ 75.90
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 16,213.65
Effect on Average Monthly Bill			\$ 1,351.14

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9652		\$ (0.0062)
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.1608		\$ 0.8853
Customer Charge	\$ 100.00		\$ 24.10
DSIC	<u>7.50%</u>		0.00%
	\$ 17,429.38	\$ 1,215.73	7.5%
	\$ 1,452.45	\$ 101.31	

PHA Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	396	Mcf	\$ 7.9377
Gas Cost Adjustment	396	Mcf	\$ 0.1265
Distribution Charge	396	Mcf	\$ 7.6087
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 6,759.46
Effect on Average Monthly Bill			\$ 563.29

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9377		\$ -
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.1600		\$ 0.5513
Customer Charge	\$ 34.00		\$ 8.65
DSIC	<u>7.50%</u>		0.00%
	\$ 7,105.74	\$ 346.27	5.1%
	\$ 592.14	\$ 28.86	

PHA/GS Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	85	Mcf	\$ 8.2282
Gas Cost Adjustment	85	Mcf	\$ 0.1265
Distribution Charge	85	Mcf	\$ 8.6661
Customer Charge	12	Months	\$ 14.9000
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 1,694.22
Effect on Average Monthly Bill			\$ 141.19

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.3359		\$ 0.1077
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 9.9252		\$ 1.2591
Customer Charge	\$ 19.50		\$ 4.60
DSIC	<u>7.50%</u>		0.00%
	\$ 1,877.77	\$ 183.54	10.8%
	\$ 156.48	\$ 15.30	

Municipal Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	1,121	Mcf	\$ 7.9377
Gas Cost Adjustment	1,121	Mcf	\$ 0.1265
Distribution Charge	1,121	Mcf	\$ 6.8908
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	<u>7.50%</u>
Annual Bill/Effect on Annual Bill			\$ 17,670.91
Effect on Average Monthly Bill			\$ 1,472.58

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9377		\$ -
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.2119		\$ 1.3211
Customer Charge	\$ 34.00		\$ 8.65
DSIC	<u>7.50%</u>		0.00%
	\$ 19,374.52	\$ 1,703.61	9.6%
	\$ 1,614.54	\$ 141.97	

Proposed IT Revenue Increase

	Total	ITA	ITB	ITC	ITD	ITE	IT2	ITN	Total IT
Current IT Revenue	\$ 12,695,228	\$ 1,119,420	\$ 1,138,695	\$ 2,003,019	\$ 2,717,414	\$ 5,716,681	\$ 75,087.04	2,700.00	\$ 12,773,015
Customer Charge Revenue	\$ 1,187,223	\$ 177,114	\$ 279,368	\$ 374,682	\$ 233,354	\$ 122,705	\$ 900	\$ 2,700	\$ 1,190,823
Volumetric charge Revenue	\$ 11,508,005	\$ 942,306	\$ 859,327	\$ 1,628,337	\$ 2,484,059	\$ 5,593,975	\$ 74,187	\$ -	\$ 11,582,192
Proposed Increase	\$ 3,742,948								
Totl volumetric revenue	\$ 15,250,953								
	33%	33%	33%	33%	33%	33%			
Current Delivery Charge	\$ 2.73	\$ 1.32	\$ 1.03	\$ 0.91	\$ 0.89				
Increase/Mcf	\$ 0.89	\$ 0.43	\$ 0.34	\$ 0.30	\$ 0.29				
New Delilvery Charge /Mcf	\$ 3.6178	\$ 1.7510	\$ 1.3663	\$ 1.2123	\$ 1.1739				
New Delilvery Charge /Dth @1036	\$ 3.4988	\$ 1.6935	\$ 1.3214	\$ 1.1725	\$ 1.1353				
Deliveries/mcf	11,605,501	345,180	650,365	1,579,377	2,715,412	6,315,167			
Proposed Volumetric Revenue	\$ 15,250,953	\$ 1,248,788	\$ 1,138,821	\$ 2,157,950	\$ 3,291,993	\$ 7,413,401	\$ 74,187	\$ -	\$ 15,325,140
Customer Charge Revenue	\$ 1,187,223	\$ 177,114	\$ 279,368	\$ 374,682	\$ 233,354	\$ 122,705	\$ 900	\$ 2,700	\$ 1,190,823
Totoal Revenue	\$ 16,438,176	\$ 1,425,902	\$ 1,418,189	\$ 2,532,631	\$ 3,525,347	\$ 7,536,106	\$ 75,087	\$ 2,700	\$ 16,515,963
Revenue Increase	3,742,948	\$ 306,482	\$ 279,494	\$ 529,612	\$ 807,934	\$ 1,819,426			\$ 3,742,948

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Residential Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			71
Delivery Charge	\$7.2955	\$8.2611	
GCR Factor			
	\$7.2955	\$8.2611	
Customer Charge	\$14.90	\$19.50	

Commercial Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			333
Delivery Charge	\$5.1908	\$5.9169	
GCR Factor			
TOTAL	\$5.19	\$5.9169	
Customer Charge	\$25.35	\$34.00	

Industrial Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000		957
Delivery Charge	\$5.1668	\$6.0521	
GCR Factor	\$0.0000		
	\$5.1668	\$6.0521	
Customer Charge	\$75.9000	\$100.00	

PHA Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			396
Delivery Charge	\$5.4534	\$6.0047	
GCR Factor			
	\$5.4534	\$6.0047	
Customer Charge	\$25.3500	\$34.00	

PHA/GS Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			85
Delivery Charge	\$6.5393	\$7.7984	
GCR Factor			
	\$6.5393	\$7.7984	
Customer Charge	\$14.9000	\$19.50	

Municipal Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			1121
Delivery Charge	\$4.7765	\$6.0976	
GCR Factor			
	\$4.7765	\$6.0976	

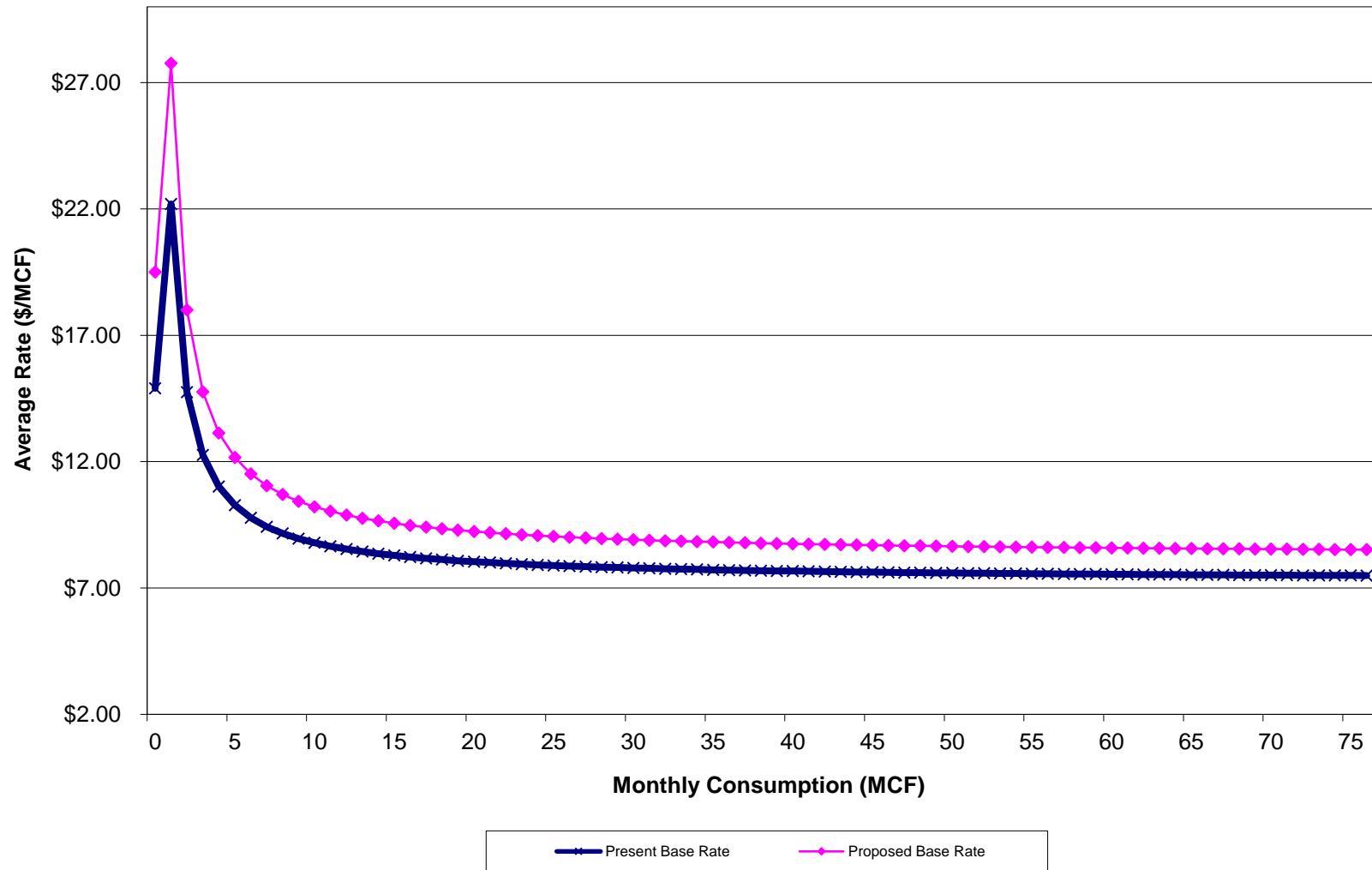
Customer Charge	\$25.3500	\$34.00
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NGV

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges			2600
Delivery Charge	\$1.2833	\$1.6510	
GCR Factor	\$1.2833	\$1.6510	
Customer Charge	\$35.0000	\$46.50	

PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES

RESIDENTIAL UNIT COST



Residential Heating

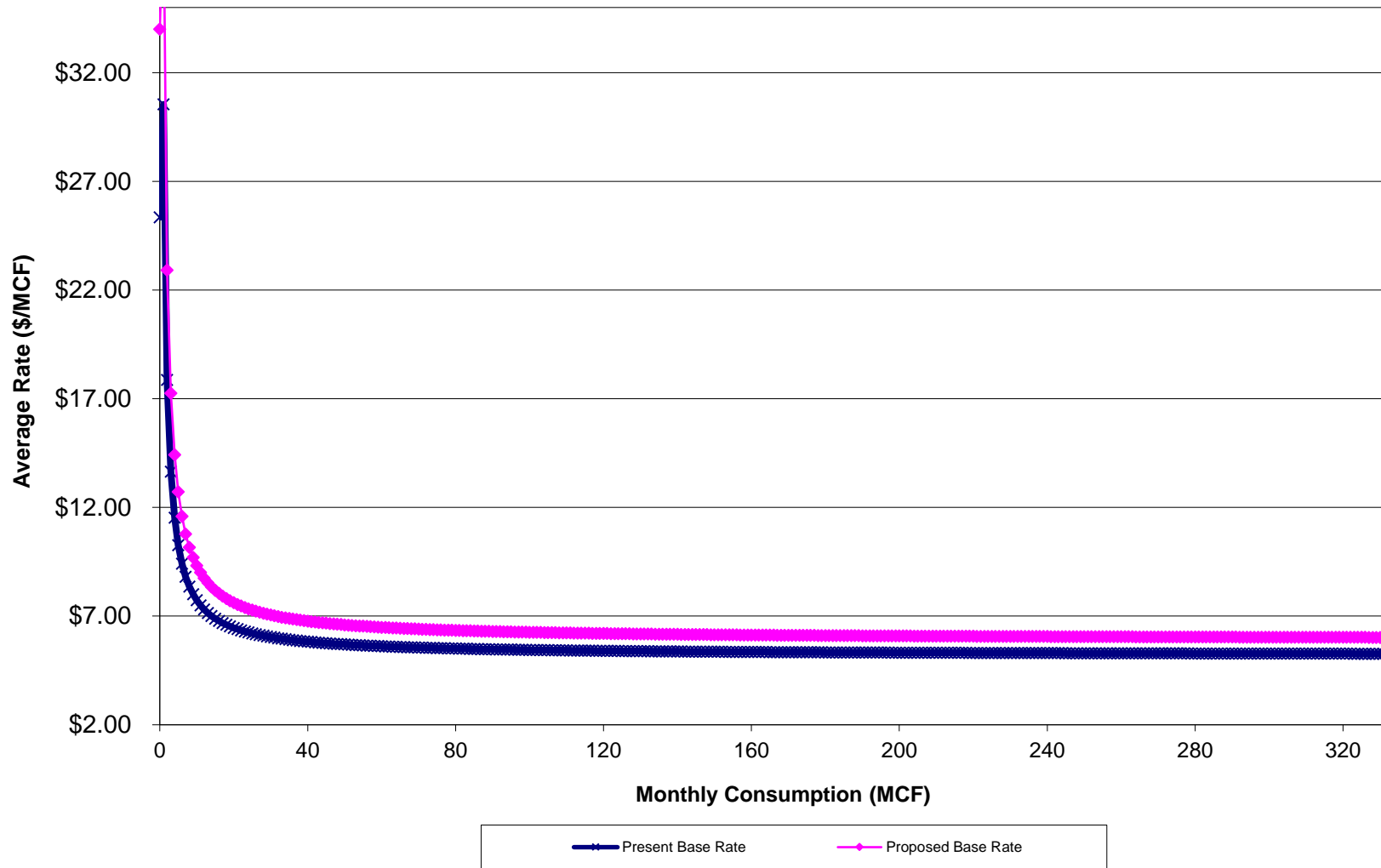
<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	71
Delivery Charge	\$7.2955	\$8.2611	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$7.2955	\$8.2611	
Customer Charge	\$14.90	\$19.50	

Units	Present Base Rate	Proposed Base Rate
0	\$ 14.90	\$ 19.50
1	\$ 22.20	\$ 27.76
2	\$ 14.75	\$ 18.01
3	\$ 12.26	\$ 14.76
4	\$ 11.02	\$ 13.14
5	\$ 10.28	\$ 12.16
6	\$ 9.78	\$ 11.51
7	\$ 9.42	\$ 11.05
8	\$ 9.16	\$ 10.70
9	\$ 8.95	\$ 10.43
10	\$ 8.79	\$ 10.21
11	\$ 8.65	\$ 10.03
12	\$ 8.54	\$ 9.89
13	\$ 8.44	\$ 9.76
14	\$ 8.36	\$ 9.65
15	\$ 8.29	\$ 9.56
16	\$ 8.23	\$ 9.48
17	\$ 8.17	\$ 9.41
18	\$ 8.12	\$ 9.34
19	\$ 8.08	\$ 9.29
20	\$ 8.04	\$ 9.24
21	\$ 8.01	\$ 9.19
22	\$ 7.97	\$ 9.15
23	\$ 7.94	\$ 9.11
24	\$ 7.92	\$ 9.07
25	\$ 7.89	\$ 9.04
26	\$ 7.87	\$ 9.01
27	\$ 7.85	\$ 8.98
28	\$ 7.83	\$ 8.96
29	\$ 7.81	\$ 8.93
30	\$ 7.79	\$ 8.91
31	\$ 7.78	\$ 8.89
32	\$ 7.76	\$ 8.87
33	\$ 7.75	\$ 8.85
34	\$ 7.73	\$ 8.83
35	\$ 7.72	\$ 8.82
36	\$ 7.71	\$ 8.80
37	\$ 7.70	\$ 8.79
38	\$ 7.69	\$ 8.77
39	\$ 7.68	\$ 8.76

Units	Present Base Rate	Proposed Base Rate
40	\$ 7.67	\$ 8.75
41	\$ 7.66	\$ 8.74
42	\$ 7.65	\$ 8.73
43	\$ 7.64	\$ 8.71
44	\$ 7.63	\$ 8.70
45	\$ 7.63	\$ 8.69
46	\$ 7.62	\$ 8.69
47	\$ 7.61	\$ 8.68
48	\$ 7.61	\$ 8.67
49	\$ 7.60	\$ 8.66
50	\$ 7.59	\$ 8.65
51	\$ 7.59	\$ 8.64
52	\$ 7.58	\$ 8.64
53	\$ 7.58	\$ 8.63
54	\$ 7.57	\$ 8.62
55	\$ 7.57	\$ 8.62
56	\$ 7.56	\$ 8.61
57	\$ 7.56	\$ 8.60
58	\$ 7.55	\$ 8.60
59	\$ 7.55	\$ 8.59
60	\$ 7.54	\$ 8.59
61	\$ 7.54	\$ 8.58
62	\$ 7.54	\$ 8.58
63	\$ 7.53	\$ 8.57
64	\$ 7.53	\$ 8.57
65	\$ 7.52	\$ 8.56
66	\$ 7.52	\$ 8.56
67	\$ 7.52	\$ 8.55
68	\$ 7.51	\$ 8.55
69	\$ 7.51	\$ 8.54
70	\$ 7.51	\$ 8.54
71	\$ 7.51	\$ 8.54
72	\$ 7.50	\$ 8.53
73	\$ 7.50	\$ 8.53
74	\$ 7.50	\$ 8.52
75	\$ 7.49	\$ 8.52
76	\$ 7.49	\$ 8.52
77	\$ 7.49	\$ 8.51
78	\$ 7.49	\$ 8.51
79	\$ 7.48	\$ 8.51
80	\$ 7.48	\$ 8.50
81	\$ 7.48	\$ 8.50
82	\$ 7.48	\$ 8.50
83	\$ 7.48	\$ 8.50
84	\$ 7.47	\$ 8.49
85	\$ 7.47	\$ 8.49
86	\$ 7.47	\$ 8.49
87	\$ 7.47	\$ 8.49
88	\$ 7.46	\$ 8.48
89	\$ 7.46	\$ 8.48
90	\$ 7.46	\$ 8.48

PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES

COMMERCIAL UNIT COST



Commercial Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	333
Delivery Charge	\$5.1908	\$5.9169	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$5.1908	\$5.9169	
Customer Charge	\$25.35	\$34.00	

Units	Present Base Rate	Proposed Base Rate
0	\$ 25.35	\$ 34.00
1	\$ 30.54	\$ 39.92
2	\$ 17.87	\$ 22.92
3	\$ 13.64	\$ 17.25
4	\$ 11.53	\$ 14.42
5	\$ 10.26	\$ 12.72
6	\$ 9.42	\$ 11.58
7	\$ 8.81	\$ 10.77
8	\$ 8.36	\$ 10.17
9	\$ 8.01	\$ 9.69
10	\$ 7.73	\$ 9.32
11	\$ 7.50	\$ 9.01
12	\$ 7.30	\$ 8.75
13	\$ 7.14	\$ 8.53
14	\$ 7.00	\$ 8.35
15	\$ 6.88	\$ 8.18
16	\$ 6.78	\$ 8.04
17	\$ 6.68	\$ 7.92
18	\$ 6.60	\$ 7.81
19	\$ 6.53	\$ 7.71
20	\$ 6.46	\$ 7.62
21	\$ 6.40	\$ 7.54
22	\$ 6.34	\$ 7.46
23	\$ 6.29	\$ 7.40
24	\$ 6.25	\$ 7.33
25	\$ 6.20	\$ 7.28
26	\$ 6.17	\$ 7.22
27	\$ 6.13	\$ 7.18
28	\$ 6.10	\$ 7.13
29	\$ 6.06	\$ 7.09
30	\$ 6.04	\$ 7.05
31	\$ 6.01	\$ 7.01
32	\$ 5.98	\$ 6.98
33	\$ 5.96	\$ 6.95
34	\$ 5.94	\$ 6.92
35	\$ 5.92	\$ 6.89
36	\$ 5.89	\$ 6.86
37	\$ 5.88	\$ 6.84
38	\$ 5.86	\$ 6.81
39	\$ 5.84	\$ 6.79
40	\$ 5.82	\$ 6.77
41	\$ 5.81	\$ 6.75

Units	Present Base Rate	Proposed Base Rate
42	\$ 5.79	\$ 6.73
43	\$ 5.78	\$ 6.71
44	\$ 5.77	\$ 6.69
45	\$ 5.75	\$ 6.67
46	\$ 5.74	\$ 6.66
47	\$ 5.73	\$ 6.64
48	\$ 5.72	\$ 6.63
49	\$ 5.71	\$ 6.61
50	\$ 5.70	\$ 6.60
51	\$ 5.69	\$ 6.58
52	\$ 5.68	\$ 6.57
53	\$ 5.67	\$ 6.56
54	\$ 5.66	\$ 6.55
55	\$ 5.65	\$ 6.54
56	\$ 5.64	\$ 6.52
57	\$ 5.64	\$ 6.51
58	\$ 5.63	\$ 6.50
59	\$ 5.62	\$ 6.49
60	\$ 5.61	\$ 6.48
61	\$ 5.61	\$ 6.47
62	\$ 5.60	\$ 6.47
63	\$ 5.59	\$ 6.46
64	\$ 5.59	\$ 6.45
65	\$ 5.58	\$ 6.44
66	\$ 5.57	\$ 6.43
67	\$ 5.57	\$ 6.42
68	\$ 5.56	\$ 6.42
69	\$ 5.56	\$ 6.41
70	\$ 5.55	\$ 6.40
71	\$ 5.55	\$ 6.40
72	\$ 5.54	\$ 6.39
73	\$ 5.54	\$ 6.38
74	\$ 5.53	\$ 6.38
75	\$ 5.53	\$ 6.37
76	\$ 5.52	\$ 6.36
77	\$ 5.52	\$ 6.36
78	\$ 5.52	\$ 6.35
79	\$ 5.51	\$ 6.35
80	\$ 5.51	\$ 6.34
81	\$ 5.50	\$ 6.34
82	\$ 5.50	\$ 6.33
83	\$ 5.50	\$ 6.33
84	\$ 5.49	\$ 6.32
85	\$ 5.49	\$ 6.32
86	\$ 5.49	\$ 6.31
87	\$ 5.48	\$ 6.31
88	\$ 5.48	\$ 6.30
89	\$ 5.48	\$ 6.30
90	\$ 5.47	\$ 6.29
91	\$ 5.47	\$ 6.29
92	\$ 5.47	\$ 6.29
93	\$ 5.46	\$ 6.28
94	\$ 5.46	\$ 6.28
95	\$ 5.46	\$ 6.27

Units	Present Base Rate	Proposed Base Rate
96	\$ 5.45	\$ 6.27
97	\$ 5.45	\$ 6.27
98	\$ 5.45	\$ 6.26
99	\$ 5.45	\$ 6.26
100	\$ 5.44	\$ 6.26
101	\$ 5.44	\$ 6.25
102	\$ 5.44	\$ 6.25
103	\$ 5.44	\$ 6.25
104	\$ 5.43	\$ 6.24
105	\$ 5.43	\$ 6.24
106	\$ 5.43	\$ 6.24
107	\$ 5.43	\$ 6.23
108	\$ 5.43	\$ 6.23
109	\$ 5.42	\$ 6.23
110	\$ 5.42	\$ 6.23
111	\$ 5.42	\$ 6.22
112	\$ 5.42	\$ 6.22
113	\$ 5.42	\$ 6.22
114	\$ 5.41	\$ 6.22
115	\$ 5.41	\$ 6.21
116	\$ 5.41	\$ 6.21
117	\$ 5.41	\$ 6.21
118	\$ 5.41	\$ 6.21
119	\$ 5.40	\$ 6.20
120	\$ 5.40	\$ 6.20
121	\$ 5.40	\$ 6.20
122	\$ 5.40	\$ 6.20
123	\$ 5.40	\$ 6.19
124	\$ 5.40	\$ 6.19
125	\$ 5.39	\$ 6.19
126	\$ 5.39	\$ 6.19
127	\$ 5.39	\$ 6.18
128	\$ 5.39	\$ 6.18
129	\$ 5.39	\$ 6.18
130	\$ 5.39	\$ 6.18
131	\$ 5.38	\$ 6.18
132	\$ 5.38	\$ 6.17
133	\$ 5.38	\$ 6.17
134	\$ 5.38	\$ 6.17
135	\$ 5.38	\$ 6.17
136	\$ 5.38	\$ 6.17
137	\$ 5.38	\$ 6.17
138	\$ 5.37	\$ 6.16
139	\$ 5.37	\$ 6.16
140	\$ 5.37	\$ 6.16
141	\$ 5.37	\$ 6.16
142	\$ 5.37	\$ 6.16
143	\$ 5.37	\$ 6.15
144	\$ 5.37	\$ 6.15
145	\$ 5.37	\$ 6.15
146	\$ 5.36	\$ 6.15
147	\$ 5.36	\$ 6.15
148	\$ 5.36	\$ 6.15
149	\$ 5.36	\$ 6.15

Units	Present Base Rate	Proposed Base Rate
150	\$ 5.36	\$ 6.14
151	\$ 5.36	\$ 6.14
152	\$ 5.36	\$ 6.14
153	\$ 5.36	\$ 6.14
154	\$ 5.36	\$ 6.14
155	\$ 5.35	\$ 6.14
156	\$ 5.35	\$ 6.13
157	\$ 5.35	\$ 6.13
158	\$ 5.35	\$ 6.13
159	\$ 5.35	\$ 6.13
160	\$ 5.35	\$ 6.13
161	\$ 5.35	\$ 6.13
162	\$ 5.35	\$ 6.13
163	\$ 5.35	\$ 6.13
164	\$ 5.35	\$ 6.12
165	\$ 5.34	\$ 6.12
166	\$ 5.34	\$ 6.12
167	\$ 5.34	\$ 6.12
168	\$ 5.34	\$ 6.12
169	\$ 5.34	\$ 6.12
170	\$ 5.34	\$ 6.12
171	\$ 5.34	\$ 6.12
172	\$ 5.34	\$ 6.11
173	\$ 5.34	\$ 6.11
174	\$ 5.34	\$ 6.11
175	\$ 5.34	\$ 6.11
176	\$ 5.33	\$ 6.11
177	\$ 5.33	\$ 6.11
178	\$ 5.33	\$ 6.11
179	\$ 5.33	\$ 6.11
180	\$ 5.33	\$ 6.11
181	\$ 5.33	\$ 6.10
182	\$ 5.33	\$ 6.10
183	\$ 5.33	\$ 6.10
184	\$ 5.33	\$ 6.10
185	\$ 5.33	\$ 6.10
186	\$ 5.33	\$ 6.10
187	\$ 5.33	\$ 6.10
188	\$ 5.33	\$ 6.10
189	\$ 5.32	\$ 6.10
190	\$ 5.32	\$ 6.10
191	\$ 5.32	\$ 6.09
192	\$ 5.32	\$ 6.09
193	\$ 5.32	\$ 6.09
194	\$ 5.32	\$ 6.09
195	\$ 5.32	\$ 6.09
196	\$ 5.32	\$ 6.09
197	\$ 5.32	\$ 6.09
198	\$ 5.32	\$ 6.09
199	\$ 5.32	\$ 6.09
200	\$ 5.32	\$ 6.09
201	\$ 5.32	\$ 6.09
202	\$ 5.32	\$ 6.09
203	\$ 5.32	\$ 6.08

Units	Present Base Rate	Proposed Base Rate
204	\$ 5.32	\$ 6.08
205	\$ 5.31	\$ 6.08
206	\$ 5.31	\$ 6.08
207	\$ 5.31	\$ 6.08
208	\$ 5.31	\$ 6.08
209	\$ 5.31	\$ 6.08
210	\$ 5.31	\$ 6.08
211	\$ 5.31	\$ 6.08
212	\$ 5.31	\$ 6.08
213	\$ 5.31	\$ 6.08
214	\$ 5.31	\$ 6.08
215	\$ 5.31	\$ 6.08
216	\$ 5.31	\$ 6.07
217	\$ 5.31	\$ 6.07
218	\$ 5.31	\$ 6.07
219	\$ 5.31	\$ 6.07
220	\$ 5.31	\$ 6.07
221	\$ 5.31	\$ 6.07
222	\$ 5.30	\$ 6.07
223	\$ 5.30	\$ 6.07
224	\$ 5.30	\$ 6.07
225	\$ 5.30	\$ 6.07
226	\$ 5.30	\$ 6.07
227	\$ 5.30	\$ 6.07
228	\$ 5.30	\$ 6.07
229	\$ 5.30	\$ 6.07
230	\$ 5.30	\$ 6.06
231	\$ 5.30	\$ 6.06
232	\$ 5.30	\$ 6.06
233	\$ 5.30	\$ 6.06
234	\$ 5.30	\$ 6.06
235	\$ 5.30	\$ 6.06
236	\$ 5.30	\$ 6.06
237	\$ 5.30	\$ 6.06
238	\$ 5.30	\$ 6.06
239	\$ 5.30	\$ 6.06
240	\$ 5.30	\$ 6.06
241	\$ 5.30	\$ 6.06
242	\$ 5.30	\$ 6.06
243	\$ 5.30	\$ 6.06
244	\$ 5.29	\$ 6.06
245	\$ 5.29	\$ 6.06
246	\$ 5.29	\$ 6.06
247	\$ 5.29	\$ 6.05
248	\$ 5.29	\$ 6.05
249	\$ 5.29	\$ 6.05
250	\$ 5.29	\$ 6.05
251	\$ 5.29	\$ 6.05
252	\$ 5.29	\$ 6.05
253	\$ 5.29	\$ 6.05
254	\$ 5.29	\$ 6.05
255	\$ 5.29	\$ 6.05
256	\$ 5.29	\$ 6.05
257	\$ 5.29	\$ 6.05

Units	Present Base Rate	Proposed Base Rate
258	\$ 5.29	\$ 6.05
259	\$ 5.29	\$ 6.05
260	\$ 5.29	\$ 6.05
261	\$ 5.29	\$ 6.05
262	\$ 5.29	\$ 6.05
263	\$ 5.29	\$ 6.05
264	\$ 5.29	\$ 6.05
265	\$ 5.29	\$ 6.05
266	\$ 5.29	\$ 6.04
267	\$ 5.29	\$ 6.04
268	\$ 5.29	\$ 6.04
269	\$ 5.29	\$ 6.04
270	\$ 5.28	\$ 6.04
271	\$ 5.28	\$ 6.04
272	\$ 5.28	\$ 6.04
273	\$ 5.28	\$ 6.04
274	\$ 5.28	\$ 6.04
275	\$ 5.28	\$ 6.04
276	\$ 5.28	\$ 6.04
277	\$ 5.28	\$ 6.04
278	\$ 5.28	\$ 6.04
279	\$ 5.28	\$ 6.04
280	\$ 5.28	\$ 6.04
281	\$ 5.28	\$ 6.04
282	\$ 5.28	\$ 6.04
283	\$ 5.28	\$ 6.04
284	\$ 5.28	\$ 6.04
285	\$ 5.28	\$ 6.04
286	\$ 5.28	\$ 6.04
287	\$ 5.28	\$ 6.04
288	\$ 5.28	\$ 6.03
289	\$ 5.28	\$ 6.03
290	\$ 5.28	\$ 6.03
291	\$ 5.28	\$ 6.03
292	\$ 5.28	\$ 6.03
293	\$ 5.28	\$ 6.03
294	\$ 5.28	\$ 6.03
295	\$ 5.28	\$ 6.03
296	\$ 5.28	\$ 6.03
297	\$ 5.28	\$ 6.03
298	\$ 5.28	\$ 6.03
299	\$ 5.28	\$ 6.03
300	\$ 5.28	\$ 6.03
301	\$ 5.28	\$ 6.03
302	\$ 5.27	\$ 6.03
303	\$ 5.27	\$ 6.03
304	\$ 5.27	\$ 6.03
305	\$ 5.27	\$ 6.03
306	\$ 5.27	\$ 6.03
307	\$ 5.27	\$ 6.03
308	\$ 5.27	\$ 6.03
309	\$ 5.27	\$ 6.03
310	\$ 5.27	\$ 6.03
311	\$ 5.27	\$ 6.03

Units	Present Base Rate	Proposed Base Rate
312	\$ 5.27	\$ 6.03
313	\$ 5.27	\$ 6.03
314	\$ 5.27	\$ 6.03
315	\$ 5.27	\$ 6.02
316	\$ 5.27	\$ 6.02
317	\$ 5.27	\$ 6.02
318	\$ 5.27	\$ 6.02
319	\$ 5.27	\$ 6.02
320	\$ 5.27	\$ 6.02
321	\$ 5.27	\$ 6.02
322	\$ 5.27	\$ 6.02
323	\$ 5.27	\$ 6.02
324	\$ 5.27	\$ 6.02
325	\$ 5.27	\$ 6.02
326	\$ 5.27	\$ 6.02
327	\$ 5.27	\$ 6.02
328	\$ 5.27	\$ 6.02
329	\$ 5.27	\$ 6.02
330	\$ 5.27	\$ 6.02
331	\$ 5.27	\$ 6.02
332	\$ 5.27	\$ 6.02
333	\$ 5.27	\$ 6.02
334	\$ 5.27	\$ 6.02
335	\$ 5.27	\$ 6.02
336	\$ 5.27	\$ 6.02
337	\$ 5.27	\$ 6.02
338	\$ 5.27	\$ 6.02
339	\$ 5.27	\$ 6.02
340	\$ 5.27	\$ 6.02
341	\$ 5.27	\$ 6.02
342	\$ 5.26	\$ 6.02
343	\$ 5.26	\$ 6.02
344	\$ 5.26	\$ 6.02
345	\$ 5.26	\$ 6.02
346	\$ 5.26	\$ 6.02
347	\$ 5.26	\$ 6.01
348	\$ 5.26	\$ 6.01
349	\$ 5.26	\$ 6.01
350	\$ 5.26	\$ 6.01
351	\$ 5.26	\$ 6.01
352	\$ 5.26	\$ 6.01
353	\$ 5.26	\$ 6.01
354	\$ 5.26	\$ 6.01
355	\$ 5.26	\$ 6.01
356	\$ 5.26	\$ 6.01
357	\$ 5.26	\$ 6.01
358	\$ 5.26	\$ 6.01
359	\$ 5.26	\$ 6.01
360	\$ 5.26	\$ 6.01
361	\$ 5.26	\$ 6.01
362	\$ 5.26	\$ 6.01
363	\$ 5.26	\$ 6.01
364	\$ 5.26	\$ 6.01
365	\$ 5.26	\$ 6.01

Units	Present Base Rate	Proposed Base Rate
366	\$ 5.26	\$ 6.01
367	\$ 5.26	\$ 6.01
368	\$ 5.26	\$ 6.01
369	\$ 5.26	\$ 6.01
370	\$ 5.26	\$ 6.01
371	\$ 5.26	\$ 6.01
372	\$ 5.26	\$ 6.01
373	\$ 5.26	\$ 6.01
374	\$ 5.26	\$ 6.01
375	\$ 5.26	\$ 6.01
376	\$ 5.26	\$ 6.01
377	\$ 5.26	\$ 6.01
378	\$ 5.26	\$ 6.01
379	\$ 5.26	\$ 6.01
380	\$ 5.26	\$ 6.01
381	\$ 5.26	\$ 6.01
382	\$ 5.26	\$ 6.01
383	\$ 5.26	\$ 6.01
384	\$ 5.26	\$ 6.01
385	\$ 5.26	\$ 6.01
386	\$ 5.26	\$ 6.00
387	\$ 5.26	\$ 6.00
388	\$ 5.26	\$ 6.00
389	\$ 5.26	\$ 6.00
390	\$ 5.26	\$ 6.00
391	\$ 5.26	\$ 6.00
392	\$ 5.26	\$ 6.00
393	\$ 5.26	\$ 6.00

Industrial Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	957
Delivery Charge	\$5.1668	\$6.0521	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$5.1668	\$6.0521	
Customer Charge	\$75.90	\$100.00	

Units	Present Base Rate	Proposed Base Rate
0	\$ 75.90	\$ 100.00
1	\$ 81.07	\$ 106.05
2	\$ 43.12	\$ 56.05
3	\$ 30.47	\$ 39.39
4	\$ 24.14	\$ 31.05
5	\$ 20.35	\$ 26.05
6	\$ 17.82	\$ 22.72
7	\$ 16.01	\$ 20.34
8	\$ 14.65	\$ 18.55
9	\$ 13.60	\$ 17.16
10	\$ 12.76	\$ 16.05
11	\$ 12.07	\$ 15.14
12	\$ 11.49	\$ 14.39
13	\$ 11.01	\$ 13.74
14	\$ 10.59	\$ 13.19
15	\$ 10.23	\$ 12.72
16	\$ 9.91	\$ 12.30
17	\$ 9.63	\$ 11.93
18	\$ 9.38	\$ 11.61
19	\$ 9.16	\$ 11.32
20	\$ 8.96	\$ 11.05
21	\$ 8.78	\$ 10.81
22	\$ 8.62	\$ 10.60
23	\$ 8.47	\$ 10.40
24	\$ 8.33	\$ 10.22
25	\$ 8.20	\$ 10.05
26	\$ 8.09	\$ 9.90
27	\$ 7.98	\$ 9.76
28	\$ 7.88	\$ 9.62
29	\$ 7.78	\$ 9.50
30	\$ 7.70	\$ 9.39
31	\$ 7.62	\$ 9.28
32	\$ 7.54	\$ 9.18
33	\$ 7.47	\$ 9.08
34	\$ 7.40	\$ 8.99
35	\$ 7.34	\$ 8.91
36	\$ 7.28	\$ 8.83
37	\$ 7.22	\$ 8.75
38	\$ 7.16	\$ 8.68
39	\$ 7.11	\$ 8.62
40	\$ 7.06	\$ 8.55
41	\$ 7.02	\$ 8.49

Units	Present Base Rate	Proposed Base Rate
42	\$ 6.97	\$ 8.43
43	\$ 6.93	\$ 8.38
44	\$ 6.89	\$ 8.32
45	\$ 6.85	\$ 8.27
46	\$ 6.82	\$ 8.23
47	\$ 6.78	\$ 8.18
48	\$ 6.75	\$ 8.14
49	\$ 6.72	\$ 8.09
50	\$ 6.68	\$ 8.05
51	\$ 6.66	\$ 8.01
52	\$ 6.63	\$ 7.98
53	\$ 6.60	\$ 7.94
54	\$ 6.57	\$ 7.90
55	\$ 6.55	\$ 7.87
56	\$ 6.52	\$ 7.84
57	\$ 6.50	\$ 7.81
58	\$ 6.48	\$ 7.78
59	\$ 6.45	\$ 7.75
60	\$ 6.43	\$ 7.72
61	\$ 6.41	\$ 7.69
62	\$ 6.39	\$ 7.67
63	\$ 6.37	\$ 7.64
64	\$ 6.35	\$ 7.61
65	\$ 6.33	\$ 7.59
66	\$ 6.32	\$ 7.57
67	\$ 6.30	\$ 7.54
68	\$ 6.28	\$ 7.52
69	\$ 6.27	\$ 7.50
70	\$ 6.25	\$ 7.48
71	\$ 6.24	\$ 7.46
72	\$ 6.22	\$ 7.44
73	\$ 6.21	\$ 7.42
74	\$ 6.19	\$ 7.40
75	\$ 6.18	\$ 7.39
76	\$ 6.17	\$ 7.37
77	\$ 6.15	\$ 7.35
78	\$ 6.14	\$ 7.33
79	\$ 6.13	\$ 7.32
80	\$ 6.12	\$ 7.30
81	\$ 6.10	\$ 7.29
82	\$ 6.09	\$ 7.27
83	\$ 6.08	\$ 7.26
84	\$ 6.07	\$ 7.24
85	\$ 6.06	\$ 7.23
86	\$ 6.05	\$ 7.21
87	\$ 6.04	\$ 7.20
88	\$ 6.03	\$ 7.19
89	\$ 6.02	\$ 7.18
90	\$ 6.01	\$ 7.16
91	\$ 6.00	\$ 7.15
92	\$ 5.99	\$ 7.14
93	\$ 5.98	\$ 7.13
94	\$ 5.97	\$ 7.12
95	\$ 5.97	\$ 7.10

Units	Present Base Rate	Proposed Base Rate
96	\$ 5.96	\$ 7.09
97	\$ 5.95	\$ 7.08
98	\$ 5.94	\$ 7.07
99	\$ 5.93	\$ 7.06
100	\$ 5.93	\$ 7.05
101	\$ 5.92	\$ 7.04
102	\$ 5.91	\$ 7.03
103	\$ 5.90	\$ 7.02
104	\$ 5.90	\$ 7.01
105	\$ 5.89	\$ 7.00
106	\$ 5.88	\$ 7.00
107	\$ 5.88	\$ 6.99
108	\$ 5.87	\$ 6.98
109	\$ 5.86	\$ 6.97
110	\$ 5.86	\$ 6.96
111	\$ 5.85	\$ 6.95
112	\$ 5.84	\$ 6.94
113	\$ 5.84	\$ 6.94
114	\$ 5.83	\$ 6.93
115	\$ 5.83	\$ 6.92
116	\$ 5.82	\$ 6.91
117	\$ 5.82	\$ 6.91
118	\$ 5.81	\$ 6.90
119	\$ 5.80	\$ 6.89
120	\$ 5.80	\$ 6.89
121	\$ 5.79	\$ 6.88
122	\$ 5.79	\$ 6.87
123	\$ 5.78	\$ 6.87
124	\$ 5.78	\$ 6.86
125	\$ 5.77	\$ 6.85
126	\$ 5.77	\$ 6.85
127	\$ 5.76	\$ 6.84
128	\$ 5.76	\$ 6.83
129	\$ 5.76	\$ 6.83
130	\$ 5.75	\$ 6.82
131	\$ 5.75	\$ 6.82
132	\$ 5.74	\$ 6.81
133	\$ 5.74	\$ 6.80
134	\$ 5.73	\$ 6.80
135	\$ 5.73	\$ 6.79
136	\$ 5.72	\$ 6.79
137	\$ 5.72	\$ 6.78
138	\$ 5.72	\$ 6.78
139	\$ 5.71	\$ 6.77
140	\$ 5.71	\$ 6.77
141	\$ 5.71	\$ 6.76
142	\$ 5.70	\$ 6.76
143	\$ 5.70	\$ 6.75
144	\$ 5.69	\$ 6.75
145	\$ 5.69	\$ 6.74
146	\$ 5.69	\$ 6.74
147	\$ 5.68	\$ 6.73
148	\$ 5.68	\$ 6.73
149	\$ 5.68	\$ 6.72

Units	Present Base Rate	Proposed Base Rate
150	\$ 5.67	\$ 6.72
151	\$ 5.67	\$ 6.71
152	\$ 5.67	\$ 6.71
153	\$ 5.66	\$ 6.71
154	\$ 5.66	\$ 6.70
155	\$ 5.66	\$ 6.70
156	\$ 5.65	\$ 6.69
157	\$ 5.65	\$ 6.69
158	\$ 5.65	\$ 6.69
159	\$ 5.64	\$ 6.68
160	\$ 5.64	\$ 6.68
161	\$ 5.64	\$ 6.67
162	\$ 5.64	\$ 6.67
163	\$ 5.63	\$ 6.67
164	\$ 5.63	\$ 6.66
165	\$ 5.63	\$ 6.66
166	\$ 5.62	\$ 6.65
167	\$ 5.62	\$ 6.65
168	\$ 5.62	\$ 6.65
169	\$ 5.62	\$ 6.64
170	\$ 5.61	\$ 6.64
171	\$ 5.61	\$ 6.64
172	\$ 5.61	\$ 6.63
173	\$ 5.61	\$ 6.63
174	\$ 5.60	\$ 6.63
175	\$ 5.60	\$ 6.62
176	\$ 5.60	\$ 6.62
177	\$ 5.60	\$ 6.62
178	\$ 5.59	\$ 6.61
179	\$ 5.59	\$ 6.61
180	\$ 5.59	\$ 6.61
181	\$ 5.59	\$ 6.60
182	\$ 5.58	\$ 6.60
183	\$ 5.58	\$ 6.60
184	\$ 5.58	\$ 6.60
185	\$ 5.58	\$ 6.59
186	\$ 5.57	\$ 6.59
187	\$ 5.57	\$ 6.59
188	\$ 5.57	\$ 6.58
189	\$ 5.57	\$ 6.58
190	\$ 5.57	\$ 6.58
191	\$ 5.56	\$ 6.58
192	\$ 5.56	\$ 6.57
193	\$ 5.56	\$ 6.57
194	\$ 5.56	\$ 6.57
195	\$ 5.56	\$ 6.56
196	\$ 5.55	\$ 6.56
197	\$ 5.55	\$ 6.56
198	\$ 5.55	\$ 6.56
199	\$ 5.55	\$ 6.55
200	\$ 5.55	\$ 6.55
201	\$ 5.54	\$ 6.55
202	\$ 5.54	\$ 6.55
203	\$ 5.54	\$ 6.54

Units	Present Base Rate	Proposed Base Rate
204	\$ 5.54	\$ 6.54
205	\$ 5.54	\$ 6.54
206	\$ 5.54	\$ 6.54
207	\$ 5.53	\$ 6.54
208	\$ 5.53	\$ 6.53
209	\$ 5.53	\$ 6.53
210	\$ 5.53	\$ 6.53
211	\$ 5.53	\$ 6.53
212	\$ 5.52	\$ 6.52
213	\$ 5.52	\$ 6.52
214	\$ 5.52	\$ 6.52
215	\$ 5.52	\$ 6.52
216	\$ 5.52	\$ 6.52
217	\$ 5.52	\$ 6.51
218	\$ 5.51	\$ 6.51
219	\$ 5.51	\$ 6.51
220	\$ 5.51	\$ 6.51
221	\$ 5.51	\$ 6.50
222	\$ 5.51	\$ 6.50
223	\$ 5.51	\$ 6.50
224	\$ 5.51	\$ 6.50
225	\$ 5.50	\$ 6.50
226	\$ 5.50	\$ 6.49
227	\$ 5.50	\$ 6.49
228	\$ 5.50	\$ 6.49
229	\$ 5.50	\$ 6.49
230	\$ 5.50	\$ 6.49
231	\$ 5.50	\$ 6.49
232	\$ 5.49	\$ 6.48
233	\$ 5.49	\$ 6.48
234	\$ 5.49	\$ 6.48
235	\$ 5.49	\$ 6.48
236	\$ 5.49	\$ 6.48
237	\$ 5.49	\$ 6.47
238	\$ 5.49	\$ 6.47
239	\$ 5.48	\$ 6.47
240	\$ 5.48	\$ 6.47
241	\$ 5.48	\$ 6.47
242	\$ 5.48	\$ 6.47
243	\$ 5.48	\$ 6.46
244	\$ 5.48	\$ 6.46
245	\$ 5.48	\$ 6.46
246	\$ 5.48	\$ 6.46
247	\$ 5.47	\$ 6.46
248	\$ 5.47	\$ 6.46
249	\$ 5.47	\$ 6.45
250	\$ 5.47	\$ 6.45
251	\$ 5.47	\$ 6.45
252	\$ 5.47	\$ 6.45
253	\$ 5.47	\$ 6.45
254	\$ 5.47	\$ 6.45
255	\$ 5.46	\$ 6.44
256	\$ 5.46	\$ 6.44
257	\$ 5.46	\$ 6.44

Units	Present Base Rate	Proposed Base Rate
258	\$ 5.46	\$ 6.44
259	\$ 5.46	\$ 6.44
260	\$ 5.46	\$ 6.44
261	\$ 5.46	\$ 6.44
262	\$ 5.46	\$ 6.43
263	\$ 5.46	\$ 6.43
264	\$ 5.45	\$ 6.43
265	\$ 5.45	\$ 6.43
266	\$ 5.45	\$ 6.43
267	\$ 5.45	\$ 6.43
268	\$ 5.45	\$ 6.43
269	\$ 5.45	\$ 6.42
270	\$ 5.45	\$ 6.42
271	\$ 5.45	\$ 6.42
272	\$ 5.45	\$ 6.42
273	\$ 5.44	\$ 6.42
274	\$ 5.44	\$ 6.42
275	\$ 5.44	\$ 6.42
276	\$ 5.44	\$ 6.41
277	\$ 5.44	\$ 6.41
278	\$ 5.44	\$ 6.41
279	\$ 5.44	\$ 6.41
280	\$ 5.44	\$ 6.41
281	\$ 5.44	\$ 6.41
282	\$ 5.44	\$ 6.41
283	\$ 5.43	\$ 6.41
284	\$ 5.43	\$ 6.40
285	\$ 5.43	\$ 6.40
286	\$ 5.43	\$ 6.40
287	\$ 5.43	\$ 6.40
288	\$ 5.43	\$ 6.40
289	\$ 5.43	\$ 6.40
290	\$ 5.43	\$ 6.40
291	\$ 5.43	\$ 6.40
292	\$ 5.43	\$ 6.39
293	\$ 5.43	\$ 6.39
294	\$ 5.42	\$ 6.39
295	\$ 5.42	\$ 6.39
296	\$ 5.42	\$ 6.39
297	\$ 5.42	\$ 6.39
298	\$ 5.42	\$ 6.39
299	\$ 5.42	\$ 6.39
300	\$ 5.42	\$ 6.39
301	\$ 5.42	\$ 6.38
302	\$ 5.42	\$ 6.38
303	\$ 5.42	\$ 6.38
304	\$ 5.42	\$ 6.38
305	\$ 5.42	\$ 6.38
306	\$ 5.41	\$ 6.38
307	\$ 5.41	\$ 6.38
308	\$ 5.41	\$ 6.38
309	\$ 5.41	\$ 6.38
310	\$ 5.41	\$ 6.37
311	\$ 5.41	\$ 6.37

Units	Present Base Rate	Proposed Base Rate
312	\$ 5.41	\$ 6.37
313	\$ 5.41	\$ 6.37
314	\$ 5.41	\$ 6.37
315	\$ 5.41	\$ 6.37
316	\$ 5.41	\$ 6.37
317	\$ 5.41	\$ 6.37
318	\$ 5.41	\$ 6.37
319	\$ 5.40	\$ 6.37
320	\$ 5.40	\$ 6.36
321	\$ 5.40	\$ 6.36
322	\$ 5.40	\$ 6.36
323	\$ 5.40	\$ 6.36
324	\$ 5.40	\$ 6.36
325	\$ 5.40	\$ 6.36
326	\$ 5.40	\$ 6.36
327	\$ 5.40	\$ 6.36
328	\$ 5.40	\$ 6.36
329	\$ 5.40	\$ 6.36
330	\$ 5.40	\$ 6.36
331	\$ 5.40	\$ 6.35
332	\$ 5.40	\$ 6.35
333	\$ 5.39	\$ 6.35
334	\$ 5.39	\$ 6.35
335	\$ 5.39	\$ 6.35
336	\$ 5.39	\$ 6.35
337	\$ 5.39	\$ 6.35
338	\$ 5.39	\$ 6.35
339	\$ 5.39	\$ 6.35
340	\$ 5.39	\$ 6.35
341	\$ 5.39	\$ 6.35
342	\$ 5.39	\$ 6.34
343	\$ 5.39	\$ 6.34
344	\$ 5.39	\$ 6.34
345	\$ 5.39	\$ 6.34
346	\$ 5.39	\$ 6.34
347	\$ 5.39	\$ 6.34
348	\$ 5.38	\$ 6.34
349	\$ 5.38	\$ 6.34
350	\$ 5.38	\$ 6.34
351	\$ 5.38	\$ 6.34
352	\$ 5.38	\$ 6.34
353	\$ 5.38	\$ 6.34
354	\$ 5.38	\$ 6.33
355	\$ 5.38	\$ 6.33
356	\$ 5.38	\$ 6.33
357	\$ 5.38	\$ 6.33
358	\$ 5.38	\$ 6.33
359	\$ 5.38	\$ 6.33
360	\$ 5.38	\$ 6.33
361	\$ 5.38	\$ 6.33
362	\$ 5.38	\$ 6.33
363	\$ 5.38	\$ 6.33
364	\$ 5.38	\$ 6.33
365	\$ 5.37	\$ 6.33

Units	Present Base Rate	Proposed Base Rate
366	\$ 5.37	\$ 6.33
367	\$ 5.37	\$ 6.32
368	\$ 5.37	\$ 6.32
369	\$ 5.37	\$ 6.32
370	\$ 5.37	\$ 6.32
371	\$ 5.37	\$ 6.32
372	\$ 5.37	\$ 6.32
373	\$ 5.37	\$ 6.32
374	\$ 5.37	\$ 6.32
375	\$ 5.37	\$ 6.32
376	\$ 5.37	\$ 6.32
377	\$ 5.37	\$ 6.32
378	\$ 5.37	\$ 6.32
379	\$ 5.37	\$ 6.32
380	\$ 5.37	\$ 6.32
381	\$ 5.37	\$ 6.31
382	\$ 5.37	\$ 6.31
383	\$ 5.36	\$ 6.31
384	\$ 5.36	\$ 6.31
385	\$ 5.36	\$ 6.31
386	\$ 5.36	\$ 6.31
387	\$ 5.36	\$ 6.31
388	\$ 5.36	\$ 6.31
389	\$ 5.36	\$ 6.31
390	\$ 5.36	\$ 6.31
391	\$ 5.36	\$ 6.31
392	\$ 5.36	\$ 6.31
393	\$ 5.36	\$ 6.31
394	\$ 5.36	\$ 6.31
395	\$ 5.36	\$ 6.31
396	\$ 5.36	\$ 6.30
397	\$ 5.36	\$ 6.30
398	\$ 5.36	\$ 6.30
399	\$ 5.36	\$ 6.30
400	\$ 5.36	\$ 6.30
401	\$ 5.36	\$ 6.30
402	\$ 5.36	\$ 6.30
403	\$ 5.36	\$ 6.30
404	\$ 5.35	\$ 6.30
405	\$ 5.35	\$ 6.30
406	\$ 5.35	\$ 6.30
407	\$ 5.35	\$ 6.30
408	\$ 5.35	\$ 6.30
409	\$ 5.35	\$ 6.30
410	\$ 5.35	\$ 6.30
411	\$ 5.35	\$ 6.30
412	\$ 5.35	\$ 6.29
413	\$ 5.35	\$ 6.29
414	\$ 5.35	\$ 6.29
415	\$ 5.35	\$ 6.29
416	\$ 5.35	\$ 6.29
417	\$ 5.35	\$ 6.29
418	\$ 5.35	\$ 6.29
419	\$ 5.35	\$ 6.29

Units	Present Base Rate	Proposed Base Rate
420	\$ 5.35	\$ 6.29
421	\$ 5.35	\$ 6.29
422	\$ 5.35	\$ 6.29
423	\$ 5.35	\$ 6.29
424	\$ 5.35	\$ 6.29
425	\$ 5.35	\$ 6.29
426	\$ 5.34	\$ 6.29
427	\$ 5.34	\$ 6.29
428	\$ 5.34	\$ 6.29
429	\$ 5.34	\$ 6.29
430	\$ 5.34	\$ 6.28
431	\$ 5.34	\$ 6.28
432	\$ 5.34	\$ 6.28
433	\$ 5.34	\$ 6.28
434	\$ 5.34	\$ 6.28
435	\$ 5.34	\$ 6.28
436	\$ 5.34	\$ 6.28
437	\$ 5.34	\$ 6.28
438	\$ 5.34	\$ 6.28
439	\$ 5.34	\$ 6.28
440	\$ 5.34	\$ 6.28
441	\$ 5.34	\$ 6.28
442	\$ 5.34	\$ 6.28
443	\$ 5.34	\$ 6.28
444	\$ 5.34	\$ 6.28
445	\$ 5.34	\$ 6.28
446	\$ 5.34	\$ 6.28
447	\$ 5.34	\$ 6.28
448	\$ 5.34	\$ 6.28
449	\$ 5.34	\$ 6.27
450	\$ 5.34	\$ 6.27
451	\$ 5.34	\$ 6.27
452	\$ 5.33	\$ 6.27
453	\$ 5.33	\$ 6.27
454	\$ 5.33	\$ 6.27
455	\$ 5.33	\$ 6.27
456	\$ 5.33	\$ 6.27
457	\$ 5.33	\$ 6.27
458	\$ 5.33	\$ 6.27
459	\$ 5.33	\$ 6.27
460	\$ 5.33	\$ 6.27
461	\$ 5.33	\$ 6.27
462	\$ 5.33	\$ 6.27
463	\$ 5.33	\$ 6.27
464	\$ 5.33	\$ 6.27
465	\$ 5.33	\$ 6.27
466	\$ 5.33	\$ 6.27
467	\$ 5.33	\$ 6.27
468	\$ 5.33	\$ 6.27
469	\$ 5.33	\$ 6.27
470	\$ 5.33	\$ 6.26
471	\$ 5.33	\$ 6.26
472	\$ 5.33	\$ 6.26
473	\$ 5.33	\$ 6.26

Units	Present Base Rate	Proposed Base Rate
474	\$ 5.33	\$ 6.26
475	\$ 5.33	\$ 6.26
476	\$ 5.33	\$ 6.26
477	\$ 5.33	\$ 6.26
478	\$ 5.33	\$ 6.26
479	\$ 5.33	\$ 6.26
480	\$ 5.32	\$ 6.26
481	\$ 5.32	\$ 6.26
482	\$ 5.32	\$ 6.26
483	\$ 5.32	\$ 6.26
484	\$ 5.32	\$ 6.26
485	\$ 5.32	\$ 6.26
486	\$ 5.32	\$ 6.26
487	\$ 5.32	\$ 6.26
488	\$ 5.32	\$ 6.26
489	\$ 5.32	\$ 6.26
490	\$ 5.32	\$ 6.26
491	\$ 5.32	\$ 6.26
492	\$ 5.32	\$ 6.26
493	\$ 5.32	\$ 6.25
494	\$ 5.32	\$ 6.25
495	\$ 5.32	\$ 6.25
496	\$ 5.32	\$ 6.25
497	\$ 5.32	\$ 6.25
498	\$ 5.32	\$ 6.25
499	\$ 5.32	\$ 6.25
500	\$ 5.32	\$ 6.25
501	\$ 5.32	\$ 6.25
502	\$ 5.32	\$ 6.25
503	\$ 5.32	\$ 6.25
504	\$ 5.32	\$ 6.25
505	\$ 5.32	\$ 6.25
506	\$ 5.32	\$ 6.25
507	\$ 5.32	\$ 6.25
508	\$ 5.32	\$ 6.25
509	\$ 5.32	\$ 6.25
510	\$ 5.32	\$ 6.25
511	\$ 5.32	\$ 6.25
512	\$ 5.32	\$ 6.25
513	\$ 5.31	\$ 6.25
514	\$ 5.31	\$ 6.25
515	\$ 5.31	\$ 6.25
516	\$ 5.31	\$ 6.25
517	\$ 5.31	\$ 6.25
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Units	Present Base Rate	Proposed Base Rate
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529	\$ 5.31	\$ 6.24
530	\$ 5.31	\$ 6.24
531	\$ 5.31	\$ 6.24
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550	\$ 5.30	\$ 6.23
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578	\$ 5.30	\$ 6.23
579	\$ 5.30	\$ 6.22
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581	\$ 5.30	\$ 6.22

Units	Present Base Rate	Proposed Base Rate
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583	\$ 5.30	\$ 6.22
584	\$ 5.30	\$ 6.22
585	\$ 5.30	\$ 6.22
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Units	Present Base Rate	Proposed Base Rate
636	\$ 5.29	\$ 6.21
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689	\$ 5.28	\$ 6.20

Units	Present Base Rate	Proposed Base Rate
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691	\$ 5.28	\$ 6.20
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715	\$ 5.27	\$ 6.19
716	\$ 5.27	\$ 6.19
717	\$ 5.27	\$ 6.19
718	\$ 5.27	\$ 6.19
719	\$ 5.27	\$ 6.19
720	\$ 5.27	\$ 6.19
721	\$ 5.27	\$ 6.19
722	\$ 5.27	\$ 6.19
723	\$ 5.27	\$ 6.19
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731	\$ 5.27	\$ 6.19
732	\$ 5.27	\$ 6.19
733	\$ 5.27	\$ 6.19
734	\$ 5.27	\$ 6.19
735	\$ 5.27	\$ 6.19
736	\$ 5.27	\$ 6.19
737	\$ 5.27	\$ 6.19
738	\$ 5.27	\$ 6.19
739	\$ 5.27	\$ 6.19
740	\$ 5.27	\$ 6.19
741	\$ 5.27	\$ 6.19
742	\$ 5.27	\$ 6.19
743	\$ 5.27	\$ 6.19

Units	Present Base Rate	Proposed Base Rate
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745	\$ 5.27	\$ 6.19
746	\$ 5.27	\$ 6.19
747	\$ 5.27	\$ 6.19
748	\$ 5.27	\$ 6.19
749	\$ 5.27	\$ 6.19
750	\$ 5.27	\$ 6.19
751	\$ 5.27	\$ 6.19
752	\$ 5.27	\$ 6.19
753	\$ 5.27	\$ 6.18
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755	\$ 5.27	\$ 6.18
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759	\$ 5.27	\$ 6.18
760	\$ 5.27	\$ 6.18
761	\$ 5.27	\$ 6.18
762	\$ 5.27	\$ 6.18
763	\$ 5.27	\$ 6.18
764	\$ 5.27	\$ 6.18
765	\$ 5.27	\$ 6.18
766	\$ 5.27	\$ 6.18
767	\$ 5.27	\$ 6.18
768	\$ 5.27	\$ 6.18
769	\$ 5.27	\$ 6.18
770	\$ 5.27	\$ 6.18
771	\$ 5.27	\$ 6.18
772	\$ 5.27	\$ 6.18
773	\$ 5.26	\$ 6.18
774	\$ 5.26	\$ 6.18
775	\$ 5.26	\$ 6.18
776	\$ 5.26	\$ 6.18
777	\$ 5.26	\$ 6.18
778	\$ 5.26	\$ 6.18
779	\$ 5.26	\$ 6.18
780	\$ 5.26	\$ 6.18
781	\$ 5.26	\$ 6.18
782	\$ 5.26	\$ 6.18
783	\$ 5.26	\$ 6.18
784	\$ 5.26	\$ 6.18
785	\$ 5.26	\$ 6.18
786	\$ 5.26	\$ 6.18
787	\$ 5.26	\$ 6.18
788	\$ 5.26	\$ 6.18
789	\$ 5.26	\$ 6.18
790	\$ 5.26	\$ 6.18
791	\$ 5.26	\$ 6.18
792	\$ 5.26	\$ 6.18
793	\$ 5.26	\$ 6.18
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797	\$ 5.26	\$ 6.18

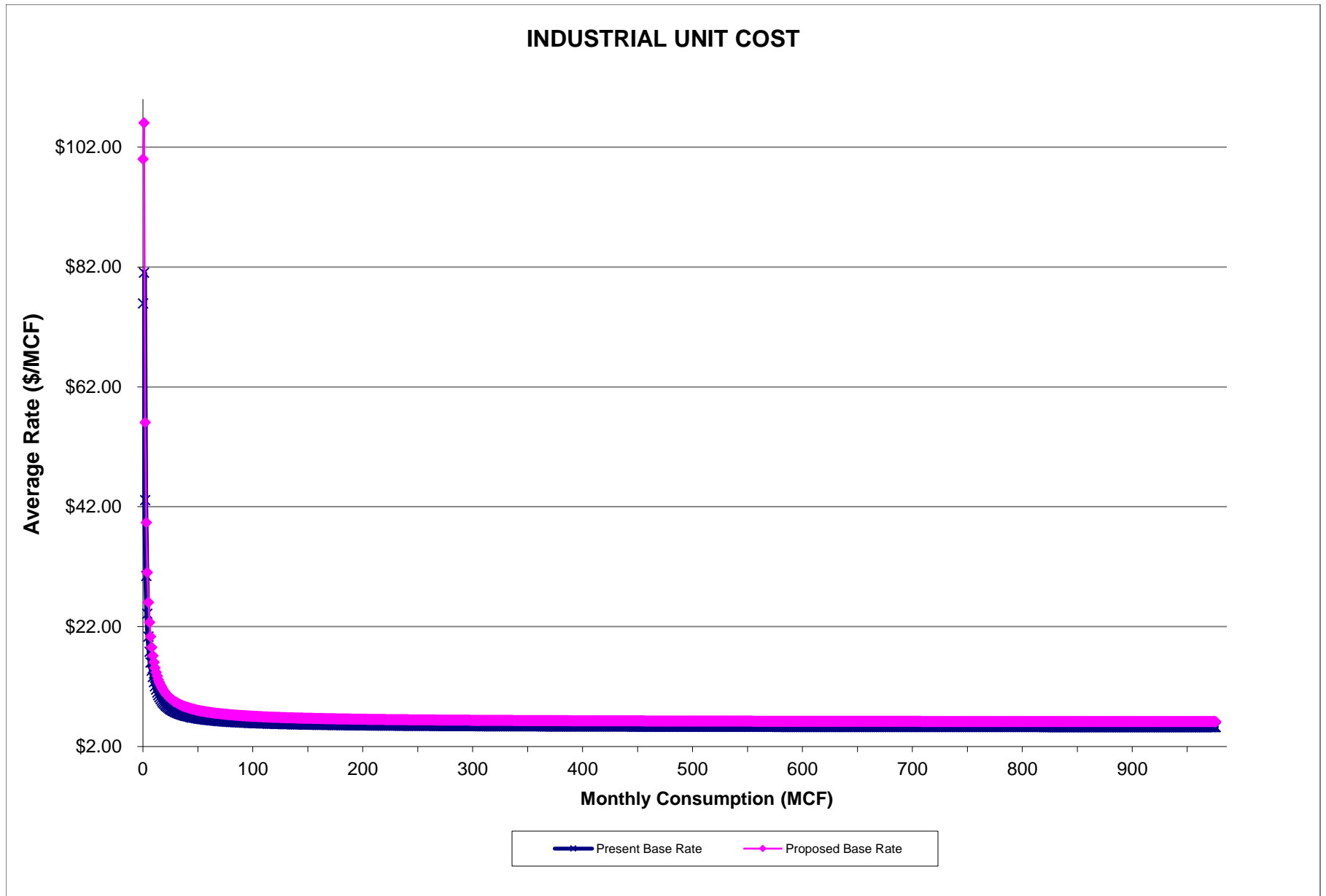
Units	Present Base Rate	Proposed Base Rate
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799	\$ 5.26	\$ 6.18
800	\$ 5.26	\$ 6.18
801	\$ 5.26	\$ 6.18
802	\$ 5.26	\$ 6.18
803	\$ 5.26	\$ 6.18
804	\$ 5.26	\$ 6.18
805	\$ 5.26	\$ 6.18
806	\$ 5.26	\$ 6.18
807	\$ 5.26	\$ 6.18
808	\$ 5.26	\$ 6.18
809	\$ 5.26	\$ 6.18
810	\$ 5.26	\$ 6.18
811	\$ 5.26	\$ 6.18
812	\$ 5.26	\$ 6.18
813	\$ 5.26	\$ 6.18
814	\$ 5.26	\$ 6.17
815	\$ 5.26	\$ 6.17
816	\$ 5.26	\$ 6.17
817	\$ 5.26	\$ 6.17
818	\$ 5.26	\$ 6.17
819	\$ 5.26	\$ 6.17
820	\$ 5.26	\$ 6.17
821	\$ 5.26	\$ 6.17
822	\$ 5.26	\$ 6.17
823	\$ 5.26	\$ 6.17
824	\$ 5.26	\$ 6.17
825	\$ 5.26	\$ 6.17
826	\$ 5.26	\$ 6.17
827	\$ 5.26	\$ 6.17
828	\$ 5.26	\$ 6.17
829	\$ 5.26	\$ 6.17
830	\$ 5.26	\$ 6.17
831	\$ 5.26	\$ 6.17
832	\$ 5.26	\$ 6.17
833	\$ 5.26	\$ 6.17
834	\$ 5.26	\$ 6.17
835	\$ 5.26	\$ 6.17
836	\$ 5.26	\$ 6.17
837	\$ 5.26	\$ 6.17
838	\$ 5.26	\$ 6.17
839	\$ 5.26	\$ 6.17
840	\$ 5.26	\$ 6.17
841	\$ 5.26	\$ 6.17
842	\$ 5.26	\$ 6.17
843	\$ 5.26	\$ 6.17
844	\$ 5.26	\$ 6.17
845	\$ 5.26	\$ 6.17
846	\$ 5.26	\$ 6.17
847	\$ 5.26	\$ 6.17
848	\$ 5.26	\$ 6.17
849	\$ 5.26	\$ 6.17
850	\$ 5.26	\$ 6.17
851	\$ 5.26	\$ 6.17

Units	Present Base Rate	Proposed Base Rate
852	\$ 5.26	\$ 6.17
853	\$ 5.26	\$ 6.17
854	\$ 5.26	\$ 6.17
855	\$ 5.26	\$ 6.17
856	\$ 5.26	\$ 6.17
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859	\$ 5.26	\$ 6.17
860	\$ 5.26	\$ 6.17
861	\$ 5.25	\$ 6.17
862	\$ 5.25	\$ 6.17
863	\$ 5.25	\$ 6.17
864	\$ 5.25	\$ 6.17
865	\$ 5.25	\$ 6.17
866	\$ 5.25	\$ 6.17
867	\$ 5.25	\$ 6.17
868	\$ 5.25	\$ 6.17
869	\$ 5.25	\$ 6.17
870	\$ 5.25	\$ 6.17
871	\$ 5.25	\$ 6.17
872	\$ 5.25	\$ 6.17
873	\$ 5.25	\$ 6.17
874	\$ 5.25	\$ 6.17
875	\$ 5.25	\$ 6.17
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877	\$ 5.25	\$ 6.17
878	\$ 5.25	\$ 6.17
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880	\$ 5.25	\$ 6.17
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882	\$ 5.25	\$ 6.17
883	\$ 5.25	\$ 6.17
884	\$ 5.25	\$ 6.17
885	\$ 5.25	\$ 6.17
886	\$ 5.25	\$ 6.16
887	\$ 5.25	\$ 6.16
888	\$ 5.25	\$ 6.16
889	\$ 5.25	\$ 6.16
890	\$ 5.25	\$ 6.16
891	\$ 5.25	\$ 6.16
892	\$ 5.25	\$ 6.16
893	\$ 5.25	\$ 6.16
894	\$ 5.25	\$ 6.16
895	\$ 5.25	\$ 6.16
896	\$ 5.25	\$ 6.16
897	\$ 5.25	\$ 6.16
898	\$ 5.25	\$ 6.16
899	\$ 5.25	\$ 6.16
900	\$ 5.25	\$ 6.16
901	\$ 5.25	\$ 6.16
902	\$ 5.25	\$ 6.16
903	\$ 5.25	\$ 6.16
904	\$ 5.25	\$ 6.16
905	\$ 5.25	\$ 6.16

Units	Present Base Rate	Proposed Base Rate
906	\$ 5.25	\$ 6.16
907	\$ 5.25	\$ 6.16
908	\$ 5.25	\$ 6.16
909	\$ 5.25	\$ 6.16
910	\$ 5.25	\$ 6.16
911	\$ 5.25	\$ 6.16
912	\$ 5.25	\$ 6.16
913	\$ 5.25	\$ 6.16
914	\$ 5.25	\$ 6.16
915	\$ 5.25	\$ 6.16
916	\$ 5.25	\$ 6.16
917	\$ 5.25	\$ 6.16
918	\$ 5.25	\$ 6.16
919	\$ 5.25	\$ 6.16
920	\$ 5.25	\$ 6.16
921	\$ 5.25	\$ 6.16
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923	\$ 5.25	\$ 6.16
924	\$ 5.25	\$ 6.16
925	\$ 5.25	\$ 6.16
926	\$ 5.25	\$ 6.16
927	\$ 5.25	\$ 6.16
928	\$ 5.25	\$ 6.16
929	\$ 5.25	\$ 6.16
930	\$ 5.25	\$ 6.16
931	\$ 5.25	\$ 6.16
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935	\$ 5.25	\$ 6.16
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937	\$ 5.25	\$ 6.16
938	\$ 5.25	\$ 6.16
939	\$ 5.25	\$ 6.16
940	\$ 5.25	\$ 6.16
941	\$ 5.25	\$ 6.16
942	\$ 5.25	\$ 6.16
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949	\$ 5.25	\$ 6.16
950	\$ 5.25	\$ 6.16
951	\$ 5.25	\$ 6.16
952	\$ 5.25	\$ 6.16
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954	\$ 5.25	\$ 6.16
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959	\$ 5.25	\$ 6.16

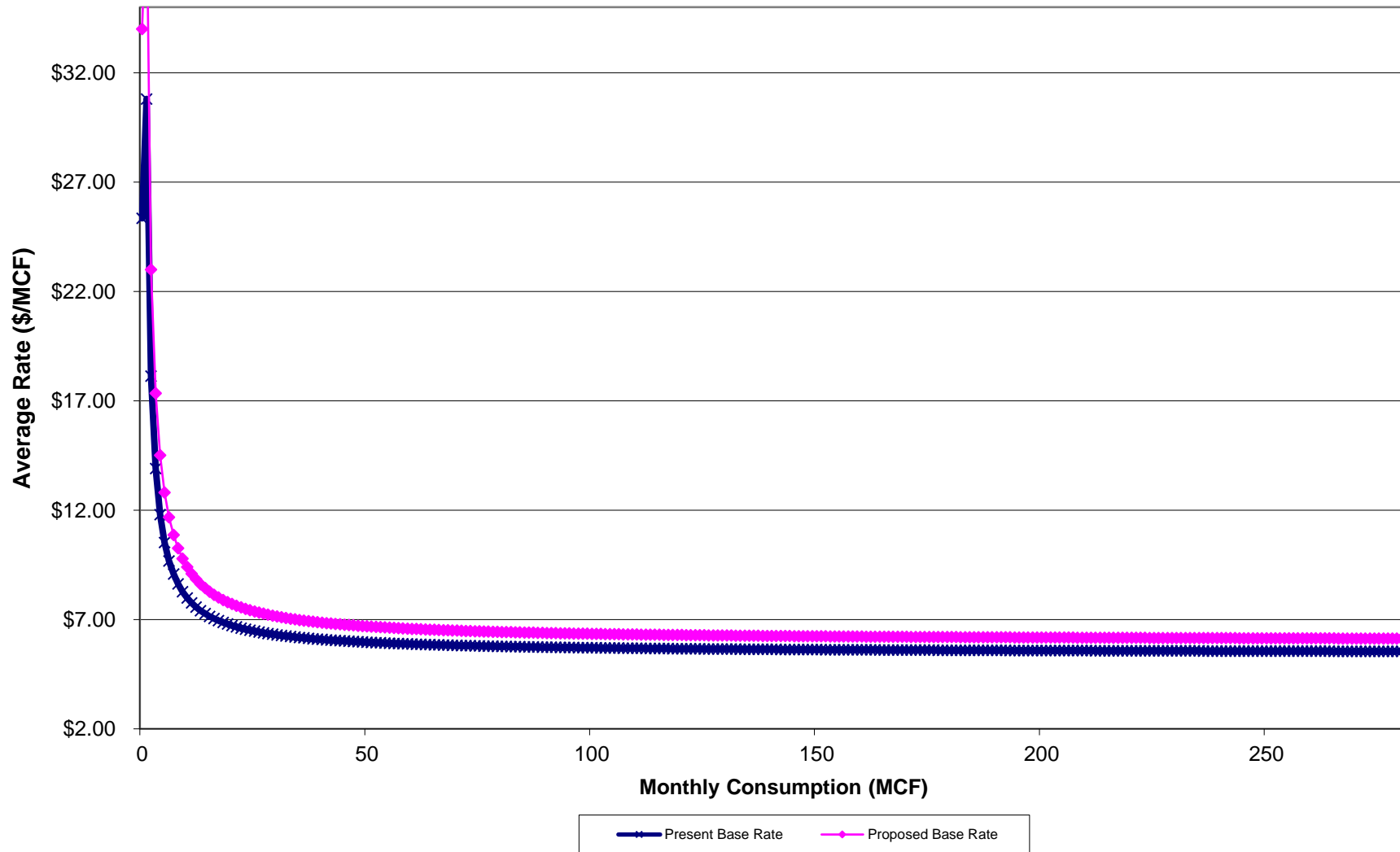
Units	Present Base Rate	Proposed Base Rate
960	\$ 5.25	\$ 6.16
961	\$ 5.25	\$ 6.16
962	\$ 5.25	\$ 6.16
963	\$ 5.25	\$ 6.16
964	\$ 5.25	\$ 6.16
965	\$ 5.25	\$ 6.16
966	\$ 5.25	\$ 6.16
967	\$ 5.25	\$ 6.16
968	\$ 5.25	\$ 6.16
969	\$ 5.25	\$ 6.16
970	\$ 5.25	\$ 6.16
971	\$ 5.24	\$ 6.16
972	\$ 5.24	\$ 6.15
973	\$ 5.24	\$ 6.15
974	\$ 5.24	\$ 6.15
975	\$ 5.24	\$ 6.15
976	\$ 5.24	\$ 6.15

PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES



PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES

PHA UNIT COST



PHA Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	396
Delivery Charge	\$5.4534	\$6.0047	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$5.4534	\$6.0047	
Customer Charge	\$25.35	\$34.00	

Units	Present Base Rate	Proposed Base Rate
0	\$ 25.35	\$ 34.00
1	\$ 30.80	\$ 40.00
2	\$ 18.13	\$ 23.00
3	\$ 13.90	\$ 17.34
4	\$ 11.79	\$ 14.50
5	\$ 10.52	\$ 12.80
6	\$ 9.68	\$ 11.67
7	\$ 9.07	\$ 10.86
8	\$ 8.62	\$ 10.25
9	\$ 8.27	\$ 9.78
10	\$ 7.99	\$ 9.40
11	\$ 7.76	\$ 9.10
12	\$ 7.57	\$ 8.84
13	\$ 7.40	\$ 8.62
14	\$ 7.26	\$ 8.43
15	\$ 7.14	\$ 8.27
16	\$ 7.04	\$ 8.13
17	\$ 6.94	\$ 8.00
18	\$ 6.86	\$ 7.89
19	\$ 6.79	\$ 7.79
20	\$ 6.72	\$ 7.70
21	\$ 6.66	\$ 7.62
22	\$ 6.61	\$ 7.55
23	\$ 6.56	\$ 7.48
24	\$ 6.51	\$ 7.42
25	\$ 6.47	\$ 7.36
26	\$ 6.43	\$ 7.31
27	\$ 6.39	\$ 7.26
28	\$ 6.36	\$ 7.22
29	\$ 6.33	\$ 7.18
30	\$ 6.30	\$ 7.14
31	\$ 6.27	\$ 7.10
32	\$ 6.25	\$ 7.07
33	\$ 6.22	\$ 7.04
34	\$ 6.20	\$ 7.00
35	\$ 6.18	\$ 6.98
36	\$ 6.16	\$ 6.95
37	\$ 6.14	\$ 6.92
38	\$ 6.12	\$ 6.90
39	\$ 6.10	\$ 6.88
40	\$ 6.09	\$ 6.85
41	\$ 6.07	\$ 6.83
42	\$ 6.06	\$ 6.81
43	\$ 6.04	\$ 6.80
44	\$ 6.03	\$ 6.78
45	\$ 6.02	\$ 6.76
46	\$ 6.00	\$ 6.74
47	\$ 5.99	\$ 6.73
48	\$ 5.98	\$ 6.71
49	\$ 5.97	\$ 6.70
50	\$ 5.96	\$ 6.68
51	\$ 5.95	\$ 6.67
52	\$ 5.94	\$ 6.66

Units	Present Base Rate	Proposed Base Rate
53	\$ 5.93	\$ 6.65
54	\$ 5.92	\$ 6.63
55	\$ 5.91	\$ 6.62
56	\$ 5.91	\$ 6.61
57	\$ 5.90	\$ 6.60
58	\$ 5.89	\$ 6.59
59	\$ 5.88	\$ 6.58
60	\$ 5.88	\$ 6.57
61	\$ 5.87	\$ 6.56
62	\$ 5.86	\$ 6.55
63	\$ 5.86	\$ 6.54
64	\$ 5.85	\$ 6.54
65	\$ 5.84	\$ 6.53
66	\$ 5.84	\$ 6.52
67	\$ 5.83	\$ 6.51
68	\$ 5.83	\$ 6.50
69	\$ 5.82	\$ 6.50
70	\$ 5.82	\$ 6.49
71	\$ 5.81	\$ 6.48
72	\$ 5.81	\$ 6.48
73	\$ 5.80	\$ 6.47
74	\$ 5.80	\$ 6.46
75	\$ 5.79	\$ 6.46
76	\$ 5.79	\$ 6.45
77	\$ 5.78	\$ 6.45
78	\$ 5.78	\$ 6.44
79	\$ 5.77	\$ 6.44
80	\$ 5.77	\$ 6.43
81	\$ 5.77	\$ 6.42
82	\$ 5.76	\$ 6.42
83	\$ 5.76	\$ 6.41
84	\$ 5.76	\$ 6.41
85	\$ 5.75	\$ 6.40
86	\$ 5.75	\$ 6.40
87	\$ 5.74	\$ 6.40
88	\$ 5.74	\$ 6.39
89	\$ 5.74	\$ 6.39
90	\$ 5.74	\$ 6.38
91	\$ 5.73	\$ 6.38
92	\$ 5.73	\$ 6.37
93	\$ 5.73	\$ 6.37
94	\$ 5.72	\$ 6.37
95	\$ 5.72	\$ 6.36
96	\$ 5.72	\$ 6.36
97	\$ 5.71	\$ 6.36
98	\$ 5.71	\$ 6.35
99	\$ 5.71	\$ 6.35
100	\$ 5.71	\$ 6.34
101	\$ 5.70	\$ 6.34
102	\$ 5.70	\$ 6.34
103	\$ 5.70	\$ 6.33
104	\$ 5.70	\$ 6.33
105	\$ 5.69	\$ 6.33
106	\$ 5.69	\$ 6.33
107	\$ 5.69	\$ 6.32
108	\$ 5.69	\$ 6.32
109	\$ 5.69	\$ 6.32
110	\$ 5.68	\$ 6.31
111	\$ 5.68	\$ 6.31
112	\$ 5.68	\$ 6.31
113	\$ 5.68	\$ 6.31
114	\$ 5.68	\$ 6.30
115	\$ 5.67	\$ 6.30
116	\$ 5.67	\$ 6.30
117	\$ 5.67	\$ 6.30

Units	Present Base Rate	Proposed Base Rate
118	\$ 5.67	\$ 6.29
119	\$ 5.67	\$ 6.29
120	\$ 5.66	\$ 6.29
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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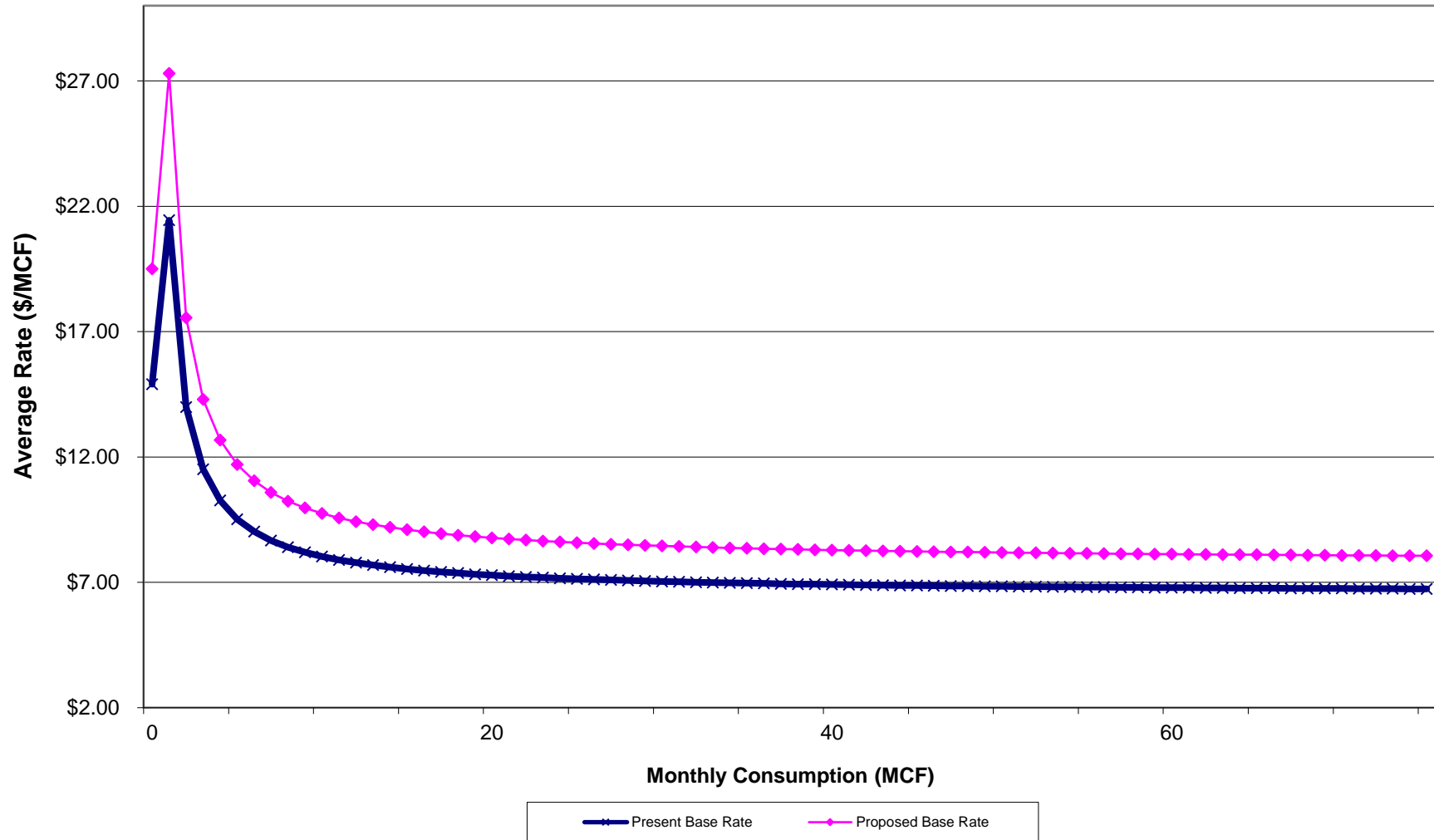
Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES

PHA/GS UNIT COST



PHA/GS

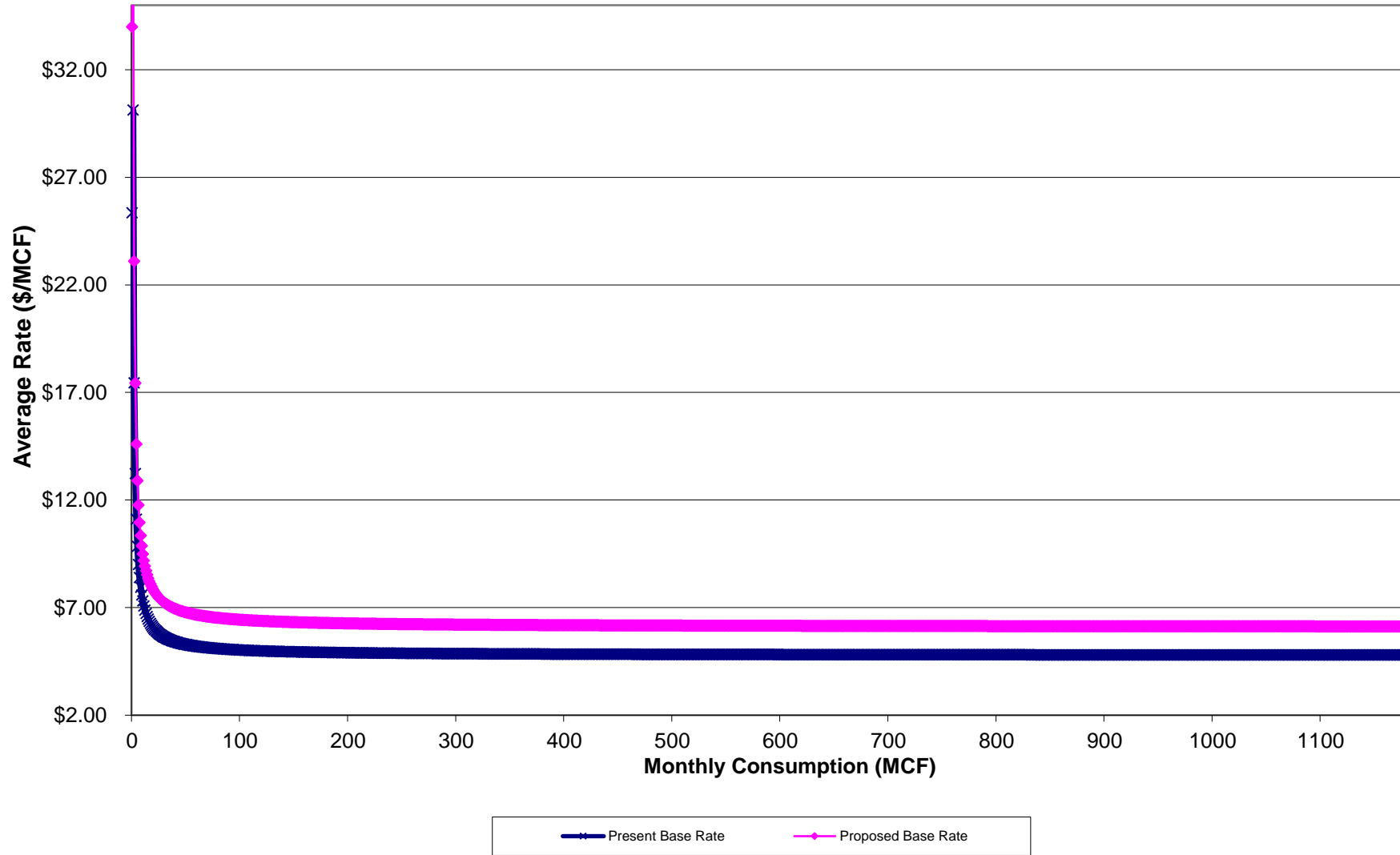
<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	85
Delivery Charge	\$6.5393	\$7.7984	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$6.5393	\$7.7984	
Customer Charge	\$14.90	\$19.50	

Units	Present Base Rate	Proposed Base Rate
0	\$ 14.90	\$ 19.50
1	\$ 21.44	\$ 27.30
2	\$ 13.99	\$ 17.55
3	\$ 11.51	\$ 14.30
4	\$ 10.26	\$ 12.67
5	\$ 9.52	\$ 11.70
6	\$ 9.02	\$ 11.05
7	\$ 8.67	\$ 10.58
8	\$ 8.40	\$ 10.24
9	\$ 8.19	\$ 9.97
10	\$ 8.03	\$ 9.75
11	\$ 7.89	\$ 9.57
12	\$ 7.78	\$ 9.42
13	\$ 7.69	\$ 9.30
14	\$ 7.60	\$ 9.19
15	\$ 7.53	\$ 9.10
16	\$ 7.47	\$ 9.02
17	\$ 7.42	\$ 8.95
18	\$ 7.37	\$ 8.88
19	\$ 7.32	\$ 8.82
20	\$ 7.28	\$ 8.77
21	\$ 7.25	\$ 8.73
22	\$ 7.22	\$ 8.68
23	\$ 7.19	\$ 8.65
24	\$ 7.16	\$ 8.61
25	\$ 7.14	\$ 8.58
26	\$ 7.11	\$ 8.55
27	\$ 7.09	\$ 8.52
28	\$ 7.07	\$ 8.49
29	\$ 7.05	\$ 8.47
30	\$ 7.04	\$ 8.45
31	\$ 7.02	\$ 8.43
32	\$ 7.00	\$ 8.41
33	\$ 6.99	\$ 8.39
34	\$ 6.98	\$ 8.37
35	\$ 6.97	\$ 8.36
36	\$ 6.95	\$ 8.34
37	\$ 6.94	\$ 8.33
38	\$ 6.93	\$ 8.31
39	\$ 6.92	\$ 8.30
40	\$ 6.91	\$ 8.29
41	\$ 6.90	\$ 8.27
42	\$ 6.89	\$ 8.26
43	\$ 6.89	\$ 8.25
44	\$ 6.88	\$ 8.24
45	\$ 6.87	\$ 8.23
46	\$ 6.86	\$ 8.22
47	\$ 6.86	\$ 8.21
48	\$ 6.85	\$ 8.20
49	\$ 6.84	\$ 8.20
50	\$ 6.84	\$ 8.19
51	\$ 6.83	\$ 8.18
52	\$ 6.83	\$ 8.17

Units	Present Base Rate	Proposed Base Rate
53	\$ 6.82	\$ 8.17
54	\$ 6.82	\$ 8.16
55	\$ 6.81	\$ 8.15
56	\$ 6.81	\$ 8.15
57	\$ 6.80	\$ 8.14
58	\$ 6.80	\$ 8.13
59	\$ 6.79	\$ 8.13
60	\$ 6.79	\$ 8.12
61	\$ 6.78	\$ 8.12
62	\$ 6.78	\$ 8.11
63	\$ 6.78	\$ 8.11
64	\$ 6.77	\$ 8.10
65	\$ 6.77	\$ 8.10
66	\$ 6.77	\$ 8.09
67	\$ 6.76	\$ 8.09
68	\$ 6.76	\$ 8.09
69	\$ 6.76	\$ 8.08
70	\$ 6.75	\$ 8.08
71	\$ 6.75	\$ 8.07
72	\$ 6.75	\$ 8.07
73	\$ 6.74	\$ 8.07
74	\$ 6.74	\$ 8.06
75	\$ 6.74	\$ 8.06
76	\$ 6.74	\$ 8.05
77	\$ 6.73	\$ 8.05
78	\$ 6.73	\$ 8.05
79	\$ 6.73	\$ 8.05
80	\$ 6.73	\$ 8.04
81	\$ 6.72	\$ 8.04
82	\$ 6.72	\$ 8.04
83	\$ 6.72	\$ 8.03
84	\$ 6.72	\$ 8.03
85	\$ 6.71	\$ 8.03
86	\$ 6.71	\$ 8.03
87	\$ 6.71	\$ 8.02
88	\$ 6.71	\$ 8.02
89	\$ 6.71	\$ 8.02
90	\$ 6.70	\$ 8.02
91	\$ 6.70	\$ 8.01
92	\$ 6.70	\$ 8.01
93	\$ 6.70	\$ 8.01
94	\$ 6.70	\$ 8.01
95	\$ 6.70	\$ 8.00
96	\$ 6.69	\$ 8.00
97	\$ 6.69	\$ 8.00
98	\$ 6.69	\$ 8.00
99	\$ 6.69	\$ 8.00
100	\$ 6.69	\$ 7.99
101	\$ 6.69	\$ 7.99
102	\$ 6.69	\$ 7.99
103	\$ 6.68	\$ 7.99
104	\$ 6.68	\$ 7.99
105	\$ 6.68	\$ 7.98
106	\$ 6.68	\$ 7.98
107	\$ 6.68	\$ 7.98
108	\$ 6.68	\$ 7.98
109	\$ 6.68	\$ 7.98

PHILADELPHIA GAS WORKS PRESENT AND PROPOSED RATES

MUNICIPAL UNIT COST



Municipal Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>	<u>Average Usage</u>
Surcharges	\$0.0000	\$0.0000	1121
Delivery Charge	\$4.7765	\$6.0976	
GCR Factor	\$0.0000	\$0.0000	
<u>TOTAL Unit Costs</u>	\$4.7765	\$6.0976	
Customer Charge	\$25.35	\$34.00	

Units	Present Base Rate	Proposed Base Rate
0	\$ 25.35	\$ 34.00
1	\$ 30.13	\$ 40.10
2	\$ 17.45	\$ 23.10
3	\$ 13.23	\$ 17.43
4	\$ 11.11	\$ 14.60
5	\$ 9.85	\$ 12.90
6	\$ 9.00	\$ 11.76
7	\$ 8.40	\$ 10.95
8	\$ 7.95	\$ 10.35
9	\$ 7.59	\$ 9.88
10	\$ 7.31	\$ 9.50
11	\$ 7.08	\$ 9.19
12	\$ 6.89	\$ 8.93
13	\$ 6.73	\$ 8.71
14	\$ 6.59	\$ 8.53
15	\$ 6.47	\$ 8.36
16	\$ 6.36	\$ 8.22
17	\$ 6.27	\$ 8.10
18	\$ 6.18	\$ 7.99
19	\$ 6.11	\$ 7.89
20	\$ 6.04	\$ 7.80
21	\$ 5.98	\$ 7.72
22	\$ 5.93	\$ 7.64
23	\$ 5.88	\$ 7.58
24	\$ 5.83	\$ 7.51
25	\$ 5.79	\$ 7.46
26	\$ 5.75	\$ 7.41
27	\$ 5.72	\$ 7.36
28	\$ 5.68	\$ 7.31
29	\$ 5.65	\$ 7.27
30	\$ 5.62	\$ 7.23
31	\$ 5.59	\$ 7.19
32	\$ 5.57	\$ 7.16
33	\$ 5.54	\$ 7.13
34	\$ 5.52	\$ 7.10
35	\$ 5.50	\$ 7.07
36	\$ 5.48	\$ 7.04
37	\$ 5.46	\$ 7.02
38	\$ 5.44	\$ 6.99
39	\$ 5.43	\$ 6.97
40	\$ 5.41	\$ 6.95
41	\$ 5.39	\$ 6.93
42	\$ 5.38	\$ 6.91
43	\$ 5.37	\$ 6.89
44	\$ 5.35	\$ 6.87
45	\$ 5.34	\$ 6.85
46	\$ 5.33	\$ 6.84
47	\$ 5.32	\$ 6.82
48	\$ 5.30	\$ 6.81
49	\$ 5.29	\$ 6.79
50	\$ 5.28	\$ 6.78
51	\$ 5.27	\$ 6.76
52	\$ 5.26	\$ 6.75

Units	Present Base Rate	Proposed Base Rate
53	\$ 5.25	\$ 6.74
54	\$ 5.25	\$ 6.73
55	\$ 5.24	\$ 6.72
56	\$ 5.23	\$ 6.70
57	\$ 5.22	\$ 6.69
58	\$ 5.21	\$ 6.68
59	\$ 5.21	\$ 6.67
60	\$ 5.20	\$ 6.66
61	\$ 5.19	\$ 6.65
62	\$ 5.19	\$ 6.65
63	\$ 5.18	\$ 6.64
64	\$ 5.17	\$ 6.63
65	\$ 5.17	\$ 6.62
66	\$ 5.16	\$ 6.61
67	\$ 5.15	\$ 6.61
68	\$ 5.15	\$ 6.60
69	\$ 5.14	\$ 6.59
70	\$ 5.14	\$ 6.58
71	\$ 5.13	\$ 6.58
72	\$ 5.13	\$ 6.57
73	\$ 5.12	\$ 6.56
74	\$ 5.12	\$ 6.56
75	\$ 5.11	\$ 6.55
76	\$ 5.11	\$ 6.54
77	\$ 5.11	\$ 6.54
78	\$ 5.10	\$ 6.53
79	\$ 5.10	\$ 6.53
80	\$ 5.09	\$ 6.52
81	\$ 5.09	\$ 6.52
82	\$ 5.09	\$ 6.51
83	\$ 5.08	\$ 6.51
84	\$ 5.08	\$ 6.50
85	\$ 5.07	\$ 6.50
86	\$ 5.07	\$ 6.49
87	\$ 5.07	\$ 6.49
88	\$ 5.06	\$ 6.48
89	\$ 5.06	\$ 6.48
90	\$ 5.06	\$ 6.48
91	\$ 5.06	\$ 6.47
92	\$ 5.05	\$ 6.47
93	\$ 5.05	\$ 6.46
94	\$ 5.05	\$ 6.46
95	\$ 5.04	\$ 6.46
96	\$ 5.04	\$ 6.45
97	\$ 5.04	\$ 6.45
98	\$ 5.04	\$ 6.44
99	\$ 5.03	\$ 6.44
100	\$ 5.03	\$ 6.44
101	\$ 5.03	\$ 6.43
102	\$ 5.03	\$ 6.43
103	\$ 5.02	\$ 6.43
104	\$ 5.02	\$ 6.42
105	\$ 5.02	\$ 6.42
106	\$ 5.02	\$ 6.42
107	\$ 5.01	\$ 6.42
108	\$ 5.01	\$ 6.41
109	\$ 5.01	\$ 6.41
110	\$ 5.01	\$ 6.41
111	\$ 5.00	\$ 6.40
112	\$ 5.00	\$ 6.40
113	\$ 5.00	\$ 6.40
114	\$ 5.00	\$ 6.40
115	\$ 5.00	\$ 6.39
116	\$ 5.00	\$ 6.39
117	\$ 4.99	\$ 6.39

Units	Present Base Rate	Proposed Base Rate
118	\$ 4.99	\$ 6.39
119	\$ 4.99	\$ 6.38
120	\$ 4.99	\$ 6.38
121	\$ 4.99	\$ 6.38
122	\$ 4.98	\$ 6.38
123	\$ 4.98	\$ 6.37
124	\$ 4.98	\$ 6.37
125	\$ 4.98	\$ 6.37
126	\$ 4.98	\$ 6.37
127	\$ 4.98	\$ 6.37
128	\$ 4.97	\$ 6.36
129	\$ 4.97	\$ 6.36
130	\$ 4.97	\$ 6.36
131	\$ 4.97	\$ 6.36
132	\$ 4.97	\$ 6.36
133	\$ 4.97	\$ 6.35
134	\$ 4.97	\$ 6.35
135	\$ 4.96	\$ 6.35
136	\$ 4.96	\$ 6.35
137	\$ 4.96	\$ 6.35
138	\$ 4.96	\$ 6.34
139	\$ 4.96	\$ 6.34
140	\$ 4.96	\$ 6.34
141	\$ 4.96	\$ 6.34
142	\$ 4.96	\$ 6.34
143	\$ 4.95	\$ 6.34
144	\$ 4.95	\$ 6.33
145	\$ 4.95	\$ 6.33
146	\$ 4.95	\$ 6.33
147	\$ 4.95	\$ 6.33
148	\$ 4.95	\$ 6.33
149	\$ 4.95	\$ 6.33
150	\$ 4.95	\$ 6.32
151	\$ 4.94	\$ 6.32
152	\$ 4.94	\$ 6.32
153	\$ 4.94	\$ 6.32
154	\$ 4.94	\$ 6.32
155	\$ 4.94	\$ 6.32
156	\$ 4.94	\$ 6.32
157	\$ 4.94	\$ 6.31
158	\$ 4.94	\$ 6.31
159	\$ 4.94	\$ 6.31
160	\$ 4.93	\$ 6.31
161	\$ 4.93	\$ 6.31
162	\$ 4.93	\$ 6.31
163	\$ 4.93	\$ 6.31
164	\$ 4.93	\$ 6.30
165	\$ 4.93	\$ 6.30
166	\$ 4.93	\$ 6.30
167	\$ 4.93	\$ 6.30
168	\$ 4.93	\$ 6.30
169	\$ 4.93	\$ 6.30
170	\$ 4.93	\$ 6.30
171	\$ 4.92	\$ 6.30
172	\$ 4.92	\$ 6.30
173	\$ 4.92	\$ 6.29
174	\$ 4.92	\$ 6.29
175	\$ 4.92	\$ 6.29
176	\$ 4.92	\$ 6.29
177	\$ 4.92	\$ 6.29
178	\$ 4.92	\$ 6.29
179	\$ 4.92	\$ 6.29
180	\$ 4.92	\$ 6.29
181	\$ 4.92	\$ 6.29
182	\$ 4.92	\$ 6.28

Units	Present Base Rate	Proposed Base Rate
183	\$ 4.92	\$ 6.28
184	\$ 4.91	\$ 6.28
185	\$ 4.91	\$ 6.28
186	\$ 4.91	\$ 6.28
187	\$ 4.91	\$ 6.28
188	\$ 4.91	\$ 6.28
189	\$ 4.91	\$ 6.28
190	\$ 4.91	\$ 6.28
191	\$ 4.91	\$ 6.28
192	\$ 4.91	\$ 6.27
193	\$ 4.91	\$ 6.27
194	\$ 4.91	\$ 6.27
195	\$ 4.91	\$ 6.27
196	\$ 4.91	\$ 6.27
197	\$ 4.91	\$ 6.27
198	\$ 4.90	\$ 6.27
199	\$ 4.90	\$ 6.27
200	\$ 4.90	\$ 6.27
201	\$ 4.90	\$ 6.27
202	\$ 4.90	\$ 6.27
203	\$ 4.90	\$ 6.27
204	\$ 4.90	\$ 6.26
205	\$ 4.90	\$ 6.26
206	\$ 4.90	\$ 6.26
207	\$ 4.90	\$ 6.26
208	\$ 4.90	\$ 6.26
209	\$ 4.90	\$ 6.26
210	\$ 4.90	\$ 6.26
211	\$ 4.90	\$ 6.26
212	\$ 4.90	\$ 6.26
213	\$ 4.90	\$ 6.26
214	\$ 4.89	\$ 6.26
215	\$ 4.89	\$ 6.26
216	\$ 4.89	\$ 6.26
217	\$ 4.89	\$ 6.25
218	\$ 4.89	\$ 6.25
219	\$ 4.89	\$ 6.25
220	\$ 4.89	\$ 6.25
221	\$ 4.89	\$ 6.25
222	\$ 4.89	\$ 6.25
223	\$ 4.89	\$ 6.25
224	\$ 4.89	\$ 6.25
225	\$ 4.89	\$ 6.25
226	\$ 4.89	\$ 6.25
227	\$ 4.89	\$ 6.25
228	\$ 4.89	\$ 6.25
229	\$ 4.89	\$ 6.25
230	\$ 4.89	\$ 6.25
231	\$ 4.89	\$ 6.24
232	\$ 4.89	\$ 6.24
233	\$ 4.89	\$ 6.24
234	\$ 4.88	\$ 6.24
235	\$ 4.88	\$ 6.24
236	\$ 4.88	\$ 6.24
237	\$ 4.88	\$ 6.24
238	\$ 4.88	\$ 6.24
239	\$ 4.88	\$ 6.24
240	\$ 4.88	\$ 6.24
241	\$ 4.88	\$ 6.24
242	\$ 4.88	\$ 6.24
243	\$ 4.88	\$ 6.24
244	\$ 4.88	\$ 6.24
245	\$ 4.88	\$ 6.24
246	\$ 4.88	\$ 6.24
247	\$ 4.88	\$ 6.24

Units	Present Base Rate	Proposed Base Rate
248	\$ 4.88	\$ 6.23
249	\$ 4.88	\$ 6.23
250	\$ 4.88	\$ 6.23
251	\$ 4.88	\$ 6.23
252	\$ 4.88	\$ 6.23
253	\$ 4.88	\$ 6.23
254	\$ 4.88	\$ 6.23
255	\$ 4.88	\$ 6.23
256	\$ 4.88	\$ 6.23
257	\$ 4.88	\$ 6.23
258	\$ 4.87	\$ 6.23
259	\$ 4.87	\$ 6.23
260	\$ 4.87	\$ 6.23
261	\$ 4.87	\$ 6.23
262	\$ 4.87	\$ 6.23
263	\$ 4.87	\$ 6.23
264	\$ 4.87	\$ 6.23
265	\$ 4.87	\$ 6.23
266	\$ 4.87	\$ 6.23
267	\$ 4.87	\$ 6.22
268	\$ 4.87	\$ 6.22
269	\$ 4.87	\$ 6.22
270	\$ 4.87	\$ 6.22
271	\$ 4.87	\$ 6.22
272	\$ 4.87	\$ 6.22
273	\$ 4.87	\$ 6.22
274	\$ 4.87	\$ 6.22
275	\$ 4.87	\$ 6.22
276	\$ 4.87	\$ 6.22
277	\$ 4.87	\$ 6.22
278	\$ 4.87	\$ 6.22
279	\$ 4.87	\$ 6.22
280	\$ 4.87	\$ 6.22
281	\$ 4.87	\$ 6.22
282	\$ 4.87	\$ 6.22
283	\$ 4.87	\$ 6.22
284	\$ 4.87	\$ 6.22
285	\$ 4.87	\$ 6.22
286	\$ 4.87	\$ 6.22
287	\$ 4.86	\$ 6.22
288	\$ 4.86	\$ 6.22
289	\$ 4.86	\$ 6.22
290	\$ 4.86	\$ 6.21
291	\$ 4.86	\$ 6.21
292	\$ 4.86	\$ 6.21
293	\$ 4.86	\$ 6.21
294	\$ 4.86	\$ 6.21
295	\$ 4.86	\$ 6.21
296	\$ 4.86	\$ 6.21
297	\$ 4.86	\$ 6.21
298	\$ 4.86	\$ 6.21
299	\$ 4.86	\$ 6.21
300	\$ 4.86	\$ 6.21
301	\$ 4.86	\$ 6.21
302	\$ 4.86	\$ 6.21
303	\$ 4.86	\$ 6.21
304	\$ 4.86	\$ 6.21
305	\$ 4.86	\$ 6.21
306	\$ 4.86	\$ 6.21
307	\$ 4.86	\$ 6.21
308	\$ 4.86	\$ 6.21
309	\$ 4.86	\$ 6.21
310	\$ 4.86	\$ 6.21
311	\$ 4.86	\$ 6.21
312	\$ 4.86	\$ 6.21

Units	Present Base Rate	Proposed Base Rate
313	\$ 4.86	\$ 6.21
314	\$ 4.86	\$ 6.21
315	\$ 4.86	\$ 6.21
316	\$ 4.86	\$ 6.21
317	\$ 4.86	\$ 6.20
318	\$ 4.86	\$ 6.20
319	\$ 4.86	\$ 6.20
320	\$ 4.86	\$ 6.20
321	\$ 4.86	\$ 6.20
322	\$ 4.86	\$ 6.20
323	\$ 4.85	\$ 6.20
324	\$ 4.85	\$ 6.20
325	\$ 4.85	\$ 6.20
326	\$ 4.85	\$ 6.20
327	\$ 4.85	\$ 6.20
328	\$ 4.85	\$ 6.20
329	\$ 4.85	\$ 6.20
330	\$ 4.85	\$ 6.20
331	\$ 4.85	\$ 6.20
332	\$ 4.85	\$ 6.20
333	\$ 4.85	\$ 6.20
334	\$ 4.85	\$ 6.20
335	\$ 4.85	\$ 6.20
336	\$ 4.85	\$ 6.20
337	\$ 4.85	\$ 6.20
338	\$ 4.85	\$ 6.20
339	\$ 4.85	\$ 6.20
340	\$ 4.85	\$ 6.20
341	\$ 4.85	\$ 6.20
342	\$ 4.85	\$ 6.20
343	\$ 4.85	\$ 6.20
344	\$ 4.85	\$ 6.20
345	\$ 4.85	\$ 6.20
346	\$ 4.85	\$ 6.20
347	\$ 4.85	\$ 6.20
348	\$ 4.85	\$ 6.20
349	\$ 4.85	\$ 6.20
350	\$ 4.85	\$ 6.19
351	\$ 4.85	\$ 6.19
352	\$ 4.85	\$ 6.19
353	\$ 4.85	\$ 6.19
354	\$ 4.85	\$ 6.19
355	\$ 4.85	\$ 6.19
356	\$ 4.85	\$ 6.19
357	\$ 4.85	\$ 6.19
358	\$ 4.85	\$ 6.19
359	\$ 4.85	\$ 6.19
360	\$ 4.85	\$ 6.19
361	\$ 4.85	\$ 6.19
362	\$ 4.85	\$ 6.19
363	\$ 4.85	\$ 6.19
364	\$ 4.85	\$ 6.19
365	\$ 4.85	\$ 6.19
366	\$ 4.85	\$ 6.19
367	\$ 4.85	\$ 6.19
368	\$ 4.85	\$ 6.19
369	\$ 4.85	\$ 6.19
370	\$ 4.85	\$ 6.19
371	\$ 4.84	\$ 6.19
372	\$ 4.84	\$ 6.19
373	\$ 4.84	\$ 6.19
374	\$ 4.84	\$ 6.19
375	\$ 4.84	\$ 6.19
376	\$ 4.84	\$ 6.19
377	\$ 4.84	\$ 6.19

Units	Present Base Rate	Proposed Base Rate
378	\$ 4.84	\$ 6.19
379	\$ 4.84	\$ 6.19
380	\$ 4.84	\$ 6.19
381	\$ 4.84	\$ 6.19
382	\$ 4.84	\$ 6.19
383	\$ 4.84	\$ 6.19
384	\$ 4.84	\$ 6.19
385	\$ 4.84	\$ 6.19
386	\$ 4.84	\$ 6.19
387	\$ 4.84	\$ 6.19
388	\$ 4.84	\$ 6.19
389	\$ 4.84	\$ 6.19
390	\$ 4.84	\$ 6.18
391	\$ 4.84	\$ 6.18
392	\$ 4.84	\$ 6.18
393	\$ 4.84	\$ 6.18
394	\$ 4.84	\$ 6.18
395	\$ 4.84	\$ 6.18
396	\$ 4.84	\$ 6.18
397	\$ 4.84	\$ 6.18
398	\$ 4.84	\$ 6.18
399	\$ 4.84	\$ 6.18
400	\$ 4.84	\$ 6.18
401	\$ 4.84	\$ 6.18
402	\$ 4.84	\$ 6.18
403	\$ 4.84	\$ 6.18
404	\$ 4.84	\$ 6.18
405	\$ 4.84	\$ 6.18
406	\$ 4.84	\$ 6.18
407	\$ 4.84	\$ 6.18
408	\$ 4.84	\$ 6.18
409	\$ 4.84	\$ 6.18
410	\$ 4.84	\$ 6.18
411	\$ 4.84	\$ 6.18
412	\$ 4.84	\$ 6.18
413	\$ 4.84	\$ 6.18
414	\$ 4.84	\$ 6.18
415	\$ 4.84	\$ 6.18
416	\$ 4.84	\$ 6.18
417	\$ 4.84	\$ 6.18
418	\$ 4.84	\$ 6.18
419	\$ 4.84	\$ 6.18
420	\$ 4.84	\$ 6.18
421	\$ 4.84	\$ 6.18
422	\$ 4.84	\$ 6.18
423	\$ 4.84	\$ 6.18
424	\$ 4.84	\$ 6.18
425	\$ 4.84	\$ 6.18
426	\$ 4.84	\$ 6.18
427	\$ 4.84	\$ 6.18
428	\$ 4.84	\$ 6.18
429	\$ 4.84	\$ 6.18
430	\$ 4.84	\$ 6.18
431	\$ 4.84	\$ 6.18
432	\$ 4.84	\$ 6.18
433	\$ 4.84	\$ 6.18
434	\$ 4.83	\$ 6.18
435	\$ 4.83	\$ 6.18
436	\$ 4.83	\$ 6.18
437	\$ 4.83	\$ 6.18
438	\$ 4.83	\$ 6.18
439	\$ 4.83	\$ 6.18
440	\$ 4.83	\$ 6.17
441	\$ 4.83	\$ 6.17
442	\$ 4.83	\$ 6.17

Units	Present Base Rate	Proposed Base Rate
443	\$ 4.83	\$ 6.17
444	\$ 4.83	\$ 6.17
445	\$ 4.83	\$ 6.17
446	\$ 4.83	\$ 6.17
447	\$ 4.83	\$ 6.17
448	\$ 4.83	\$ 6.17
449	\$ 4.83	\$ 6.17
450	\$ 4.83	\$ 6.17
451	\$ 4.83	\$ 6.17
452	\$ 4.83	\$ 6.17
453	\$ 4.83	\$ 6.17
454	\$ 4.83	\$ 6.17
455	\$ 4.83	\$ 6.17
456	\$ 4.83	\$ 6.17
457	\$ 4.83	\$ 6.17
458	\$ 4.83	\$ 6.17
459	\$ 4.83	\$ 6.17
460	\$ 4.83	\$ 6.17
461	\$ 4.83	\$ 6.17
462	\$ 4.83	\$ 6.17
463	\$ 4.83	\$ 6.17
464	\$ 4.83	\$ 6.17
465	\$ 4.83	\$ 6.17
466	\$ 4.83	\$ 6.17
467	\$ 4.83	\$ 6.17
468	\$ 4.83	\$ 6.17
469	\$ 4.83	\$ 6.17
470	\$ 4.83	\$ 6.17
471	\$ 4.83	\$ 6.17
472	\$ 4.83	\$ 6.17
473	\$ 4.83	\$ 6.17
474	\$ 4.83	\$ 6.17
475	\$ 4.83	\$ 6.17
476	\$ 4.83	\$ 6.17
477	\$ 4.83	\$ 6.17
478	\$ 4.83	\$ 6.17
479	\$ 4.83	\$ 6.17
480	\$ 4.83	\$ 6.17
481	\$ 4.83	\$ 6.17
482	\$ 4.83	\$ 6.17
483	\$ 4.83	\$ 6.17
484	\$ 4.83	\$ 6.17
485	\$ 4.83	\$ 6.17
486	\$ 4.83	\$ 6.17
487	\$ 4.83	\$ 6.17
488	\$ 4.83	\$ 6.17
489	\$ 4.83	\$ 6.17
490	\$ 4.83	\$ 6.17
491	\$ 4.83	\$ 6.17
492	\$ 4.83	\$ 6.17
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
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Units	Present Base Rate	Proposed Base Rate
1158	\$ 4.80	\$ 6.13
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1177	\$ 4.80	\$ 6.13
1178	\$ 4.80	\$ 6.13
1179	\$ 4.80	\$ 6.13
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1189	\$ 4.80	\$ 6.13
1190	\$ 4.80	\$ 6.13
1191	\$ 4.80	\$ 6.13
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1198	\$ 4.80	\$ 6.13
1199	\$ 4.80	\$ 6.13
1200	\$ 4.80	\$ 6.13
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1221	\$ 4.80	\$ 6.13
1222	\$ 4.80	\$ 6.13

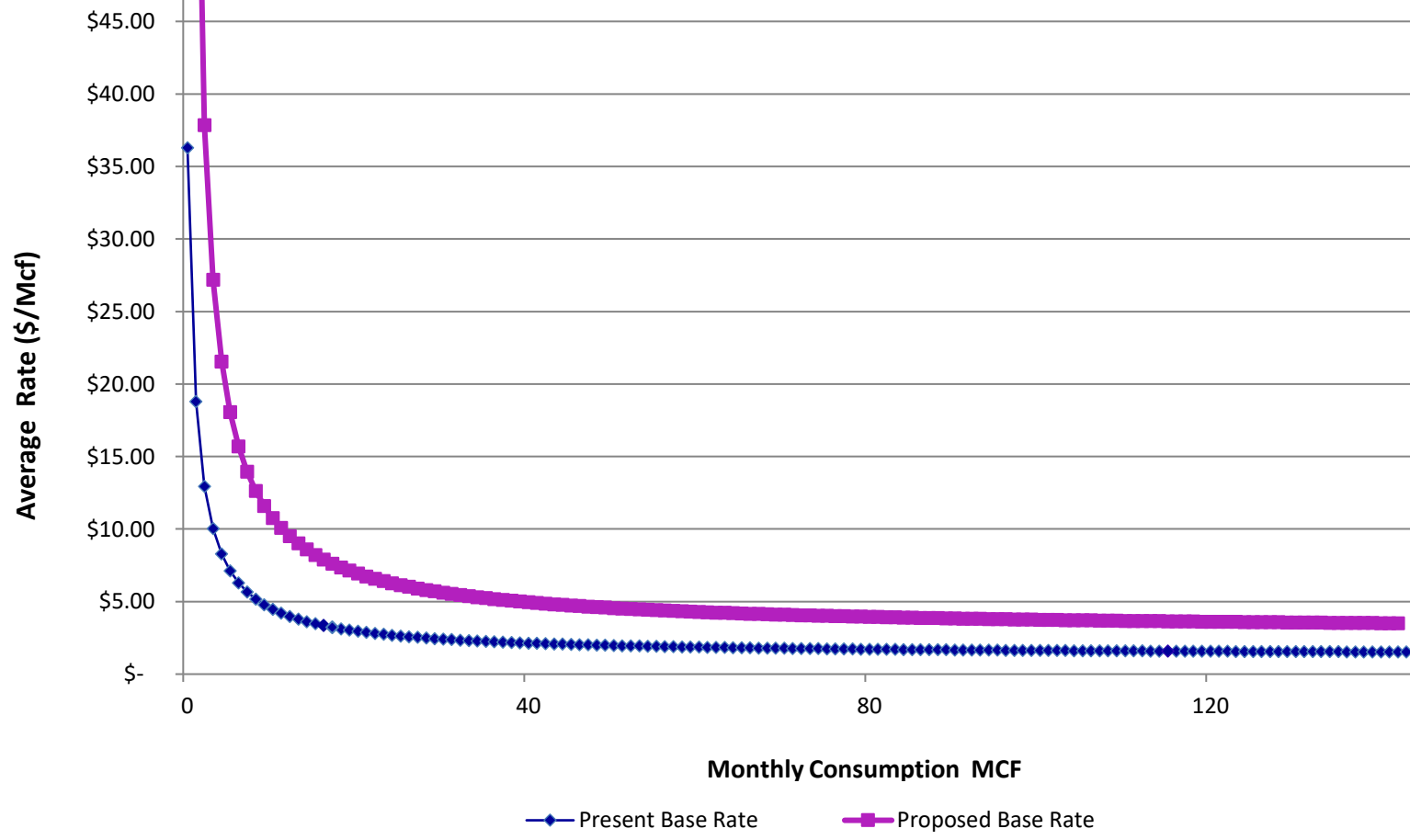
Units	Present Base Rate	Proposed Base Rate
1223	\$ 4.80	\$ 6.13
1224	\$ 4.80	\$ 6.13
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1287	\$ 4.80	\$ 6.12

Units	Present Base Rate	Proposed Base Rate
1288	\$ 4.80	\$ 6.12
1289	\$ 4.80	\$ 6.12
1290	\$ 4.80	\$ 6.12
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1301	\$ 4.80	\$ 6.12
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Units	Present Base Rate	Proposed Base Rate
1353	\$ 4.80	\$ 6.12
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1369	\$ 4.80	\$ 6.12
1370	\$ 4.80	\$ 6.12
1371	\$ 4.79	\$ 6.12
1372	\$ 4.79	\$ 6.12
1373	\$ 4.79	\$ 6.12
1374	\$ 4.79	\$ 6.12
1375	\$ 4.79	\$ 6.12
1376	\$ 4.79	\$ 6.12
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1378	\$ 4.79	\$ 6.12
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1380	\$ 4.79	\$ 6.12
1381	\$ 4.79	\$ 6.12
1382	\$ 4.79	\$ 6.12
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1414	\$ 4.79	\$ 6.12
1415	\$ 4.79	\$ 6.12
1416	\$ 4.79	\$ 6.12
1417	\$ 4.79	\$ 6.12

Units	Present Base Rate	Proposed Base Rate
1418	\$ 4.79	\$ 6.12
1419	\$ 4.79	\$ 6.12
1420	\$ 4.79	\$ 6.12
1421	\$ 4.79	\$ 6.12

NGV UNIT COST





NGV Heating

<u>Unit Costs</u>	<u>Current Rates</u>	<u>Proposed Rates</u>
Surcharges	\$0.0000	\$0.0000
Delivery Charge	\$1.2833	1.651
GCR Factor		
<u>TOTAL Unit Costs</u>	\$1.2833	\$1.6510
Customer Charge	\$35.0000	\$46.50

Units	Present Base Rate	Proposed Base Rate
0	\$ 35.00	\$ 46.50
1	\$ 36.28	\$ 48.15
2	\$ 18.78	\$ 24.90
3	\$ 12.95	\$ 17.15
4	\$ 10.03	\$ 13.28
5	\$ 8.28	\$ 10.95
6	\$ 7.12	\$ 9.40
7	\$ 6.28	\$ 8.29
8	\$ 5.66	\$ 7.46
9	\$ 5.17	\$ 6.82
10	\$ 4.78	\$ 6.30
11	\$ 4.47	\$ 5.88
12	\$ 4.20	\$ 5.53
13	\$ 3.98	\$ 5.23
14	\$ 3.78	\$ 4.97
15	\$ 3.62	\$ 4.75
16	\$ 3.47	\$ 4.56
17	\$ 3.34	\$ 4.39
18	\$ 3.23	\$ 4.23
19	\$ 3.13	\$ 4.10
20	\$ 3.03	\$ 3.98
21	\$ 2.95	\$ 3.87
22	\$ 2.87	\$ 3.76
23	\$ 2.81	\$ 3.67
24	\$ 2.74	\$ 3.59
25	\$ 2.68	\$ 3.51
26	\$ 2.63	\$ 3.44
27	\$ 2.58	\$ 3.37
28	\$ 2.53	\$ 3.31
29	\$ 2.49	\$ 3.25
30	\$ 2.45	\$ 3.20
31	\$ 2.41	\$ 3.15
32	\$ 2.38	\$ 3.10
33	\$ 2.34	\$ 3.06
34	\$ 2.31	\$ 3.02
35	\$ 2.28	\$ 2.98
36	\$ 2.26	\$ 2.94
37	\$ 2.23	\$ 2.91
38	\$ 2.20	\$ 2.87
39	\$ 2.18	\$ 2.84
40	\$ 2.16	\$ 2.81
41	\$ 2.14	\$ 2.79
42	\$ 2.12	\$ 2.76
43	\$ 2.10	\$ 2.73
44	\$ 2.08	\$ 2.71
45	\$ 2.06	\$ 2.68
46	\$ 2.04	\$ 2.66
47	\$ 2.03	\$ 2.64
48	\$ 2.01	\$ 2.62
49	\$ 2.00	\$ 2.60
50	\$ 1.98	\$ 2.58
51	\$ 1.97	\$ 2.56
52	\$ 1.96	\$ 2.55
53	\$ 1.94	\$ 2.53
54	\$ 1.93	\$ 2.51
55	\$ 1.92	\$ 2.50

Units	Present Base Rate	Proposed Base Rate
56	\$ 1.91	\$ 2.48
57	\$ 1.90	\$ 2.47
58	\$ 1.89	\$ 2.45
59	\$ 1.88	\$ 2.44
60	\$ 1.87	\$ 2.43
61	\$ 1.86	\$ 2.41
62	\$ 1.85	\$ 2.40
63	\$ 1.84	\$ 2.39
64	\$ 1.83	\$ 2.38
65	\$ 1.82	\$ 2.37
66	\$ 1.81	\$ 2.36
67	\$ 1.81	\$ 2.35
68	\$ 1.80	\$ 2.33
69	\$ 1.79	\$ 2.32
70	\$ 1.78	\$ 2.32
71	\$ 1.78	\$ 2.31
72	\$ 1.77	\$ 2.30
73	\$ 1.76	\$ 2.29
74	\$ 1.76	\$ 2.28
75	\$ 1.75	\$ 2.27
76	\$ 1.74	\$ 2.26
77	\$ 1.74	\$ 2.25
78	\$ 1.73	\$ 2.25
79	\$ 1.73	\$ 2.24
80	\$ 1.72	\$ 2.23
81	\$ 1.72	\$ 2.23
82	\$ 1.71	\$ 2.22
83	\$ 1.70	\$ 2.21
84	\$ 1.70	\$ 2.20
85	\$ 1.70	\$ 2.20
86	\$ 1.69	\$ 2.19
87	\$ 1.69	\$ 2.19
88	\$ 1.68	\$ 2.18
89	\$ 1.68	\$ 2.17
90	\$ 1.67	\$ 2.17
91	\$ 1.67	\$ 2.16
92	\$ 1.66	\$ 2.16
93	\$ 1.66	\$ 2.15
94	\$ 1.66	\$ 2.15
95	\$ 1.65	\$ 2.14
96	\$ 1.65	\$ 2.14
97	\$ 1.64	\$ 2.13
98	\$ 1.64	\$ 2.13
99	\$ 1.64	\$ 2.12
100	\$ 1.63	\$ 2.12
101	\$ 1.63	\$ 2.11
102	\$ 1.63	\$ 2.11
103	\$ 1.62	\$ 2.10
104	\$ 1.62	\$ 2.10
105	\$ 1.62	\$ 2.09
106	\$ 1.61	\$ 2.09
107	\$ 1.61	\$ 2.09
108	\$ 1.61	\$ 2.08
109	\$ 1.60	\$ 2.08
110	\$ 1.60	\$ 2.07
111	\$ 1.60	\$ 2.07
112	\$ 1.60	\$ 2.07
113	\$ 1.59	\$ 2.06
114	\$ 1.59	\$ 2.06
115	\$ 1.59	\$ 2.06
116	\$ 1.59	\$ 2.05
117	\$ 1.58	\$ 2.05
118	\$ 1.58	\$ 2.05
119	\$ 1.58	\$ 2.04
120	\$ 1.57	\$ 2.04
121	\$ 1.57	\$ 2.04
122	\$ 1.57	\$ 2.03
123	\$ 1.57	\$ 2.03

Units	Present Base Rate	Proposed Base Rate
124 \$	1.57	\$ 2.03
125 \$	1.56	\$ 2.02
126 \$	1.56	\$ 2.02
127 \$	1.56	\$ 2.02
128 \$	1.56	\$ 2.01
129 \$	1.55	\$ 2.01
130 \$	1.55	\$ 2.01
131 \$	1.55	\$ 2.01
132 \$	1.55	\$ 2.00
133 \$	1.55	\$ 2.00
134 \$	1.54	\$ 2.00
135 \$	1.54	\$ 2.00
136 \$	1.54	\$ 1.99
137 \$	1.54	\$ 1.99
138 \$	1.54	\$ 1.99
139 \$	1.54	\$ 1.99
140 \$	1.53	\$ 1.98
141 \$	1.53	\$ 1.98
142 \$	1.53	\$ 1.98
143 \$	1.53	\$ 1.98
144 \$	1.53	\$ 1.97

Revised Exh. A IV.B.12

**FY 2024 Base Rate Case
Typical Monthly Bill**

February 1, 2023

September 1, 2023

Residential Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	71	Mcf	\$ 8.2282
Gas Cost Adjustment	71	Mcf	\$ 0.1265
Distribution Charge	71	Mcf	\$ 9.4223
Customer Charge	12	Months	\$ 14.90
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 1,504.55
Effect on Average Monthly Bill			\$ 125.38

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.3359		\$ 0.1077
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 10.3879		\$ 0.9656
Customer Charge	\$ 19.50		\$ 4.60
DSIC	7.50%		0.00%
	\$ 1,645.24	\$ 140.69	9.4%
	\$ 137.10	\$ 11.72	

Commercial Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	333	Mcf	\$ 8.0107
Gas Cost Adjustment	333	Mcf	\$ 0.1265
Distribution Charge	333	Mcf	\$ 7.3461
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 5,666.42
Effect on Average Monthly Bill			\$ 472.20

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.0439		\$ 0.0332
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.0722		\$ 0.7261
Customer Charge	\$ 34.00		\$ 8.65
DSIC	7.50%		0.00%
	\$ 6,048.99	\$ 382.57	6.8%
	\$ 504.08	\$ 31.88	

Industrial Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	957	Mcf	\$ 7.9714
Gas Cost Adjustment	957	Mcf	\$ 0.1265
Distribution Charge	957	Mcf	\$ 7.2755
Customer Charge	12	Months	\$ 75.90
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 16,213.65
Effect on Average Monthly Bill			\$ 1,351.14

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9652		\$ (0.0062)
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.1608		\$ 0.8853
Customer Charge	\$ 100.00		\$ 24.10
DSIC	7.50%		0.00%
	\$ 17,429.38	\$ 1,215.73	7.5%
	\$ 1,452.45	\$ 101.31	

PHA Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	396	Mcf	\$ 7.9377
Gas Cost Adjustment	396	Mcf	\$ 0.1265
Distribution Charge	396	Mcf	\$ 7.6087
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 6,759.46
Effect on Average Monthly Bill			\$ 563.29

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9377		\$ -
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.1600		\$ 0.5513
Customer Charge	\$ 34.00		\$ 8.65
DSIC	7.50%		0.00%
	\$ 7,105.74	\$ 346.27	5.1%
	\$ 592.14	\$ 28.86	

PHA/GS Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	85	Mcf	\$ 8.2282
Gas Cost Adjustment	85	Mcf	\$ 0.1265
Distribution Charge	85	Mcf	\$ 8.6661
Customer Charge	12	Months	\$ 14.9000
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 1,694.22
Effect on Average Monthly Bill			\$ 141.19

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 8.3359		\$ 0.1077
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 9.9252		\$ 1.2591
Customer Charge	\$ 19.50		\$ 4.60
DSIC	7.50%		0.00%
	\$ 1,877.77	\$ 183.54	10.8%
	\$ 156.48	\$ 15.30	

Municipal Heating

<u>Unit Costs</u>	<u>Annual Usage/Months</u>	<u>Unit</u>	<u>Current Rates</u>
Commodity Charge	1,121	Mcf	\$ 7.9377
Gas Cost Adjustment	1,121	Mcf	\$ 0.1265
Distribution Charge	1,121	Mcf	\$ 6.8908
Customer Charge	12	Months	\$ 25.35
DSIC		Percentage	7.50%
Annual Bill/Effect on Annual Bill			\$ 17,670.91
Effect on Average Monthly Bill			\$ 1,472.58

	<u>Rate Change Update</u>	<u>Change In Annual Bill</u>	<u>Change In Rate</u>
Commodity Charge	\$ 7.9377		\$ -
Gas Cost Adjustment	\$ 0.1265		\$ -
Distribution Charge	\$ 8.2119		\$ 1.3211
Customer Charge	\$ 34.00		\$ 8.65
DSIC	7.50%		0.00%
	\$ 19,374.52	\$ 1,703.61	9.6%
	\$ 1,614.54	\$ 141.97	

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUPPLEMENTAL TESTIMONY OF

CONSTANCE E. HEPPENSTALL

ON BEHALF OF
PHILADELPHIA GAS WORKS

Docket No. R-2023-3037933

TOPIC:

Cost of Service

May 5, 2023

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CEH-1S	Cost of Service Study - Supplemental
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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME FOR THE RECORD.**

3 A. Constance E. Heppenstall.

4 **Q. ARE YOU THE SAME CONSTANCE E. HEPPENSTALL THAT SPONSORED**
5 **DIRECT TESTIMONY IN THIS PROCEEDING?**

6 A. Yes, I am.

7 **II. PURPOSE OF TESTIMONY**

8 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

9 A. The purpose of my testimony is to explain PGW's cost of service allocation study,
10 sometimes called class cost of service study as it relates to PGW customer Grays Ferry
11 Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. (or "GFCP/VEPI").
12 Exhibit CEH-1 set forth the cost of service and the revenues under present and proposed
13 rates for the Company's operations. GFCP/VEPI's total cost of service, as shown on
14 Schedule A, is \$10,237,000.

15 **Q. WHAT IS THE PURPOSE OF A COST OF SERVICE ALLOCATION STUDY?**

16 A. As stated in my direct testimony, the purpose of the study is to allocate PGW's full
17 revenue requirement or total cost of service to the various customer classes. The study
18 allocates costs to the Residential, Commercial, Industrial, Municipal, Philadelphia
19 Housing Authority General Service ("PHA-GS"), PHA-Rate 8, Developmental Natural
20 Gas Vehicle Service ("NGVS"), the Interruptible (IT) classes and GFCP/VEPI.
21 Customers under contract or non-tariff rates are excluded from the allocation of costs as
22 this is a base rate proceeding. The revenues from the contract customers are included as
23 a source of revenue to reduce the overall cost of service to be allocated to the other
24 classes.

1 **Q. WHAT ARE THE VOLUMES WERE USED TO DETERMINE THE**
2 **ALLOCATION TO THE GFCEP/VEPI CUSTOMER CLASS?**

3 A. I used the following volumes for this study. These volumes (in MCF) are based on a
4 three year average of ARS and Retail Sales-Firm volume, and the total volume equals the
5 actual volume used by GFCEP/VEPI in the test year as shown below:

	<u>Annual</u>	<u>Daily</u>
Usage (MCF)	12,286,916	33,663
ARS	3,768,722	10,325
Retail Sales - Firm	53,129	146
Transportation	<u>8,465,065</u>	<u>23,192</u>
	12,286,916	33,663

6
7 **Q. HOW DID YOU USE THESE VOLUMES IN CALCULATING THE COSTS TO**
8 **GFCEP/VEPI IN THE COST OF SERVICE STUDY?**

9 A. For Factor 1, which allocates costs that vary directly with the sale of gas, I used
10 GFCEP/VEPI's Retail Sales-Firm volumes. For Factor 2, I used in the calculation of
11 maximum day extra demands and Factor 3, used to allocate mains, I applied the total of
12 GFCEP/VEPI's Retail Sales-Firm and ARS volumes, which are GFCEP/VEPI's volumes
13 that use and benefit from PGW's distribution system. For Factor 2A, which allocates
14 costs related to storage, no volumes were included for GFCEP/VEPI. Factor 3A is the
15 only factor that uses the full volumes for GFCEP/VEPI as Factor 3A is used to allocate
16 costs associated with distribution other than mains.

17 **Q. IS THIS THE SAME METHOD THAT WAS USED IN THE PGW'S PRIOR**
18 **RATE CASE IN DOCKET NO. R-2020-3017206?**

19 A. Yes, except in that docket, GFCEP/VEPI was not presented as a separate class. At that
20 time, GFCEP/VEPI was served under a contract, so the associated revenues were treated as
21 Other Revenues. In this proceeding, GFCEP/VEPI is treated as an additional, individual

1 customer class to which costs are allocated. This is the same methodology used in
2 Docket No. C-2021-3029259.

3 **Q. PLEASE DISCUSS THE DIFFERENCES REGARDING THE TREATMENT OF**
4 **GFCP/VEPI IN PRIOR PGW COST OF SERVICE STUDIES VERSUS THE**
5 **STUDY PRESENTED IN THIS CASE AND IN DOCKET NO. C-2021-3029259.**

6 A. In certain prior cost of service studies, GFCP/VEPI was treated as part of the IT/GTS
7 class and was either directly assigned assets or its demand and throughput were excluded
8 from the GTS allocation. Or, as in Docket No. R-2020-3017206, which I sponsored,
9 GFCP/VEPI revenues were treated as Other Revenues – Grays Ferry, fixed at the contract
10 rate, which could not be adjusted.

11 In prior cases, PGW did not included any consideration of costs associated with ARS or
12 Sales Volumes for GFCP/VEPI. Costs were allocated for transportation service only in
13 prior proceedings and ARS-related costs were never recognized. This is not a change in
14 cost of service methodology, but rather ARS is now being recognized, for the first time,
15 as a separate service and allocated the related appropriate costs. ARS was never
16 addressed previously, and no costs were ever allocated to it.

17 Nor would it have made any difference had ARS been recognized, as GFCP/VEPI was
18 served under a special contract at the time and a tariff that incorporated the terms of the
19 contract, with no opportunity for a rate revision at least as PGW perceived the situation.
20 The change in circumstances is that, now, the contract has expired and the opportunity for
21 the establishment of new cost based rates is presented.

22 PGW maintains that the cost of service provided in this proceeding accurately allocates
23 costs to GFCP/VEPI based on its unique usage patterns and all of the services that it
24 consumes.

1 **Q. WHY DOES THE COST OF SERVICE STUDY ALLOCATE THE COSTS OF**
2 **DISTRIBUTION ASSETS TO GFCP/VEPI BASED ARS VOLUMES?**

3 A. GFCP/VEPI is allocated distribution costs based on the ARS volumes as this program
4 would not be available to GFCP/VEPI without PGW's distribution system. The program
5 is designed so that GFCP/VEPI delivers gas to the Skippack lateral, which supplies
6 PGW's distribution system, and, as a result, frees up capacity at the Philadelphia Lateral
7 to all gas be delivered there for GFCP/VEPI. Without PGW's distribution system, this
8 displacement transaction would not be available.

9 **Q. DID YOU COMPLETE AN ALTERNATIVE COST ANALYSIS AT PGW'S**
10 **REQUEST?**

11 A. Yes. At the request of PGW, I prepared a study that isolates the costs assigned to
12 GFCP/VEPI in my original class cost of service study into two separate components: the
13 basic transportation function of delivering gas; and the ARS component. I would
14 describe the process as unbundling.

15 For transportation cost, identified as Local Transportation Service in PGW's proposed
16 Rate GS-XLT, I removed all non-high pressure distribution plant costs and overheads, so
17 that only the cost of maintaining the Four Mile line and some overheads are included.

18 This results in a revenue requirement that isolates the costs for transportation.

19 I then assigned the remaining costs that were removed from transportation service to ARS.

20 **Q. WHAT WAS THE RESULT OF THIS STUDY?**

21 A. The overall cost of services to GFCP/VEPI remains the same at \$10,237,000 (average
22 rate of \$0.833 per MCF) but is now unbundled into two components. The cost of service,
23 for basic transportation delivery service is \$1,295,176 or a rate of \$0.1054 per MCF. The
24 balance of costs, \$8,941,824 (\$10,237,000 of GFCP/VEPI costs (Exhibit CEH-1), less

1 \$1,296,176) are assigned to GFCP/VEPI's ARS program, for a cost of \$2.373 per MCF.

2 These results are shown on the Summary Schedule in Exhibit CEH-1S.

3 **III. CONCLUSION**

4 **Q. DOES THAT COMPLETE YOUR SUPPLEMENT TESTIMONY?**

5 A. Yes, although I reserve the right to file additional testimony.

Exhibit CEH-1S

Philadelphia Gas Works Exhibit CEH-1S
Witness: C.E. Heppenstall

PHILADELPHIA GAS WORKS

COST OF SERVICE ALLOCATION STUDY –
SUPPLEMENTAL

AS OF AUGUST 31, 2024

GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC
Valley Forge, Pennsylvania

Summary Schedule

PHILADELPHIA GAS WORKS

GRAYS FERRY USAGE AND RATES

	<u>Volumes</u>	<u>Cost of Service</u>	<u>Per MCF</u>
Transportation Rate	12,286,916	\$ 1,295,176	\$ 0.1054
Additional Cost for ARS	3,768,722	\$ 8,941,824	\$ 2.373
Total Cost	12,286,916	\$ 10,237,000	\$ 0.833

PHILADELPHIA GAS WORKS
COST OF SERVICE AS OF AUGUST 31, 2024, AT PROPOSED REVENUE LEVEL ALLOCATED TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref.	Account	Cost of Service in '000's	Volumetric Costs						Customer Costs										
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - RB (9)	NGVS (10)	Interruptible (11)	Greys Ferry (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - RB (18)	NGVS (19)	Interruptible (20)
OPERATION AND MAINTENANCE EXPENSES																			
PRODUCTION EXPENSES																			
701	Manufactured Gas Production Expenses																		
702	Operation Labor and Expenses	319	252	52	3	7	1	3	0										
703	Misc. Steam Expenses	397	65	4	0	9	2	4	0										
706	Maintenance of Structures	6	5	1	0	0	0	0	0										
707	Maintenance of Boiler Plant Equipment	276	45	3	6	19	3	9	0										
712	Other Power Expenses	842	664	138	9	19	3	9	0										
734	Duplicate Charges - Credit	(596)	(470)	(88)	(6)	(13)	(2)	(6)	(0)										
735	Misc. Production Expenses	1,633	288	18	36	7	17	7	0										
740	Maintenance Supervision and Engineering	467	368	77	5	10	2	5	0										
741	Maintenance of Structures	149	40	24	2	3	1	2	0										
742	Maintenance of Production Equipment	149	40	24	2	3	1	2	0										
	Total - Manu. Gas Production Expenses	4,028	3,176	680	43	90	16	41	0										
807	Other Gas Supply Expenses	11,746	9,265	1,926	126	281	48	119	1										
812	Purchased Gas Expense	43	34	7	0	1	0	0	0										
813	Gas Used for Operations	3,129	2,468	513	34	70	13	32	0										
	Total Other Gas Supply Expenses	14,918	11,767	2,446	160	332	61	152	1										
	Total Natural Gas Production Expenses	18,944	14,943	3,106	203	422	77	193	1										
OTHER STORAGE EXPENSE																			
840	Operating Supervision and Engineering	1,327	1,020	241	22	27	5	12	0										
841	Operation Labor and Expenses	3,985	3,082	724	66	80	15	37	0										
842	Rents	333	256	61	6	33	1	6	0										
843	Maintenance	8,412	6,463	1,528	140	170	32	78	0										
850	Operating Supervision and Engineering	1,272	977	231	21	26	5	12	0										
	Total Natural Gas Storage Expense	15,329	11,777	2,765	255	309	69	143	1										

PHILADELPHIA GAS WORKS

COST OF SERVICE AS OF AUGUST 31, 2024, AT PROPOSED REVENUE LEVEL ALLOCATED TO CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref. (2)	Account (1)	Cost of Service in '000's (3)	Volumetric Costs										Customer Costs						
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Ferry (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - R8 (18)	NGVS (19)	Interruptible (20)
DISTRIBUTION EXPENSES																			
870	Supervision And Engineering	2,757	886	233	20	24	4	11	0	194	22	967	324	27	28	6	9	0	1
871	Distribution Load Dispatching	2,159	1,278	334	29	34	6	16	0	270	192	-	-	-	-	-	-	-	-
874	Mains And Services Expenses	3,287	2,118	569	48	57	10	26	1	488	-	-	179	5	10	23	6	0	7
875	M & R Station Expenses - General	2,280	1,350	352	31	36	7	17	0	285	202	-	-	152	-	-	-	-	-
876	M & R Station Expenses - Industrial	512	445	116	10	12	2	5	0	94	67	-	-	331	503	74	159	6	-
877	M & R Station Expenses - City Gate Station	18,880	-	-	-	-	-	-	-	3,270	-	12,158	5,650	192	291	43	92	3	-
878	Meter and House Regulator Expenses	10,926	-	-	-	-	-	-	-	1,940	-	7,036	1,940	161	169	36	55	2	3
879	Customer Installations Expenses	16,489	5,297	1,395	121	142	26	65	2	1,161	130	5,785	1,940	4	4	1	0	0	0
880	Other Expenses	10	3	1	0	0	0	0	0	1	0	4	1	0	0	0	0	0	0
881	Rents	380	122	132	43	53	1	32	0	477	3	133	45	-	-	-	-	-	-
885	Maint. Of Measuring Station Expenses - General	30,876	19,322	5,130	49	57	95	29	6	4,277	114	-	-	-	-	-	-	-	-
889	Maint. Of Measuring Station Expenses - Industrial	1,279	757	188	17	20	4	9	-	160	-	-	-	83	-	-	-	-	-
890	Maint. Of Measuring Station Expenses - City Gate	93	-	-	-	-	-	-	-	-	55	-	-	4	-	-	-	-	-
891	Maint. Of Measuring Station Expenses - Industrial	618	366	96	8	10	2	4	0	77	-	2,313	135	4	8	17	4	0	5
892	Maint. Of Services	2,487	-	-	-	-	-	-	-	-	-	3,491	176	4	6	15	7	0	3
893	Maint. Of Meters and House Regulators	3,703	-	-	-	-	-	-	-	-	-	3,491	176	4	6	15	7	0	3
	Total Distribution Expenses	99,698	31,982	8,425	731	858	157	394	9	7,014	784	34,943	11,720	973	1,019	215	334	12	19
CUSTOMER ACCOUNTING EXPENSES																			
901	Operation	2,839	-	-	-	-	-	-	-	-	-	2,676	135	3	5	12	6	0	2
902	Supervision	868	-	-	-	-	-	-	-	-	-	818	41	1	1	4	2	0	1
903	Meter Reading Expenses	37,465	-	-	-	-	-	-	-	-	-	35,317	1,785	41	62	195	75	0	28
	Total Customer Accounting Expenses	41,172	-	-	-	-	-	-	-	-	-	36,812	1,982	45	69	171	82	0	31
CUSTOMER SERVICE AND INFORMATION EXPENSES																			
908	Operation	6,334	-	-	-	-	-	-	-	-	-	5,971	302	7	11	26	13	0	5
	Total Customer Service & Info Expenses	6,334	-	-	-	-	-	-	-	-	-	5,971	302	7	11	26	13	0	5



PHILADELPHIA GAS WORKS
COST OF SERVICE AS OF AUGUST 31, 2024, AT PROPOSED REVENUE LEVEL ALLOCATED TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref.	Account	Cost of Service in '000's	Volumetric Costs										Customer Costs						
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Fury (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - R8 (18)	NGVS (19)	Interruptible (20)
ADMINISTRATIVE AND GENERAL EXPENSES																			
900	Administrative & General Salaries	24,028	7,778	1,896	158	210	39	97	1	929	104	10,562	1,853	136	145	54	57	2	7
921	Office Supplies and Expenses	19,700	6,377	1,555	129	173	32	79	0	762	85	8,659	1,519	111	119	45	47	1	6
921	Customer Programs - ELRP, Senior Discounts, CRP	23,451	17,168	5,081	472	633	83	215	0	(922)	(10)	(3,290)	(248)	(15)	(17)	(11)	(8)	-	(2)
922	Administrative Expenses Transferred-Credit	(31,571)	(10,220)	(2,482)	(376)	(51)	(127)	(137)	(2)	(1,221)	(138)	(13,877)	(2,434)	(178)	(191)	(72)	(75)	(2)	(10)
923	Outside Services Employed - Other	3,979	1,288	314	26	35	6	6	0	154	17	1,749	307	22	24	9	9	0	0
925	Injuries and Damages	11,132	5,607	1,489	127	151	28	69	2	958	11	2,379	258	16	17	11	9	-	2
926	Employee Pensions and Benefits	74,022	37,282	9,888	844	1,007	183	461	10	6,371	72	15,817	1,714	104	115	75	57	-	11
969	OP&EB Funding	(10,095)	(5,084)	(1,350)	(137)	(25)	(83)	(63)	(1)	(889)	(10)	(2,157)	(234)	(14)	(16)	(10)	(8)	-	(1)
924	Property Insurance	2,072	671	184	14	18	3	8	0	80	9	911	160	12	13	5	0	0	1
928	Regulatory Commission Expense	4,397	1,423	347	29	39	7	18	0	170	19	1,933	339	25	27	10	10	0	1
929	Duplicate Charges	(1,096)	(517)	(126)	(10)	(4)	(3)	(6)	(0)	(82)	(7)	(702)	(123)	(9)	(10)	(4)	(4)	(0)	(0)
930	General Advertising Expenses	8,073	2,537	716	59	79	15	36	1	351	39	3,988	100	51	58	21	21	1	3
931	Telephone Expenses	1,656	431	111	14	14	4	57	0	24	1	241	41	1	1	1	1	0	2
	Total Administrative & General Expenses	126,309	64,637	17,569	1,487	1,753	316	891	22	7,599	203	25,201	4,651	275	298	144	129	-2	20
	Total Operation and Maintenance Expenses	309,686	123,280	31,775	2,656	3,341	610	1,531	33	14,614	966	103,926	18,035	1,301	1,396	555	558	14	76

DEPRECIATION AND AMORTIZATION EXPENSE

Factor Ref.	Account	Cost of Service in '000's	Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Fury (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - R8 (18)	NGVS (19)	Interruptible (20)
PRODUCTION PLANT																			
305	Structures and Improvements	371	293	61	4	8	2	4	0	-	-	-	-	-	-	-	-	-	-
306	Boiler Plant Equipment	20	16	3	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
307	Other Power Equipment	141	112	23	2	3	1	1	0	-	-	-	-	-	-	-	-	-	-
311	LPG Equipment	29	23	5	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
312	Oil Gas Equipment	3	2	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
319	Gas Mfg Equipment	0	0	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
320	Other Equipment	551	434	90	6	12	2	6	0	-	-	-	-	-	-	-	-	-	-
2A	Structures and Improvements	313	240	57	5	6	1	3	0	-	-	-	-	-	-	-	-	-	-
2A	Gas Holders	382	311	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
2A	Purification Equipment	0	0	0	0	0	0	0	0	-	-	-	-	-	-	-	-	-	-
2A	Liquefaction Equipment	823	632	150	14	17	3	8	0	-	-	-	-	-	-	-	-	-	-
364	Vaporizing Equipment	300	230	54	6	1	3	0	0	-	-	-	-	-	-	-	-	-	-
365	Compressor Equipment	251	183	46	4	5	1	2	0	-	-	-	-	-	-	-	-	-	-
367	Measuring and Regulating Equipment	85	65	15	1	2	0	1	0	-	-	-	-	-	-	-	-	-	-
368	Other Equipment	1,000	768	182	17	20	4	9	0	-	-	-	-	-	-	-	-	-	-
DISTRIBUTION PLANT																			
375	Structures And Improvements	17	7	2	0	0	0	0	0	2	0	5	1	0	0	0	0	0	0
376	Compressor Station Equipment	18,867	12,158	3,207	278	326	60	150	3	2,684	0	-	-	-	-	-	-	-	-
3A	Measuring & Regulating Equipment - General	350	207	54	5	6	1	3	0	44	31	-	-	-	-	-	-	-	-
380	Services	19,698	-	-	-	-	-	-	-	-	-	18,309	1,069	30	63	138	35	0	43
381	Meters	2,526	-	-	-	-	-	-	-	-	-	1,627	756	44	67	10	21	1	1
382	Meter Installations	2,697	-	-	-	-	-	-	-	-	-	1,737	807	47	72	11	23	1	1
383	House Regulators	50	-	-	-	-	-	-	-	-	-	46	3	0	0	0	0	0	0
384	House Regulator Installations	49	-	-	-	-	-	-	-	-	-	31	15	1	1	0	0	0	0
385	Industrial Measuring & Regulating Equipment	13	-	-	-	-	-	-	-	-	-	-	-	13	-	-	-	-	-
387	Other Equipment	153	63	17	1	2	0	1	0	14	0	47	6	0	0	0	0	0	0

PHILADELPHIA GAS WORKS
COST OF SERVICE AS OF AUGUST 31, 2024, AT PROPOSED REVENUE LEVEL ALLOCATED TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref.	Account	Cost of Service in '000's	Volumetric Costs										Customer Costs					
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Fury (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - R8 (18)	NGVS (19)
GENERAL PLANT																		
390	Structures And Improvements	2,140	693	169	14	19	3	9	0	83	9	941	165	12	13	5	0	1
391	Office Furniture And Equipment	4,707	1,534	321	41	8	69	0	0	19	20	2,089	363	27	26	11	0	1
392	Tools, Shop And Garage Equipment	1,356	327	32	43	0	20	0	0	19	2	2,154	30	20	11	12	0	0
393	Stores Equipment	4	1	0	0	0	0	0	0	0	0	6	1	0	0	0	0	0
394	Tools, Shop And Garage Equipment	637	50	4	6	1	3	3	0	25	3	280	49	4	4	2	0	0
396	Power Operated Garage Equipment	67	5	0	0	0	0	0	0	0	0	30	5	0	0	0	0	0
397	Communication Equipment	517	168	3	5	1	2	2	0	227	2	227	40	3	3	1	0	0
398	Miscellaneous Equipment	859	278	6	8	1	3	0	0	378	4	378	66	5	2	2	0	0
9	Lease - GASB 87	2,836	918	224	19	25	5	11	0	110	12	1,247	219	16	17	7	0	0
9	Software Subscriptions - GASB 96	423	137	33	4	1	2	0	0	16	2	186	33	2	3	1	0	0
	Total Depreciation & Amortization Expense	65,412	20,992	5,319	485	104	269	5	3,405	105	29,320	3,975	232	307	198	120	3	49
10.833	Cost of Removal	6,729	734	63	76	14	35	1	532	6	2,082	277	15	21	14	8	0	4
14	Regulatory Asset - Pandemic Bad Debt	10,077	-	-	-	-	-	-	-	-	9,887	473	9	5	3	-	-	-
10	Regulatory Asset - Pandemic	756	245	60	7	1	3	0	29	3	332	58	4	5	2	0	0	0
	Total Operating Expenses	392,660	147,363	37,887	3,179	3,969	729	1,828	10,530	1,101	150,247	22,818	1,562	1,735	772	658	17	128
	Interest Gain/Loss and Other Income	(7,211)	(3,050)	(786)	(68)	(15)	(38)	(1)	(570)	(6)	(2,232)	(296)	(16)	(23)	(15)	(9)	(0)	(4)
INTEREST AND OTHER EXPENSE																		
12	Interest on Long Term Debt	62,738	26,534	6,841	589	712	131	327	7	4,958	55	19,416	2,579	143	199	78	2	34
12	Other	(1,776)	(751)	(194)	(17)	(4)	(9)	(0)	(140)	(2)	(560)	(73)	(4)	(6)	(4)	(2)	(0)	(1)
12	Loss From Extinction of Debt	3,348	1,416	38	31	17	7	17	0	285	3	1,096	138	8	11	4	0	2
	Total Interest and Other Expense	64,310	27,199	7,012	603	730	134	336	7	5,082	56	19,902	2,844	146	204	80	2	35
3	FEDERAL GRANT REVENUE	(10,752)	(6,829)	(1,828)	(168)	(84)	(85)	(2)	(1,530)	-	-	-	-	-	-	-	-	-
12	CITY PAYMENT	10,000	7,813	1,363	189	36	94	2	1,463	16	5,571	740	41	57	38	22	1	10
12	NET INCOME	147,295	62,296	16,060	1,382	1,673	308	769	11,641	129	45,584	6,065	335	468	314	182	5	79
	TOTAL COST OF SERVICE	604,302	234,292	60,308	5,107	6,329	1,159	2,903	34,626	1,295	219,072	31,581	2,067	2,441	1,246	963	24	248
Less: Other Revenues																		
DA	Uncollectible Accounts - MFC	(13,768)	(722)	(12)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Uncollectible Accounts - Other	(23,151)	-	-	-	-	-	-	-	-	(22,024)	(1,087)	(21)	(12)	(7)	-	-	-
4	Appliance Repair and Other Revenues	7,807	-	-	-	-	-	-	-	-	5,027	2,336	137	208	31	66	2	-
2A	Other Revenues - LNG Sales	1,059	192	18	21	4	10	0	0	-	-	-	-	-	-	-	-	-
1	Other Revenues - Cap Release	10,124	7,986	1,060	225	41	103	0	-	-	-	-	-	-	-	-	-	-
14	Other Revenues - Finance Charges	14,167	-	-	-	-	-	-	-	-	13,497	666	13	7	4	-	-	-
1B	CRP Forgiveness	12,870	9,422	2,792	259	45	118	5	-	-	-	-	-	-	-	-	-	-
1B	Senior Discount	1,705	1,248	370	30	6	16	1	-	-	-	-	-	-	-	-	-	-
13A	DSIC Surcharge at 7.50%	38,783	16,007	4,117	349	432	79	189	4	-	14,955	2,182	141	167	85	66	2	-
1B	OPEB Surcharge	16,792	12,293	3,542	298	338	59	154	7	-	-	-	-	-	-	-	-	-
1B	ELRP	7,989	5,848	1,733	142	28	73	3	-	-	-	-	-	-	-	-	-	-
DA	Efficiency Cost Recovery ECR	887	675	200	8	3	8	0	-	-	-	-	-	-	-	-	-	-
13	Unbilled Adjustment	(463)	(180)	(46)	(5)	(1)	(2)	(0)	(27)	(1)	(188)	(24)	(2)	(2)	(1)	(1)	(0)	(0)
13	NGS/LNG and Contract Revenues	686	286	6	7	1	3	0	39	0	249	36	2	3	1	1	0	0
	Subtotal	75,508	41,346	14,006	1,164	1,473	267	682	13	0	11,535	4,109	271	371	114	132	4	0
	TOTAL COST OF SERVICE RELATED TO TARIFF SALES AND TRANSPORTATION	\$ 528,794	193,145	46,302	3,944	4,855	893	2,222	34,613	1,295	207,537	27,882	1,797	2,070	1,133	831	20	248

PHILADELPHIA GAS WORKS
COST OF SERVICE AS OF AUGUST 31, 2024, AT PROPOSED REVENUE LEVEL ALLOCATED TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Account (1)	Factor Ref. (2)	Cost of Service in '000's (3)	Volumetric Costs										Customer Costs						
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA - GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Ferry (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - R8 (18)	NGVS (19)	Interruptible (20)
GENERAL PLANT																			
389 Land and Land Rights	10	3,713	1,202	283	24	33	6	15	0	144	16	1,632	286	21	22	8	9	0	1
390 Structures And Improvements	10	62,742	20,310	4,562	411	549	101	252	4	2,426	271	27,579	4,837	355	380	142	148	4	19
391 Office Furniture And Equipment	10	69,892	5,624	499	613	113	282	282	4	2,707	302	30,785	5,396	396	424	159	165	5	21
392 Transportation Equipment	10	26,393	8,543	173	231	43	106	2	1,021	114	11,601	2,035	149	160	60	62	2	8	
393 Tools And Equipment	10	47,717	3,232	47	87	16	40	0	386	43	4,360	770	56	0	23	0	0	1	
394 Trenching And Garage Equipment	10	9,885	3,232	788	87	16	40	0	386	43	4,360	770	56	0	23	0	0	1	
395 Power Operated Equipment	10	86	28	7	1	0	0	0	3	0	38	7	0	0	1	0	0	0	
396 Communication Equipment	10	446	144	35	4	1	2	0	17	2	196	34	3	3	1	1	0	0	
397 Miscellaneous Equipment	10	25,008	8,095	1,974	164	219	40	101	0	967	108	10,993	1,928	141	151	57	59	2	8
398 Total General Plant		198,413	64,227	15,860	1,301	1,738	321	788	11	7,673	857	87,213	15,298	1,122	1,201	450	469	13	61
Total Plant		1,725,100	733,482	189,272	16,297	19,692	3,621	9,048	185	137,993	1,377	528,884	69,532	3,793	5,366	3,674	2,092	54	939
OTHER RATE BASE ELEMENTS																			
Cash Working Capital	10	38,711	12,531	3,055	254	339	63	156	2	1,497	167	17,016	2,885	219	234	85	91	3	12
Total Other Rate Base Elements		38,711	12,531	3,055	254	339	63	156	2	1,497	167	17,016	2,885	219	234	85	91	3	12
Total Measure of Value		\$ 1,763,800	746,013	192,327	16,551	20,031	3,684	9,203	187	139,400	1,544	545,879	72,516	4,012	5,600	3,762	2,183	57	951

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 1, 1A AND 1B. ALLOCATION OF COSTS WHICH VARY DIRECTLY WITH SALE OF GAS

Factors are based on the pro forma average daily sales volumes for each service classification.

Service Classification	Pro Forma Average Daily PGC Volumes (Mcf)	Allocation Factor 1	Pro Forma Average Daily Firm Sales (Mcf)	Allocation Factor 1A	Pro Forma Average Daily Firm Sales For Surcharges (Mcf)	Allocation Factor 1B
(1)	(2)	(3)	(4)	(5)	(4)	(5)
<u>Volumetric Costs</u>						
Residential	89,006	0.78880	95,409	0.73208	95,409	0.73208
Commercial	18,499	0.16394	28,268	0.21690	28,268	0.21690
Industrial	1,210	0.01072	2,316	0.01777	2,316	0.01777
Municipal	2,511	0.02225	2,623	0.02013	2,623	0.02013
PHA GS	459	0.00407	459	0.00352	459	0.00352
PHA R8	1,147	0.01017	1,196	0.00918	1,196	0.00918
NGVS	5	0.00004	55	0.00042	55	0.00042
Interruptible	-	-	-	-	-	-
Grays Ferry/Veolia	-	-	-	-	-	-
Total	<u>112,837</u>	<u>1.00000</u>	<u>130,326</u>	<u>1.00000</u>	<u>130,326</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTORS 2 AND 2A. CALCULATION OF MAXIMUM DAY EXTRA DEMAND FACTORS.

Factors are based on the maximum day extra demand throughput for each classification.

Service Classification	Pro Forma Average Daily Throughput Volumes (Mcf)	Peak Day Capacity (Mcf)	Extra Capacity (Mcf)	Allocation Factor 2	Allocation Factor 2A*
(1)	(2)	(3)	(4)=(3)-(2)	(5)	(6)
<u>Volumetric Costs</u>					
Residential	95,409	429,513	334,104	0.70062	0.76829
Commercial	28,268	107,276	79,008	0.16568	0.18168
Industrial	2,316	9,559	7,243	0.01519	0.01666
Municipal	2,623	11,394	8,771	0.01839	0.02017
PHA GS	459	2,131	1,673	0.00351	0.00385
PHA R8	1,196	5,251	4,054	0.00850	0.00932
NGVS	55	70	15	0.00003	0.00003
Interruptible	31,867	73,869	42,002	0.08808	
Grays Ferry/Veolia	-	-	-	-	
Total	<u>162,193</u>	<u>639,063</u>	<u>476,870</u>	<u>1.00000</u>	<u>1.00000</u>

* Factor 2A excludes Interruptible volumes.

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTORS 2B. CALCULATION OF MAXIMUM DAY EXTRA DEMAND FACTORS.

Factors are based on the maximum day extra demand throughput for each classification.

Service Classification	Pro Forma Average Daily Throughput Volumes (Mcf)	Peak Day Capacity (Mcf)	Extra Capacity (Mcf)	Allocation Factor 2B
(1)	(2)	(3)	(4)=(3)-(2)	(5)
<u>Volumetric Costs</u>				
Residential	95,409	429,513	334,104	0.69665
Commercial	28,268	107,276	79,008	0.16474
Industrial	2,316	9,559	7,243	0.01510
Municipal	2,623	11,394	8,771	0.01829
PHA GS	459	2,131	1,673	0.00349
PHA R8	1,196	5,251	4,054	0.00845
NGVS	55	70	15	0.00003
Interruptible	31,867	73,869	42,002	0.08758
Grays Ferry/Veolia	33,663	36,380	2,717	0.00567
Total	195,856	675,443	479,588	1.00000

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 3. ALLOCATION OF COSTS ASSOCIATED WITH DISTRIBUTION

Factors are based on the weighting of the factors derived from average daily throughput volumes and from maximum day extra capacity demand for each service classification, as follows:

Service Classification	Average Daily Throughput			Maximum Day Extra Demand		Allocation Factor 3
	MCF/Day	Allocation Factor	Weighted Factor*	Allocation Factor 2	Weighted Factor*	
(1)	(2)	(3)	(4)=(3)x 0.50000	(5)	(6)=(5)x 0.50000	(7)=(4)+(6)
<u>Volumetric Costs</u>						
Residential	95,409	0.58824	0.29412	0.70062	0.35031	0.64443
Commercial	28,268	0.17429	0.08714	0.16568	0.08284	0.16998
Industrial	2,316	0.01428	0.00714	0.01519	0.00759	0.01473
Municipal	2,623	0.01617	0.00809	0.01839	0.00920	0.01728
PHA GS	459	0.00283	0.00141	0.00351	0.00175	0.00317
PHA R8	1,196	0.00738	0.00369	0.00850	0.00425	0.00794
NGVS	55	0.00034	0.00017	0.00003	0.00002	0.00019
Interruptible	31,867	0.19648	0.09824	0.08808	0.04404	0.14228
Grays Ferry	-	-	-	-	-	-
Total	162,193	1.00000	0.50000	1.00000	0.50000	1.00000

* The weighting of the factors is based on the percentage of average daily throughput.

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 3A. ALLOCATION OF COSTS ASSOCIATED WITH DISTRIBUTION, OTHER THAN MAINS

Factors are based on the weighting of the factors derived from average daily throughput volumes and from maximum day extra capacity demand for each service classification, as follows:

Service Classification	Average Daily Throughput			Maximum Day Extra Demand		Allocation Factor 3A (7)=(4)+(6)
	MCF/Day (2)	Allocation Factor (3)	Weighted Factor* (4)=(3)x 0.50000	Allocation Factor 2B (5)	Weighted Factor* (6)=(5)x 0.50000	
<u>Volumetric Costs</u>						
Residential	95,409	0.48714	0.24357	0.69665	0.34832	0.59189
Commercial	28,268	0.14433	0.07217	0.16474	0.08237	0.15454
Industrial	2,316	0.01183	0.00591	0.01510	0.00755	0.01346
Municipal	2,623	0.01339	0.00670	0.01829	0.00914	0.01584
PHA GS	459	0.00234	0.00117	0.00349	0.00174	0.00291
PHA R8	1,196	0.00611	0.00305	0.00845	0.00423	0.00728
NGVS	55	0.00028	0.00014	0.00003	0.00002	0.00016
Interruptible	31,867	0.16271	0.08135	0.08758	0.04379	0.12514
Grays Ferry	33,663	0.17188	0.08594	0.00567	0.00283	0.08877
Total	195,856	1.00000	0.50000	1.00000	0.50000	1.00000

* The weighting of the factors is based on the percentage of average daily throughput.

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 4. ALLOCATION OF COSTS ASSOCIATED WITH METERS AND ACCOUNTS 381

Factors are based on the cost of meters by class included in Accounts 381 Meters and M&R Equipment.

<u>Service Classification</u> (1)	<u>Original Cost of Meters</u> (2)	<u>Allocation Factor</u> (3)
<u>Customer Costs</u>		
Residential	\$ 33,991,918	0.64395
Commercial	15,796,766	0.29926
Industrial	926,622	0.01755
Municipal	1,405,252	0.02662
PHA - GS	206,290	0.00391
PHA - Rate 8	443,266	0.00840
NGVS	16,329	0.00031
Interruptible	-	-
	<hr/>	<hr/>
Total	<u>\$ 52,786,442</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 5. ALLOCATION OF COSTS ASSOCIATED WITH INDUSTRIAL MEASURING AND REGULATING EQUIPMENT.

Directly assigned to the Industrial Class

<u>Service Classification</u> (1)	<u>Allocation Factor</u> (1)
<u>Volumetric</u> Industrial	1.0000

FACTOR 6. ALLOCATION OF COSTS ASSOCIATED WITH SERVICES AND HOUSE REGULATORS.

Factors are based on the cost of services by class included in Account 380, Service Lines.

<u>Service Classification</u> (1)	<u>Original Cost of Service Lines</u> (2)	<u>Allocation Factor</u> (3)
<u>Customer Costs</u>		
Residential	\$ 622,311,038	0.92998
Commercial	36,349,977	0.05432
Industrial	1,016,179	0.00152
Municipal	2,128,931	0.00318
PHA - GS	4,687,344	0.00700
PHA - Rate 8	1,189,237	0.00178
NGVS	13,013	0.00002
Interruptible	1,470,369	0.00220
 Total	 <u>\$ 669,166,088</u>	 <u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 7. ALLOCATION OF COSTS ASSOCIATED WITH CUSTOMER ACCOUNTING
AND METER READING.

Factors are based on the number of customers for each classification, as follows.

<u>Service Classification</u> (1)	<u>Number of Customers</u> (2)	<u>Allocation Factor 7</u> (3)
<u>Customer Costs</u>		
Residential	488,206	0.94267
Commercial	24,679	0.04765
Industrial	572	0.00110
Municipal	863	0.00167
PHA - GS	2,145	0.00414
PHA - Rate 8	1,035	0.00200
NGVS	3	0.00001
Interruptible	393	0.00076
	<hr/>	<hr/>
Total	<u>517,896</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 8. ALLOCATION OF DISTRIBUTION OPERATION OTHER EXPENSES AND RENT.

Factors are based on distribution operation expenses other than those being allocated.

Service Classification <u>(1)</u>	Operation Expenses <u>(2)</u>	Allocation Factor <u>(3)</u>
<u>Volumetric Costs</u>		
Residential	\$ 25,685	0.32121
Commercial	6,764	0.08459
Industrial	587	0.00734
Municipal	689	0.00861
PHA GS	126	0.00158
PHA R8	316	0.00396
NGVS	7	0.00009
Interruptible	5,631	0.07043
Grays Ferry/Veolia	629	0.00787
<u>Customer Costs</u>		
Residential	28,054	0.35084
Commercial	9,410	0.11768
Industrial	781	0.00977
Municipal	818	0.01023
PHA GS	172	0.00215
PHA R8	268	0.00335
NGVS	9	0.00012
Interruptible	15	0.00019
Total	<u>\$ 79,962</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 9. ALLOCATION OF DISTRIBUTION ASSETS

Factors are based on distribution assets other than those being allocated.

<u>Service Classification</u> (1)	<u>Rate Base Costs</u> (2)	<u>Allocation Factor</u> (3)
<u>Volumetric Costs</u>		
Residential	\$ 589,229	0.41418
Commercial	155,413	0.10924
Industrial	13,471	0.00947
Municipal	15,802	0.01111
PHA GS	2,896	0.00204
PHA R8	7,259	0.00510
NGVS	169	0.00012
Interruptible	130,057	0.09142
Grays Ferry/Veolia	519	0.00036
<u>Customer Costs</u>		
Residential	441,065	0.31004
Commercial	54,162	0.03807
Industrial	2,668	0.00188
Municipal	4,159	0.00292
PHA GS	3,220	0.00226
PHA R8	1,621	0.00114
NGVS	41	0.00003
Interruptible	877	0.00062
Total	<u>\$ 1,422,628</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 10. ALLOCATION OF ADMINISTRATIVE AND GENERAL EXPENSES.

Factors are based on the allocation of operation and maintenance expenses.

<u>Service Classification</u> (1)	<u>Operation & Maintenance Expenses</u> (2)	<u>Allocation Factor</u> (3)
<u>Volumetric Costs</u>		
Residential	\$ 58,712	0.32370
Commercial	14,315	0.07893
Industrial	1,189	0.00656
Municipal	1,588	0.00876
PHA GS	293	0.00162
PHA R8	730	0.00402
NGVS	10	0.00006
Interruptible	7,014	0.03867
Grays Ferry/Veolia	784	0.00432
<u>Customer Costs</u>		
Residential	79,725	0.43956
Commercial	13,984	0.07710
Industrial	1,025	0.00565
Municipal	1,098	0.00605
PHA GS	411	0.00227
PHA R8	429	0.00236
NGVS	12	0.00007
Interruptible	55	0.00031
 Total	 <u>\$ 181,377</u>	 <u>1.0000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 11. ALLOCATION OF LABOR RELATED TAXES AND BENEFITS.

Factors are based on the allocation of total operation and maintenance direct labor expense to service classifications as shown on the following page.

<u>Service Classification</u> (1)	<u>Total Labor Expense</u> (2)	<u>Allocation Factor</u> (3)
<u>Volumetric Costs</u>		
Residential	\$ 78,686	0.50366
Commercial	20,890	0.13371
Industrial	1,782	0.01141
Municipal	2,126	0.01361
PHA GS	387	0.00248
PHA R8	972	0.00622
NGVS	22	0.00014
Interruptible	13,447	0.08607
Grays Ferry/Veolia	152	0.00097
<u>Customer Costs</u>		
Residential	33,383	0.21368
Commercial	3,617	0.02315
Industrial	220	0.00141
Municipal	243	0.00156
PHA GS	158	0.00101
PHA R8	121	0.00077
NGVS	-	-
Interruptible	23	0.00015
Total	<u>\$ 156,229</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS
FACTOR 11 - ALLOCATION OF LAURE COSTS TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref	Account	Labor Costs (3)	Volumetric Costs							Customer Costs									
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA GS (8)	PHA - R8 (9)	NGVS (10)	Interruptible (11)	Grays Ferry/Viola (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA - GS (17)	PHA - Rate 8 (18)	NGVS (19)	Interruptible (20)
02	TOTAL PAYROLL - 2022	\$ 107	\$ 35	\$ 16	\$ 11	\$ 1	\$ 1	\$ 1	\$ 4	\$ 7	\$ 47	\$ 18	\$ 9	\$ 1	\$ 4	\$ 4	\$ 4	\$ 1	\$ 1
03	President & CEO	1,524	535	137	11	15	44	15	64	20	736	329	26	27	10	11	11	27	1
04	Communications	482	1,483	327	30	44	14	14	175	20	1,987	349	29	27	10	4	4	27	1
05	Officers Salaries	1,599	518	126	10	14	3	3	62	7	703	123	9	10	4	4	4	10	1
07	Legal	1,192	629	52	58	10	27	1	1,124	2	1,124	57	1	2	5	2	2	2	1
09	Commercial Resource Center	2,800	2,123	629	52	58	10	27	1	173	1,868	345	25	27	10	11	11	27	1
10	Gas Control & Acquisition	4,477	1,449	353	29	39	7	18	46	5	524	92	7	7	3	3	3	7	1
10	VP Reg. Compliance & Customer Programs	1,193	386	94	8	10	2	5	8	1	91	16	1	1	1	1	1	1	1
10	Human Resources	208	67	16	1	2	1	1	8	1	67	16	1	1	1	1	1	1	1
10	VP Regulatory & Legislative Affairs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10	VP Supply Chain	758	245	60	5	7	1	3	29	3	333	68	4	5	2	2	2	5	1
10	VP Budget & Strategic Development	842	273	66	6	7	1	3	33	4	370	65	5	5	2	2	2	5	1
21	Gas Planning & Rates	959	73	10	7	10	1	1	14	1	904	48	1	2	4	2	2	2	1
21	Customer Review	1,146	102	3	17	20	4	9	162	2	14	2	1	1	1	1	1	1	1
30	Energy-Phase Business	651	735	194	7	14	3	7	182	2	233	41	3	3	1	1	1	3	1
31	Chemical Services	590	172	42	3	5	1	2	20	2	233	41	3	3	1	1	1	3	1
38	VP Technical Compliance	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
39	SVP HRD, Labor, & Corp Comm	973	315	77	6	9	2	4	38	4	428	75	6	6	2	2	2	6	2
40	Chief Financial Officer	2,928	0	0	0	0	0	0	0	0	2,928	155	3	4	1	1	1	3	4
41	Risk Management	1,770	573	140	12	16	3	7	68	8	10,776	511	10	18	44	21	21	18	8
44	Account Management	1,098	355	87	7	10	2	4	42	5	483	85	6	7	2	2	2	7	1
45	Accounting & Reporting	1,994	1,994	486	40	54	10	25	238	27	2,707	475	35	37	14	15	15	37	2
46	Treasury	6,159	0	0	0	0	0	0	0	0	2,479	125	3	4	11	5	5	4	2
47	Information Services	2,630	19,463	5,134	445	522	96	240	4,297	6	24,792	475	35	37	14	15	15	37	2
49	Collections	30,202	19,463	5,134	445	522	96	240	4,297	6	24,792	475	35	37	14	15	15	37	2
50	Field Services	43,316	27,914	7,363	638	749	137	344	6,163	8	34,077	638	6	6	2	2	2	6	2
52	Distribution	13,550	9,920	2,939	241	273	48	124	6	4	13,550	241	1	1	1	1	1	1	1
53	Gas Processing	101	33	8	1	1	1	1	4	1	101	8	1	1	1	1	1	1	1
54	Internal Auditing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
56	SVP Operations & Supply Chain	559	360	95	8	10	2	4	80	4	559	95	8	10	2	4	4	10	4
57	SVP Gas Management	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

PHILADELPHIA GAS WORKS
FACTOR 11 - ALLOCATION OF LABOR COSTS TO
CUSTOMER CLASS SERVICE CLASSIFICATIONS

Factor Ref.	Account	Labor Costs (3)	Volumetric Costs										Customer Costs								
			Residential (4)	Commercial (5)	Industrial (6)	Municipal (7)	PHA-GS (8)	PHA-R8 (9)	NGVS (10)	Interruptible (11)	Grays Ferry/Orinda (12)	Res (13)	Com (14)	Ind (15)	Muni (16)	PHA-GS (17)	PHA-Rate 8 (18)	NGVS (19)	Interruptible (20)		
58	VP Marketing	73	24	6	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
59	Organizational Development	1,315	426	104	9	12	2	5	5	6	578	101	8	3	3	3	-	-	-	-	
60	Marketing	2,869	961	234	19	26	5	12	115	13	1,305	229	17	18	7	7	-	-	-	1	
63	Data & Analytics	1,033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
64	CIS	963	78	19	2	2	-	1	9	1	106	19	1	1	1	1	-	-	-	-	
65	Labor Relations	40	291	71	6	6	-	4	35	4	397	69	5	5	2	2	-	-	-	-	
66	Customer Planning	800	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
67	Customer Programs	893	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
68	Supply Chain	6,809	4,388	1,157	100	118	22	54	969	-	842	43	1	1	4	2	-	-	-	-	
71	Facilities Management	2,143	1,381	364	32	37	7	17	305	-	-	-	-	-	-	-	-	-	-	-	
72	Fleet Operations	3,638	1,178	287	24	32	6	15	141	16	1,599	280	21	22	8	9	-	-	-	1	
73	Resource Management and Technology	784	508	133	12	14	2	6	112	-	-	-	-	-	-	-	-	-	-	-	
		\$ 158,226	\$ 78,686	\$ 20,890	\$ 1,782	\$ 2,126	\$ 387	\$ 972	\$ 13,447	\$ 152	\$ 33,383	\$ 3,617	\$ 220	\$ 243	\$ 158	\$ 121	\$ -	\$ -	\$ -	\$ 23	
TOTAL LABOR RELATED COST FOR ALLOCATION																					

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 12. ALLOCATION OF SURPLUS AND INTEREST EXPENSE.

Factors are based on the result of allocating the original cost measure of value, as presented on the following pages.

Service Classification <u>(1)</u>	Original Cost Less Depreciation <u>(2)</u>	Allocation Factor <u>(3)</u>
<u>Volumetric Costs</u>		
Residential	\$ 746,013	0.42293
Commercial	192,327	0.10904
Industrial	16,551	0.00938
Municipal	20,031	0.01136
PHA GS	3,684	0.00209
PHA R8	9,203	0.00522
NGVS	187	0.00011
Interruptible	139,400	0.07903
Grays Ferry	1,544	0.00088
<u>Customer Costs</u>		
Residential	545,879	0.30947
Commercial	72,516	0.04111
Industrial	4,012	0.00227
Municipal	5,600	0.00317
PHA GS	3,762	0.00213
PHA R8	2,183	0.00124
NGVS	57	0.00003
Interruptible	951	0.00054
Total	<u>\$ 1,763,900</u>	<u>1.00000</u>

FACTOR 13. ALLOCATION OF REGULATORY COMMISSION EXPENSES, ASSESSMENTS AND OTHER REVENUES.

Factors are based on the allocated cost of service excluding those items being allocated.

Service Classification <u>(1)</u>	Total Cost of Service <u>(2)</u>	Allocation Factor <u>(3)</u>
<u>Volumetric Costs</u>		
Residential	\$ 234,492	0.38804
Commercial	60,308	0.09980
Industrial	5,107	0.00845
Municipal	6,329	0.01047
PHA GS	1,159	0.00192
PHA R8	2,903	0.00480
NGVS	60	0.00010
Interruptible	34,626	0.05730
Grays Ferry	1,295	0.00214
<u>Customer Costs</u>		
Residential	219,072	0.36252
Commercial	31,961	0.05289
Industrial	2,067	0.00342
Municipal	2,441	0.00404
PHA GS	1,246	0.00206
PHA R8	963	0.00159
NGVS	24	0.00004
Interruptible	248	0.00041
Total	<u>\$ 604,302</u>	<u>1.00000</u>

PHILADELPHIA GAS WORKS

FACTORS FOR ALLOCATING COST OF SERVICE TO SERVICE CLASSIFICATIONS

FACTOR 13A. ALLOCATION OF OPEB SURCHARGE

Factors are based on the allocated cost of service excluding those items being allocated, excluding IT and Grays Ferry cost of service,

Service Classification <u>(1)</u>	Total Cost of Service <u>(2)</u>	Allocation Factor <u>(3)</u>
<u>Volumetric Costs</u>		
Residential	\$ 234,492	0.41274
Commercial	60,308	0.10615
Industrial	5,107	0.00899
Municipal	6,329	0.01114
PHA GS	1,159	0.00204
PHA R8	2,903	0.00511
NGVS	60	0.00011
Interruptible	-	-
Grays Ferry	-	-
<u>Customer Costs</u>		
Residential	219,072	0.38560
Commercial	31,961	0.05626
Industrial	2,067	0.00364
Municipal	2,441	0.00430
PHA GS	1,246	0.00219
PHA R8	963	0.00170
NGVS	24	0.00004
Interruptible	-	-
 Total	 <u>\$ 568,133</u>	 <u>1.00000</u>

FACTOR 14. ALLOCATION OF UNCOLLECTIBLES NOT RECOVERED FROM MFC

Factors are based on 3-year average of uncollectibles.

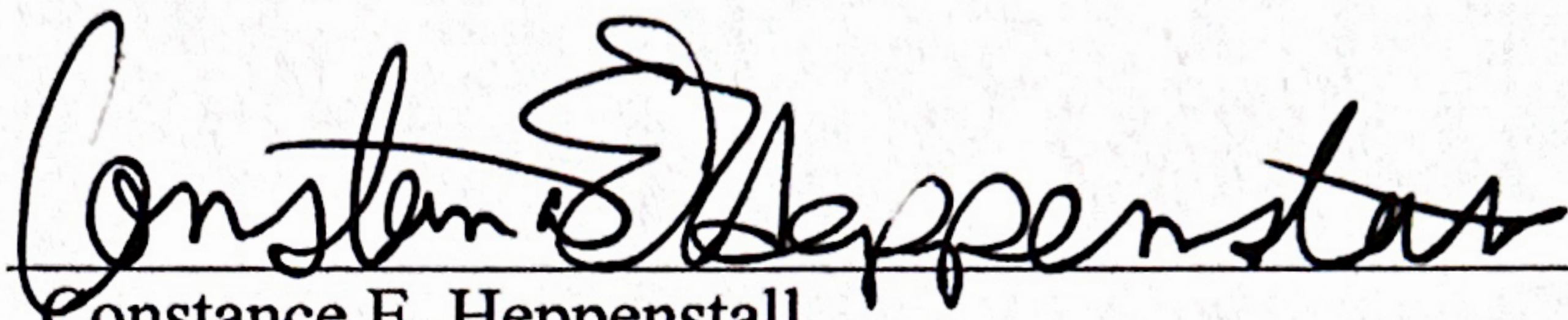
Service Classification <u>(1)</u>	3-Year Average Uncollectibles <u>(2)</u>	Allocation Factor <u>(3)</u>
<u>Customer Costs</u>		
Residential	\$ 24,714,302	0.95136
Commercial	1,219,711	0.04695
Industrial	23,660	0.00091
Municipal	12,938	0.00050
PHA GS	7,311	0.00028
PHA R8	-	-
 Total	 <u>25,977,922</u>	 <u>1.00000</u>

VERIFICATION

I, Constance E. Heppenstall, hereby state that: (1) I am employed by Gannett Fleming Valuation and Rate Consultants, LLC as Senior Project Manager, Rate Studies; (2) I have been retained by Philadelphia Gas Works ("PGW") and am authorized to present testimony on its behalf; (3) the facts set forth in my testimony are true and correct to the best of my knowledge, information and belief; and (4) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

5/5/2023

Dated



Constance E. Heppenstall
Senior Project Manager, Rate Studies
Gannett Fleming Valuation and Rate Consultants, LLC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUPPLEMENTAL DIRECT TESTIMONY OF

FLORIAN TEME

ON BEHALF OF
PHILADELPHIA GAS WORKS

Docket No. R-2023-3037933

Philadelphia Gas Works
General Rate Increase Request

TOPICS:

Proposed Rate GS-XLT and
Revised Revenue Allocation

May 5, 2023

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FT-4	Summary of Rate GS-XLT Revenues
FT-5	Rate Class Effects of Proposed Rate GS-XLT
FT-6	Proposed Tariff - Rate GS-XLT

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND POSITION WITH THE COMPANY.**

3 A. My name is Florian Teme. My position is Vice President, Marketing, Sales and Energy
4 Planning.

5 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS CASE?**

6 A. Yes. I previously submitted Direct Testimony of PGW as Statement No. 6 in this
7 proceeding.

8 **Q. WHEN YOU SUBMITTED DIRECT TESTIMONY ON FEBRUARY 27, 2023**
9 **(PGW ST. NO. 6) YOU STATED THAT THE PARTIES TO THE GFCP/VEPI**
10 **(“GFCP/VEPI”) COMPLAINT CASE “ARE CURRENTLY AWAITING AN**
11 **ORDER FROM THE COMMISSION.” (PAGE 11).**

12 A. Yes. I reported that GFCP/VEPI’s Historic Test Year revenues were not being increased,
13 but that: “Once the Commission issues a final ruling in Docket No. C-2021- 3029259,
14 PGW will supplement the proposed rates to account for the Commission's
15 determination.”

16 **Q. HAS THE COMMISSION ISSUED A RULING IN THAT PROCEEDING?**

17 A. Yes. On April 20, 2023, the Commission issued a ruling that referred the matter of the
18 rates for GFCP/VEPI to this base rate case, stating that:

19 ... we conclude that the question of the proper COS-based gas
20 transportation rate applicable to PGW’s service to Vicinity is
21 properly considered at PGW’s currently pending base rate
22 proceeding.....

23
24 Accordingly, we shall direct that the Section 1301 question of the
25 “just and reasonable” rate and rate class applicable to PGW’s service
26 to Vicinity be expressly examined under COS principles in the
27 currently pending *PGW 2023 Base Rate Case*.¹
28

¹ April 2023 Order at 38.

1 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

2 A. To comply with the Commission’s April 20, 2023 Order and address the appropriate rate
3 for GFCP/VEPI, PGW is proposing a “special rate” that would be applicable to them.

4 The proposed rate is higher than that established in 1996, which rates have been
5 unchanged since that time, but is still well below the \$10,237,000 cost of service level
6 calculated by Ms. Heppenstall in her testimony.

7 **Q. BEFORE DISCUSSING THE NEW RATE, ARE THERE ANY IMPACTS OF**
8 **THE COMMISSION’S ORDER ON OTHER ASPECTS OF THE RATE CASE**
9 **BESIDES THE RATES TO GFCP/VEPI RATE?**

10 A. No. Of course, there are rate decreases to other rate classes reflecting the impact of
11 increasing the rates and revenues to be recovered from GFCP/VEPI, as I will explain.
12 The revenue requirement portion of the case and the increase request have not changed.
13 Nor are we changing the class cost of service study, including the results for GFCP/VEPI.
14 The various requested changes to our tariff that I described in PGW Statement No. 6 at
15 pages 12-15 are also unchanged.

16 **Q. WHAT ARE THE RATES PROPOSED FOR GFCP/VEPI?**

17 A. PGW is proposing a new tariff rate class: General Service – Extra Large Transportation
18 (“Rate GS-XLT”).

19 **Q. CAN YOU DESCRIBE THE REVENUE IMPACT OF RATE GS-XLT?**

20 A. Yes. The new Rate GS-XLT moves GFCP/VEPI closer to cost of service based rates
21 and, therefore, produces greater revenue than the old Rate GTS-Firm which was included
22 as a placeholder in PGW’s initial filing. These proposed rates will produce overall
23 revenues of \$5.279 million This is \$ 4.150 million more than collected under current
24 rates and has been applied to reduce rates to the other classes.

1 Exhibit FT-5, attached, shows the rate class effects of this exercise. The additional
2 revenues were distributed to reduce the proposed rate increase for all classes other than
3 IT. Based on PGW's Class Cost of Service Study, the originally proposed IT customer
4 class rate increase did not bring that class to cost. Therefore, allocating a portion of the
5 additional revenue from Rate GS-XLT to the Rate IT class would not be appropriate.

6 **Q. WHAT ARE THE COMPONENTS OF RATE GS-XLT?**

7 A. The availability of Rate GS-XLT is limited and offered to customers "who share a
8 common point of interconnection that collectively consumes and whose natural gas
9 throughput to its Facilities on the PGW system is greater than 9 Bcf annually." There are
10 three basic service components: Local Gas Transportation Service, Alternative Receipt
11 Service and Sales Service.

12 **Q. PLEASE DESCRIBE TRANSPORTATION SERVICE.**

13 A. The path for transportation is from receipt at the TETCO city gate to the customer's
14 facility. Multiple meters are allowed, as GFCP/VEPI have two meters presently, at a rate
15 of \$1,100 per month per meter. Local Gas Transportation Service is "firm non-
16 interruptible" and available for up to 56,000 Dekatherms per day. The minimum annual
17 quantity is 9 Bcf.

18 Since, larger customers tend to have thermal meters, we have converted Ms.

19 Heppenstall's cost based \$0.1054 per Mcf into dekatherms and a rate of \$0.11067 per

20 Dth. The customer is expected to balance their own load, as GFCP/VEPI have done in

21 the past, without relying on banking or balancing by PGW.

1 **Q. PLEASE DESCRIBE ALTERNATIVE RECEIPT SERVICE UNDER RATE GS-**
2 **XLT.**

3 A. Alternative Receipt Service (“ARS”) is a continuation of the displacement service that
4 PGW has provided to GFCP/VEPI for the last twenty-five years and which they have
5 stated elsewhere they would like to continue. ARS is described in Mr. Reeves’ testimony
6 in detail. The description of the service is the same acceptance of delivery at TETCO
7 Gate Station 034 and then the delivery of substitute volumes at TETCO Gate Station 060,
8 the location where GFCP/VEPI need the gas for delivery to their facilities. Monthly
9 notice of the needed volumes is required, otherwise PGW may use the capacity for
10 another purpose for the benefit its other customers. The service is interruptible.
11 Pricing is based upon PGW’s TETCO release history updated annually, and a floor is set
12 at the TETCO maximum tariff rate. Mr. Reeves’ direct testimony describes the rationale
13 for this rate design.

14 The anticipated ARS rate revenues of \$3.957 million, are substantially below Ms.
15 Heppenstall’s calculated \$8,941,824 cost of service for ARS.

16 **Q. LASTLY, IS SALES SERVICE OFFERED UNDER RATE GS-XLS?**

17 A. Yes. Sales is composed of a transportation component that recovers base rate costs and
18 the prevailing GCR rate. PGW does not guarantee that sale service will be available
19 when demanded and, therefore, is “best efforts” only. GFCP/VEPI did not purchase any
20 sales service from PGW last year so the revenue effect is zero. Because PGW can only
21 offer sales service on a “best efforts” basis, PGW is proposing that the transportation
22 component will be set at the lowest applicable Interruptible Service Rate.

1 **Q. WHAT ABOUT OTHER TERMS AND CONDITIONS?**

2 A. The tariff lists the standard set of “Conditions of Use” that all of PGW’s customers
3 follow, including title to the gas transported, extension of facilities, line loss and
4 balancing. The “Terms of Payment” are the same as for all of PGW’s customers.

5 **Q. ARE THERE ANY OTHER PROPOSED CHANGES CONTAINED IN RATE GS-**
6 **XLT COMPARED TO THE RATES CURRENTLY CHARGED TO GFCP/VEPI?**

7 A. Yes. PGW is also proposing that the surcharges that apply to the Local Gas Transportation
8 Service rates be applied to Rate GS-XLT. Specifically, the Local Transportation Service of
9 Rate GS-XLT is a firm non-interruptible rate as requested by GFCP/VEPI in numerous
10 filings and recognized by the Commission in its April 20, 2023 Order. Therefore, the
11 same surcharges that apply to other GS transportation customers should apply here.
12 These are: the Universal Service and Energy Conservation Surcharge; the Efficiency Cost
13 Recovery Surcharge; Other Post Employment Benefit Surcharge; and the Distribution
14 System Improvement Charge. These programs benefit all customers and application to
15 firm service is consistent with our Commission-approved practices for all other firm
16 services. These charges would not be applied to ARS and Sales Service.

17 **Q. ARE YOU SPONSORING A PROPOSED TARIFF FOR RATE GS-XLT?**

18 A. Yes, the proposed Tariff is Exhibit FT-6 to my testimony. Once the Commission
19 approves PGW’s rate, PGW will incorporate this new rate into its existing Tariff as part
20 of the compliance filing process for the base rate case.

21 **Q. ARE THERE ANY UPDATES THAT YOU WISH TO MAKE TO OTHER**
22 **PREVIOUSLY FILED DOCUMENTS?**

23 A. Yes. Also being filed with my testimony are updated and revised filing requirements
24 that, based on PGW’s review are impacted by this rate proposal. These modify the

1 original filing requirements to reflect the changes addressed in my supplemental direct
2 testimony.

3 **II. CONCLUSION**

4 **Q. DOES THAT COMPLETE YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

5 **A. Yes. I reserve the right to file additional testimony as necessary.**

Exhibit FT-4

Exhibit FT-4

Revenue				
		Usage	Rate	Revenue
Meter Charge				\$ 26,400
ARS		3,768,722	\$ 1.0500	\$ 3,957,158
Transportation		12,286,916	\$ 0.1054	\$ 1,295,041
Total Revenue				\$ 5,278,599
Present Revenue				\$ 1,129,040

Exhibit FT-5

Revenue Increase						
Service Classification	Amount	Percent Increase	Revenue From Grays Ferry	Revised Increase	Percent Increase	Share of Increase
Residential	\$ 68,090	16.23%	3,442	64,648	15.41%	75.33%
Commercial	10,857	14.94%	549	10,308	14.19%	12.01%
Industrial	960	16.33%	49	912	15.51%	1.06%
Municipal	1,427	22.65%	72	1,355	21.50%	1.58%
PHA - GS	358	17.83%	18	340	16.93%	0.40%
PHA - Rate 8	377	12.62%	19	358	11.98%	0.42%
NGVS	8	22.94%	0	8	21.78%	0.01%
Interruptible	3,743	22.66%		3,743	22.66%	4.36%
GS-XLT	-	0.00%	(4,150)	4,150	367.53%	4.84%
Total	\$ 85,820	16.28%		\$ 85,820	16.28%	100.00%

Exhibit FT-6

PHILADELPHIA GAS WORKS

GENERAL SERVICE EXTRA LARGE TRANSPORTATION - RATE GS-XLT**AVAILABILITY**

This Rate GS-XLT is only available to Customer(s) who share a common point of interconnection that collectively consumes gas and whose natural gas throughput to its Facilities on the PGW system is greater than 9 Bcf annually or, if a new customer, that can demonstrate to the Company's satisfaction such future use and throughput.

The term "Facilities" means the gas burning equipment of the Customers. Facilities that operate in a coordinated fashion among affiliated (commonly owned) entities on a contiguous parcel of land and receive service through a common point of interconnection shall be treated as a single customer for purposes of this rate schedule.

CHARACTER OF SERVICE

Transportation Service under this rate schedule is firm and shall be interrupted only in cases of operating emergencies experienced by the Company or instances of Force Majeure. The Company assumes no liability for interruptions caused by failure of supply sources or upstream transportation by third parties and shall not be obligated to deliver Gas under this rate schedule on any day that Gas is not received at its gate station for the Customer's account.

MONTHLY RATE

The Monthly Charge shall be the sum of the following:

1. **CUSTOMER CHARGE:** \$1,100.00 per month per meter.
2. **LOCAL GAS TRANSPORTATION SERVICE:**

"Local Gas Transportation Service" shall mean the local Gas transportation service provided by the Company, pursuant to this Rate GS-XLT, from Gate Station 060 to the Facility metering station.

PGW will provide firm non-interruptible Local Gas Transportation Service to the Customer's Facility for up to 50,000 Dekatherms per Day. Customer, at PGW discretion, may balance its daily purchases, nominations, and deliveries in the interstate pipeline(s) and PGW shall have no responsibility for banking or balancing Customer's transportation deliveries.

The Local Gas Transportation Charge shall be an amount equal to \$0.11067 per Dth, as measured by PGW at the Customer's metering station(s).

The Customer shall reimburse Company for any expense actually incurred for Customer's benefit from third party sources in the provision of this Service, such as directly assignable taxes, pipeline balancing penalties, governmentally imposed charges, and contingent liability for external transportation charges and fuel requirements. Additionally, for existing Customers, any unavoidable Gas supply costs (e.g., pipeline demand charges) incurred on the Customer's behalf. Such charges shall be in addition to charges specified elsewhere in this Rate GS-XLT. Minimum annual quantity is 9 Bcf.

Issued: May 5, 2023

Effective:

PHILADELPHIA GAS WORKS

3. ALTERNATIVE RECEIPT SERVICE

Rate GS-XLT Customers shall pay PGW a rate per Dth equal to the greater of (1) the average revenue per Dth received by the Company from all releases, excluding choice capacity releases and asset management agreement associated release, of recallable capacity on Texas Eastern Transmission ("TETCO") during PGW's prior fiscal year, which shall be annually updated by PGW with the Commission by September 15 of each year following; or (2) the max TETCO tariff rate. The Minimum ARS Quantity provided by the Company shall be 5,000 Dth per day. The minimum monthly charge shall be the above rate times 5,000 Dth times the number of days in the month regardless of whether the Customer uses less. The Maximum ARS Quantity provided by the Company shall be 21,000 Dth/day.

Definitions Relevant to ARS

"Day" shall mean a period of time consisting of twenty-four hours and including the solar day and the night.

"Gate Station 060" shall mean the new gate station, referred to by TETCO as Point of Delivery No. 73060, to be installed pursuant to the TETCO Precedent Agreement near the interconnection of the PGW Liquids Pipeline and the TETCO Philadelphia Lateral.

"Gate Station 034" shall mean the gate station, referred to by TETCO as Point of Delivery No. 70034, located at an interconnection of PGW's distribution system and TETCO's pipeline system in Montgomery County, Pennsylvania.

"Maximum ARS Quantity" shall mean 21,000 Dth of gas daily; provided.

Description of ARS

PGW will, (i) accept at PGW's facilities at the outlet of Gate Station 034 delivery of a quantity in Dth of Gas nominated by the Rate GS-XLT Customer and actually delivered by TETCO (the "ARS Quantity") for such Day up to the Maximum ARS Quantity for such Day, and (ii) in exchange for such Gas, deliver to PGW's facilities at the outlet of Gate Station 060 on such Day a quantity of Gas in Dth equal to the ARS Quantity for such Day; provided however, that at its election, PGW shall be excused from its ARS obligations on any Day.

ARS, as described above, is a displacement service. Rate GS-XLT Customers are obligated to notify PGW thirty (30) days in advance of the first of every month they will accept ARS service of the volume of ARS they are accepting for the entire month up to the Maximum ARS Quantity without adjustment throughout the month. PGW, at its discretion, may use such unclaimed ARS volume's up to the Maximum ARS Quantity, at its discretion, for another purpose.

PHILADELPHIA GAS WORKS

The Alternative Receipt Service rights granted to Rate GS-XLT Customers pursuant to the Service shall not be assignable by Rate GS-XLT Customers, and any Gas delivered by PGW to the Facility pursuant to ARS shall be used only in the Facility.

4. **SALES SERVICE:**

PGW will make Sales Service available to the Customer on a "best efforts" basis solely for use at the Customer's Facility, Rate GS-XLT Customers acknowledge that, from time to time on any given day, a request for Sales Service may be denied or limited by PGW in its sole judgment for economic or operational reasons.

The rate for such service shall be composed of a transportation component and a commodity component, as follows:

Transportation component:	The lowest applicable Interruptible Service Rate
Commodity component:	The current GCR Rate per Dth

For purposes of calculating Sales Service and transportation quantities, the first Gas recorded through the meters at the Facility Delivery Point on each Day for which Sales Service Gas has been nominated shall be considered Sales Service Gas.

5. **SURCHARGES**

The Universal Service and Energy Conservation Surcharge; the Efficiency Cost Recovery Surcharge; Other Post Employment Benefit Surcharge; and Distribution System Improvement Charge shall apply to the Local Gas Transportation Service applied under this Rate GS-XLT.

6. **MINIMUM MONTHLY CHARGE:**

The minimum monthly charge shall be the Customer Charge per meter, and the minimum monthly ARS charge.

TERMS OF PAYMENT

Bills will be rendered and payment terms applied in accordance with this Tariff.

CONDITIONS OF USE

1. The Company shall not be obligated to incur the cost of additional facilities to provide Transportation Service hereunder for existing load. Nonetheless, in the event the Company elects to provide additional facilities, which in the Company's sole judgment are required to provide Transportation Service, the cost of such facilities shall be the responsibility of the Customer. Customers may appeal the Company's judgment to the Commission. The Company shall provide, install, own and maintain such facilities. Where applicable, extensions and enlargements of Gas supply facilities for qualifying new load shall be in accordance with Section 10.

PHILADELPHIA GAS WORKS

2. The Customer warrants and will provide satisfactory documentation, upon request, that it has good and merchantable title for all Gas delivered to the Company for transportation hereunder. Title shall be free and clear of all liens, encumbrances and claims whatsoever. Customer will indemnify Company and hold the Company harmless from all suits, actions, debts, accounts, damages, costs, losses and expenses arising out of the adverse claims of any or all persons to said Gas and/or to royalties, taxes, license fees or charges thereon, including pipeline transportation and service charges, which are applicable to such Gas and/or the delivery of such Gas to the Company.
3. The Company may retain for line loss and unaccounted-for Gas a percentage of the total volume of Gas delivered into its system for Customer's account. The percentage of Gas to be retained by the Company shall be equivalent to the percentage for total system line loss and unaccounted-for, as utilized in the Company's annual operating budget. This condition may, at the Company's discretion, be revised as appropriate, where the transported Gas can be delivered directly to the Customer without commingling with other distribution system supplies. If circumstances change, the Company will notify the Customer in writing thirty (30) days prior to any change.
4. In the event that the Company declares an emergency situation it may, at its discretion, divert Customer's Gas for such purposes as Company deems appropriate and Customer will be compensated for such Gas at the cost at which the Customer acquired the Gas, at the Customer's cost of the alternate fuel utilized or at the Company's avoided cost of Gas during the billing month, whichever is highest. The Customer shall demonstrate its cost of Natural Gas or replacement fuel by making a copy of its purchase contract available to Company upon request. All Gas purchased by the Company will be credited to the Customer's account.
5. Rate GS-XLT is subject to the provisions of the Daily Balancing Service – Rate DB in this Tariff (pgs. 101-109). For purposes of Rate DB, Rate GS-XLT customers with a common point of interconnection will be deemed by the Company to meet the qualifications for Rate DB regardless of how they structure their natural gas purchases. This condition may, at the Company's discretion, be waived or revised as appropriate, where the transported Gas can be delivered directly to the Customer without commingling with other distribution system supplies. If circumstances change, the Company will notify the Customer in writing thirty (30) days prior to any change.

UNAUTHORIZED USE

If a Customer uses Rate GS-XLT service after being notified that service under this schedule is not available, uses gas at other than the specified Facilities allowed under this tariff or uses this service in excess of authorized limitations when established and duly notified, all such unauthorized usage shall be billed a penalty charge of seventy five dollars (\$75.00) per Dth on the positive difference between the amount consumed by Customer and the amount delivered to the Company. Failure to comply with an Operational Flow Order (OFO) will result in a penalty charge of seventy-five dollars (\$75.00) per Dth plus all incremental costs incurred by the Company as a result of the failure to comply with the OFO.

LIABILITY

The Company shall not be liable for curtailment of service under this rate schedule or loss of Gas of the Customer as a result of any steps taken to comply with any law, regulation or order of any governmental agency with jurisdiction to regulate, allocate or control Gas supplies or the rendering of service hereunder, and regardless of any defect in such law, regulation or order.

PHILADELPHIA GAS WORKS

The Company reserves the right to commingle transport Gas with its other supplies but Gas is and remains the property of the Customer while being transported and delivered by the Company. The Customer shall be responsible for maintaining all insurance it deems necessary to protect its property interest in such Gas before, during and after receipt by the Company.

The Company shall not be liable for any loss to the Customer or any other entity or person(s) arising from or out of service under this rate schedule, including loss of Gas in the possession of the Company or any other cause.

COMPANY RULES

The provisions of this Tariff GS-XLT shall govern the service under this classification except where noted herein.

VERIFICATION

I, Florian Teme, hereby state that: (1) I am the Vice President, Marketing, Sales and Energy Planning for Philadelphia Gas Works (“PGW”); (2) the facts set forth in my testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 5, 2023



Florian Teme
Vice President, Marketing, Sales and
Energy Planning
Philadelphia Gas Works

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DIRECT TESTIMONY OF

RYAN E. REEVES

ON BEHALF OF
PHILADELPHIA GAS WORKS

Docket No. R-2023-3037933

TOPIC:

Proposed Rates for Grays Ferry Cogeneration Partnership
and Vicinity Energy Philadelphia, Inc.

May 5, 2023

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION WITH PGW.**

3 A. My name is Ryan E. Reeves. My position with Philadelphia Gas Works (“PGW” or
4 “Company”) is Director of Gas Supply, Transportation and Control.

5 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

6 A. I received a Bachelor of Science degree in Chemical Engineering from Drexel University
7 in 2009 and a Master’s degree in Business Administration from Villanova University in
8 2016. I have held the following positions at PGW: Staff Engineer and Operations Engineer
9 at PGW’s Richmond LNG Plant, and Manager of Special Projects.

10 **Q. PLEASE DESCRIBE YOUR DUTIES IN YOUR PRESENT POSITION.**

11 A. I develop and monitor PGW’s long-term Gas Supply Strategic Plan that ensures PGW has
12 the financial resources and assets to execute its business strategy. I advance policies,
13 procedures and practices that ensure safe, reliable, competitively priced gas supplies and
14 other energy resources to meet current and future demands on PGW’s systems, and I
15 analyze the overall long-term capital and operating budget plans for Gas Supply.

16 **Q. HAVE YOU EVER PROVIDED TESTIMONY BEFORE THIS COMMISSION?**

17 A. Yes. Among other proceedings, I provided testimony in PGW’s 2021-2022 Gas Cost Rate
18 proceeding (Docket No. R-2021-3023970); in PGW’s 2022-2023 GCR proceeding
19 (Docket No. R-2022-3030686); in PGW’s 2023-2024 GCR proceeding (Docket No. R-
20 2023-3038069); and in the complaint proceeding filed by Grays Ferry Cogeneration
21 Partnership and Vicinity Energy Philadelphia, Inc. (collectively, “GFCP/VEPI”) (Docket
22 No. C-2021-3029259).

1 **II. DESCRIPTION OF ALTERNATIVE RECEIPT SERVICE TO GFCP/VEPI**
2 **UNDER RATE GTS-FIRM**

3 **Q. DOES PGW PROVIDE ALTERNATIVE RECEIPT SERVICE TO GFCP/VEPI**
4 **UNDER RATE GTS-FIRM?**

5 A. Yes. In addition to transportation service, sales service, and capacity release service, PGW
6 provides Alternative Receipt Service (“ARS”) under the 1996 Contracts and Rate GTS-F.
7 This contract provision, which was incorporated by reference into the Tariff, ended with
8 the termination of the 25-year contract with Grays Ferry Cogeneration Partnership and
9 Vicinity Energy Philadelphia, Inc (“GFCP/VEPI). PGW was instructed by the
10 Commission to continue to provide service to GFCP/VEP pursuant to rate GTS-F and to
11 propose a new rate for GFCP/VEPI for service going forward which will replace the
12 present rates going forward.

13 **Q. IS PGW PROPOSING TO CONTINUE TO OFFER AN ARS RATE?**

14 A. Yes. PGW has decided to offer a special rate that would be available to GFCP/VEPI that
15 would include continuing ARS service.

16 **Q. PLEASE DESCRIBE HOW ARS WORKS.**

17 A. It is my understanding that, GFCP/VEPI has contracted with TETCO for maximum
18 pipeline capacity at Gate Station 060 of only 35,000 Dth per day, but GFCP/VEPI’s peak
19 daily quantity is 56,000 Dth/day. Therefore, GFCP/VEPI requires more TETCO delivery
20 capacity to meet their needs than the amount for which they have contracted.

21 This is the only Gate Station at which GFCP/VEPI receives gas service and the only one
22 on which they hold capacity rights.

23 To accommodate this shortfall, for the last twenty-five years, PGW has provided
24 GFCP/VEPI with the option under their current (now expired) GTS-F rate, of requesting
25 ARS. Under ARS, GFCP/VEPI delivers gas to the 034 gate station and PGW makes the

1 same quantities of gas available to GFCP/VEPI at Gate Station 060. We propose that ARS
2 continue as GFCP/VEPI have elsewhere stated that they wish for PGW to do so.

3 This displacement service is not an ordinary service provided by PGW. The exchange
4 arrangement works as follows: With PGW's consent, GFCP/VEPI delivers gas to other
5 parts of PGW's distribution system when the pipeline capacity available to the GFCP/VEPI
6 at Gate Station 060 is not sufficient to meet their demand.

7 GFCP/VEPI cause gas to be delivered using Gate Station 034 on TETCO's Skippack
8 Lateral near Lawndale (a neighborhood in Northeast Philadelphia). That same amount of
9 gas is then delivered to Gate Station 060 by PGW using PGW's firm capacity rights on
10 TETCO's Philadelphia Lateral, which are otherwise needed by PGW to meet PGW's
11 system peaks (and which PGW has determined will not be so needed at that time). The gas
12 delivered by PGW to Gate Station 060 then flows to the GFCP/VEPI in the same way as
13 GFCP/VEPI transportation service. I would also note that ARS is not always available
14 because PGW has to ensure that it has distribution capacity available at Gate Station 034
15 to be able to handle the gas.

16 **Q. DOES ARS IMPACT THE FLOW OF GAS ON PGW'S DISTRIBUTION**
17 **SYSTEM?**

18 A. Yes. When ARS is not being provided, PGW's customers in South Philadelphia are served
19 via TETCO's Gate Station 030 off of the Philadelphia Lateral. Gas flows from the
20 Philadelphia Lateral, through Gate Station 030, to PGW's distribution system, and from
21 there on to PGW's customers in South Philadelphia.

22 When PGW provides ARS, a portion of PGW's capacity on the Philadelphia Lateral is
23 used to provide gas to the Grays Ferry facility. In turn, an equal amount of gas is provided

1 by GFCP/VEPI on the Skippack Lateral. When PGW provides ARS, the Company serves
2 the customers in South Philadelphia that would normally be served via the Philadelphia
3 Lateral from gas that is delivered from the next closest gate station. It then replaces that
4 gas with gas from another gate station, and so on until the additional gas delivered at 034
5 by GFCP/VEPI is utilized. Therefore, for PGW to accept GFCP/VEPI's gas flows through
6 the 034 Gate Station to PGW's distribution system, PGW needs two things: first, it needs
7 a customer load on the distribution system to use this gas at the 034 Gate Station, and
8 secondly, it needs other distribution system and pipeline assets to provide gas to the
9 customers who normally receive service through 030 on the Philadelphia Lateral if not for
10 the ARS.

11 **Q. COULD PGW PROVIDE GFCP/VEPI WITH ARS WITHOUT USING PGW'S**
12 **DISTRIBUTION SYSTEM?**

13 No. The reason PGW can offer ARS is because it has customers and load distributed on
14 both sides of Philadelphia and can flow gas to them from alternative locations. The simple
15 fact is if PGW's distribution was not connected to 034 Gate Station then the ARS would
16 not work.

17 **Q. IS ARS AN INTERRUPTIBLE SERVICE?**

18 A. Yes. ARS is contractually "non-firm." However, PGW has never interrupted
19 GFCP/VEPI's receipt of ARS. Under the 1996 Contracts, which were incorporated into
20 Rate GTS-F, PGW has the right to deny an ARS request for up to 15 winter days each
21 season when the average temperature on that day is predicted to be 25 degrees Fahrenheit

1 or below.¹ PGW's new ARS service is proposed to continue to be interruptible PGW
 2 determines that it cannot be provided.

3 **III. COSTS OF PGW TO PROVIDE ARS**

4 **Q. PLEASE COMPARE THE COSTS AND EFFORT REQUIRED BY PGW FOR**
 5 **TRANSPORTATION SERVICE AND ALTERNATIVE RECEIPT SERVICE.**

6 A. When compared to the typical delivery of gas (via Gate Station 060), this exchange service
 7 imposes more costs upon PGW and PGW's system, since the exchange requires PGW to
 8 not only deliver gas to Gate Station 060 but also coordinate the deliveries of gas to Gate
 9 Station 0-34. PGW is required to use its distribution system in order to deliver enough gas
 10 into its system so as to be able to deliver gas at the 060 gate station for use by GFCP/VEPI.

11 **Q. DOES PGW INCUR COSTS IN PROVIDING ARS TO GFCP/VEPI?**

12 A. Yes. Without the availability of PGW's distributions system or use of its firm pipeline
 13 assets, PGW would not be able to deliver natural gas at an interstate pipeline delivery point,
 14 use that gas and make available that same amount of gas at a totally different (and
 15 unconnected) interstate delivery point (the 060 gate station). In addition to the physical
 16 use of the system, effectuating this displacement requires careful planning by PGW's Gas
 17 Acquisitions and Control personnel and constant monitoring of its facilities to ensure that
 18 it can intake and deliver the additional gas delivered via ARS. To claim that there is "no
 19 cost" to PGW to provide gas via ARS is no different than claiming that PGW incurs "no
 20 cost" in delivering any incremental gas load to any customer. All embedded, fixed costs
 21 of a utility are paid for by the customers using them on a fully distributed cost basis, not
 22 on an incremental cost basis.

¹ See Partnership Service Agreement § 3.5; Partnership Service Contract § 3.5; Trigen Service Agreement § 3.4; Trigen Service Agreement § 3.4.

1 For all customers who have gas provided by another supplier besides PGW, PGW has
2 multiple departments that track, confirm, and account to make sure the correct amount of
3 gas was delivered. ARS is no different. The gas nominating cycle happens around the
4 clock and PGW personnel make sure the ARS is in balance and makes adjustments if issues
5 arise. Also, when issues arise, PGW personnel have to spend time to make solutions to
6 solve the problems.

7 **Q. HAS PGW'S COST OF SERVICE WITNESS, MS. HEPPENSTALL,**
8 **RECOGNIZED THESE OPERATIONAL FACTS IN DETERMINING THE COST**
9 **OF ARS SERVICE?**

10 A. Yes. Ms. Heppenstall's Class Cost of Service Study has allocated a share of the distribution
11 system costs to this service.

12 **Q. IS PGW PROPOSING THAT, GOING FORWARD, ARS SERVICE SHOULD BE**
13 **PRICED AT THE COST OF THAT SERVICE AS DETERMINED BY MS.**
14 **HEPPENSTAL'S COST OF SERVICE STUDY?**

15 A. No. PGW believes that a more appropriate pricing construct would be to attempt to price
16 the service in a manner that is more in line with the market value of the capacity that
17 partially underlies the service. Capacity on TETCO is constrained and it is significantly
18 constrained on the Philadelphia Lateral. If PGW did not have to provide ARS it could,
19 when the capacity was not otherwise needed to meet firm load, release that capacity to the
20 market and realize significant margins in excess of the current cost of the capacity to
21 ratepayers. For that reason we are proposing that the ARS service be priced to reflect the
22 greater of (1) the average revenue per Dth received by the Company from all releases of
23 recallable capacity on Texas Eastern Transmission ("TETCO") during the prior fiscal year
24 (\$1.05/Dth for the FPFTY); or (2) the maximum TETCO tariff rate (currently \$.61/Dth).

1 **Q. PLEASE EXPLAIN WHY THESE BENCHMARKS ARE APPROPRIATE FOR**
2 **PRICING ARS.**

3 A. PGW feels these benchmarks are appropriate for four reasons. One, since the ARS does
4 not have any direct comparison, PGW's actual average capacity release is the closest
5 feature to establish a market rate. It reflects what PGW receives in the marketplace for
6 released TETCO capacity. Secondly, using PGW's actual average capacity release will
7 ensure that PGW's GCR customers are not subsidizing the price of capacity that is being
8 used for GFCP/VEPI.

9 Third, PGW's average capacity release figure reflects actual transactions in the market, so
10 that it will be more likely to track market trends, while at the same time, the minimum
11 ensures that the rate will not fall below TETCO's tariffed rate. As noted, the current
12 maximum tariffed capacity release for TETCO is \$0.61/ Dth. Parenthetically, this is the
13 rate that GFCP/VEPI has offered to PGW for capacity release in its pending GCR
14 proceeding.

15 Fourth, the rate must consider the cost of providing the service. Ms. Heppenstall has
16 testified that the cost of ARS service is some \$\$2.373 per Mcf. The proposed rate for FY
17 2024 – \$1.05 – is just 44% of full cost, and the proposed max rate – \$0.61 – is just 26% of
18 the full cost.

19 Accordingly, PGW believes that this approach maximizes pricing for the benefit of our
20 other customers, attempts to reflect the competitive alternatives that a GS-XLT customer
21 might be able to use instead of some portion of ARS and also recognizes that the rate can
22 not just reflect comparable capacity costs because PGW must have and utilize its
23 distribution system to provide this service.

1 IV. **CONCLUSION**

2 Q. **DOES THIS COMPLETE YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

3 A. Yes. I reserve the right to offer further responsive testimony. Thank you.

VERIFICATION

I, Ryan E. Reeves, hereby state that: (1) I am the Director of Gas Supply, Transportation, and Control for Philadelphia Gas Works (“PGW”); (2) the facts set forth in my testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 5, 2023



Ryan E. Reeves
Director of Gas Supply, Transportation, and
Control
Philadelphia Gas Works