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September 13, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission *et al.* v. FirstEnergy Pennsylvania Electric Company
Docket Nos. R-2024-3047068, *et al.*

Dear Secretary Chiavetta:

On behalf of FirstEnergy Pennsylvania Electric Company ("FE PA"), attached for filing is the Joint Petition for Settlement of All Issues ("Settlement") in the above-referenced proceeding. Accompanying the Settlement are the following Appendices, which include the Statements in Support of the Settlement submitted by the active parties in this proceeding.

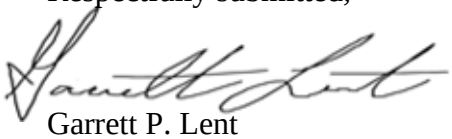
- Appendix A – *Pro Forma* Tariff
- Appendix B – Proof of Revenues
- Appendix C – Rate Impact Analysis
- Appendix D – Rate Design Schedules
- Appendix E – Revenue Allocation
- Appendix F – Rate Design Example of New LEDC Program Rider
- Appendix G – List of Abbreviations
- Appendix H – Proposed Findings of Fact
- Appendix I – Proposed Conclusions of Law
- Appendix J – Proposed Ordering Paragraphs
- Appendix K – FE PA Statement in Support
- Appendix L – I&E Statement in Support
- Appendix M – OCA Statement in Support
- Appendix N – OSBA Statement in Support

- Appendix O – CAUSE-PA Statement in Support
- Appendix P – Large User Groups Statement in Support
- Appendix Q – PSU Statement in Support
- Appendix R – Walmart Statement in Support
- Appendix S – IBEW Local 777 Statement in Support
- Appendix T – IBEW Local 459 Statement in Support
- Appendix U – UWUA Local 102 Statement in Support

FE PA will separately e-mail a Word version of the Settlement and Appendices G-J to the assigned Administrative Law Judges. In addition, each party will separately e-mail Word versions of its Statement in Support to the assigned Administrative Law Judges.

Copies of the Settlement and Appendices will be provided as indicated on the Certificate of Service. FE PA is serving copies of the Settlement and Appendices upon all *pro se* customer complainants in this proceeding, as indicated on the Certificate of Service.

Respectfully submitted,



Garrett P. Lent

GPL/dmc
Attachments

cc: The Honorable Katrina L. Dunderdale (*via email; w/attachments*)
Emily I. DeVoe (*via email; w/attachments*)
Mary Swarner (*via email; w/ attachments*)
Jordan Van Order (*via email; w/ attachments*)
Marissa Boyle (*via email; w/ attachments*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: September 13, 2024

Garrett P. Lent

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2024-3047068
Office of Consumer Advocate	:	C-2024-3048327
Office of Small Business Advocate	:	C-2024-3048411
Annette Martin	:	C-2024-3048409
Met-Ed Industrial Users Group, et al.	:	C-2024-3048673
Donald Ellenberger	:	C-2024-3048783
Pennsylvania State University	:	C-2024-3048958
Connie Dunmyer	:	C-2024-3049013
Mark Bowers	:	C-2024-3049014
Amy Stutzman	:	C-2024-3049016
Amy Stutzman	:	C-2024-3049017
Hattie Coates	:	C-2024-3049021
John J. Dolan	:	C-2024-3049128
Utility Workers Union of America Local 102	:	C-2024-3049235
David R. VanNorman, Jr.	:	C-2024-3049599
Roland Hoffman	:	C-2024-3049608
David Hoffman	:	C-2024-3049661
Judith A. Garofolo	:	C-2024-3049665
Elaine Kitts	:	C-2024-3049679
Ryan Gandelman	:	C-2024-3049683
Beth Gandelman	:	C-2024-3049774
Charles E. Schwering	:	C-2024-3049805
John Piccinic	:	C-2024-3049957
Henry Barzilay	:	C-2024-3049999
Stanley and Lois LaFuria	:	C-2024-3050000
Albert Dilworth	:	C-2024-3050001
Jackie Stoner	:	C-2024-3050413
Carol Ann Eroh	:	C-2024-3050849
	:	
v.	:	
	:	
FirstEnergy Pennsylvania Electric Company	:	

JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES

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TO THE ADMINISTRATIVE LAW JUDGES KATRINA L. DUNDERDALE AND EMILY I. DEVOE:

I. INTRODUCTION

FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company"), the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the "Large User Groups",[1] the International Brotherhood of Electric Workers Local 459 ("IBEW Local 459"), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"), the UWUA System Local 102 ("UWUA 102"), Walmart, Inc. ("Walmart") and the Pennsylvania State University ("PSU"), parties in the above-captioned proceeding (hereinafter collectively referred to as the "Joint Petitioners" or "Parties"), all active parties in the above-captioned base rate proceeding,[2] hereby file this Joint Petition for Approval of Settlement of All Issues ("Settlement") and respectfully request that Administrative Law Judge Katrina L. Dunderdale ("ALJ Dunderdale") and Administrative Law Judge Emily I. DeVoe ("ALJ DeVoe") (collectively, "ALJs") and the Pennsylvania Public Utility Commission ("Commission") approve FE PA's distribution base rate increase filing subject to the terms and conditions of the Settlement.

This Settlement represents a full settlement of all issues and concerns raised in the instant proceeding. The Settlement provides for increases in base rates, as set forth in the *pro forma* tariff supplement attached hereto as **Appendix A** and the proof of revenues attached hereto as **Appendix**

[1] The Large User Groups are comprised of the Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), and West Penn Power Industrial Interveners ("WPPII").

[2] A number of individuals filed *pro se* formal complaints opposing the proposed rate increase. None of these complainants were active parties in this proceeding. A complete copy of this Settlement is being served on all formal complainants.

B, designed to produce a net increase in overall annual distribution operating revenues of $225.0 million for FE PA,[3] based upon a Fully Projected Future Test Year ("FPFTY") ending December 31, 2025.

The effect of the Settlement on Residential customer rates as of January 1, 2025, is set forth below and in **Appendix C**:

FE PA Residential Class Rate Impact Analysis
using 1,000 kWh for average usage, Total Bill (52. PA Code 53.45)

Rate Districts	Current	Increase	Increase	Total
Met-Ed	$ 187.70	$ 191.19	$ 3.49	1.9%
Penelec	$ 200.96	$ 209.29	$ 8.33	4.1%
Penn Power	$ 180.59	$ 188.72	$ 8.13	4.5%
West Penn	$ 156.36	$ 166.07	$ 9.70	6.2%

Additional detail for the effect of the change on all other classes is provided in **Appendix C**. Also included are **Appendix D** which contains the Rate Design schedules, **Appendix E** for Revenue Allocation and **Appendix F** as a rate design example of the new LED Streetlighting Conversion Program ("LEDC") Rider, as provided for by the Settlement.

A List of Abbreviations is provided as **Appendix G**. Proposed Findings of Fact, Conclusions of Law, and Ordering Paragraphs are provided as **Appendices H-J**, respectively. Finally, the Joint Petitioners' respective Statements in Support of the Settlement are included as **Appendices K** through **U**.

In support of the Settlement, the Joint Petitioners state the following:

[3] As explained in Paragraph 42, *infra*, the overall revenue requirement increase is broken down by Rate District as follows: Met-Ed Rate District - $39.60 million; Penelec Rate District - $57.69 million; Penn Power Rate District - $24.98 million; West Penn Rate District - $102.73 million.

II. BACKGROUND

1. On April 2, 2024, FE PA filed Supplement No. 3 to FE PA's Tariff Electric – Pa. P.U.C. No. 1 ("Supplement No. 3"), responses to filing requirements and standard data requests, and supporting direct testimony and exhibits with the Commission (the "2024 Base Rate Case"). In Supplement No. 3, FE PA sought a base rate increase, pursuant to 66 Pa.C.S. § 1308 of the Public Utility Code ("Code"), of approximately $502 million annually across all "Rate Districts" based on data for a fully projected future test year ending December 31, 2025. On a Rate District basis, FE PA proposed rates designed to increase annual distribution revenues as follows: Met-Ed Rate District - $146 million, Penelec Rate District - $132 million, Penn Power Rate District - $55 million, and West Penn Rate District - $169 million. Supplement No. 3 also contained non-substantive revisions to the language of certain Rules and Regulations, rate schedules and riders in the Company's currently effective tariff, as summarized in FE PA Exhibit MSK-2. The filing was made in compliance with the Commission's regulations and contained all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

2. On April 9, 2024, I&E filed a Notice of Appearance.

3. On April 10, 2024, FE PA was served with the Formal Complaint and Public Statement filed by OCA at Docket No. C-2024-3048327.

4. On April 15, 2024, OSBA entered its Notice of Appearance.

5. On April 16, 2024, CAUSE-PA filed a Petition to Intervene and Answer.

6. On April 17, 2024, OCA filed a Notice of Appearance.

7. On April 24, 2024, the Large User Groups filed a Joint Complaint.

8. On April 25, 2024, Administrative Law Judge ("ALJ") Katrina Dunderdale issued a Prehearing Order.

9. Also on April 25, 2024, IBEW Local 459 filed a Petition to Intervene.

10. Further, the Commission entered an Order on April 25, 2024, instituting an investigation into the lawfulness, justness, and reasonableness of the rates, rules and regulations contained the proposed Supplement No. 3. The April 25, 2024 Order also suspended proposed Supplement No. 3 until January 1, 2025, unless otherwise directed by Order of the Commission, and assigned the case to the Commission's Office of ALJ.

11. On April 30, 2024, IBEW Local 777 filed a Petition to Intervene.

12. On May 1, 2024, various parties filed Prehearing Memorandums.

13. On May 2, 2024, Walmart filed a Petition to Intervene.

14. Also on May 2, 2024, a telephonic prehearing conference was held with the parties. At the prehearing conference, various procedural matters were discussed, and a litigation schedule was established.

15. On May 10, 2024, PSU filed a Complaint.

16. On or around May 23, 2024, UWUA 102 filed a Complaint.

17. A number of in-person and telephonic public input hearings were held, as follows:

(a) <u>In-Person Public Input Hearings</u>

- June 25, 2024 (1:00 p.m. and 6:00 p.m.) – East Stroudsburg, PA;
- June 26, 2024 (1:00 p.m. and 6:00 p.m.) – Reading, PA;
- June 27, 2024 (1:00 p.m. and 6:00 p.m.) – State College, PA;
- July 9, 2024 (1:00 p.m. and 6:00 p.m.) – Erie, PA;
- July 10, 2024 (1:00 p.m. and 6:00 p.m.) – Butler, PA;
- July 11, 2024 (1:00 p.m. and 6:00 p.m.) – Greensburg, PA; and
- July 12, 2024 (1:00 p.m. and 6:00 p.m.) – Washington, PA.

(b) <u>Telephonic Public Input Hearings</u>

- July 16, 2024 (1:00 p.m. and 6:00 p.m.); and
- July 17, 2024 (1:00 p.m. and 6:00 p.m.).

In total, 14 in-person public input hearings and 4 telephonic public input hearings were held.

18. The Parties also engaged in extensive discovery throughout the proceeding. FE PA responded to more than 746 interrogatories and requests for production of documents, many of which included multiple subparts.

19. In accordance with the procedural schedule, I&E, OCA, OSBA, CAUSE-PA, the Large User Groups, Walmart, PSU and IBEW Local 777 submitted the following written direct testimony, including associated exhibits, on or before June 25, 2024:

(a) I&E: I&E Statement No. 1, Direct Testimony of Vanessa Okum; I&E Statement No. 2, Direct Testimony of D.C. Patel; I&E Statement No. 3, Direct Testimony of Joseph Kubas; and I&E Statement No. 4, Direct Testimony of Christine Wilson.

(b) OCA: OCA Statement No. 1, Direct Testimony of Dante Mugrace; OCA Statement No. 2, Direct Testimony of Marlon Griffing; OCA Statement No. 3, Direct Testimony of David Garrett; OCA Statement No. 4, Direct Testimony of Karl R. Pavlovic; OCA Statement No. 5, Direct Testimony of Roger D. Colton; OCA Statement No. 6, Direct Testimony of Barbara Alexander; and OCA Statement No. 7, Direct Testimony of Rao Konidena.

(c) OSBA: OSBA Statement No. 1, Direct Testimony of Mark D. Ewen.

(d) CAUSE-PA: CAUSE-PA Statement No. 1, Direct Testimony of Harry Geller.

(e) Large User Groups: Large User Groups Statement No. 1, Direct Testimony of Brian C. Andrews.

(f) Walmart: Walmart Statement No. 1, Direct Testimony of Lisa V. Perry.

(g) PSU: PSU Statement No. 1, Direct Testimony of James L. Crist.

(h) IBEW Local 777: IBEW-7, the Direct Testimony of Daulph Kline.

20. On July 12, 2024, the Large User Groups and PSU served the following written supplemental direct testimony:

(a) Large User Groups: Large User Groups Statement No. 1-S, Supplemental Direct Testimony of Brian C. Andrews.

(b) PSU: PSU Statement No. 1-S, Supplemental Direct Testimony of James L. Crist.

21. On or before July 22, 2024, FE PA, I&E, OCA, the Large User Groups, PSU, and IBEW Local 777 submitted the following written rebuttal testimony, including associated exhibits:

(a) FE PA: FE PA Statement No. 1-R, Rebuttal Testimony of Joanne Savage; FE PA Statement No. 2-R, Rebuttal Testimony of Wade Smith; FE PA Statement No. 3-R, Rebuttal Testimony of Patricia Larkin; FE PA Statement No. 4-R, Rebuttal Testimony of Tracy Ashton; FE PA Statement No. 5-R, Rebuttal Testimony of Gregory Gawlik; FE PA Statement No. 6-R, Rebuttal Testimony of Mark Kehl; FE PA Statement No. 7-R, Rebuttal Testimony of Timothy Lyons; FE PA Statement No. 8-R, Rebuttal Testimony of Mark Jones; FE PA Statement No. 9-R, Rebuttal Testimony of John Spanos; FE PA Statement No. 10-R, Rebuttal Testimony of Dylan D'Ascendis; FE PA Statement No. 11-R, Rebuttal Testimony of Bill Wang; FE PA Statement No. 12-R, Rebuttal Testimony of John Hawkins; FE PA Statement No. 13-R, Rebuttal Testimony of April Marx; and FE PA Statement No. 14-R, Rebuttal Testimony of Jason DeStigter.

(b) I&E: I&E Statement No. 1-R, Rebuttal Testimony of Vanessa Okum; and I&E Statement No. 4-R, Rebuttal Testimony of Christine Wilson.

(c) OCA: OCA Statement No. 4R, Rebuttal Testimony of Karl R. Pavlovic; and OCA Statement No. 6R, Rebuttal Testimony of Barbara Alexander.

(d) Large User Groups: Large User Groups Statement No. 1R, Rebuttal Testimony of Brian C. Andrews.

(e) PSU: PSU Statement No. 1-R, Rebuttal Testimony of James L. Crist.

(f) IBEW Local 777: IBEW-8, the Rebuttal Testimony of Daulph Kline.

22. On August 8, 2023, FE PA, I&E, OCA, OSBA, CAUSE-PA, the Large User Groups, PSU and IBEW Local 777 submitted the following written surrebuttal testimony, including associated exhibits:

(a) FE PA: FE PA Statement No. 8-SR, Surrebuttal Testimony of Mark Jones; FE PA Statement No. 12-SR, Surrebuttal Testimony of John Hawkins; and FE PA Statement No. 13-SR, Surrebuttal Testimony of April Marx.

(b) I&E: I&E Statement No. 1-SR, Surrebuttal Testimony of Vanessa Okum; I&E Statement No. 2-SR, Surrebuttal Testimony of D.C. Patel; I&E Statement No. 3-SR, Surrebuttal Testimony of Joseph Kubas; and I&E Statement No. 4-SR, Surrebuttal Testimony of Christine Wilson.

(c) OCA: OCA Statement No. 1SR, Surrebuttal Testimony of Dante Mugrace; OCA Statement No. 2SR, Surrebuttal Testimony of Marlon Griffing; OCA Statement No. 3SR, Surrebuttal Testimony of David Garrett; OCA Statement No. 4SR, Surrebuttal Testimony of Karl R. Pavlovic; OCA Statement No. 5SR, Surrebuttal Testimony of Roger D. Colton; OCA Statement No. 6SR, Surrebuttal Testimony of Barbara Alexander; and OCA Statement No. 7SR, Surrebuttal Testimony of Rao Konidena.

(d) OSBA: OSBA Statement No. 1-S, Surrebuttal Testimony of Mark D. Ewen.

(e) CAUSE-PA: CAUSE-PA Statement No. 1-SR, Surrebuttal Testimony of Harry Geller.

(f) Large User Groups: Large User Groups Statement No. 1SR, Surrebuttal Testimony of Brian C. Andrews.

(g) PSU: PSU Statement No. 1-SR, Surrebuttal Testimony of James L. Crist.

(h) IBEW Local 777: IBEW-9, the Surrebuttal Testimony of Daulph Kline.

23. A complete listing of all pre-served testimony and exhibits of the parties, which were admitted into the record, is set forth in the First-Post Hearing Order dated August 21, 2024, as amended by the Second Post-Hearing Order dated August 20, 2024.

24. On August 12, 2024, FE PA submitted written rejoinder outlines for certain of its witnesses, as follows:

(a) FE PA: Joanne Savage, Tracy Ashton, Timothy Lyons, Mark Jones, Dylan D'Ascendis, John Hawkins, and April Marx.

25. On August 14, 2024, as a result of settlement discussions held in this proceeding, and the efforts of the parties to examine the issues raised, counsel for FE PA sent an e-mail to the ALJs indicating the parties were requesting that the telephonic evidentiary hearing scheduled for August 15, 2024 be cancelled, and that August 16, 2024, act as the first day of hearings in this matter. Also on August 14, 2024, FE PA provided a cross-examination matrix and order of

witnesses to the ALJs via email. ALJ Dunderdale responded to the request to cancel the August 15, 2024 hearing date via e-mail, and directed the parties to convene for telephonic hearings on August 15, 2024 as scheduled.

26. On August 15, 2024, a Motion for Protective Order was filed and served. The Motion for Protective Order was substantively identical to Stipulated Protective Agreements previously entered into between FE PA and the parties to this proceeding, that provided for the protection of proprietary and confidential information exchanged amongst the parties.

27. On August 15, 2024, a telephonic evidentiary hearing was held. After discussing preliminary and procedural matters, providing an update on the status of ongoing settlement discussions, and receiving certain questions from the ALJs that FE PA was directed to answer, the hearing was recessed until 2:30 p.m. At the 2:30 p.m. hearing session, a further update regarding settlement discussions was provided. In addition, the procedure for the remainder of the scheduled hearings was established. The ALJs directed that the August 16, 2024 hearing date would be cancelled, and that hearings would reconvene on August 19, 2024, so that any cross-examination of witnesses could be conducted and so that FE PA could provide any testimony and/or exhibits responding to the ALJs' directed questions. In addition, it was agreed that all pre-served testimony would be admitted into the record via written stipulation and verification.

28. Further on August 15, 2024, the ALJs issued a Protective Order.

29. On August 19, 2024, a Joint Stipulation for the admission of all pre-served testimony and exhibits was submitted.

30. Also on August 19, 2024, the parties reconvened for a further telephonic evidentiary hearing. Cross examination of two FE PA witnesses, one OCA witness, and IBEW Local 777's witness was conducted. In addition, FE PA witnesses Joanne Savage and Tracy

Ashton provided supplemental testimony and exhibits responding to the ALJs' directed questions. FE PA Exhibits JMS-6, and Exhibits TMA-6 through TMA-10 were admitted into the record. The ALJs further directed that the parties were directed to provide a further update regarding settlement discussions by close of business on August 20, 2024.

31. The parties continued to engage in settlement negotiations, attempting to reach a full settlement on all issues in this proceeding.

32. On August 20, 2024, counsel for FE PA provided the ALJs with a further update regarding settlement discussions via e-mail.

33. On August 21, 2024, ALJ Dunderdale directed the parties via e-mail that the settlement was due on or before the Main Brief due date – September 4, 2024. ALJ Dunderdale also further directed the parties to supply the ALJs with the settlement term sheet by 5:00 p.m. on August 22, 2024.

34. Also on August 21, 2024, counsel for OCA sent an e-mail to the ALJs and the parties seeking clarification regarding the directives related to the due date for the settlement and the submission of a term sheet. ALJ DeVoe responded via e-mail and cancelled the deadline to submit a term sheet and indicated that the ALJs would confer and provide further direction the next day.

35. Further on August 21, 2024, the First Post-Hearing Order admitting evidence into the record was issued. The First Post-Hearing Order admitted all pre-served testimony and exhibits that were set forth in the Joint Stipulation into the record.

36. On August 22, 2024, the Second Post-Hearing Order was issued. The Second Post-Hearing Order clarified the First Post-Hearing Order.

37. Also on August 22, 2024, counsel for FE PA notified the ALJs via e-mail that a unanimous settlement of all issues had been reached.

38. As a result of the settlement efforts described above, the Joint Petitioners have agreed to a settlement that fully resolves all issues among them. The Joint Petitioners are in full agreement that the Settlement is in the public interest as a reasonable resolution of their respective interests and should be approved without modification. The Settlement agreed to by the Joint Petitioners is set forth in the following Section III.

III. SETTLEMENT

A. GENERAL

39. The following terms of this Settlement reflect a carefully balanced compromise of the Joint Petitioners' positions on various issues. The Joint Petitioners agree that the Settlement is in the public interest.

40. The Joint Petitioners agree that FE PA's electric distribution base rate increase filing should be approved, including those tariff changes included in and specifically identified in **Appendix A**, subject to the terms and conditions of this Settlement that are specified below.

B. REVENUE REQUIREMENT

41. FE PA shall be permitted to submit a revised tariff supplement that is designed to produce an overall, annual electric distribution revenue increase of $225.0 million, to become effective on January 1, 2025, for service rendered thereafter. The increase in annual distribution rate revenue is in lieu of the as-filed, overall increase of approximately $502 million. The Settlement as to revenue requirement shall be a "black box" settlement, except for the items set forth below.

42. The overall electric distribution revenue increase is broken down by each of FE PA's Rate Districts as follows:

a) Met-Ed Rate District - $39,600,000;

b) Penelec Rate District - $57,690,000;

c) Penn Power Rate District - $24,980,000; and

d) West Penn Rate District - $102,730,000.

C. REVENUE ALLOCATION AND RATE DESIGN

43. Revenue Allocation. For purposes of this Settlement, class revenue allocation will be based on the information provided as **Appendix E**.

44. Monthly Customer Charges. FE PA's existing monthly customer charges for residential customers in the Met-Ed, Penelec and Penn Power Rate Districts will be maintained at the current amounts without modification. FE PA's monthly customer charge for residential customers in the West Penn Rate District will be increased to $9.00 per month.

45. Streetlighting: FE PA will create a Rider for its Streetlighting Conversion Program. The costs of this program will be allocated among the customer classes by Network System Peak Load ("NSPL") and charged on a cents/kWh (cents per kilowatt hour) basis for Residential and Commercial customer classes, and on a dollars/kw (dollars per kilowatt) basis for Industrial customer classes. FE PA has removed the expense of this program from the overall annual electric distribution revenue increase contemplated by this Settlement. See **Appendix F** as a rate design example of the new LEDC Rider.

D. RATE CASE STAYOUT

46. As a condition of this Settlement, FE PA agrees that it will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027.

E. DSIC REPORTING

47. DSIC Eligible Plant. As of the effective date of rates in this proceeding, FE PA will be eligible to include plant additions in the Distribution System Improvement Charge ("DSIC") at the later of, (a) the end of the FPFTY, and (b) once the total FPFTY plant account balances exceed $3,696,815,000 for the Met-Ed Rate District; $4,029,557,000 for the Penelec Rate District; $1,052,092,000 for the Penn Power Rate District; and $3,760,467,000 for the West Penn Rate District. The foregoing provision is included solely for purposes of calculating the DSIC and is not determinative for future ratemaking purposes of the projected additions to be included in rate base in a FPFTY filing.

48. DSIC Equity Return. For purposes of calculating its DSIC, FE PA shall use the equity return rate for electric utilities contained in the Commission's most recent Quarterly Report on the Earnings of Jurisdictional Utilities and shall update the equity return rate each quarter consistent with any changes to the equity return rate for electric utilities contained in the most recent Quarterly Earnings Report, consistent with 66 Pa.C.S. § 1357(b)(3), until such time as the DSIC is reset pursuant to the provisions of 66 Pa.C.S. § 1358(b)(1).

49. Test Year Plant Reporting. The Company shall submit an update to FE PA, Volume I, Ex. V-A-3, pp. 2-5 no later than May 1, 2025, which will include actual capital expenditures, plant additions, and retirements by month from January 1, 2024, through December 31, 2024. An additional update for actuals from January 1, 2025, through December 31, 2025, shall be filed no later than May 1, 2026. FE PA will further provide comparisons of its actual capital expenditures, plant additions, and retirements to its projections for these periods as a part of its next base rate case filing.

F. ACCOUNTING

50. Depreciation Rates. For purposes of this Settlement, FE PA's proposal to change its depreciation methodology from the Average Service Life ("ASL") method to the Equal Life Group ("ELG") method is withdrawn.

51. Pension/OPEB. FE PA withdraws its proposal for implementation of the "PON Mechanism". This Settlement restricts neither FE PA from proposing any of the pension and other post-employment benefits ("OPEB") mechanisms and claims raised in this proceeding in its future base rate proceedings, nor any position that other parties may choose to take with respect to such proposals in the future.

52. Storm Expense. FE PA will amortize all known and measurable amounts for both extraordinary and non-extraordinary storm expense recorded through December 31, 2023, with no rate base or debt cost treatment for unamortized balances, as follows:

a) The extraordinary storm balance starting on January 1, 2025, will be $17,019,000 per year for five years, broken down among the Rate Districts as follows: Met-Ed Rate District - $6,714,000; Penelec Rate District - $1,635,000; Penn Power Rate District - $3,990,000; and West Penn Rate District - $4,679,000.

b) The storm reserve balance totaling $189,488,000 as of December 31, 2023, starting January 1, 2025, will be $18,950,000 per year for ten years, broken down among the Rate Districts as: Met-Ed Rate District - balance totaling $88,886,000, or $8,889,000 per year; Penelec Rate District - balance totaling $41,279,000, or $4,128,000 per year; Penn Power Rate District - balance totaling $19,465,000, or $1,947,000 per year; and West Penn Rate District - balance totaling $39,858,000, or $3,986,000 per year.

53. The annual funding for the storm reserve starting January 1, 2025 will be based on the five-year historical average of actual storm costs totaling $52,802,000, broken down among the Rate Districts as follows: Met-Ed Rate District - $25,319,000; Penelec Rate District - $10,954,000; Penn Power Rate District - $3,215,000; and West Penn Rate District - $13,315,000.

54. The balance of the storm reserve between rate cases shall be capped at two times the annual funding for the storm reserve of $52,802,000. This cap is in addition to (i) the remaining unamortized balances accumulated as of December 31, 2023, (ii) any storm reserve activity from 2024 and (iii) any extraordinary storm balances.

55. COVID-19 Cost Deferral. FE PA's revenue increase provided in this Settlement is reflective of the removal of COVID-19 deferral amounts incurred with respect to waived late payment charges and reconnection fees. The remaining deferred COVID-19 costs totaling $21,453,000 will be amortized over five years starting on January 1, 2025 (*i.e.*, $4,290,000 per year for five years) with no rate base treatment for the unamortized balance, broken down among the Rate Districts as follows: Met-Ed Rate District - $749,000; Penelec Rate District - $1,544,000; Penn Power Rate District - $580,000; and West Penn Rate District - $1,417,000.

56. Verizon Complaint. For purposes of this Settlement, FE PA withdraws its claim for rate base and expense treatment associated with its litigation against Verizon. (*See* FE PA Statement No. 1, at pp. 21-22; FE PA Exhibit PML-1, at p. 20 (Adjustment RB-5) and FE PA Exhibit PML-1, at p. 56 (Adjustment IS-10).) However, FE PA reserves the right to file a future petition for deferral treatment of these costs depending on the outcome of the pending appeals at 42 MAP 2024 and 43 MAP 2024, and any subsequent litigation.

57. Refunds. FE PA agrees to refund customers $13.6 million as a one-time fixed bill credit based on customer counts within thirty days of the Commission's entry of a final order in

this proceeding. (*See* FE PA Statement No. 1, at pp. 19-21.) The $13.6 million will be allocated to rate schedules on the basis of 2023 distribution revenues. The total amount was determined by applying a six percent compounded interest which, will continue to be calculated until the amount in the regulatory liability is fully refunded to customers. The refund amount is broken down by Rate District as follows: approximately $4.4 million for the Met-Ed Rate District, approximately $4.3 million for the Penelec Rate District, approximately $1.2 million for the Penn Power Rate District, and approximately $3.7 million for the West Penn Rate District. FE PA will submit an informational filing to the Commission and supply the same filing to all Parties in this proceeding reporting the actual refunds distributed to customers no more than thirty days after the completion of the refund distribution.

G. CUSTOMER SERVICE AND UNIVERSAL SERVICE ISSUES

58. Customer Service and Call Center Performance.

a) FE PA commits to continue maintaining its customer service performance for customer call center, reliability of service, billing, meter reading, and response to customer complaints and disputes at levels consistent with its 5-year historical average as reported to the Commission until the date of its next base rate case filing. To the extent that FE PA's performance does not meet this level, FE PA agrees to meet with the parties, including Intervenor IBEW Local 777, as requested to discuss those areas of challenge and its plans to improve service levels. FE PA agrees that its call center performance results for answering calls and abandonment rate will not deteriorate during the rate effective year and prior to its filing of its next base rate case.

b) FE PA will conduct and document routine audits of its call center performance. These audits will be performed annually and will focus on call taking performance and quality and compliance with Pennsylvania-specific policies and regulations. In addition, the Company will specifically document training provided to temporary contractors prior to handling Pennsylvania customer calls.

59. FirstEnergy Pennsylvania Customer Assistance Program ("PCAP").

a) FE PA will review and adjust its PCAP rates based upon the new, applicable residential electric distribution base rates established in this proceeding to ensure all PCAP customers are receiving the most advantageous customer assistance program ("CAP") rate available.

b) FE PA will implement all changes to FE PA's PCAP to be approved as part of FE PA's Universal Service and Energy Conservation Plan ("USECP") for 2024-2028 approved at Docket Nos. M-2022-3036532, et al. by no later than the effective date of electric distribution base rates established in this proceeding.

60. Hardship Fund.

a) FE PA will consult with its Universal Services Advisory Committee ("USAC") and develop a plan to increase voluntary contributions to its Hardship Fund grant within nine months of the Commission's entry of a final order in this proceeding. Changes to be explored will include but will not be limited to solicitation of donations through e-billing and solicitation

of voluntary contributions from FE PA's larger commercial and industrial customers.

b) FE PA will amend its seasonal parameters for the Hardship Fund so that, at a minimum, customers whose electric service is off or who are at risk of termination can qualify for a Hardship Fund grant in any month of the year, provided funding is available and the applicant is otherwise eligible.

c) FE will initiate the issuance of plain language notices to low-income customers with a past due bill during the winter heating season to let them know that they have a past due bill and outline the assistance that is available to help pay their bill, including but not necessarily limited to Hardship Fund, CAP, and Low Income Home Energy Assistance Program ("LIHEAP").

d) FE PA will increase its annual shareholder hardship matching contribution for grant assistance to $500,000 annually.

e) FE PA will also make an annual shareholder hardship contribution for grant assistance over routine funding levels in the amount of $2,000,000 annually for a three-year period beginning in 2025.

f) To the extent any unspent funds remain at the end of the program year, those funds will be rolled over and added to the available budget for the following year. Excess hardship funds may be transferred amongst Rate Districts based upon need.

g) FE PA will increase its maximum Hardship Fund grant to $600.00.

h) Within ninety days of the Commission's entry of a final order in this proceeding, FE PA will eliminate any prohibitions against PCAP customers receiving a hardship fund grant. FE PA will work with Dollar Energy Fund ("DEF") to update its internal and customer-facing materials to reflect this changed policy without delay.

i) FE PA will implement data tracking for its outreach efforts to the Company's most vulnerable customers, to include:

  i) PCAP enrollment rates measured against the number of estimated low-income customers in each Rate District;

  ii) Email/web outreach;

  iii) Community outreach efforts, including the estimated number of participants and geographic location;

  iv) Applications received; and

  v) Participation in/hosting of assistance fairs, including the estimated number of participants and geographic location.

j) FE PA will use best efforts to measure the geographic reach of all outreach efforts to ensure equitable distribution of efforts across its rate districts based on relative need and poverty levels.

k) FE PA will provide annual updates to its USAC regarding these datapoints until its next base rate case filing.

61. Low Income Usage Reduction Program ("LIURP").

a) FE PA will increase its LIURP annual budget by a percentage equal to any approved increase in residential base distribution rates in this proceeding, allocated proportionally amongst FE PA's Rate Districts. If rollover amounts exceed $1 million for any Rate District, FE PA will host a collaborative meeting within thirty days of the end of the program year with members of its USAC, interested parties to this proceeding, Commission Bureau of Consumer Services ("BCS") staff. At the collaborative, FE PA will identify the reasons for such an exceedance and will outline a plan for how FE PA intends to (i) fully expend the current budget and the carry-over amount, and (ii) prevent excessive carry-over in the new program year. All carry-over funds must be spent on LIURP-related services, but FE PA reserves the right to propose reallocation of rollover funding across Rate Districts based on relative need. Following the collaborative contemplated by this subparagraph (a), FE PA will make a filing with the Commission at its current USECP Docket outlining its proposed plan and requesting staff action to approve the plan within sixty days. FE PA will serve a copy of this filing on all parties to this proceeding.

b) Subject to subparagraph (a) above, regarding the process for handling roll-over funds in excess of $1 million, FE PA will continue to carryover any unspent LIURP funds from the previous program year and add them to the budget for the following year by rate district.

c) FE PA will continue to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FE PA's health and safety budget alone. In doing so, over the twelve months following the Commission's entry of a final order in this proceeding, FE PA will host a series of collaborative meetings with its USAC, as well as local weatherization and home repair program administrators across its service territory, to identify concrete ways to leverage and coordinate LIURP with home repair and weatherization programs.

62. Universal Service Administration.

a) Within ninety days of the Commission's entry of a final order in this proceeding, FE PA will implement a process whereby it will leverage LIHEAP data from the Pennsylvania Department of Human Service ("DHS") to meaningfully improve enrollment and retention in the PCAP, simplify burdensome paperwork requirements, and reduce unnecessarily duplicative administrative costs. FE PA will specifically leverage the LIHEAP data for the purposes of: (i) developing a seamless, concurrent, and immediate process to process PCAP enrollments without further application; (ii) auto recertification; and (iii) outreach to non-participants. Customers will be notified that LIHEAP data was used for the streamlined

application or auto recertification, neither of which will require additional income documentation.

b) Within six months of the Commission's entry of a final order in this proceeding, the Company will petition the Commission for approval to implement automatic enrollment for LIHEAP recipients that have never previously been enrolled in either PCAP or CAP.

c) FE PA will implement a biennial audit process for monitoring and oversight of DEF's administration of programs within six months of the Commission's entry of a final order in this proceeding. A review of the components to be audited will be reviewed with FE PA's USAC, where audit results will also be shared when available.

63. Confirmed Low-Income Customer Definition. Within six months of the Commission's entry of a final order in this proceeding, FE PA will convene a collaborative of its USAC to discuss its current definition of "confirmed low-income" ("CLI") customers with the commitment to, within twelve months of the Commission's entry of a final order in this proceeding, revise its definition to clearly outline those criteria which would qualify for CLI definitions and the timeframe for which a CLI designation will be retained under the Company's practices and procedures and consistent with 52 Pa. Code § 54.72.

64. Complaint Handling and Analysis. Within ninety days of the Commission's entry of a final order in this proceeding, FE PA will develop internal protocols for a regular and proper root cause analysis ("RCA") of its complaint trends, both for internal disputes and Commission Bureau of Consumer Services ("BCS") informal complaints that document infractions. This plan will require a written RCA, and report on findings, including identification of trends, evaluation,

steps to reform or avoid repeated trends, and internal steps taken to take proper internal enforcement action where needed. Quarterly updates to include results will be provided to the statutory advocates (i.e., I&E, OCA and OSBA) and Intervenor IBEW Local 777 until the Company's next base rate filing.

65. Practices, Procedures and Notices. FE PA will undertake a review of all policies, procedures, and training materials for revision, where appropriate, to ensure that:

a) All language reflects accurate requirements as required by statute or regulation and consistent with Commission orders and formal policies, as well as FE PA's tariffs;

b) FE PA's field representatives and customer service center representatives are provided with clear and robust directions for how to communicate with limited English proficiency ("LEP") customers.

c) All customers with income at or below 250% Federal Poverty Level ("FPL") receive protection from termination for nonpayment during the Winter Moratorium as required by statute or regulation and consistent with Commission orders and formal policies;

d) All guidance regarding the identification of "confirmed low-income" customers to conform with the Commission's regulations for electric distribution utilities, including as related to the waiver and/or refund of security deposits in such instances;

e) All guidance related to security deposits and the refund thereof;

f) All customer notices and communications containing references related to medical certificate requirements to ensure they are compliant with all legal

requirements. Specifically, as part of this review, FE PA will revise its termination notices, website, and other relevant customer communications to include (i) a link to access FE PA's electronic medical certificate submission form and the Commission's standard written medical certificate form; (ii) clear information about the length of a medical certificate and how a medical certificate can be renewed; and (iii) information about the payment requirements while protected by a medical certificate. Where termination notices or other written communications have spacing limitations, weblinks to additional information may be provided.

66. FirstEnergy will also amend its tariff regarding cash security deposits to advise that:

a) The Company will not require an applicant or customer to provide a cash deposit when the customer provides information which demonstrates that he or she qualifies as CLI.

b) That any customer who has previously posted a cash security deposit, and who is subsequently newly found to be exempt from a deposit demand will be refunded that deposit within thirty days of identifying that customer as CLI. Security deposit refunds issued for CLI customers will be made directly to the customer, unless FE PA obtains informed consent to apply the security deposit to the customer's account balance.

67. The reviews and any associated revisions contemplated by Paragraphs 65-66 above will be completed within twelve months of the Commission's entry of a final order in this proceeding and will be conducted in consultation with the BCS and FE PA's USAC.

68. Language Access. Beginning no later than March 1, 2025, FE PA will provide its field representatives with a card in English and Spanish that field representatives can share with customers to facilitate a response to questions to confirm whether there is a medical condition in the service location, whether a protection from abuse order or other court order with evidence of domestic violence is in effect, or, in winter months (December 1 to March 31), whether the household's income is at or below 250% FPL, thus triggering additional protections at the service location. These cards will be in plain language and will include a phone number consumers can call for direct translation and interpreter services.

69. Analytic Technologies. FE PA will include a standing topic on its USAC meeting agendas through the filing of its next electric distribution base rate proceeding related to the possible development and use of speech analytics software, artificial intelligence, and other such technologies to assist with the monitoring of phone calls involving, or potentially involving, universal service programs and other low-income customers. Intervenor IBEW Local 777 shall also be forwarded the USAC meeting agendas and will be considered to be an interested party with respect to the discussions pertaining to Analytic Technologies.

70. Reconnection Fees. Within six months following the Commission's entry of a final order in this proceeding in this proceeding, FE PA will begin allowing Hardship Funds to be used for purposes of payment of reconnection fees for all CLI customers. For CAP participants seeking to reconnect service following an involuntary termination, reconnection fees will not be required to be paid upfront as a condition of reconnection and will be added to any remaining pre-program arrearages upon reenrollment in the program. Any associated tariff revisions pursuant to this paragraph will be completed within twelve months of the Commission's entry of a final order in this proceeding.

H. ADDITIONAL PROVISIONS

71. Reliability and Operations.

a) FE PA commits to increase its internal field hires such that it will replace the prior year's attrition level plus ten percent, on a Rate District basis further divided proportionally by local, beginning January 1, 2025 (for 2024 attrition) for a period of five years or until its next base rate proceeding, whichever happens first.

b) FE PA will complete a review of its distribution system for opportunities to introduce projects to selectively underground facilities by December 31, 2025. Upon completion of this review, FE PA agrees to propose modifications to its Long Term Infrastructure Improvement Plan filed at Docket No. P-2024-3050269 ("LTIIP III") to incorporate select projects identified as opportunities where largest impacts can be delivered.

c) FE PA commits to a cumulative improvement in reliability that results in a reduction of the weighted average System Average Interruption Duration Index ("SAIDI") by 3.5% and System Average Interruption Frequency Index ("SAIFI") by 2.5% after three years following the effective date of rates implementing the base electric distribution revenue increase provided for in this Settlement.

d) The improvements to SAIDI and SAIFI contemplated by subparagraph (c) above will be measured using actual year-ended December 31, 2027 performance results as compared to the three-year averages as published in the 2023 PUC Electric Reliability Report results, assuming similar weather for that three-year average time period.

e) Consistent with subparagraphs (c) and (d) above, FE will provide an annual report to the parties detailing its performance improvement data reflected in the same terms as will be measured for compliance, by no later than April 1 each year.

f) If year-end December 31, 2027 performance does not reflect at least 75% achievement of the reliability improvement goals set forth in subparagraph (c) above, the Company will convene a meeting of the Parties to this proceeding following its report due April 1, 2028, in order to (i) discuss the reasons why the reliability improvement goals have not been achieved, and (ii) outline its plan to ensure it remains on track to achieve the stated goals.

72. Non-Basic Services.

a) FE PA's web portal will identify that non-basic services and products are "non-basic", are not required to be purchased from FE PA, and that other companies offer these same services.

b) FE PA will educate customers who purchase HomeServe, or other non-basic services billed by the Company, about (i) the definition of non-basic service, (ii) the relationship between non-basic and basic services, and (iii) related customer protections. Educational materials shall be provided in plain language via marketing materials, FE PA's customer enrollment portal or other appropriate delivery channels best suited to ensure transparency, enhance customer comprehension and considering customer communication preferences.

c) FE PA will insert a "non-basic" services label on its customer bills prior to the listing of the products and services purchased by the customer.

d) The Company agrees to provide the proposed language changes/additions contemplated by subparagraphs (b)-(c) above to the Parties in this case for comment and discussion prior to implementing the contemplated changes/additions.

e) Settlement terms relating to HomeServe should not be interpreted as any party's agreement to or acceptance of the Company's provision of non-basic services or products. In any future proceeding, all parties expressly reserve the right to take any position they deem appropriate as to the Company's use of HomeServe and/or the provision of non-basic products and services.

73. Electric Vehicle ("EV") Pilot. For purposes of this Settlement, FE withdraws all elements of its EV Pilot. (*See* FE PA Statement No. 8, at pp. 13-17.) Within twelve months of the Commission's entry of a final order in this proceeding, FE PA will initiate work with interested stakeholders, including Intervenor IBEW Local 777, to (i) develop a new EV distribution rate specifically for public-facing EV chargers, similar to PECO Energy Company's EV-FC Rider, and (ii) seek Commission approval for such a rate in its next general base rate case.

IV. THE SETTLEMENT IS IN THE PUBLIC INTEREST

74. Commission policy promotes settlements. *See* 52 Pa. Code § 5.231. Settlements lessen the time and expense the parties must expend litigating a case and, at the same time, conserve administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See id.* § 69.401. To accept a settlement, the Commission must first determine that the proposed terms and conditions

are in the public interest. *Pa. PUC v. York Water Co.*, Docket No. R-00049165 (Order entered Oct. 4, 2004); *Pa. PUC v. C.S. Water & Sewer Assocs.*, 74 Pa. P.U.C. 767 (1991).

75. This Settlement was achieved by the Joint Petitioners after an extensive investigation of FE PA's filing, including extensive informal and formal discovery and the filing of substantial testimony by the active parties.

76. Approval of the Settlement without modification will reduce the time and expenses that the active parties and the Commission must expend on the proceedings.

77. The Joint Petitioners will further supplement the reasons that the Settlement is in the public interest in their Statements in Support. The Statements in Support are attached to this Settlement as **Appendices K** through **U**. In their respective Statements in Support, each Joint Petitioner explains why, in its view, the Settlement is fair, just, and reasonable and reflects a reasonable compromise of the disputed issues in this proceeding.[4]

V. SETTLEMENT CONDITIONS

78. The Settlement is conditioned upon the Commission's approval of the terms and conditions contained in this Settlement without modification. If the Commission modifies the Settlement, any Joint Petitioner may elect to withdraw from the Settlement and may proceed with litigation, and, in such event, the Settlement shall be void and of no effect. Such election to withdraw must be made in writing, filed with the Secretary of the Commission, and served upon all Joint Petitioners within five business days after the entry of an Order modifying the Settlement.

[4] It is noted that, because certain Joint Petitioners only participated with regard to certain issues in this proceeding, some of the Statements in Support may be limited in the scope of issues addressed.

79. If the Commission approves the Settlement without modification, the Joint Petitioners acknowledge and agree that the rates, rules, and proposals set forth in the 2024 Base Rate Case filing, as modified by the Settlement, shall be Commission-made rates.

80. This Settlement is proposed by the Joint Petitioners to settle all issues in the instant proceeding. If the Commission does not approve the Settlement without modification and the proceeding continues, the Joint Petitioners reserve their respective procedural rights to evidentiary hearings, submission of additional testimony and exhibits, cross-examination of witnesses, briefing, and argument of their respective positions. The Settlement is made without any admission against, or prejudice to, any position that any Joint Petitioner may adopt in the event of any subsequent litigation of these proceedings, or in any other proceeding.

81. Any issue(s) not specifically addressed in the Settlement terms are not deemed as accepted or rejected as part of this black box settlement. The Settlement shall not be construed as approval of any Joint Petitioner's position on any issue, except to the extent required to effectuate the terms and agreements of the Settlement.

82. The Joint Petitioners acknowledge that the Settlement reflects a compromise of competing positions and does not necessarily reflect any Joint Petitioner's position with respect to any issues raised in this proceeding. The terms and conditions of the Settlement are limited to the facts of this specific case and are the product of compromise for the sole purpose of settling this case. This Settlement is presented without prejudice to any position which any of the Joint Petitioners may have advanced and without prejudice to the position any of the Parties may advance on the merits of the issues in future proceedings. This Settlement does not preclude the Joint Petitioners from taking other positions in proceedings of other public utilities under Section 1308 of the Public Utility Code, 66 Pa.C.S. § 1308, or any other proceeding. Each term and

condition set forth in this Joint Petition, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.

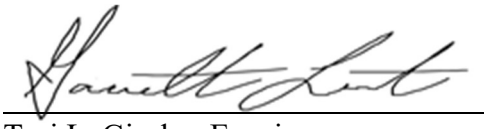
83. If the ALJs recommend adopting the Settlement without modification, the Joint Petitioners waive their right to file Exceptions.

84. Unless otherwise expressly indicated, all terms and conditions contained herein shall take effect upon entry of a final order in this proceeding, without the need or requirement for additional Commission review or approval.

VI. CONCLUSION

WHEREFORE, the Joint Petitioners respectfully request that the Administrative Law Judges Katrina L. Dunderdale and Emily I. DeVoe recommend approval of, and the Pennsylvania Public Utility Commission approve, this Joint Petition for Approval of Settlement of All Issues without modification.

Respectfully submitted,



Date: 9/13/24

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Appendix A

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

Supplement No. XX to
Electric Pa P.U.C. No. 1

FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

2800 POTTSVILLE PIKE
READING, PENNSYLVANIA 19605

Electric Service Tariff

Effective in

The Territory as Defined on
Page Nos. 6 - 20 of this Tariff

Issued:

Effective:

By: Wade Smith, President
Reading, Pennsylvania

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

Supplement No. XX to
Electric Pa P.U.C. No. 1
Third Revised Page 2
Superseding Second Page 2

LIST OF MODIFICATIONS

CHANGES:

DESCRIPTION OF TERRITORY - Original Page No. 12 Updated Met-ed territory to include Upper Allen Township.

ON PEAK HOURS- Original Page No. 27 Updated Hours to match PJM.

LINE EXTENSION - Original Page No. 34 Minor rephrasing of terms.

EXTENSION OF COMPANY FACILITIES - Original Page No. 38 Minor rephrasing of terms.

ADMINISTRATIVE CHARGES - Original Page No. 53 Eliminated service charge for Met-Ed and Penelec. Established new pricing for dishonorable check and reconnection fees.

RULES & REGULATIONS- Original Page No. 56 & 57 Correcting word placement to top of page.

RESIDENTIAL SERVICE RATE - Original Pages No. 61 & 62 Distribution pricing update

GENERAL SERVICE SMALL – Original Page No. 65 Distribution pricing update. Also added language for maximum demand level for Small

GENERAL SERVICE SMALL – Original Page No. 66 Simplified terms of contract general provision

GENERAL SERVICE VOLUNTEER – Original Pages No. 68 & 69 Distribution pricing update.

GENERAL SERVICE MEDIUM – Original Page No. 70 Distribution pricing update and minor language changes.

GENERAL SERVICE MEDIUM – Original Page No. 71 changed demand intervals times from fifteen minutes to a range of fifteen minutes to an hour, based upon meter capabilitie**s.**

GENERAL SERVICE MEDIUM – Original Page No. 72 removed repetitive sentence related to demand intervals.

GENERAL SERVICE MEDIUM – Original Page No. 73 Simplified terms of contract general provision

GENERAL SERVICE LARGE – Original Page No. 75 Distribution pricing update. Also remove language related to providing transformers greater than 2,500 KVA.

GENERAL SERVICE LARGE – Original Page No. 76 removed repetitive sentence related to demand intervals.

GENERAL SERVICE LARGE – Original Page No. 77 Simplified terms of contract general provision

GENERAL SERVICE PRIMARY – Original Page No. 79 Added language for maximum demand level for GP

GENERAL SERVICE PRIMARY – Original Page No. 80 Distribution pricing update

GENERAL SERVICE TRANSMISSION POWER – Original Page No. 86 & 90 Distribution pricing update

SCHEDULE 44 WEST PENN PRIMARY SERVICE – Original Page No. 92 Distribution pricing update

SCHEDULE 46 WEST PENN PRIMARY SERVICE – Original Page No. 95 Distribution pricing update

RATE H SCHEDULE – Original Page No. 98 Distribution pricing update

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

Supplement No. XX to
Electric Pa P.U.C. No. 1
Third Revised Page 2a
Superseding Second Page 2

RATE PNP SCHEDULE – Original Page No. 102 Distribution pricing update

RATE PNP SCHEDULE – Original Page No. 103 Changed demand intervals times from fifteen minutes to a range of fifteen minutes to an hour, based upon meter capabilities.

BORDERLINE SERVICE – Original Page No. 104 Distribution pricing update

LED STREET LIGHTING SERVICE – Original Page No. 106 Distribution pricing update and wording change to allow installations with less than 12 lights

LED STREET LIGHTING SERVICE – Original Page No. 107 Minor language change to clarify general provisions

LED OUTDOOR AREA LIGHTING RATE – Original Page No. 108 & 109 Removed obsolete Ornamental street lighting schedule and added new LED OAL schedule.

OUTDOOR AREA LIGHTING SERVICE – Original Pages No. 110 & 112 Distribution pricing update

STREET LIGHTING MED-ED – Original Page No. 114, 115, 116, 117 & 118 Distribution pricing update

STREET LIGHTING MED-ED – Original Page No. 115 Added language to ensure all non-LED lights are replaced with LED lights going forward.

STREET LIGHTING MED-ED – Original Page No. 116 & 118 Removed language allowing Mercury vapor lights to be converted to high pressure sodium lights.

HPS STREET LIGHTING SERVICE PENELEC – Original Pages No. 120, 121 & 122 Distribution pricing update

HPS STREET LIGHTING SERVICE PENELEC – Original Page No. 121 Added language to ensure all non-LED lights are replaced with LED lights going forward

MUNICIPAL STREET LIGHTING SERVICE – Original Pages No. 123, 124, 125 & 126 Distribution pricing update

PRIVATE OUTDOOR LIGHTING SERVICE – Original Page No. 128 Distribution pricing update. Grandfathered rate to new customers.

SLS-SV LIGHTING SERVICE – Original Page No. 131 Distribution pricing update

SLS-SV LIGHTING SERVICE – Original Page No. 132 Removed language allowing Mercury vapor lights to be converted to high pressure sodium lights

SLS-SVD LIGHTING SERVICE – Original Page No. 133, 134 & 135 This grandfathered rate has been removed, as there are no customers receiving service.

SCHEDULE 51 LIGHTING SERVICE – Original Page No. 136 Distribution pricing update

SCHEDULE 52 LIGHTING SERVICE – Original Page No. 141 Distribution pricing update and inclusion of general provisions which are on other street lighting rates, but were not included on this tariff page

SCHEDULE 53-71 LIGHTING SERVICE – Original Pages No. 142, 147, 151, 155, 159, 160, 161, 167, 168, 172, 173 & 179 Distribution pricing update

RIDER MATRIX RIDER – Original Page No. 181 Updated to reflect new LED OAL rate and remove obsolete lighting schedules.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

Supplement No. XX to
Electric Pa P.U.C. No. 1
Third Revised Page 2b
Superseding Second Page 2

STAS RIDER – Original Page No. 182 Rider charges brought to zero as STAS adjusted in base rate calculation

TCJA RIDER – Original Page No. 183 Rider charges brought to zero as TCJA adjusted in base rate calculation

NET METERING RIDER – Original Page No. 190 Eliminated billing provision # 4 as the provision will not be enforced. Added language to clarify rules for shopping customers.

EEC RIDER – Original Page No. 194 Updated to reflect new LED OAL rate and remove obsolete lighting schedules.

SMART METER RIDER – Original Page No. 198 Rider charges brought to zero as Smart Meter adjusted in base rate calculation

PTC RIDER – Original Page No. 203 Updated to reflect new LED OAL rate and remove obsolete lighting schedules

DSS RIDER – Original Page No. 213 Updated to reflect new LED OAL rate and remove obsolete lighting schedules

PARTIAL SERVICE RIDER – Original Page No. 223 Distribution pricing update. Language added to clarify that the administrative charge is in addition to the fixed customer charge.

PARTIAL SERVICE RIDER – Original Page No. 224, 225, 226 Removed terms and conditions F, added clarification language to Backup Service #4 and Maintenance Service No.1 and 4.

DSIC RIDER – Original Page No. 239 Rider charges brought to zero as DSIC adjusted in base rate calculation

STATION POWER RIDER – New Page No. 244 Adding new Rider page to define the billing charges related to PJM Generators based on net output

LED CONVERSION CHARGE RIDER – New Page No. 245 Adding a new rider to recover the remaining net asset value of non-LED streetlights being converting to LEDs.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

DESCRIPTION OF TERRITORY (continued)

CUMBERLAND COUNTY – Met-Ed and Penelec Rate Districts

Met-Ed Rate District

Borough of Mt. Holly Springs.

Townships of Cooke, Dickinson, Monroe, South Middleton, Upper Allen. (C)

Penelec Rate District

Boroughs of Newburg, Shippensburg.

Townships of Hopewell, Lower Frankford, Lower Mifflin, Shippensburg, Southampton, Upper Frankford, Upper Mifflin.

DAUPHIN COUNTY – Met-Ed Rate District

Boroughs of Middletown, Royalton.

Townships of Conewago, Derry, East Hanover, Londonderry, Lower Swatara.

ELK COUNTY – Penelec and West Penn Rate Districts

Penelec Rate District

Townships of Millstone, Spring Creek.

West Penn Rate District

City of St. Marys.

Boroughs of Johnsonburg, Ridgway.

Townships of Benezette, Fox, Highland, Horton, Jay, Jones, Ridgway.

ERIE COUNTY – Penelec Rate District

Cities of Corry, Erie.

Boroughs of Albion, Cranesville, Edinboro, Elgin, Lake City, McKean, Mill Village, North East, Platea, Union City, Waterford, Wattsburg, Wesleyville.

Townships of Amity, Concord, Conneaut, Elk Creek, Fairview, Franklin, Girard, Greene, Greenfield, Harborcreek, Lawrence Park, Le Boeuf, McKean, Millcreek, North East, Springfield, Summit, Union, Venango, Washington, Waterford, Wayne.

(C) Change

GENERAL RULES AND REGULATIONS, DEFINITIONS (continued)

On-Peak Hours - For the Met-Ed Rate District, the On-peak hours shall be from 6 a.m. to 6 p.m., 7 a.m. to 7 p.m., 8 a.m. to 8 p.m., 9 a.m. to 9 p.m., or 10 a.m. to 10 p.m. prevailing time, at the option of the Customer, Mondays to Fridays excluding holidays. If the Customer does not select the On-Peak hours within 30 days of the receipt of notice to do so, the On-Peak hours will default to 8a.m. to 8 p.m.
For Penelec Rate District, the On-Peak Hours shall be from 8:00 a.m. to 8:00 p.m., prevailing times, Monday through Friday excluding holidays.
For the Penn Power Rate District, the On-Peak hours shall be from 8:00 a.m. to 9:00 p.m., prevailing times, Monday through Friday, excluding holidays.
For the West Penn Rate District, the On-peak hours shall be from 7:00 a.m. to 10:00 p.m., prevailing times, Monday through Saturday.
All other hours shall be Off-peak. The Off-Peak holidays are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. (C)

Permanent Residential Customer - A Customer occupying a dwelling or mobile home on a permanent foundation which is the Customer's primary residence occupied year-round for normal living purposes and including: (i) electrical wiring conforming with the National Electrical Code and the Company's service installation policies; (ii) a permanently installed heating system; and (iii) permanently installed plumbing and sewage systems.

PJM - PJM Interconnection, L.L.C. or any successor organization/entity thereto.

Point of Delivery - The location at which the Company's service connection terminates and the Customer's wiring and installation begins.

Power Factor - The ratio of the watts to the volt-amperes.

Price to Compare Default Service Charge - The cents per kWh rates representing the Rate District's costs for providing energy, capacity, including the cost of complying with non- solar AEPS, market-based transmission and ancillary services for Customers who take Default Service.

Primary Voltage - Voltage greater than 600 volts.

Private Right-of-Way - The right-of-way or easement for electric facilities on, over, under, across and/or through real or other property owned by an individual or entity which is not a governmental, municipal or other public body to provide service.

Public Right-of-Way - The right-of-way or easement for electric facilities, subject to reasonable permitting, on, over, under, across along and/or through real or other property owned by a governmental, municipal or other public body to provide service.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

GENERAL RULES AND REGULATIONS

4. Extension of Company Facilities: System Upgrades

The standard service provided by the Company for delivery of electric energy to a Customer under this Tariff, regardless of delivery voltage, shall be from overhead Distribution Lines, except as noted in any Rate Schedule or other applicable provision of this Tariff. Subject to the requirements of this Tariff, the Company shall extend its Distribution and Transmission Lines to Applicants. Any request for electric service that requires the extension, removal, relocation or change of the Company's existing Distribution and Transmission Lines shall be provided as set forth in this Rule. Applicants requesting a Line Extension shall, at the Company's discretion, execute the Company's Line Extension contract. Any Customer served by a Line Extension completed before the effective date of this Rule 4 shall be subject to the terms and conditions of its existing Line Extension contract and the Company's then- applicable Line Extension tariff, rules and regulations.

a. Line Extensions

(1) Non-Speculative Single-Phase Line Extension

Company Obligations

The Company's engineering layout shall be the sole basis used for determining the design of the Line Extension and/or Service Line. Any additional Line Extension and/or Service Line costs in excess of those costs assumed by the Company under this Tariff shall be borne by the Applicant/Customer. As used in this Rule 4, an overhead span of conductor is approximately equal to 250 feet. The Company shall construct, own and maintain all Line Extensions. The Company shall provide an Applicant, at no charge, up to three (3) spans of conductor, three (3) poles and related material on the Public Right-of-Way for each Line Extension, including the Service Line. The Company shall provide an Applicant, at no charge, one (1) span of conductor and related material on Private Right-of-Way for each Line Extension, including the Service Line, to serve a Permanent Residential Customer. The number of spans provided to an Applicant/Customer at no charge shall be referred to in this Rule 4 as the span allowance. (C) (C) (C)

The Company shall not commence construction of a Line Extension and/or Service Line until completion of all of the following:

1. The Company's receipt and acceptance of an application for electric service.

2. Execution by the Company and the Applicant/Customer of appropriate agreements for electric service and/or Line Extensions, and the payment by the Applicant/Customer of any and all associated costs or charges.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

GENERAL RULES AND REGULATIONS

5. Extension of Company Facilities: System Upgrades (continued)

A Subdivision is not required to have underground service. However, should the lot owner or owners in a subdivision desire underground service, such service shall be provided by the Company if such lot owner or owners, at their option, either comply with Rule 4a(1) (Non-Speculative Single-Phase Line Extensions) or 4a(3) (Speculative Single-Phase and All Three-Phase Line Extensions and Service Lines).

If as a result of a Line Extension or any other request that results in an expansion of the Company's facilities, an increase in the Company's facilities, construction of a system upgrade or any other change to or the modification of the Company's electric system, the Applicant/Customer shall pay all costs for such work as specified in this Rule 4.

(3) Speculative Single-Phase and All Three-Phase Line Extensions and Service Lines

When the Company is requested to increase capacity, expand facilities or construct Speculative Single-Phase Line Extensions and/or Service Lines or Three-Phase Line Extensions and/or Service Lines, the Company shall determine from the circumstances of each case the nature and level of financing and/or revenue projection required of the Applicant/Customer prior to construction or installation of Company facilities. The Company shall employ a five (5) year revenue projection in order to offset the initial construction costs. The five (5) year revenue projection includes five (5) years of forecasted distribution revenues less certain incremental delivery costs including, but not limited to, distribution operation and maintenance expenses, depreciation expenses, gross receipts taxes, state and federal income taxes, and a reasonable return component. The Company shall require the Applicant/Customer to make (i) a CIAC equivalent to the Company's total estimated costs associated with the construction of facilities necessary to render service in excess of the amount not covered by the revenue projection or (ii) a Cash Advance for the total construction costs to render service. The Company shall refund all or a portion of a Cash Advance previously provided by the Applicant in the event that the Company's revenue analysis for any newly connected Non-Residential Customer indicates that there are revenues in excess of the costs to provide service to that newly connected Non-Residential Customer, within five (5) years from the completion of the initial Line Extension. (C) (C) (C) (C)

Where an application for an overhead Line Extension for a tract of land being developed or proposed to be developed, in whole or in part, for residential, commercial or industrial purposes, not covered by Rule 4a(2), (Underground Electric Service in New Residential Developments) is received from an entity that is not expected to be a Customer, the Company, prior to construction, shall require payment of a CIAC or a Cash Advance from the Applicant covering the Company's total estimated costs associated with the construction of said overhead extension (i) to the tract of land being developed and (ii) within the boundary of the tract of land necessary to serve prospective Customers in the tract.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

GENERAL RULES AND REGULATIONS

11. Payment of Bills (continued)

A Residential Customer who has elected to receive Combined Billing for metered Residential Service and Outdoor Lighting Service shall be subject to 52 Pa. Code, Chapter 56 of the Commission's regulations and be treated as a single residential account.

e. Winter Termination – Determining Income Eligibility for Winter Termination

To determine if a Customer exceeds the 250% federal poverty level threshold, the Company will utilize financial information provided by the Customer. The Company may elect to send to the Customer an income verification form for completion and return.

12. Administrative Charges

a. Dishonorable Check Charges (C)

If a check or electronic transfer of funds received by the Company in payment of a Customer's account is returned unpaid or denied to the Company by the Customer's bank, a Fifteen Dollar ($15.00) charge for the returned check shall be added by the Company to the Customer's account and the Customer shall pay this amount to the Company in addition to all other applicable charges. (C)

b. Reconnect Charges

A Residential Customer who requests a disconnection and reconnection of service at the same location within a twelve (12) month period shall pay the Company a reconnect charge equivalent to the monthly minimum charge stated in the Customer's applicable Rate Schedule or other Tariff provision multiplied by the number of months between the disconnect and reconnect period, or the minimum reconnect charge stated in this Rule 12c, whichever is greater.

Every Residential Customer that requests a connection or a reconnection shall pay the Company a fee of Fifteen Dollars ($15.00). (C)

Every Non-Residential Customer shall pay the Company a reconnection fee/charge that is the higher of (i) the Residential Customer reconnect fees/charges specified in this Rule 12c or (ii) the Company's actual cost for reconnection of that particular Non-Residential Customer.

(C) Change

GENERAL RULES AND REGULATIONS

16. Auxiliary Power Sources and Readiness to Serve

Service to a Customer, any part of whose electric requirements are provided by other than Company-owned facilities, and where the Company supply can be substituted for that of the Customer, will be supplied only under the provisions of this rule.

The maximum demand in kilowatt and power factor which the Company is obligated to supply shall be determined by agreement between Customer and Company.

In case the maximum demand in kilovolt-amperes which the Company is obligated to supply is less than the Customer's maximum demand as estimated by the Company, the Company may require the Customer to limit his demand to the load which the Company is obligated to supply by means of a load limiter to be furnished, installed, and maintained by the Customer, approved, set, and sealed by the Company.

The Customer shall not at any instant operate any source of supply in parallel with the Company's service without written permission from the Company.

Monthly billing will be under the provisions of the rates in conjunction with which this rule is employed.

The Customer shall reimburse the Company for all loss or damage sustained by the Company as a result of the Customer's use of the Company's service under the provisions of this rule.

17. Interconnection, Safety & Reliability Requirements

In order to assure the integrity and safe operation of the Company’s system and to permit the continuation of reliable service to other Customers, the following requirements and standards apply to all types of Generating Facilities, including customer owned generation, desiring to interconnect with the Company’s system.

All generation operations shall be performed in a safe, reasonable and competent manner in accordance with prudent electric practices in order to, among other things, preserve and protect the Company’s electric system.

All Generating Facilities shall submit a written application to the Company for acceptance of interconnected operation of their facilities with the Company’s system prior to engaging in such interconnected operations. The Company may require, among other things, the following as part of any application submitted by an Applicant/Customer for service under this Rule 17:

a. Plans, specifications and location of the proposed installation.

b. Single line diagrams and details of the proposed protection schemes.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

GENERAL RULES AND REGULATIONS

17. Interconnection, Safety & Reliability Requirements (continued)

c. Instruction manuals for all protective components.

d. Component specifications and internal wiring diagrams of protective components, if not provided in instruction manuals.

e. Generator data required to analyze fault contributions and load current flows including, but not limited to, equivalent impedances, time constants and harmonic distortions.

f. The rating of all protective equipment if not provided in instruction manuals.

g. All such other information that may be required by the Company.

Paralleling Customer generation with the Company's system shall be permitted only upon the written consent of the Company.

EMERGENCY CONDITIONS

18. Load Control

Whenever the demands for electric power on all or part of the Company's system exceed or threaten to exceed the capacity then actually and lawfully available to supply such demands, or whenever system instability or cascading outages could result from actual or expected transmission overloads or other contingencies, or whenever such conditions exist in the system of another public utility or PJM control area with which the Company's system is interconnected and cause a reduction in the capacity available to the Company from that source or threaten the integrity of the Company's system or when communicated by PJM per established policies and standards, a load emergency situation exists. In such case(s), the Company shall take such reasonable steps as the time available permits or as directed by PJM to bring the demands within the then-available capacity or otherwise control load. Such steps shall include, but shall not be limited to, reduction or interruption of service to one or more Customers, in accordance with the Company's procedures for controlling load.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE RS
RESIDENTIAL SERVICE

AVAILABILITY:

Met-Ed and Penelec

This Rate is available to Residential Customers using the Company's standard, single-phase service through a single meter including not more than 2,000 watts of non-residential connected load served through the same meter.

Penn Power

Available for Residential Service using the Company's standard, single-phase service, to installations served through one meter for each family unit in a residence or apartment. When service is used through the same meter for both residential and commercial purposes the General Service rate schedule shall apply.

West Penn

Available for single-phase service to a single-family residence served through one meter. Combination residential and commercial service may be taken on this Rate when the entire service is taken through one meter and the total commercial connected load does not necessitate upgrade of service facilities. This Rate is available for single-phase service to farms when supplied along with service for the residence through one meter.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn
Customer Charge	$1125	$11.25	$11.00	$9.00 (I)
Per kWh for all kWh	5.138 cents per kWh	6.815 cents per kWh	5.480 cents per kWh	4.306 cents per kWh

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Residential Customer Class rate applies.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE RS (continued)

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge listed in the General Monthly Charges section of this rate schedule plus distribution energy charges and charges related to applicable riders.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

EQUAL PAYMENT PLAN:

As per Rule 10b(4), Equal Payment Plan.

SPECIAL MONTHLY CHARGES FOR LOADS IN EXCESS OF 25 KILOWATTS:

The Company shall install a suitable demand meter to determine the maximum 15-minute integrated demand when (i) a Customer's service requires the installation of an individual transformer, (ii) a Customer's total monthly consumption exceeds 10,000 kilowatt-hours for two (2) consecutive months, or (iii) when the Customer's service entrance requirements exceed 600 amperes.

If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge, as outlined in the chart below, per kW for all kW shall apply to such excess as set forth in this provision, in addition to the General Monthly Charges. In no event shall the demand charge be based upon less than seventy-five percent (75%) of the highest excess demand during the preceding eleven (11) months.

Rate District	Met-Ed	Penelec	Penn Power	West Penn
Demand Charge	$2.95 per kW	$3.26 per kW	$2.25 per kW	$3.05 per Kw

(I)

GENERAL PROVISIONS:

	General Provision Matrix							
	A (1)	A (2)	A (3)	B (1)	B (2)	B (3)	C	D
Met-Ed	X			X				
Penelec		X						
Penn Power					X		X	
West Penn			X			X		X

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE GS-SMALL (GS-S)
GENERAL SERVICE SECONDARY - NON-DEMAND METERED

AVAILABILITY:

Met-Ed & Penelec

Available to non-Residential Customers without demand meters that use electric service through a single delivery location for lighting, heating and/or power service. Secondary voltage shall be supplied to Customers at a single transformer location when load does not require transformer capacity in excess of 2,500 KVA. Upon a Customer's request, the Company may, at its option, provide transformers having a capacity of greater than 2,500 KVA.

If an existing Customer's total consumption exceeds 1,500 kWh per month for two (2) consecutive months in the most recent twelve-month period, the Customer may no longer be eligible for service under this Rate Schedule GS-Small. Based upon the Company's then estimate of the Customer 's new demand, the Customer shall be placed on Rate Schedule GS-Medium or such other Rate Schedule for which such Customer most qualifies.

Penn Power & West Penn

Available for service through a single metering installation for secondary light and power service for loads up to 1,500 kWh. If an existing Customer's total consumption exceeds 1,500 kWh per month for two (2) consecutive months in the most recent twelve-month period, the Customer may no longer be eligible for service under this Rate Schedule GS-Small. (C)

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Customer Charge	$23.78	$20.87	$30.04	$12.35	(I)
Per kWh for all billed kWh	5.092 cents per kWh	4.262 cents per kWh	4.817 cents per kWh	4.722 cents per kWh	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Price to Compare Default Service Rate Rider applies unless the Customer elects to receive Default Service from the Company under the Hourly Pricing Default Service Rider.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-SMALL (continued)

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge listed in the General Monthly Charges section of this rate schedule plus distribution energy charges and charges related to applicable riders. (C)

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

GENERAL PROVISIONS: Each applicable provision is marked within the table.

	General Provision Matrix					
	A	B	C	D	E	F
Met-Ed	X		X			
Penelec	X		X			
Penn Power	X	X	X			X
West Penn	X			X	X	

A. TERMS OF CONTRACT: Each Customer shall be required to enter into a Delivery Service contract with the Company for a minimum one (1) year term. If the Delivery Service contract is terminated by the Customer prior to its expiration, the Minimum Charge provisions of this Rate Schedule shall apply. If the Customer's capacity or service requirements increase, the Company, in its sole and exclusive judgment, may at any time require the Customer to enter into a new Delivery Service contract. (C)

B. SPECIAL RULE GSDS: Customers with a historic billing demand of 500 kW and above and who would otherwise qualify for Rate Schedule GP or TP, but who are on Rate Schedule GS-Small due to the Customer not being under contract, will be placed on the Hourly Pricing Default Service Rider.

C. FIXED USAGE: The Company may, in its sole and exclusive discretion, permit Customers to take service under this Special Provision. For Customers permitted by the Company to take service under this Special Provision, the Company may, in its sole and exclusive discretion, impute a level of energy and demand for that Customer based upon the Customer's projected load and hours of use for that load.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE GS-V
VOLUNTEER FIRE COMPANY AND NON-PROFIT AMBULANCE SERVICE, RESCUE SQUAD AND SENIOR CENTER SERVICE RATE

AVAILABILITY:

This Rate Schedule is restricted to Volunteer Fire Companies, Non-Profit Ambulance Services, Non-Profit Rescue Squads and Non-Profit Senior Citizen Centers that sign a one (1) year contract.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn
Customer Charge	$11.25	$11.25	$11.00	$9.00 (I)
Per kWh for all kWh	5.138 cents per kWh	6.815 cents per kWh	5.480 cents per kWh	4.306 cents per kWh

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Residential Customer Class rate applies.

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge listed in the General Monthly Charges section of this rate schedule plus distribution energy charges and charges related to applicable riders.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-V (continued)

SPECIAL MONTHLY CHARGES FOR LOADS IN EXCESS OF 25 KILOWATTS:

The Company shall install a suitable demand meter to determine 15-minute to a maximum of an hourly integrated demand when (i) a Customer's service requires the installation of an individual transformer, (ii) a Customer's total monthly consumption exceeds 10,000 kilowatt-hours for two (2) consecutive months, or (iii) when the Customer's service entrance requirements exceed 600 amperes. (C)

If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge, as outlined in the chart below, per kW for all kW shall apply to such excess as set forth in this provision, in addition to the General Monthly Charges. In no event shall the demand charge be based upon less than seventy-five percent (75%) of the highest excess demand during the preceding eleven (11) months.

Rate District	Met-Ed	Penelec	Penn Power	West Penn
Demand Charge	$2.95 per kW	$3.26 per kW	$2.25 per kW	$3.05 per Kw

(I)

TERM OF CONTRACT:

Each Customer shall be required to enter into a Delivery Service contract with the Company for a minimum one (1) year term. If the Delivery Service contract is terminated by the Customer prior to its expiration, the Minimum Charge provisions of this Rate Schedule shall apply. If the Customer's capacity or service requirements increase, the Company, in its sole and exclusive judgment, may at any time require the Customer to enter into a new Delivery Service contract.

RULES AND REGULATIONS:

The Company's Standard Rules and Regulations shall apply to the installation and use of electric service. Motors and equipment served under this rate schedule shall have electrical characteristics so as not to interfere with service supplied to other customers of the Company.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE GS-MEDIUM
GENERAL SERVICE SECONDARY – DEMAND METERED

AVAILABILITY:

Available to Non-Residential Customers that use electric service through a single delivery location for lighting, heating and/or power service up to 400 kW demand. Secondary voltage shall be supplied to Customers at a single transformer location when load does not require transformer capacity in excess of 2,500 KVA. Upon a Customer's request, the Company may, at its option, provide transformers having a capacity of greater than 2,500 KVA.

New Customers requiring transformer capacity in excess of 2,500 KVA and existing Customers whose load increases such that a transformer change is required (over 2,500 KVA) shall be required to take untransformed service.

If an existing Customer's total consumption is less than 1,500 kWh per month for twelve (12) consecutive months, the Customer is no longer eligible for service under this Rate Schedule GS- Medium. Based upon the Company's then estimate of the Customer's usage, the Customer shall be placed on Rate Schedule GS-Small or such other Rate Schedule for which such Customer most qualifies. (C)

If an existing Customer's registered demand is equal to or greater than 400 kW for two (2) consecutive months in the most recent twelve-month period, the Customer is no longer eligible for service under this Rate Schedule GS-Medium and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies. (C)

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed		Penelec		Penn Power	West Penn	
Phase	Single	Three	Single	Three	All	All	
Customer Charge	$26.01	$46.50	$21.91	$44.07	$32.02	$23.29	(I)
Per kW for all billing kW	$5.51	$5.51	$6.99	$6.99	$4.13	$3.46	(I)
Per kVAr of reactive billing demand		$0.22		$0.22	$0.24	$0.22	(I)
Energy: cents per kWh for all kWh						0.531	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on page 181.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-MEDIUM (continued)

DEFAULT SERVICE CHARGES:

For Rate Schedule GS-Medium (PTC) Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies unless the Customer elects to receive Default Service from the Company under the Hourly Pricing Default Service Rider. For Rate Schedule GS-Medium (HP) Customers receiving Default Service from the Company, the Hourly Pricing Default Service Rider rates apply.

DETERMINATION OF RATE SCHEDULE GS-MEDIUM (PTC) AND GS-MEDIUM (HP):

Rate Schedule GS-Medium (PTC): Customers receiving service under this Rate Schedule with a kW Demand less than 100 kW.

Rate Schedule GS-Medium (HP): Customers receiving service under this Rate Schedule with a kW Demand equal to or greater than 100 kW.

The Customer's demand used for the determination of the default service rider that the customer should be billed under if receiving Default Service from the Company shall be determined as follows: effective June 1st of each year, a review of the measured demand for the period April 1st of the preceding year to March 31st of the current year will be conducted. Based on the review, if the measured demand in any twelve months is less than 100 kW, then the Customer shall receive Default Service under the provisions of the Price to Compare Default Service Rate Rider. Otherwise, the Customer will receive Default Service under the provisions of the Hourly Pricing Default Service Rider.

DETERMINATION OF BILLING DEMAND:

The Company shall install suitable demand meters to determine 15-minute to a maximum of an hourly integrated demand when (i) the connected load being served equals fifteen (15) kilowatts or more, or (ii) the Company estimates that a demand greater than five (5) kilowatts will be established. The Company may install a demand meter on new or upgraded electric services. (C)

A determination of connected load or estimated demand may be made by the Company at any time and shall be made when the Customer's total consumption exceeds 1,500 kWh per month for two (2) consecutive months in the most recent twelve-month period.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-MEDIUM (continued)

A Customer's demand shall be measured by indicating or recording instruments. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On- Peak Hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours, or (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. The on-peak and off-peak hour provisions of this definition are only applicable for those customers who have installations of Time-of-Use demand meters. (C)

Pending the installation of a demand meter, Customer's Demand shall be a formula demand determined by dividing the kilowatt-hour consumption by 200.

REACTIVE BILLING DEMAND:

Reactive Billing Demand, measured in kVAr, shall be the integrated reactive demand occurring coincident with the Billing Demand.

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge plus the demand charge at current rate levels times the Billing Demand, plus Distribution Charges plus any charges stated in or calculated by any applicable Rider.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-MEDIUM (continued)

GENERAL PROVISIONS:

General Provision Matrix						
	A	B (1)	B (2)	C (1)	C (2)	D
Met-Ed	X	X		X		
Penelec	X		X	X		
Penn Power	X					
West Penn Power	X				X	X

(C)

A. TERMS OF CONTRACT:

Each Customer shall be required to enter into a Delivery Service contract with the Company for a minimum one (1) year term. If the Delivery Service contract is terminated by the Customer prior to its expiration, the Minimum Charge provisions of this Rate Schedule shall apply. If the Customer's capacity or service requirements increase, the Company, in its sole and exclusive judgment, may at any time require the Customer to enter into a new Delivery Service contract. (C)

B. COMBINED BILLING:

(1) THIS PROVISION HAS BEEN RESTRICTED TO PRESENT LOCATIONS SINCE SEPTEMBER 18, 1978. Only one standard single-phase metered service and one standard three-phase metered service, each in excess of five (5) kW measured demand for each service, shall be supplied at one contract location, and when so supplied the energy and demand registrations of the separate meters shall be determined separately and may be added for billing purposes when the use of capacity on each service will remain in excess of five (5) kW for each month of the contract year. Each separate and non-contiguous point of delivery or service installation shall be considered a contract location and shall be metered and billed under a separate service contract.

(2) THIS PROVISION IS RESTRICTED AS OF JUNE 18, 1976, to existing Customers and loads at existing locations. Combined Billing will not be permitted except where Customers are supplied with single-phase and three-phase service at secondary voltages at a single location. In such instances, only one (1) single-phase and one (1) three-phase service may be combined for billing purposes. Customer locations and loads may not continue to be billed under this Provision B (2) (i) if the Customer increases the capacity of either service entrance wiring, or (ii) the Customer increases the electrical load in the facility necessitating a change in the Company's facilities. Billing demand shall be the sum of the individual demands of each metered service. The individual demand of each metered service shall be determined separately.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE GS-LARGE
GENERAL SERVICE SECONDARY

AVAILABILITY:

This Rate is available to non-Residential Customers using electric service through a single delivery location for lighting, heating and/or power service whose registered demand is equal to or greater than 400 kW in two (2) consecutive months in the most recent twelve-month period. Secondary voltage shall be supplied to Customers at a single transformer location when load does not require transformer capacity in excess of 2,500 KVA. (C)

New Customers requiring transformer capacity in excess 2,500 KVA and existing Customers whose load increases such that a transformer change is required (over 2,500 KVA) shall be required to take untransformed service.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Customer Charge	$295.31	$229.30	$152.83	$176.79	(I)
Per kW for all billed kW	$4.44	$7.43	$5.12	$4.95	(I)
Per kVAr of reactive billing demand	$0.22	$0.21	$0.24	$0.22	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate Schedule are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Hourly Pricing Default Service Rider rates apply.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-LARGE (continued)

DETERMINATION OF BILLING DEMAND:

A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute to maximum one hour intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On- Peak Hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours, or (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. The on-peak and off-peak hour provisions of this definition are only applicable for those customers who have installations of Time-of-Use demand meters. (C)

Pending the installation of a demand meter, Customer's Demand shall be a formula demand determined by dividing the kilowatt-hour consumption by 200.

REACTIVE BILLING DEMAND:

Reactive Billing Demand, measured in kVAr, shall be the integrated reactive demand occurring coincident with the Billing Demand.

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge plus the demand charge at current rate levels times the Billing Demand, plus Distribution Charges plus any charges stated in or calculated by any applicable Rider.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GS-LARGE (continued)

GENERAL PROVISIONS:

General Provision Matrix						
	A	B (1)	B (2)	C (1)	C (2)	D
Met-Ed	X					
Penelec	X	X		X		
Penn Power	X		X			
West Penn	X				X	X

(C)

A. TERMS OF CONTRACT:

Each Customer shall be required to enter into a Delivery Service contract with the Company for a minimum one (1) year term. If the Delivery Service contract is terminated by the Customer prior to its expiration, the Minimum Charge provisions of this Rate Schedule shall apply. If the Customer's capacity or service requirements increase, the Company, in its sole and exclusive judgment, may at any time require the Customer to enter into a new Delivery Service contra (C)

B. COMBINED BILLING:

(1) This Provision is restricted as of June 18, 1976, to existing loads at existing locations. Combined Billing shall be permitted for three-phase multi- metered points at secondary voltages established prior to June 18, 1976. The billing demand shall be the sum of the individual demands of each metered service. Customer locations and loads may not continue to be billed under this General Provision: (i) if the Customer increases the capacity of either service entrance wiring, or (ii) the Customer increases the electrical load in the facility necessitating a change in the Company's facilities.

(2) For those Customers that were previously on the Optional Controlled Service Rider prior to June 20, 1996 shall be allowed to combine their separate meter readings that were in place under the Optional Controlled Service Rider into one single meter reading for billing purposes.

C. SERVICE AT PRIMARY VOLTAGE:

(1) Customers served at Primary Voltage may be billed under this Rate GS-Large, at the Company's sole and exclusive discretion, when a Customer requires Primary Service at a voltage less than the nearest available Primary Voltage, if the Company agrees to provide the Primary Voltage requested by the Customer.

(2) Customers served at voltages greater than 1,000 volts under this Rate Schedule qualify for a voltage discount of $1.49 per for all billing kW. (D)

(C) Change
(D) Decrease

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE GP
GENERAL SERVICE – PRIMARY

AVAILABILITY:

Met-Ed & Penelec

Available to non-Residential Customers using electric power and/or lighting service through a single delivery location at 2,400 volts or higher. If an existing Customer's billing demand exceeds 3,000 kW for more than two (2) consecutive months in any 12-month period, then the Customer may no longer be eligible for service under Rate GP and shall be placed on Rate Schedule LP or such other Rate Schedule for which such Customer most qualifies, unless Customer is not otherwise eligible for another rate. Choice of voltage shall be at the option of the Company. All substation and transformer equipment required for utilization of the delivery voltage shall be owned and maintained by the Customer. As described more fully in the next paragraph, this Rate Schedule shall be applicable to the owner of any Generating Facility whose Generating Facility is interconnected to the Company's electric system, if the Company believes, in its sole and exclusive discretion, that the provisions of this Rate Schedule are otherwise available to the Generating Facility. (C)

The Company shall determine the applicability of this Rate Schedule to Generating Facility owners in its sole and exclusive discretion. If and when the Company determines that the owner of a Generating Facility interconnected to the Company's system has not previously entered into Tariff or other arrangements satisfactory to the Company allowing it to charge and receive payment of Delivery Service Charges, Default Service Charges and/or Net Station Power, as applicable, the Company will assign the Generating Facility to this Rate Schedule if the Company believes, the provisions of this Rate Schedule are otherwise available to the Generating Facility. For any hour in which the Company has determined the Generating Facility receives energy or capacity, as metered at or near such facility, the Generating Facility owner shall be responsible for paying to the Company all Delivery Service charges and/or Default Service Charges, applicable, based upon the metered energy and demand. In addition, the Generating Facility owner shall be responsible for paying to the Company all charges associated with Net Station Power for each applicable billing period based upon the default service rates specified in this Rate Schedule.

Minimum billing demand shall not be less than twenty-five (25) KW.

Penn Power

Available for primary light and power service. The billing load as hereinafter defined shall not be less than 25 kW. Service at alternating current, 60 hertz, three-phase, at nominal primary voltages as available from suitable facilities of adequate capacity adjacent to the premises to be served, and as determined by the Company. The Customer shall have the responsibility for ownership, operation, and maintenance of all transforming, controlling, regulating, and protective equipment.

West Penn

Available for service at 15,000 volts or less for loads of 2,000 kilowatts or greater, supplied at a single point of delivery. Also available at 12,470 volts where Company elects, at its sole option, to supply service direct from an adjacent 138,000 volt transmission line by a single transformation. Service shall not be available for Standby or Maintenance Service such as that required for Alternative Generation Facilities. An Electric Service Agreement shall be executed.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE GP (continued)

PSU

Available for service at 12,470 volts from Company substations.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Distribution Charge	$1,029.09	$1,115.91	$138.43	$1,235.76	(I)
Per kW for all billed kW	$3.11	$3.81	$5.23	$0.76	(I)
Per kVAr of reactive billing demand	$0.22	$0.21	$0.24	$0.23	(I)
Transformer Charge				$1.50	(I)

Rate District	PSU	
Customer Charge	$994.35	(I)
Demand Charge: First 10,000 kilovolt-amperes	$2.66	(I)
Demand Charge: Additional kilovolt-amperes	$3.03	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Hourly Pricing Default Service Rider rates apply.

DETERMINATION OF BILLING DEMAND:

Met-Ed, Penelec, Penn Power, & West Penn

The Customer's demand shall be measured by indicating or recording instruments. Demand shall be integrated over 15-minute intervals or as otherwise determined by the Company. The billing demand in the current month shall be the greatest of: (i) For ME, PN and PP twenty-five (25) kW. For WP two thousand (2,000) kW, (ii) the maximum measured demand established in the month during On-Peak Hours, as stated herein, (iii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours, (iv) contract demand, or (v) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. The on-peak and off-peak hour provisions of this definition are only applicable for those customers who have installations of Time-of-Use demand meters.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE TP (continued)

The Customer shall have the responsibility for ownership, operation, and maintenance of all transforming, controlling, regulating, and protective equipment.

The Company reserves the right to install the metering equipment on either the primary or secondary side of the customer's transformers, and when installed on the secondary side, compensating metering equipment will be used to correct for transformer losses.

West Penn

Available for service at 25,000 volts or more for loads of 2,000 kilowatts or greater, supplied at a single point of delivery. Service shall not be available for Standby or Maintenance Service such as that required for Alternative Generation Facilities. An Electric Service Agreement shall be executed.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Distribution Charge	$5,731.69	$3,829.99	$372.87	$1,235.76	(I)
Per kW for all billed kW	$0.89 (D)	$2.01 (I)	$0.60 (I)	$0.76 (I)	
Per kVAr of reactive billing demand			$0.22	$0.23	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Hourly Pricing Default Service Rider rates apply.

(D) Decrease
(I) Increase

RATE SCHEDULES, RATE TP (continued)

B. VOLTAGE DISCOUNT:

(1) If the Company, in its sole discretion, elects to serve a Customer at 115 KV or greater, the demand charge shall be decreased as follows: Credit in the amount of $0.70 Dollars/KW of Demand. (I)

(2) Upon request by the Customer, the Company shall furnish service at 115,000 volts or greater where available provided Customer furnishes all necessary transformer and terminal equipment. If service is supplied at 115,000 volts or greater, the kilowatt demand charge and energy charges per month shall be decreased as shown below per kW of billing demand and as shown below per kWh of total energy, respectively. In the case of an account with multi-point delivery, the credits shall be based on the contribution of the 115,000 volt or greater delivery point to the billing demand and total billed energy. Credit in the amount of $1.61 Dollars/KW of Demand. (D)

(3) If the Company, in its sole discretion, elects to serve a Customer at 115 KV or greater, the demand charge shall be decreased as follows: Credit in the amount of $0.18 Dollars/KW of Demand.

(4) For loads of 10,000 kilowatts or greater, the Company will furnish service at voltages above 100,000 volts if such service is provided at a single delivery point from the Company's transmission system and in the sole judgment of the Company the necessary capacity is available. When such service is supplied and the Customer owns and maintains all required facilities, discounts will be allowed, but in no case will the amount of the minimum bill be hereby reduced. Credit in the amount of $0.63 Dollars/KW of Demand. (D)

C. LESS THAN 23,000 VOLT DELIVERY: Service will be rendered at less than 23,000 volts only at the sole and exclusive discretion of the Company and only when it can be provided economically through a single transformation from available transmission lines of 115,000 volts or above.

D. MULTI-POINT DELIVERY: THE AVAILABILITY OF THIS PROVISION TO CUSTOMERS HAS BEEN RESTRICTED SINCE JUNE 18, 1976. NEITHER DELIVERY SERVICE CUSTOMERS NOR NEW DELIVERY SERVICE CUSTOMERS SHALL BE PERMITTED TO TAKE SERVICE UNDER THIS PROVISION. ANY CUSTOMER PRESENTLY SERVED UNDER THIS PROVISION WHO BECOMES A DELIVERY SERVICE CUSTOMER AND LATER RETURNS AS A DEFAULT SERVICE CUSTOMER SHALL NOT BE PERMITTED TO TAKE SERVICE UNDER THIS PROVISION. If the load of an industrial Customer located on single or contiguous premises becomes greater than the capacity of the standard circuit or circuits established by the Company to supply the Customer, additional delivery points may be established for such premises upon written request of the Customer, provided multi-point delivery is not disadvantageous to the Company. When such additional points of delivery are established, billing shall be based on the sum of the meter readings except that, at the written request of the Customer, billing demand shall be based on the sum of the simultaneous meter readings where the Customer employs load management techniques to reduce its contribution to the Company's system annual and monthly peaks. Customer's locations and loads billed under this provision may not continue to be so served if there is a substantial increase in load necessitating any increase in the capacity of the Company's facilities or in the capacity of the Customer's service entrance wiring. Multiple Customer-owned circuits from the same substation shall not be considered multi-point delivery.

(D) Decrease
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

SCHEDULE 44
PRIMARY POWER SERVICE

AVAILABILITY:

West Penn

Available only to locations now served hereunder and to locations for which definite rate commitments have been made as of December 31, 1998, under conditions stated below for interruptible power service at not less than 25,000 volts balanced three-phase for loads of 5,000 kilovolt-amperes or greater to the extent that Company, in its sole judgment, determines that it has capacity for such service at the point of supply. Service shall not be available for Standby or Maintenance Service such as that required for Alternative Generation Facilities. An Electric Service Agreement shall be executed.

GENERAL MONTHLY CHARGES:

Distribution Charges

Rate District	West Penn		
Customer Charge	$5.60		(I)
Point of supply	At generating stations	At transmission lines	
Per kVA for all billed kVA	$0.09	$0.09	(D)
Per kWh for all billed kWh	$0.00040	$0.00040	(I)

PENALTY CHARGE:

In addition to the above demand and energy charges, a charge of $7.00 per kVA will apply each time a Customer fails to interrupt when requested. The kVA subject to this charge shall be the maximum fifteen-minute kilovolt-ampere demand during each interruption period beginning with the second full fifteen-minute period after commencement of an interruption by the Company and continuing through the fifteen-minute period immediately preceding termination of that interruption period.

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Hourly Pricing Default Service Rider rates apply.

(D) Decrease
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

SCHEDULE 46
PRIMARY POWER SERVICE

AVAILABILITY:

West Penn

Available only to locations now served hereunder and to locations for which definite rate commitments have been made as of December 31, 1998 for service at 25,000 volts or higher for loads of 30,000 kilovolt-amperes or greater, supplied at not more than five plant locations within a distance of eight miles. Service shall not be available for Standby or Maintenance Service such as that required for Alternative Generation Facilities. An Electric Service Agreement shall be executed.

GENERAL MONTHLY CHARGES:

Distribution Charges

Rate District	West Penn	
Customer Charge	$6.84	(I)
Per kVA for all billed kVA	$0.60	(I)
Voltage Discount: per kVA for all billed kVA	$0.14	
Energy Charges: per kWh for all billed kWh	$0.00130	(I)

VOLTAGE DISCOUNT (kVA):

If requested, the Company will furnish service at voltages above 100,000 volts at each plant location if such service at that location is over 10,000 kilovolt-amperes, is provided at a single delivery point from the Company's transmission system, is the only service on that account, and if in the sole judgment of the Company, the necessary capacity is available. When such service is supplied and the Customer owns and maintains all required facilities, the above discounts will be allowed but in no case will the amount of the minimum bill be hereby reduced.

To qualify for this transmission voltage service, the Customer must be billed for at least 10,000 kilovolt-amperes at least once in every 12-month period at each metering point.

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE H
ALL ELECTRIC SCHOOL, CHURCH AND HOSPITAL RATE

AVAILABILITY:

Penelec

THE AVAILABILITY OF THIS RATE SCHEDULE TO CUSTOMERS HAS BEEN RESTRICTED SINCE MARCH 29, 1971.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Penelec
Customer Charge	$35.13
Cents per kWh for all kWh	3.677

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Customer Charge listed in the General Monthly Charges section of this rate schedule plus distribution energy charges and charges related to applicable riders.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE MS
MUNICIPAL SERVICE RATE

AVAILABILITY:

Met-Ed

THE AVAILABILITY OF THIS RATE SCHEDULE TO CUSTOMERS HAS BEEN RESTRICTED SINCE OCTOBER 19, 1983.

Municipal lighting, and/or power and/or heating service used by counties, cities, boroughs, townships and public school districts for public purposes only and not applicable to service where counties, cities, boroughs, townships or public school districts are compensated in any form (other than admissions collected by such bodies) for the use of any of the facilities for which service is supplied.

Secondary Voltage: Secondary voltage will be supplied by the Company to Customers at a single transformer location when load does not require transformer capacity in excess of 2,500 KVA.

Primary Voltage: New Customers requiring transformer capacity in excess of 2,500 KVA and existing Customers whose load increases such that a transformer change is required (over 2,500 KVA) shall be required to take untransformed service.

GENERAL MONTHLY CHARGES:

The Distribution Charges are applicable to Delivery Service Customers:

Rate District	Met-Ed
Customer Charge	$32.23
Cents per kWh for all kWh	3.430

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES

RATE PNP
PUBLIC OR NON-PROFIT ORGANIZATION RATE

AVAILABILITY:

Penn Power

Certain public or non-profit organizations may receive electric service pursuant to the charges set forth below as part of the Company's Community and Customer Partnership Program (CCPP) rate schedule.

Service at alternating current, 60 hertz, standard single-phase or three-phase three-wire or four-wire secondary service, as available. Single and three-phase service will be metered and billed separately or, when feasible, single and three-phase service will be furnished through a single meter installation and billed as one account provided the customer arranges his wiring to facilitate the installation of a single meter. Where service is furnished at three-phase, the customer shall provide and maintain all equipment required for lighting service.

DEFINITION:

Public or Non-Profit Organization – organization which has the authority to tax and has tax exempt status or an organization recognized by the Internal Revenue Service (IRS) as non-profit. Only qualifying organizations that have temporary connections or occasional use of electric service for periods of less than 30 days and where such service is for an event in the public interest and available to the public qualify for this special provision. The 30-day requirement may be waived for public organizations, but in no event shall occasional use extend beyond 12 continuous months.

GENERAL MONTHLY CHARGES:

The net monthly charge per customer shall be:

Rate District	Penn Power
Customer Charge	$15.56
Cents per kWh for all kWh	4.370

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RATE SCHEDULES, RATE PNP (continued)

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

DETERMINATION OF BILLING DEMAND:

A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute to no more than an hour intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-peak hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during Off-peak hours, as stated herein, (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. (C)

MINIMUM CHARGE:

The monthly Minimum Charge shall be the applicable Rate District Customer Charge plus distribution energy charges and any related to applicable riders.

PAYMENT TERMS:

The net amount is due and payable within 15 days after the date of mailing the bill. If the net amount is not received in full on or before the date shown on the bill for payment of net amount, the gross amount, which is 2% more than the net amount balance, is due and payable. If the normal due date should fall on a Saturday, Sunday, bank holiday or any other day when the offices of the Company which regularly receive payment are not open to the general public, the due date shall be extended to the next business day.

RULES AND REGULATIONS:

The Company's Standard Rules and Regulations shall apply to the installation and use of electric service. Motors and equipment served under this rate schedule shall have electrical characteristics so as not to interfere with service supplied to other customers of the Company.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

BORDERLINE SERVICE

AVAILABILITY:

Met-Ed and Penelec

Borderline Service is available to public utility companies for resale in adjacent service territory to the Company under reciprocal agreements between the Company and other public utility companies, subject to the following conditions:

A. A request shall be made in writing for each point of supply where service is desired.

B. Borderline service may be supplied in the Company's sole and exclusive discretion when it has available adequate capacity to serve the requested location(s).

C. When such service is supplied, energy shall be supplied at sixty (60) cycle alternating current, at such potential and of such phase as may be mutually agreed upon.

All of the following general monthly charges are applicable to Delivery Service Customers.

GENERAL MONTHLY CHARGES:

Rate District	Met-Ed	Penelec
Cents per kWh for all kWh	4.490	6.084

(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

INVESTMENT CHARGE:

One percent (1%) on the Company's investment in facilities necessary to deliver and meter the service.

The energy may be metered at the point of supply or at the nearest suitable point, or the energy may be estimated from the sum of the meter readings of purchaser's customers, plus an agreed upon correction to cover transformation and the line losses from the point of supply.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

LED STREET LIGHTING SERVICE

AVAILABILITY:

This Service is applicable to Company owned overhead or underground Light Emitting Diode (LED) street lighting service to municipal, local, state and federal governmental bodies, community associations and to public authorities for lighting of streets, highways, parks and similar places for the safety and convenience of the public.

A minimum installation of 12 LED lights per customer per individual order is required when replacing existing lighting. This restriction does not apply to new installations or existing locations with less than 12 lights. (C)

GENERAL MONTHLY CHARGES:

Demand and Energy Charges for common lamp sizes:

Charges Per Month Per Light:

Cobra Head

Nominal Watts	Monthly kWh	ME Distribution	PN Distribution	PP Distribution	WP Distribution	
50	18	$10.52	$9.37	$8.94	$9.07	(I)
90	32	$13.00	$11.16	$10.73	$11.41	(I)
130	46	$13.81	$12.59	$11.95	$12.13	(I)
260	91	$21.34	$19.55	$18.48	$18.79	(I)

Colonial

Nominal Watts	Monthly kWh	ME Distribution	PN Distribution	PP Distribution	WP Distribution	
50	18	$16.55	$15.11	$14.32	$14.53	(I)
90	32	$18.19	$16.62	$15.73	$15.99	(I)

Acorn

Nominal Watts	Monthly kWh	ME Distribution	PN Distribution	PP Distribution	WP Distribution	
50	18	$27.46	$25.20	$23.78	$24.19	(I)
90	32	$29.02	$26.65	$25.14	$25.57	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, LED Street Lighting (continued)

DEFAULT SERVICE CHARGES:

For customers receiving default service, the Price to Compare Default Service Charge shall be determined using the applicable Monthly kWh usage multiplied by the Price to Compare Default Service Rate Rider, Commercial Customer Class rate.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

TERM OF CONTRACT:

Provision of this Service requires a contract with the Company. The initial term of contract shall be not less than ten (10) years, subject to renewal for successive one (1) year terms, unless other terms shall be provided in the contract. When replacement of existing lighting is requested by the Customer of an existing luminaire during the initial ten (10) year term, the Customer shall pay the cost of removal in addition to an amount representative of the depreciable life of the fixture for the remainder of the term (to be determined by the Company).

GENERAL PROVISIONS:

A. The Company shall furnish, install, and maintain lighting fixtures on an approved existing pole at the above rates all necessary street lighting facilities consisting of but not limited to lamps, luminaires, and other supporting materials. (C)

B. All additional and new lighting equipment, consisting of but not limited to poles, brackets, wiring, transformation, etc., not provided for herein and installed by the Company at the request of the customer shall be the property of the Company and be paid for by the customer prior to the customer taking service. (C)

C. Costs associated with activities related to the replacement, relocation, alteration, repair, or removal of existing street lighting equipment are not included as part of normal maintenance will be the responsibility of the customer. Examples of such activities include, but are not limited to, the replacement of an existing fixture, removal or relocation of a lamp, luminaire, bracket, pole, or installation of a luminaire shield.

D. All lamps shall be unmetered and will operate from dusk to dawn each and every night, or for approximately 4,200 hours per year.

E. If a Customer requests an underground system, it will be installed where service is supplied from an existing underground distribution system. Additional cost shall be borne by the Customer.

F. All service and necessary maintenance will be performed only during regular working hours of the Company.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

OUTDOOR AREA LIGHTING SERVICE

AVAILABILITY:

This Service is only available to customers who were previously served under the Company's outdoor area lighting ("OAL") schedules. Only Company owned Light Emitting Diode (LED) lights will be installed. All equipment will be owned, installed, and maintained by the Company.

GENERAL MONTHLY CHARGES:

Demand and Energy Charges for common lamp sizes:

Charges Per Month Per Light:

Light Type	Nominal Watts	Monthly kWh	FE PA Distribution
Flood	30	11	$22.48
Flood	50	18	$22.81
Flood	90	32	$24.66
Flood	130	46	$27.44
Flood	260	91	$29.81
Security	30	11	$18.54
Security	50	18	$18.42
Security	90	32	$19.71
Shoebox	50	18	$22.02
Shoebox	90	31	$22.27
Shoebox	130	46	$27.60
Underpass	30	11	$23.09
Underpass	50	18	$23.09
Underpass	90	32	$24.26

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For customers receiving default service, the Price to Compare Default Service Charge shall be determined using the applicable Monthly kWh usage multiplied by the Price to Compare Default Service Rate Rider, Commercial Customer Class rate.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, Outdoor Area Lighting (continued)

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

TERM OF CONTRACT:

Provision of this Service requires a contract with the Company. The initial term of contract shall be not less than twenty (20) years, subject to renewal for successive one (1) year terms, unless other terms shall be provided in the contract. When replacement of existing lighting is requested by the Customer of an existing luminaire during the initial twenty (20) year term, the Customer shall pay the cost of removal in addition to an amount representative of the depreciable life of the fixture for the remainder of the term (to be determined by the Company).

GENERAL PROVISIONS:

A. The Company shall furnish, install, and maintain lighting fixtures on an approved existing pole at the above rates, all necessary outdoor area lighting facilities consisting of but not limited to lamps, luminaires, and other supporting materials.

B. All additional and new lighting equipment, consisting of but not limited to poles, brackets, wiring, transformation, etc., not provided for herein and installed by the Company at the request of the customer shall be the property of the Company and be paid for by the customer prior to the customer taking service.

C. Costs associated with activities related to the replacement, relocation, alteration, repair, or removal of existing lighting equipment are not included as part of normal maintenance will be the responsibility of the customer. Examples of such activities include, but are not limited to, the replacement of an existing fixture, removal or relocation of a lamp, luminaire, bracket, pole, or installation of a luminaire shield.

D. All lamps shall be unmetered and will operate from dusk to dawn each and every night, or for approximately 4,200 hours per year.

E. If a Customer requests an underground system, it will be installed where service is supplied from an existing underground distribution system. Additional cost shall be borne by the Customer.

F. All service and necessary maintenance will be performed only during regular working hours of the Company.

G. The Customer shall provide cleared rights-of-way, including easements as may be required by the Company and the customer shall be responsible for any permits which may be required in order for the Company to supply the lighting service.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

OUTDOOR AREA LIGHTING SERVICE

AVAILABILITY:

Met-Ed and Penelec

Available for lighting of outdoor areas and roadways from dusk to dawn, served from Company's existing overhead wood pole distribution system where 120-volt service is available and where the Company's sole determination that street lighting service is not appropriate.

THIS SERVICE SHALL BE FURTHER RESTRICTED TO EXISTING CUSTOMERS AT EXISTING LOCATIONS AS OF AUGUST 1, 2012.

Met-Ed

INSTALLATION OF MERCURY VAPOR LIGHTS UNDER THIS SERVICE IS RESTRICTED TO EXISTING LIGHTS AT PRESENT LOCATIONS AS OF OCTOBER 19, 1983.

RATE PER MONTH:

Mercury Vapor

Nominal Lamp Watt	Monthly kWh	ME Distribution	PN Distribution	
100	42		$9.18	(I)
175	70	$8.98		(I)
175	74		$9.74	(I)
250	107		$13.83	(I)
400	174		$15.82	(I)
400 Flood Lighting	174		$17.92	(I)
700	294		$22.16	(I)
1000	420		$22.85	(I)
1000 Flood Lighting	420		$29.50	(I)

Sodium Vapor

Nominal Lamp Watt	Monthly kWh	ME Distribution	PN Distribution	
70	29		$21.48	(I)
100- Area Lighting	46	$26.27		(I)
100	50		$21.56	(I)
150	65		$26.55	(I)
200	80		$31.53	(I)
200 Flood Lighting	80		$38.30	(I)
250	110		$32.88	(I)
250 Flood Lighting	98	$14.23		(I)
400	169		$31.86	(I)
400 Flood Lighting	169		$37.66	(I)
400-Flood Lighting	156	$9.16		(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, Outdoor Area Lighting (continued)

C. ADDITIONAL FACILITIES

(1) No change in height of existing poles in primary distribution lines shall be made, nor shall additional poles be installed in such lines, for the purpose of installing a light unless Customer elects to pay the Company the cost of such change. If requested by a Customer, Company may, at its option, install a pole for supporting a light, and external secondary facilities to such pole, and in such cases there shall be a charge of Nine Dollars and Ninety-Three Cents ($9.93) per pole and secondary facilities per month. Not more than two (2) one-pole extensions, or one (1) two-pole extension, may be made per Customer at any single premises. In either case, the extensions may be made only if a light is installed on each pole installed. If requested by a Customer, the Company may, at its option, install secondary facilities to serve a light, and in such cases, there shall be a charge issued to the Customer by the Company of Nine Dollars and Ninety-Three Cents ($9.93) per light per month. As an alternative to the charges stated herein, the Customers may pay to the Company the cost of furnishing and installing the required facilities. For facilities to be installed hereunder, the Customer shall grant such right-of-way as is required, in accordance with the provisions of this Tariff. The Customer shall obtain satisfactory written approval from the appropriate public authorities for lights to be located on public thorough fares. (I) (I)

(2) PROVISION FOR ADDITIONAL FACILITIES INSTALLED AT COMPANY EXPENSE IS RESTRICTED TO FACILITIES INSTALLED PRIOR TO JANUARY 27, 1979. If the Company installs additional poles, there shall be an additional monthly charge as follows: For wood poles, One Dollar and Seventy-Eight Cents ($1.78) per pole per lamp and Four Dollars and Thirty-Seven Cents ($4.37) for each pole in excess of one (1) per lamp; for fabricated poles, Eight Dollars and Ninety-Three Cents ($8.93) per pole per lamp and Eleven Dollars and Seventy-Seven Cents ($11.77) for each in excess of one (1) per lamp. After January 27, 1979, where additional facilities are required, lamps shall be installed only on facilities provided or paid for by the Customer. All facilities shall be owned and maintained by the Company. (I) (I) (I) (I)

RESTRICTED TO FACILITIES INSTALLED PRIOR TO APRIL 9, 1981. Special equipment and/or underground service may be furnished at the Company's option upon the Customer's written request, subject to an additional charge to cover the cost of furnishing such special equipment and/or underground service. Supports of other than standard length or underground service shall be provided at the Company's option, subject to an advance payment by the Customer to the Company of the additional costs.

The Customer shall obtain all necessary approvals required for lights to be located on public thoroughfares.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

STREET LIGHTING SERVICE - ME

AVAILABILITY:

Available only to present Customers for installations now being served prior to December 31, 2023. This Service is applicable to overhead or underground street lighting service to municipal, local, state and federal governmental bodies, community associations and to public authorities for lighting of streets, highways, parks and similar places for the safety and convenience of the public. This Service supersedes Rate SV, Rate MH, Rate MV-1, Rate MV-2, Rate SL and Rate OSL, excepting Rate OSL, Provision A - Post Top Series Incandescent Street Lighting.

The Company will provide unmetered energy, at the rate herein provided, when the Customer furnishes, installs, owns and maintains (including lamp and photocell) the entire lighting system consisting of, but not limited to, lamps, luminaries, controls, brackets, ballasts, conductors, and poles. Lighting units will operate from dusk to dawn, which is approximately 4,200 hours per year. The Company will supply electricity at mutually agreed upon delivery points for the operation of the lights. The Company may, at any time, inspect and/or test the Customer's equipment to verify or measure actual load. This service is limited to installations of contiguous Metal Halide street lighting units located in an area previously approved by the Company or limited to Sodium Vapor, Mercury Vapor or Incandescent street light units also served under General Provision A or General Provision D of this Service.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	Met-Ed			
Lamp Type	Sodium Vapor			
Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
70	32	0.00	8.64	(I)
100	46	0.00	8.46	(I)
150	66	0.00	8.33	(I)
200	75	0.00	7.83	(I)
250	98	0.00	8.85	(I)
400	156	0.00	8.68	(I)

Rate District	Met-Ed			
Lamp Type	Mercury Vapor			
Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
100	42	0.00	8.75	(I)
175	74	0.00	8.47	(I)
250	107	0.00	8.07	(I)
400	174	0.00	7.24	(I)
1000	420	0.00	5.54	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, STREET LIGHTING SERVICE – ME (continued)

Rate District	Met-Ed			
Lamp Type	Incandescent			
Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
105	44	0.00	8.62	(I)
205	86	0.00	8.20	(I)

Rate District	Met-Ed			
Lamp Type	Metal Halide			
Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
175	70	0.00	8.76	(I)
250	98	0.00	8.76	(I)
400	156	0.00	8.57	(I)

Overhead Alternative Technology Lighting		
Distribution	Monthly Minimum Charge	
0.00	8.46	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

The Price to Compare Default Service Charge shall be determined using the applicable Monthly kWh usage, from the preceding chart, multiplied by the Price to Compare Default Service Rate Rider Commercial Customer Class rate.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

TERM OF CONTRACT:

Provision of this Service requires a contract with the Company. The initial term of contract shall be not less than ten (10) years, subject to renewal for successive one (1) year terms, unless other terms shall be provided in the contract. When replacement with different type luminaire is requested by the Customer of an existing luminaire during the initial ten (10) year term of contract, the Customer shall pay the cost of removal in addition to the depreciable life of the fixture for the remainder of the contract term (to be determined by the Company). Under Provision B, the term of contract may be less than ten (10) years, but not less than one (1) year.

All non-LED light fixtures that become inoperable will be replaced with an equivalent lumen output LED light fixture. When such replacement occurs, LED rates will apply based on the Company's current electric service Tariff.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, STREET LIGHTING SERVICE – ME (continued)

GENERAL PROVISIONS:

(A) COMPANY OPERATION AND MAINTENANCE OF CONVENTIONAL LUMINAIRE: The Company will operate and maintain conventional (non-ornamental) Sodium Vapor, Mercury Vapor and Incandescent lighting units consisting of lamps, luminaries, controls, brackets and ballasts approved by the Company. These units will be installed on wood poles at mounting heights not to exceed forty-five (45) feet and in a manner acceptable to the Company. The Company will operate and maintain and replace the photocell controls and lamps as necessary to the extent hereinafter expressly provided at the following monthly rates and charges per light:

(1)	Sodium Vapor Lamps	$3.05	(I)
(2)	Mercury Vapor Lamps	$1.26	(I)
(3)	Incandescent Lamps	$3.42	(I)

(B) COMPANY OWNERSHIP OF CONVENTIONAL LUMINAIRE FACILITIES: The Company will furnish and install and own its standard Sodium Vapor, Mercury Vapor and Incandescent conventional (non-ornamental) street lighting units consisting of lamps, luminaries, controls, brackets and ballasts, mounted on the Company's wood poles and utilizing the Company's overhead distribution system. For each light, the Company will furnish without added charge up to 300 feet of overhead line on existing suitable poles. At its option, the Company may install additional wood poles, provided that a street lighting unit is then installed on each dedicated pole. The type of lighting units and fixtures currently being furnished by the Company at the time service is contracted for under this Service will be installed at the rates herein provided.:

(1)	Charges Per Month Per Light:	$2.92	(I)
(2)	Charges Per Month Per Dedicated Pole:	$12.18	(I)

(I) Increase

SERVICES, STREET LIGHTING SERVICE – ME (continued)

(C) UNDERGROUND FEED TO STREET LIGHTS: This provision is for the installation of new facilities at new locations or the conversion of facilities at existing locations. Where the Company furnishes an underground electrical source, there shall be billed charges in addition to the other charges specified in this Service per light as follows:

Demand and Energy Charges for common lamp sizes:

Sodium Vapor				
Nominal Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
70	32	0.11	0.16	(I)
100	46	0.16	0.16	(I)
150	66	0.25	0.16	(I)
250	98	0.41	0.16	(I)
400	156	0.64	0.16	(I)

Mercury Vapor				
Nominal Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
175	74	0.30	0.16	(I)
250	107	0.43	0.16	(I)
400	174	0.64	0.16	(I)
1000	420	1.67	0.16	(I)

Metal Halide				
Nominal Watts	Monthly kWh	Distribution	Monthly Minimum Charge	
175	70	0.29	0.16	(I)
250	98	0.41	0.16	(I)
400	156	0.64	0.16	(I)

Underground Alternative Technology Lighting		
*Distribution	Monthly Minimum Charge	
0.300	0.18	(I)

*cents per kWh

The cost of trenching and backfilling, including breaking and replacement of concrete and other surfacing, and the provision and installation of duct or conduit (concrete encased where specified by the Company), where duct or conduit is required by the Company, shall be borne by the Customer. The cost of foundations required for support of standards shall be borne by the Customer, except that the Company will supply foundation bolts and conduit required for the installation in foundations. The Customer shall make such installations or contract with the Company or with others to do so, all to be in compliance with the Company's specifications. All installations made by (or for) the Customer shall be maintained by the Customer, except as next stated herein.

Upon mutual agreement with the Company, the Customer may transfer to the Company the ownership of such installations (except where an integral part of the Customer's property), and in the event of such transfer of ownership, the Company will thereafter maintain such equipment, and there shall be no change in the charges stated in the Rate Per Month of this Street Lighting Service, General Provisions D., E. and F.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, STREET LIGHTING SERVICE – ME (continued)

(D) COMPANY OPERATION & MAINTENANCE OF ORNAMENTAL LUMINARIES: The Company will operate and maintain ornamental Sodium Vapor and Mercury Vapor lighting units consisting of lamps, luminaire controls, brackets and ballasts approved by the Company and served from the Company's distribution system.

These units will be installed on ornamental standards and in a manner acceptable to the Company. The Company will operate and maintain and replace the photocell controls and lamps as necessary to the extent hereinafter expressly provided at the following rates and charges Per Month Per Light:

(1)	Sodium Vapor Lamps	$3.63	(I)
(2)	Mercury Vapor Lamps	$2.06	(I)

(E) COMPANY OWNERSHIP OF ORNAMENTAL LUMINAIRE: Where at the approval of the Company, the Customer owns, installs and maintains the cable and ducts (or conduit) and the standards and foundation therefore and the Company owns, installs, and maintains its standard Sodium Vapor, Mercury Vapor or Incandescent Ornamental street light units consisting of only the lamp, ballast, control, luminaire (and its interior wiring), the Luminaire Charge per month for ornamental lights, not to exceed thirty-five (35) foot mounting height, will be as follows:

Luminaire Charge: $6.93 Per Light Per Month (I)

(F) COMPANY OWNERSHIP OF ORNAMENTAL STANDARDS: Where, at the Company's option and upon Customer request, the Company has installed on a Company-owned standard a Company-owned and Company-approved standard Sodium Vapor, Mercury Vapor or Incandescent ornamental luminaire, the Company will own, operate, and maintain said standard at the following rate:

$13.06 Standard Charge Per Month (I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

HIGH PRESSURE SODIUM VAPOR STREET LIGHTING SERVICE - PN

AVAILABILITY:

Penelec

Available only to present Customers for installations now being served prior to December 31, 2023. Lighting service on public streets, highways, bridges, parks and similar public places for municipalities and other governmental agencies.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Wood Pole

Rate District	Penelec			
Initial Lumens	Watts	kWh per Month	Distribution	
5,800	70	29	$11.84	(I)
9,500	100	50	$10.49	(I)
16,000	150	71	$9.97	(I)
22,000	200	80	$15.22	(I)
27,500	250	110	$15.99	(I)
50,000	400	169	$10.46	(I)

Fiberglass Pole Not Over 16 Feet

Rate District	Penelec			
Initial Lumens	Watts	kWh per Month	Distribution	
5,800	70	29	$18.93	(I)
9,500	100	50	$17.58	(I)
16,000	150	71	$17.06	(I)
22,000	200	80	$22.27	(I)
27,500	250	110	$23.01	(I)
50,000	400	169	$17.54	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

The Price to Compare Default Service Charge shall be determined using the applicable Monthly kWh usage, from the preceding chart, multiplied by the Price to Compare Default Service Rate Rider Commercial Customer Class rate.

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, HPS VAPOR STREET LIGHTING SERVICE – PN (continued)

TERM OF CONTRACT:

Not less than five (5) years.

All non-LED light fixtures that become inoperable will be replaced with an equivalent lumen output LED light fixture. When such replacement occurs, LED rates will apply based on the Company's current electric service Tariff. (C)

GENERAL PROVISIONS:

(A) The Company shall furnish, install, and maintain at the above rates all necessary street lighting facilities consisting of lamps, luminaries, controls, brackets, and ballasts, utilizing the Company's general overhead or underground distribution system.

(B) Bills for service supplied under this Rate shall be rendered by the Company monthly.

(C) Lamps shall be lighted from dusk to dawn each and every night, or for approximately 4,200 hours per year.

(D) Additional high pressure sodium vapor street lighting fixtures of the type currently used by the Company shall be installed by the Company on existing circuits at the Customer's request at any time except during the last three (3) months of any contract term. Additional high pressure sodium vapor street lighting fixtures of the type currently used by the Company involving the construction by the Company of additional circuits and/or pole line shall be installed by the Company at the Customer's request at any time except during the last twelve (12) months of any contract term.

(E) If additional street lighting facilities are installed at the Customer's request, they shall be considered as an addition to the contract and subject to all the provisions thereof.

(F) If the Customer requests the Company to remove the present high pressure sodium vapor street light system to install LED lights and if the present system is less than twenty years old, the Customer shall pay the removal cost plus the remaining value of the system.

(G) If a Customer requests an underground system, the additional cost shall be borne by the Customer, or may be included in the contract at the following additional charges:
Underground (1): Earth construction at 5.00¢ per foot. (I)
Underground (2): Requiring removal and replacement of paving or sidewalks at 45.00¢ per foot. (I)
Underground (3): If a Customer furnishes and installs foundation bases for fabricated poles and the conductor raceways in accordance with Company specifications, the charges in items (1) and (2) shall not apply.
Underground (4): Stone construction - additional costs shall be borne by the Customer.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, HPS VAPOR STREET LIGHTING SERVICE – PN (continued)

(I) Underpass Lighting: High pressure sodium vapor lamps for 24-hour service shall be supplied by the Company, as follows:

Watts	kWh per Month	Distribution	
70	60	$11.24	(I)
100	104	$7.89	(I)
150	148	$7.25	(I)
200	167	$11.29	(I)

(J) Special equipment, including steel, aluminum or concrete poles or fiberglass poles in excess of sixteen (16) feet in length may be furnished at the Company's option, upon written request, and the additional cost there of shall be borne by the Customer.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

MUNICIPAL STREET LIGHTING SERVICE (SLS-MUNI)

AVAILABILITY:

Penelec

Lighting service on public streets, highways, bridges, parks and similar public places for municipalities and other governmental agencies.

THIS RATE IS RESTRICTED SOLELY TO EXISTING LAMP LOCATIONS OF CUSTOMERS WHO WERE RECEIVING SERVICE HEREUNDER ON APRIL 9, 1981. ANY CUSTOMER PRESENTLY SERVED UNDER THIS MUNICIPAL STREET LIGHTING SERVICE AND ELECTS TO TERMINATE THIS SERVICE, SHALL NOT BE PERMITTED TO RETURN AS A MUNICIPAL STREET LIGHTING SERVICE CUSTOMER.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Mercury Vapor Floodlight Units:

Wood Pole

Rate District	Penelec			
Initial Lumens	Watts	kWh per Month	Distribution	
21,500	400	174	$15.01	(I)
60,000	1,000	420	$18.02	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

The Price to Compare Default Service Charge shall be determined using the applicable Monthly kWh usage, from the preceding chart, multiplied by the Price to Compare Default Service Rate Rider Commercial Customer Class rate.

(I) Increase

SERVICES, SLS-MUNI (continued)

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

TERM OF CONTRACT:

Not less than five (5) years.

GENERAL PROVISIONS:

(A) The Company shall furnish, install, and maintain at the above rates all necessary street lighting facilities consisting of lamps, luminaries, controls, brackets, and ballasts, utilizing the Company's general overhead or underground distribution system.

(B) If a Customer requests an underground system, the additional cost shall be borne by the Customer, or may be included in the contract at the following additional charges:
Underground (1): Earth construction at 5.00¢ per foot. (I)
Underground (2): Requiring removal and replacement of paving or sidewalks at 45.00¢ per foot. (I)
Underground (3): If a Customer furnishes and installs foundation bases for fabricated poles and the conductor raceways in accordance with Company specifications, the charges in items (1) and (2) shall not apply.
Underground (4): Stone construction - additional costs shall be borne by the Customer.

(C) The Company may, at its option, furnish special equipment to a Customer who requests it at such increased rates per lamp as may be determined by the Company.

(D) Limited Access Highway Lighting: If a Customer owns the entire street lighting installation, the Company shall supply energy, furnish and install replacement lamps and photoelectric controls, and clean the fixtures when and if necessary. Replacement of, or repairs to, Customer-owned facilities other than lamps and photoelectric controls shall be made at the Customer's expense. The Rate, per lamp per month, is as follows:

	kWh per Month	Rate	
250 watt mercury vapor lamp	107	$7.81	(I)
400 watt mercury vapor lamp	174	$6.68	(I)
High Pressure Sodium Vapor lamps with mounting heights over thirty-five (35) feet:			
200 watt sodium vapor lamp	80	$14.36	(I)
400 watt sodium vapor lamp	169	$12.01	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, SLS-MUNI (continued)

(E) This Special Provision E. is restricted solely to Overhead or Boulevard Street Lighting in the City of Altoona where the Company furnishes overhead circuits consisting of cable and wire from Customer-owned series street lighting transformers to pole locations. In addition to the transformers and all auxiliary equipment, consisting of lightning arresters, oil switches, relays, supporting structures and wiring, the Customer supplies and maintains all fixtures, lighting units, supports, standards, etc. Such service shall be supplied and metered by the Company at primary voltage except at the Customer's option, a portion may be supplied at secondary voltage for the operation of control equipment and for supply to self-controlled lamps connected to the Company's secondary lines. The charges for this service include the following:

(1) For each overhead self-controlled unit, served from the general overhead distribution system, a charge of Two Dollars and Ten Cents ($2.10). (I)

(2) No charge for the boulevard units.

(3) For the kilowatt-hours consumed as indicated by the summation of the monthly meter readings:

First 100,000 kWh	0.8204¢ kWh	(I)
Excess kWh	0.2158¢ kWh	(I)

(4) ALTERNATIVE TECHNOLOGY LIGHTING: The Alternative Technology Lighting charges shall apply to lighting facilities owned and maintained by the Customer which utilize Induction, Solid State, or Plasma Lighting technologies, or such additional alternative technology as may be specified by the Company. The Alternative Technology Lighting must be certified by an Edison Testing Laboratories "ETL" (or equivalent) to verify the actual consumption of the fixture. In addition, and in order to certify the safe operation, the fixture must be Underwriters Laboratories "UL" (or equivalent) listed.

For purposes of the Provision E, the following definitions shall apply:

Induction Lighting – Discharge lamps, where mercury or other atoms are energized to elevate their energy level, then discharge a photon as they fall back to their normal state.

Solid State Lighting – Technology using semi-conducting materials to convert electricity into light. Solid State Lighting is an umbrella term encompassing both light- emitting diodes (LEDs) and organic light-emitting diodes (OLEDs).

Plasma Lighting – Plasma lamps are a family of light sources that generate light by exciting a plasma inside a closed transparent burner or bulb using a radio frequency (RF) power. Typically, such lamps use a noble gas or a mixture of these gases and additional materials such as metal halides, sodium, mercury, or sulfur. A waveguide is used to constrain and focus the electrical field into the plasma. In operation the gas is ionized and free electrons, accelerated by the electrical field collide with gas and metal atoms. Some electrons circling around the gas and metal atoms are excited by these collisions, bringing them to a higher energy state. When the electron falls back to its original state, it emits a photon, resulting in visible light or ultraviolet radiation depending on the fill materials.

(I) Increase

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ELECTRIC COMPANY

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FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

PRIVATE OUTDOOR LIGHTING SERVICE – (PLS)

AVAILABILITY:

Penn Power

Available only to present Customers for installations now being served prior to December 31, 2024. Available for all-night outdoor lighting service to any Customer on the lines of the Rate District where such service can be supplied by the installation of lighting fixtures supplied directly from (1) existing secondary circuits or (2) an extension of existing secondary circuit that requires only one additional span of secondary circuit and does not require any other facilities or expenses (e.g. new pole, pole changeout, or guying). Complete lighting service will be furnished by the Company using vapor lamps installed in standard fixtures. All equipment will be installed and maintained by the Company. (C)

GENERAL MONTHLY CHARGES:

Overhead and Post-Top (PT) Lighting Service:

The charges listed below for lights not designated as PT are for each light with luminaire and bracket arm, supplied from an existing pole and secondary facilities.

The charges listed below for lights designated as PT are for each lamp with post-top luminaire mounted on a 14'-16' post installed 4' in the ground, where service is supplied from existing secondary, including 50 feet of circuit installed in a trench provided by the customer.

Distribution Charge

Rating in Watts	Type	Nominal Lumens	Average Monthly kWh	Distribution	
175	Mercury Vapor	7,500	70	$17.42	(I)
175	Mercury Vapor – PT	7,500	70	$31.69	(I)
400	Mercury Vapor	22,000	156	$14.98	(I)
70	Sodium Vapor	5,800	32	$21.73	(I)
100	Sodium Vapor – PT	9,500	46	$33.31	(I)
100	Sodium Vapor	9,500	46	$21.87	(I)
150	Sodium Vapor	16,000	66	$21.07	(I)
250	Sodium Vapor	27,500	98	$22.09	(I)
400	Sodium Vapor	50,000	156	$21.89	(I)
250	Metal Halide	23,000	98	$27.27	(I)
400	Metal Halide	40,000	156	$23.28	(I)
1,000	Metal Halide	110,000	364	$9.94	(I)

When service cannot be supplied from facilities included above and additional facilities are required, the customer will in addition to the above charges pay the following distribution charge for each pole:

For each 30’ or 35’ pole, per month	$13.23	(I)
For each 40’ pole, per month	$15.39	(I)

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

HIGH PRESSURE SODIUM VAPOR STREET LIGHTING SERVICE – (SLS-SV)

AVAILABILITY:

Penn Power

Available only to present Customers for installations now being served prior to December 31, 2023. Available to municipalities and other governmental agencies for lighting public streets, highways, bridges, parking lots, parks, and similar public places. Company will furnish, install, operate, and maintain its standard HPS street light units consisting of lamps, luminaires, controls, brackets, and ballasts utilizing the Company's wood, metal or steel poles and overhead and underground distribution facilities that exist along public thoroughfares. Exceptions are as noted under Special Terms and Conditions. Lighting units will operate from sunset until sunrise, each night of the year, approximately 4,070 hours of annual operation.

GENERAL MONTHLY CHARGES:

Distribution Charge

Rating in Watts	Nominal Lumens	Average Monthly kWh	Distribution	
70	5,800	32	$12.06	(I)
100	9,500	46	$10.50	(I)
150	16,000	66	$10.66	(I)
250	27,500	98	$12.45	(I)
400	50,000	156	$12.82	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

The Default Service Charges shall be determined using the applicable Average Monthly kWh usage, from the preceding chart, multiplied by the Price to Compare Default Service Rate Rider, Commercial Customer Class rate.

ADDITIONAL FACILITIES:

When the customer requests service that requires additional facilities, such as wood, metal or ornamental poles not presently considered a part of the Company's existing overhead or underground distribution system, the customer shall bear these additional costs. The customer shall also bear the cost of rearranging or extending the existing facilities necessary to serve additional lights or to obtain the required mounting height. All necessary street lighting facilities are supplied, installed, owned, operated, and maintained by the Company and are connected to the Company's available general distribution system. The equipment installed under the above rate is of the type currently being furnished by the Company at the time service is contracted. (C)

(C) Change
(I) Increase

SERVICES, SLS-SV (continued)

The Company will install the streetlights as requested upon payment by the customer of the aforementioned excess costs. The customer may elect to pay monthly minimum charges for a period not to exceed 60 months based on the estimated construction cost of such additional facilities. (C)

REPLACEMENTS:

If the customer requests the Company to remove the present high pressure sodium vapor street light system to install LED lights and if the present system is less than twenty years old, the customer shall pay the removal cost plus the remaining value of the system. (C)

TERMS OF PAYMENT:

The net amount billed is due and payable within a period of thirty days. If the net amount is not paid on or before the date shown on the bill for payment of net amount, the bill shall bear interest at the rate of 2% per month of the unpaid net balance.

CONTRACT:

Electric service hereunder will be furnished in accordance with a written contract which by its terms shall be in full force and effect for a period of ten years and shall continue in force thereafter for five-year periods unless either party shall give to the other not less than 60 days' notice in writing prior to the expiration date of any of said five-year period that the contract shall be terminated at the expiration date of said five-year period. When a contract is terminated in the manner provided herein, the service will be discontinued.

RULES AND REGULATIONS:

The Company's Standard Rules and Regulations shall apply to the installation and use of electric service .

(C) Change

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ELECTRIC COMPANY

SERVICES

SCHEDULE 51
STREET LIGHTING SERVICE

AVAILABILITY:

West Penn

Available only to present Customers for installations now being served prior to June 6, 1997 for mercury vapor street lighting to municipalities and to unincorporated communities, for lighting public bridges and major highway interchanges, for other suitable readily accessible locations as solely determined by the Company, and for connections existing as of August 28, 1985.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	West Penn			
Lumen	Watts	kWh	Monthly Rate	
8,150	175	74	$13.29	(I)
11,500	250	103	$18.39	(I)
21,500	400	162	$22.59	(I)
60,000	1,000	386	$35.03	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

GENERAL:

Compensating for Transmission and Distribution Losses.

Multiplying Customer’s calculated on-peak lighting energy by 1.09333 and calculated off-peak lighting energy by 1.04808 produces the generation energy that must be delivered to the system within the West Penn Rate District.

The rating of lamps in lumens is for identification and shall approximate the manufacturer's standard rating.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 52
OUTDOOR LIGHTING SERVICE

AVAILABILITY:

West Penn

Available for existing high pressure sodium vapor outdoor lighting installed before June 6, 1997 and for existing mercury vapor installations installed prior to August 28, 1985.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	West Penn			
Lamp Type	High Pressure Sodium Vapor			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$15.31	(I)

Rate District	West Penn			
Lamp Type	Mercury Vapor			
Lumen	Watts	kWh	Monthly Rate	
4,000	100	45	$11.43	(I)
8,150	175	74	$12.88	(I)
21,500	400	162	$20.96	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

GENERAL:

(C)

Compensating for Transmission and Distribution Losses:

Multiplying Customer's calculated on-peak lighting energy by 1.09333 and calculated off-peak lighting energy by 1.04808 produces the generation energy that must be delivered to the system within the West Penn Rate District.

The rating of lamps in lumens is for identification purposes only and shall approximate the manufacturer's standard rating. All lamps are lighted from dusk to dawn aggregating approximately 4,200 hours per year.

Company will, at its own cost, install, operate, and maintain its standard overhead outdoor lighting equipment.

When, in the sole determination of the Company, such facilities reach the end of their useful life and replacement is desired by the Customer, the Customer will be required to contribute to replacement under whatever additional facilities plan is then in effect under this rate.

(C) Change
(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 53
STREET AND AREA LIGHTING

AVAILABILITY:

West Penn

Available only for present Customers for installations being served prior to June 6, 1997 for high pressure sodium vapor street and area lighting to Customers for lighting roadways, parking lots, and other suitable readily-accessible areas as solely determined by the Company.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

OVERHEAD SERVICE

Rate District	West Penn			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$17.14	(I)
22,000	200	86	$22.83	(I)
*50,000	400	167	$33.02	(I)

*Also available for floodlighting application.

UNDERGROUND SERVICE

Low Mount

Rate District	West Penn			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$29.83	(I)

High Mount

Rate District	West Penn				
Lumen	Watts	kWh	Single Luminaire Per Pole	Each Additional Luminaire Per Pole	
9,500	100	51	$58.53	$28.04	(I)
22,000	200	86	$58.07	$29.90	(I)
50,000	400	167	$63.02	$34.84	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 54
STREET LIGHTING SERVICE

AVAILABILITY:

West Penn

Available only to present Customers for installations now being served prior to June 6, 1997 for high pressure sodium vapor street lighting to municipalities and to unincorporated communities and for lighting major highway interchanges and other suitable readily accessible locations as solely determined by the Company.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	West Penn			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$16.19	(I)
22,000	200	86	$21.93	(I)
50,000	400	167	$32.09	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

GENERAL:

Compensating for Transmission and Distribution Losses.

Multiplying Customer's calculated on-peak lighting energy by 1.09333 and calculated off-peak lighting energy by 1.04808 produces the generation energy that must be delivered to the system within the West Penn Rate District.

The rating of lamps in lumens is for identification purposes only and shall approximate the manufacturer's standard rating.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 55
AREA LIGHTING SERVICE – UNDERGROUND DISTRIBUTION

AVAILABILITY:

West Penn

Available only to present Customers for installations now being served prior to June 6, 1997 for high-pressure sodium vapor lighting to municipalities for area lighting service from an underground distribution system. Also available for existing mercury vapor installations installed prior to January 8, 1989.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	West Penn		
Lamp Type	Sodium Vapor Low Mount		
Lumen	Watts	kWh	Monthly Rate
9,500	100	51	$28.90 (I)

Rate District	West Penn		
Lamp Type	Sodium Vapor High Mount – Single Luminaire per pole		
Lumen	Watts	kWh	Monthly Rate
9,500	100	51	$53.25 (I)
22,000	200	86	$57.09 (I)

Rate District	West Penn		
Lamp Type	Sodium Vapor High Mount – Each additional Luminaire per pole		
Lumen	Watts	kWh	Monthly Rate
22,000	200	86	$28.84 (I)

Rate District	West Penn		
Lamp Type	Mercury Vapor		
Lumen	Watts	kWh	Monthly Rate
8,150	175	74	$24.79 (I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 56
STREET LIGHTING SERVICE - CUSTOMER-OWNED EQUIPMENT

AVAILABILITY:

West Penn

Available only to present Customers for installations now being served prior to June 6, 1997 for high-pressure sodium vapor street lighting to municipalities. This Schedule is not available to serve lighting systems in an area where there will be a mix of Company-owned and Customer-owned systems.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

Rate District	West Penn				
Lumen	Watts	kWh	Installed on Customer-Owned Pole	Installed on Company's Distribution system	
9,500	100	51	$6.60	$8.77	(I)
22,000	200	86	$10.92	$14.18	(I)
50,000	400	167	$17.81	$21.60	(I)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

GENERAL:

Compensating for Transmission and Distribution Losses.

Multiplying Customer's calculated on-peak lighting energy by 1.09333 and calculated off-peak lighting energy by 1.04808 produces the generation energy that must be delivered to the system within the West Penn Rate District.

The rating of lamps in lumens is for identification purposes only and shall approximate the manufacturer's standard rating.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 57
OUTDOOR LIGHTING
EQUIPMENT, MAINTENANCE, AND UNMETERED SERVICE

AVAILABILITY:

West Penn

Available for existing outdoor lighting installed before December 31, 2023 and for existing mercury vapor installations installed prior to February 13, 2009. Available for roadway and other outdoor lighting supplied from overhead or underground secondary distribution system of the Company and contracted for by a Customer for lighting accessible areas.

GENERAL MONTHLY CHARGES:

Distribution Charge by Nominal Lamp Size:

OVERHEAD SERVICE

Rate District	West Penn				
Lamp Type	High Pressure Sodium – Vertical Open Lens Luminaire ("OL")				
Lumen	Watts	kWh	Installed on New Wood Pole	Installed on Existing Pole	
9,500	100	51	$27.98	$15.58	(I)

Rate District	West Penn			
Lamp Type	Mercury Vapor - Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
8,150	175	74	$12.65	(I)

Rate District	West Penn			
Lamp Type	High Pressure Sodium - Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$15.31	(I)
22,000	200	86	$20.45	(I)
50,000	400	167	$29.55	(I)

Rate District	West Penn			
Lamp Type	Metal Halide - Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
8,500	100	51	$21.82	(I)
11,600	175	74	$21.82	(I)
36,000	400	157	$31.86	(I)
90,000	1000	379	$46.05	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, SCHEDULE 57 (continued)

Rate District	West Penn			
Lamp Type	High Pressure Sodium Floodlight			
Lumen	Watts	kWh	Monthly Rate	
22,000	200	86	$23.16	(I)
50,000	400	167	$32.09	(I)

Rate District	West Penn			
Lamp Type	Metal Halide Floodlight			
Lumen	Watts	kWh	Monthly Rate	
36,000	400	157	$32.39	(I)
90,000	1000	379	$46.05	(I)

UNDERGROUND SERVICE

Rate District	West Penn			
Lamp Type	High Pressure Sodium - Colonial Post Top Luminaire 14' Mounting Height			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$26.72	(I)

Rate District	West Penn			
Lamp Type	Metal Halide - Colonial Post Top Luminaire 14' Mounting Height			
Lumen	Watts	kWh	Monthly Rate	
11,600	175	74	$32.77	(I)

Rate District	West Penn			
Lamp Type	High Pressure Sodium - Horizontal Luminaire (Cobra Head) 30' Mounting Height[1]			
Lumen	Watts	kWh	Single Luminaire Per Pole	
9,500	100	51	$49.85	(I)
22,000	200	86	$52.20	(I)
50,000	400	167	$55.69	(I)

[1] Mounted on a 30’ direct burial pole.

Rate District	West Penn			
Lamp Type	Metal Halide - Horizontal Luminaire (Cobra Head) 30' Mounting Height			
Lumen	Watts	kWh	Monthly Rate	
36,000	400	157	$67.39	(I)

Rate District	West Penn				
Lamp Type	High Pressure Sodium - Rectangular Luminaire (Shoe Box) 30' Mounting Height				
Lumen	Watts	kWh	Single Luminaire Per Pole, with base[2]	Single Luminaire Per Pole, no base	Each Additional Luminaire Per Pole
9,500	100	51	$79.03	$58.53	$28.05 (I)
22,000	200	86	$70.63	$54.41	$32.20 (I)
50,000	400	167	$73.36	$68.07	$37.65 (I)

[2] With base includes the installation of a non-concrete power installed foundation where soil conditions warrant its application.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, SCHEDULE 57 (continued)

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

TERM:

SHORT TERM

Short Term Service having an initial term of thirty (30) days is available if the Customer makes an initial payment of the cost of installation and removal of the luminaire and bracket in addition to any other payments required under "CONDITIONS" below. This initial payment shall be refundable with interest if the lighting system remains in service for five years. After the initial term, the Agreement shall remain in effect until canceled by either party with not less than thirty (30) days prior written notice of cancellation.

LONG TERM

Long Term Service having an initial term of ten years is available and monthly rate as set forth in this schedule shall be reduced by fifty cents per lamp. After the initial term, the Agreement shall remain in effect until canceled by either party with not less than 90 days prior written notice of cancellation.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 58
OUTDOOR LIGHTING MAINTENANCE AND UNMETERED SERVICE

AVAILABILITY:

West Penn

Available for high-pressure sodium, mercury vapor and metal halide lighting being served prior to February 13, 2009.

GENERAL MONTHLY CHARGES:

Distribution Charge

Installed On Customer Owned Pole:

Rate District	West Penn			
Lamp Type	High Pressure Sodium Vapor			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$5.91	(I)
22,000	200	86	$10.15	(I)
50,000	400	167	$16.56	(I)

Rate District	West Penn			
Lamp Type	Mercury Vapor			
Lumen	Watts	kWh	Monthly Rate	
21,500	400	162	$11.77	(I)

Rate District	West Penn			
Lamp Type	Metal Halide			
Lumen	Watts	kWh	Monthly Rate	
15,000	250	103	$10.56	(I)
36,000	400	157	$11.24	(I)
90,000	1,000	379	$20.63	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, SCHEDULE 58 (continued)

Installed on Company's Distribution System:

Rate District	West Penn			
Lamp Type	High Pressure Sodium Vapor			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$8.15	(I)
22,000	200	86	$12.19	(I)
50,000	400	167	$18.59	(I)

Rate District	West Penn			
Lamp Type	Metal Halide			
Lumen	Watts	kWh	Monthly Rate	
11,600	175	74	$11.24	(I)
15,000	250	103	$12.52	(I)
36,000	400	157	$13.28	(I)
90,000	1,000	379	$22.65	(I)

Note: The rating of the lamps in lumens is for identification and shall approximate the manufacturer's standard rating.

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

TERM:

Initial term of the Agreement shall be one year. After the initial term, the Agreement shall remain in effect until a 30-day written notice of cancellation is provided and, unless Customer provides specific date in writing more than 30 days in the future, upon the expiration of 30 days. Any remaining balance due for extra facilities, rearrangement of facilities or other additional installed costs which were separately billed over the term of the agreement shall also become immediately due and payable.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 59
OUTDOOR LIGHTING EQUIPMENT AND MAINTENANCE SERVICE

AVAILABILITY:

West Penn

Available for roadway and other outdoor lighting being served prior to February 13, 2009 where energy is supplied by Customer's metered service and contracted for by a Customer for lighting accessible areas.

GENERAL MONTHLY CHARGES:

Distribution Charge

OVERHEAD SERVICE Installation on Existing Pole:

Rate District	West Penn			
Lamp Type	Mercury Vapor – Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
8,150	175	74	$13.52	(I)

Rate District	West Penn			
Lamp Type	High Pressure Sodium – Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
9,500	100	51	$14.91	(I)
22,000	200	86	$19.46	(I)
50,000	400	167	$23.05	(I)

Rate District	West Penn			
Lamp Type	Metal Halide - Horizontal Luminaire (Cobra Head)			
Lumen	Watts	kWh	Monthly Rate	
36,000	400	157	$22.19	(I)

Rate District	West Penn			
Lamp Type	High Pressure Sodium Floodlight			
Lumen	Watts	kWh	Monthly Rate	
22,000	200	86	$20.32	(I)
50,000	400	167	$23.30	(I)

Rate District	West Penn			
Lamp Type	Metal Halide Floodlight			
Lumen	Watts	kWh	Monthly Rate	
36,000	400	157	$22.20	(I)
90,000	1,000	379	$34.88	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES, SCHEDULE 59 (continued)

UNDERGROUND SERVICE

Rate District	West Penn		
Lamp Type	High Pressure Sodium - Colonial Post Top Luminaire 14' Mounting Height		
Lumen	Watts	kWh	Monthly Rate
9,500	100	51	$27.05

(I)

Rate District	West Penn		
Lamp Type	Metal Halide - Colonial Post Top Luminaire 14' Mounting Height		
Lumen	Watts	kWh	Monthly Rate
11,600	175	74	$31.19

(I)

Rate District	West Penn		
Lamp Type	Metal Halide - Rectangular Luminaire (Shoe Box) 30' Mounting Height, Single Luminaire Per Pole, no base		
Lumen	Watts	kWh	Monthly Rate
36,000	400	157	$52.30

(I)

Note: The rating of the lamps in lumens is for identification and shall approximate the manufacturer's standard rating.

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

TERM:

Short Term Service having an initial term of thirty (30) days is available if the Customer makes an initial payment of the cost of installation, and removal of the luminaire and bracket in addition to any other payments required under "CONDITIONS" below. This initial payment shall be refundable, with interest, if the lighting system remains in service for five years. After the initial term, the Agreement shall remain in effect until canceled by either party with not less than thirty (30) days prior written notice of cancellation.

Long Term Service having an initial term of ten (10) years is available and monthly rate as set forth in this schedule shall be reduced by fifty cents per lamp. After the initial term, the Agreement shall remain in effect until canceled by either party with not less than ninety (90) days prior written notice of cancellation. Municipal lighting service is typically provided under long term agreement for initial and supplemental installation.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SERVICES

SCHEDULE 71
MERCURY VAPOR STREET AND HIGHWAY LIGHTING SERVICE

AVAILABILITY:

West Penn

Available only to present Customers for installations now being served prior to August 26, 1978. This Schedule applies to lighting service sold for the lighting of public streets, public highways, and other public outdoor areas in municipalities, governmental units, and unincorporated communities where such service can be supplied from the existing general distribution system.

This Schedule is also applicable within private property which is open to the general public such as private walkways, streets, and roads when the property and buildings are under common ownership and when supply from the Company's distribution system is directly available and when lighting service is contracted for by the owner thereof.

GENERAL MONTHLY CHARGES:

Distribution Charge

Underground Supply Metal Pole:

Low Mounting

Rate District	West Penn		
Lumen	Watts	kWh	Monthly Rate
8,150	175	74	$21.64

(I)

All lamps are lighted from dusk to dawn every night or for approximately 4,200 hours per annum.

RIDERS:

The Riders included in this Tariff that apply to this Rate are listed in the Rider Matrix on page 181.

DEFAULT SERVICE CHARGES:

For Customers receiving Default Service from the Company, the Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies.

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

RIDER MATRIX

(C)

Rate District	Rates and Services	STAS	TCJA	USC	EE&C-C	SMT	DSS	SPRVC	DSIC	LEDC	
ME	RS, GS-V	X	X	X	X	X	X	X	X	X	
ME	GS-S, GS-M, GS-L, GP, MS	X	X		X	X	X	X	X	X	
ME	TP	X	X		X	X	X	X		X	
ME	BL	X	X				X	X	X		
ME	SL, LED-SL, OALS	X	X		X		X	X	X	X	(C)
PN	RS, GS-V	X	X	X	X	X	X	X	X	X	
PN	GS-S, GS-M, GS-L, GP, TP, H	X	X		X	X	X	X	X	X	
PN	BL	X	X				X	X	X		
PN	HPS-SL, M-SL, LED-SL, OALS	X	X		X		X	X	X	X	
PP	RS, GS-V	X	X	X	X	X	X	X	X	X	
PP	GS-S, GS-M, GS-L, GP, TP, PNP	X	X		X	X	X	X	X	X	
PP	PLS, SV, LED, OALS	X	X		X		X	X	X	X	(C)
WP	RS, GS-V	X	X	X	X	X	X		X	X	
WP	GS-S, GS-M, GS-L, GP, TP	X	X		X	X	X		X	X	
WP	44, 46	X	X		X	X	X			X	
WP	51, 52, 53, 54, 55, 56, 57, 58, 71, LED-SL, OALS	X	X		X		X		X	X	(C)
WP	59	X									
PSU	GP	X	X		X	X	X			X	

Rider Titles

STAS	State Tax Adjustment Surcharge Rider
TCJA	Tax Cuts and Jobs Act Voluntary Surcharge Rider
USC	Universal Service Cost Rider
EE&C-C	Energy Efficiency and Conservation Charge Rider
SMT	Smart Meter Technologies Charge Rider
DSS	Default Service Support Rider
SPVRC	Solar Photovoltaic Requirements Charge Rider
DSIC	Distribution System Improvement Charge
LEDC	LED Conversion Charge Rider

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

STATE TAX ADJUSTMENT SURCHARGE RIDER

After the addition of the charges provided in other applicable Riders, a State Tax Adjustment Surcharge ("STAS") as outlined below shall be applied effective for service rendered on and after January 1, 2025 in addition to all other billings calculated under the provisions of this Tariff. (C)

Rate District	Met-Ed	Penelec	Penn Power	West Penn	PSU
Surcharge	0.00%	0.00%	0.00%	0.00%	0.00%

(C)

The State Tax Adjustment Surcharge will be recomputed using the elements prescribed by the Commission in its regulations at 52 Pa. Code §69.51, et seq. and at 52 Pa. Code §54.91, et seq.:

1. on December 21 of each year until the surcharge is rolled into base rates, or

2. whenever the Companies experience a material change in any of the taxes used in calculation of the surcharge due to any changes in its state tax liability arising under 66 Pa. C.S. §§ 2806(g), 2809(c) or 2810.

The recalculation will be submitted to the Commission within ten (10) days after the occurrence of the event which occasions such recomputation or as prescribed in the Commission's regulations at 52 Pa. Code §54.91, et seq. If the recomputed surcharge is less than the one in effect, the Companies will, or if the recomputed surcharge is more than the one in effect the Companies may, submit with such recomputation a tariff or supplement to reflect such recomputed surcharge. The effective date of such tariff or supplement shall be ten (10) days after the filing or as prescribed in the Commission's regulations at 52 Pa. Code §54.91, et seq.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

TAX CUTS AND JOBS ACT VOLUNTARY SURCHARGE RIDER

To implement the effects of the Tax Cuts and Jobs Act ("TCJA"), on March 15, 2018 the Pennsylvania Public Utility Commission ("Commission") issued a Temporary Rates Order at Docket No. M-2018-2641242 directing the Companies to file its current base rates and riders as temporary rates, pursuant to Section 1310(d) of the Public Utility Code 66 Pa. C.S. § 1310(d). Subsequently, on May 17, 2018, the Commission entered an Order superseding the March 15, 2018 Temporary Rates Order directing the utility to establish rates as follows:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	PSU
Surcharge	0.00%	0.00%	0.00%	0.00%	0.00%

(C)

A negative surcharge will apply as a credit for intrastate service to all customer bills rendered on and after January 1, 2025. This negative surcharge will apply equally to all customers in the Residential Customer Class, the Commercial Customer Class and the Industrial Customer Class, exclusive of STAS and all automatic adjustment clause rider revenues. (C)

The negative surcharge will be reconciled at the end of each calendar year and will remain in place until the Company files and the Commission approves new base rates for the Company pursuant to Section 1308(d) that include the effects of the TCJA tax rate changes.

The Tax Cuts and Jobs Act Voluntary Surcharge ("TCJAVSC") shall be calculated in accordance with the formula set forth below:

$$\text{TCJAVSC} = \frac{(TS - E)}{\text{Distribution Revenues}}$$

Where:

TS = The estimated current tax savings for the Companies, resulting from all changes in corporate taxes resulting from the TCJA compared to taxes that would have been accrued absent TCJA, based on the Company's most current budget for the Computational Period. Calculated consistent with Appendix A, attached to the Commission's Order at Docket No. R- 2018-3000597.

E = The over or under-refunding of the TCJAVSC that result from the billing of the TCJVSC during the Reconciliation Period, with interest. The reconciliation report showing the actual amounts of over refund / (under refund) shall be filed with the Commission 120 days after the end of the Reconciliation Year and included in the following calendar year's TCJAVSC (an over refund is denoted by a positive E and an under refund is denoted by a negative E). Interest shall be computed monthly for the over or under refund at the residential mortgage lending rate specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law (41 P.S. §§101, et seq.).

(C) Change

NET METERING RIDER (continued)

3. Meter aggregation on properties owned or leased and operated by a customer-generator shall be allowed for purposes of net metering. Meter aggregation shall be limited to meters located on properties within two (2) miles of the boundaries of the customer-generator's property. Meter aggregation shall only be available for properties located within the Company's service territory. Physical meter aggregation shall be at the customer-generator's expense. The Company shall provide the necessary equipment to complete physical aggregation. If the customer-generator requests virtual meter aggregation, it shall be provided by the Company at the customer-generator's expense. The customer-generator shall be responsible only for any incremental expense entailed in processing his account on a virtual meter aggregation basis. (C)

APPLICATION:

Customer-generators seeking to receive service under the provisions of this Rider must submit a written application to the Company demonstrating compliance with the Net Metering Rider provisions and quantifying the total rated generating capacity of the customer-generator facility.

NET METERING FOR SHOPPING CUSTOMERS (C)

1. Customer-generators may take net metering services from EGSs that offer such services.

2. If a net-metering customer takes service from an EGS, the Company will credit the customer for distribution charges for each kilowatt hour produced by a Tier I or Tier II resource installed on the customer-generator's side of the electric revenue meter, up to the total amount of kilowatt hours delivered to the customer by the Company during the billing period. If a customer-generator supplies more electricity to the electric distribution system than the EDC delivers to the customer-generator in a given billing period, the excess kilowatt hours shall be carried forward and credited against the customer-generator's usage in subsequent billing periods at the Company's distribution rates. Any excess kilowatt hours at the end of the PJM planning period will not carry over to the next year and reduce distribution charges. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rates Schedule.

3. If the Company delivers more kilowatt hours of electricity than the customer-generator facility feeds back to the Company's system during the billing period, all charges of the applicable rate schedule shall be applied to the net kilowatt hours of electricity that the Company delivered. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

4. Pursuant to Commission regulations, the credit or compensation terms for excess electricity produced by customer-generators who are customers of EGSs shall be stated in the service agreement between the customer-generator and the EGS.

5. If a customer-generator switches electricity suppliers, the Company shall treat the end of the service as if it were the end of the PJM planning period.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

ENERGY EFFICIENCY AND CONSERVATION CHARGE RIDER

An Energy Efficiency and Conservation ("EEC") Charge ("Phase IV EE&C-C") shall be applied to each Billing Unit during a billing month to Customers served under this Tariff, with the exception of those served under Borderline Service rates.

Residential, Commercial, and Street Lighting Customer Class rates will be calculated to the nearest one-thousandth of a cent per kWh. Industrial Customer Class rates will be calculated to the nearest one-hundredth of a dollar per kW PLC. The Phase IV EE&C-C rates shall be calculated separately for each Customer Class according to the provisions of this rider.

For service rendered June 1, 2023 through May 31, 2024, the Phase IV EE&C-C rates billed by Customer Class are as follows:

Met-Ed					
Customer Class	Residential	Commercial	Street Lighting	Industrial	
Rate Schedule	RS	GS-V, GS-S, GS-M, MS, Outdoor Area Lighting Service	Street Lighting Service (SLS), LED SLS	GS-L, GP, TP	(C)
Charge	0.192 cents per kWh	0.129 cents per kWh	0.058 cents per kWh	$0.32 per kW PLC	

Penelec				
Customer Class	Residential	Commercial	Street Lighting	Industrial
Rate Schedule	RS	GS-V, GS-S, GS-M, H, Outdoor Area Lighting Service	HPS SLS, Municipal SLS, LED SLS	GS-L, GP, TP
Charge	0.226 cents per kWh	0.175 cents per kWh	0.011 cents per kWh	$0.24 per kW PLC

Penn Power					
Customer Class	Residential	Commercial	Street Lighting	Industrial	
Rate Schedule	RS	GS-S, GS-S(GSDS), GS-M, PLS, Outdoor Area Lighting, GS-V, PNP	SV, LED	GS-L, GP, TP	(C)
Charge	0.200 cents per kWh	0.206 cents per kWh	0.185 cents per kWh	$0.44 per kW PLC	

West Penn					
Customer Class	Residential	Commercial	Street Lighting	Industrial	
Rate Schedule	RS	GS-V, GS-S, GS-M, Outdoor Area Lighting	51:58, 71, 72	GS-L, GP, TP, 44, 46	(C)
Charge	0.162 cents per kWh	0.167 cents per kWh	(0.106) cents per kWh	$0.22 per kW PLC	

PSU	
Customer Class	Industrial
Rate Schedule	GP
Charge	$0.22 per kW PLC

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

SMART METER TECHNOLOGIES CHARGE RIDER

A Smart Meter Technologies ("SMT") Charge ("SMT-C") shall be applied as a monthly Customer charge during each billing month to metered Customers served under this Tariff, with the exception of those served under Borderline Service rates, all Customer class SMT-C charges will be determined to the nearest cent except for the West Penn Residential customer class which will be to the nearest one-thousandth of a cent per kWh. The SMT-C rates shall be calculated separately for each Customer Class according to the provisions of this rider. For all Customers, the SMT-C shall be included in the distribution charges of the monthly bill.

For service rendered on or after January 1, 2025 the SMT-C rates billed by Customer Class are as follows:

Met-Ed				
Customer Class	Residential	Commercial	Industrial	
Rate Schedule	RS, GS-V	GS-S, GS-M, MS	GS-L, GP, TP	
Charge	$0 per month	$0 per month	$0 per month	(C)

Penelec				
Customer Class	Residential	Commercial	Industrial	
Rate Schedule	RS, GS-V	GS-S, GS-M, H	GS-L, GP, LP	
Charge	$0 per month	$0 per month	$0 per month	(C)

Penn Power				
Customer Class	Residential	Commercial	Industrial	
Rate Schedule	RS, GS-V	GS-S, GS-S(GSDS), GS-M, PNP	GS-L, GP, GT	
Charge	$0 per month	$0 per month	$0 per month	(C)

West Penn				
Customer Class	Residential	Commercial	Industrial	
Rate Schedule	RS, GS-V	GS-S, GS-M	GS-L, 44, 46	
Charge	$0 per kWh	$0 per month	$0 per month	(C)

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

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PRICE TO COMPARE DEFAULT SERVICE RATE RIDER

A Price to Compare Default Service Rate ("$PTC_{Default}$") shall be applied to each kWh of Default Service that the Company delivers to Customers under this rider as determined to the nearest one-thousandth of a cent per kWh. The $PTC_{Default}$ rate shall be billed to Customers receiving Default Service from the Company under this rider. The rates shall be calculated according to the provisions of this rider.

For service rendered December 1, 2023 through May 31, 2024 the $PTC_{Default}$ rates billed by Customer Class are as follows:

Met-Ed			
Customer Class	Residential	Commercial	
Rate Schedule	RS, GS-V	GS-S, GS-M (PTC), MS, Borderline Service, Street Lighting Service, LED Street Lighting Service, and Outdoor Lighting Service	(C)
Charge	$0.11306 per kWh	$0.11872 per kWh	

Penelec			
Customer Class	Residential	Commercial	
Rate Schedule	RS, GS-V	GS-S, GS-M (PTC), H, Borderline Service, Street Lighting Service, LED Street Lighting Service and Outdoor Lighting Service	(C)
Charge	$0.10607 per kWh	$0.11603 per kWh	

Penn Power			
Customer Class	Residential	Commercial	
Rate Schedule	RS, GS-V	GS-S, GS-M (PTC), PNP, PLS, SV, Outdoor Lighting Service and LED	(C)
Charge	$0.11231 per kWh	$0.13109 per kWh	

West Penn			
Customer Class	Residential	Commercial	
Rate Schedule	RS, GS-V	GS-S, GS-M (PTC), 51-58, 71, Outdoor Lighting Service and LED	(C)
Charge	$0.10001 per kWh	$0.11023 per kWh	

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

DEFAULT SERVICE SUPPORT RIDER

A Default Service Support ("DSS") rate shall be applied to DSS Sales delivered by the Company to Delivery Service Customers under this rider as determined to the nearest one-thousandth of a cent per kWh or dollar per kW NSPL, as applicable. The DSS rate shall be billed to Customers receiving Delivery Service from the Company under this rider. The DSS rates shall be calculated according to the provisions of this rider. The DSS Rider shall be non-bypassable.

For service rendered during the DSS Initial Computational Period and thereafter, the DSS Computational Year, the DSS rates billed by Rate Schedule are as follows:

Rate District	Met-Ed			
Customer Class	Residential	Commercial		Industrial
Rate Schedule	RS, GS-V	GS-S	GS-M, MS, OALS, STLT, LED, BRD	GS-L, GP, TP
Charge	0.405 cents per kWh	0.110 cents per kWh	0.111 cents per kWh	$0.621 per kW NSPL

(C)

Rate District	Penelec		
Customer Class	Residential	Commercial	Industrial
Rate Schedule	RS, GS-V	GS-S, GS-M, H, BRD, LED, Street Lighting, Municipal Street Lighting, OALS	GS-L, GP, TP
Charge	0.842 cents per kWh	0.388 cents per kWh	$2.812 per kW NSPL

(C)

Rate District	Penn Power			
Customer Class	Residential	Commercial		Industrial
Rate Schedule	RS, GS-V	GS-S	PNP, GS-M, PLS, SV, SM, LED, OALS	GS-L, GP, TP, GS-S (GSDS)
Charge	(0.072) cents per kWh	(0.176) cents per kWh	(0.181) cents per kWh	$(0.842) per kW NSPL

(C)

Rate District	West Penn			
Customer Class	Residential	Commercial		Industrial
Rate Schedule	RS, GS-V	GS-S	GS-M, 51-58, 71, LED, OALS	GS-L, GP, TP, 44, 46
Charge	0.443 cents per kWh	0.182 cents per kWh	0.177 cents per kWh	$1.237 per kW NSPL

(C)

Rate District	PSU
Customer Class	Industrial
Rate Schedule	GP
Charge	$1.237 per kW NSPL

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

PARTIAL SERVICES RIDER

AVAILABILITY/APPLICABILITY:

This Rider applies to general service customers having on-site non-synchronous generation equipment or synchronous equipment that does not qualify for the Net Metering Rider capable of supplying a portion of their power requirements for other than emergency purposes. Electricity sold under this Rider may not be resold; nor may it be used to operate the auxiliary loads of the generating facilities while those facilities are generating electricity for sale.

In addition to the charges included in the applicable rate schedule, all of the following general monthly charges are applicable to Delivery Service Customers.

Penelec

For any Customer taking backup and maintenance service from the Company as of January 1, 2015, the following applies: Customers who take service at a voltage level less than 115,000 volts but are served directly from a 115,000 volt or greater source through a single transformation shall be billed by the Company for backup and maintenance service at the transmission voltage charges plus a monthly fee equal to 1% of the net book value in such facilities owned by the Company at such lower volts that are dedicated to providing service to such Customer.

GENERAL MONTHLY CHARGES:

In addition to the standard charges based on the Customer's applicable rate schedule, the monthly Administrative Fee listed below will be charged. The distribution charges below are dependent upon the voltage at which the Customer is being served and the services (i.e., Backup Demand and/or Maintenance Demand) selected by the Customer:

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Administrative Fee	$85.89	$96.81	$59.50	$107.59	(I)

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Distribution Charge	Backup Demand (Dollars/kW)				
Secondary Voltage	$3.37	$5.61	$3.90	$3.68	(I)
Primary Voltage	$2.42	$2.91	$3.95	$0.55	(I)
Transmission Voltage	$0.17	$0.31	$0.31	$0.10	(I)

Rate District	Met-Ed	Penelec	Penn Power	West Penn	
Distribution Charge	Maintenance Demand (Dollars/kW)				
Secondary Voltage	$2.70	$4.49	$3.12	$2.94	(I)
Primary Voltage	$1.94	$2.33	$3.15	$0.55	(I)
Transmission Voltage	$0.14	$0.25	$0.25	$0.09	(I)

(I) Increase

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

PARTIAL SERVICES RIDER (continued)

PAYMENT TERMS:

As per Rule 11, Payment of Bills.

TERM OF CONTRACT:

Each Customer shall be required to enter into a Delivery Service contract with the Company for a minimum one (1) year term. If the Delivery Service contract is terminated by the Customer prior to its expiration, the Minimum Charge provisions of this Rate Schedule shall apply. If the Customer's capacity or service requirements increase, the Company, in its sole and exclusive judgment, may at any time require the Customer to enter into a new Delivery Service contract.

TERMS AND CONDITIONS:

A. Except where modified by this Rider, the Customer shall be subject to the terms and conditions of the Rate Schedule that would otherwise apply to the Customer.

B. Service under this Rider shall be supplied only at locations where, in the Company's sole and exclusive discretion, there exists lines and equipment of sufficient capacity to supply the service requested by the Customer.

C. The Customer's total combined capacity for the Backup and Maintenance Service shall not exceed the capacity of the generator(s) or other source of power to the Customer that is experiencing the outage.

D. The Customer's generators or other source of supply shall not be operated in parallel with the Company's lines except upon written consent of the Company or as defined under the contractual arrangements.

E. The periods of the year to be considered peak periods are from December 15 through March 15 and May 31 through September 15. Non-peak periods shall be the remaining periods of the year. Peak and non-peak periods may be changed from time to time by the Company after giving notice to the Customer. (C)

F. The Company may, at its option, require the Customer to install metering equipment sufficient to verify the performance of the Customer's generating equipment.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

PARTIAL SERVICES RIDER (continued)

GENERAL PROVISIONS:

A. BACKUP SERVICE:

1. Following the written request of the Customer indicating the amount of Backup Service required, the Company shall supply such service each month at the charges listed under General Monthly Charges.

2. During any billing period in which the Customer's generating equipment or other source of power experiences a forced or unscheduled outage which requires the Company to provide backup energy, the Customer shall be required to pay the Company for (i) the backup capacity at the charges listed in this Rider, General Monthly Charges, (ii) all capacity in excess of the specified capacity as Supplemental Service, (iii) all energy purchased at the charges and applicable riders set forth in the Rate Schedule that would otherwise apply to said Customer, and (iv) if actual capacity is greater than the backup capacity, a minimum bill will apply in the following months for demand determination. The minimum bill will apply even if the actual capacity is less than the backup capacity in any given month. The minimum bill will end after eleven (11) months or start over when the actual capacity is greater than backup capacity.

3. During any billing period in which the Company is not required to provide energy to "backup" the Customer's generating equipment or other source of power, the Customer shall pay to the Company the charges listed under General Monthly Charges for backup capacity.

4. Backup Service at the charges listed in this Rider, General Monthly Charges is limited to fifteen percent (15%) of the On-peak hours and fifteen percent (15%) of the Off-peak hours during any and all rolling consecutive twelve-month billing periods. Backup Service beyond fifteen percent (15%) of the time during a particular consecutive twelve-month period shall be billed to the Customer by the Company as Supplement Service at the Rate Schedule that would otherwise apply to said Customer. (C)

5. The Customer shall permit the Company to install metering on the customers generation at the customers expense (phone line) or the Customer is required to notify the Company of the failure of its generating equipment in order to invoke this Rider Paragraph A2 of the Backup Service provision. The Company shall not be required to rebill the Customer if the Company is not notified of the equipment failure prior to the Company's scheduled billing date of the Customer's account.

6. Backup Service Billing Demand shall be the Contract Demand for Backup Service.

7. The Backup Service Measured Demand shall equal the lesser of a) the difference between the generating capability of the Customer's generator less the actual amount generated in a fifteen (15) minute period as measured by Company's metering located on the Customer Generator, or as provided with documentation acceptable to the Company by the Customer, or b) the Backup Service Billing Demand.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

PARTIAL SERVICES RIDER (continued)

B. MAINTENANCE SERVICE:

1. At the option of the Company, Customers may schedule their maintenance outages at any and all hours, during the periods from March 15 to May 31, September 15 to December 15, July 4 and Labor Day. Customers may also schedule their maintenance outages during Off-peak hours of the remainder of the year. (C)

2. Customers who schedule their maintenance outages as set forth in this Rider Paragraph B1 and who request maintenance service in accordance with this Rider Paragraph B7, shall be billed by the Company at the charges listed under General Monthly Charges for the additional demands created during the scheduled outage up to the amount of requested maintenance power. In addition, the Customer shall be billed by, and pay to, the Company normal monthly charges including, but not limited to, the Monthly Minimum Charges, Demand Charges, Backup and Energy Charges at the Rate Schedule(s) that would otherwise apply to said Customer.

3. The additional demands, subject to maintenance charges, created during the scheduled outage shall not exceed the specified Maintenance Service capacity. Maintenance Service at the charges listed under General Monthly Charges shall be limited to twenty-five percent (25%) of the time (i.e., hours) during any and all rolling consecutive twelve (12) month periods. Maintenance Service beyond twenty-five percent (25%) of the time during a particular consecutive twelve (12) month period shall be billed by the Company at the Rate Schedule that would otherwise apply to said Customer. (C)

4. When the Customer's scheduled maintenance outage of the generating facility cannot be scheduled in accordance with this Rider Paragraph B1, the demand established shall be subject to the charges and conditions set forth in the applicable Rate Schedule that would otherwise apply to said Customer.

5. The Company may, at its option, allow a Customer to extend the maintenance outages into On-peak periods provided that the length of extension into these periods does not exceed five (5) days. The demands established during these periods shall be billed by the Company at the charges specified in General Monthly Charges.

6. The Customer shall provide thirty (30) days written advance notice to the Company of a scheduled maintenance outage and specify the amount of maintenance power required. The Company shall make the Maintenance Service available within thirty (30) days before or after the Customer's requested maintenance outage.

(C) Change

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE RIDER

In addition to the net charges provided for in this Tariff, a charge of:

Rate District	Met-Ed	Penelec	Penn Power	West Penn
Net Charge	0.00%	0.000%	0.00%	0.00%

(D)

will apply consistent with the Commission Orders dated June 9, 2016 and April 19, 2018, at Docket Nos. (ME) P-2015-2508942, (PN) P-2015-2508936, (PP) P-2015-2508931, and (WP) P-2015-2508948 approving the Distribution System Improvement Charge ("DSIC"). This charge will be effective January 1, 2025. (C)

1. General Description

A. Purpose: To recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property which is completed and placed in service and recorded in the individual accounts, as noted below, between base rate cases and to provide the Rate Districts with the resources to accelerate the replacement of aging infrastructure, to comply with evolving regulatory requirements and to develop and implement solutions to regional supply problems.

The costs of extending facilities to serve new customers are not recoverable through the DSIC.

B. Eligible Property: The DSIC-eligible property will consist of the following:

- Poles and towers (account 364);
- Overhead conductors (account 365) and underground conduit and conductors (accounts 366 and 367);
- Line transformers (account 368) and substation equipment (account 362);
- Any fixture or device related to eligible property listed above, including insulators, circuit breakers, fuses, reclosers, grounding wires, crossarms and brackets, relays, capacitors, converters and condensers;
- Unreimbursed costs related to highway relocation projects where an electric distribution company must relocate its facilities; and
- Other related capitalized costs.

C. Effective Date: The DSIC will become effective July 1, 2016.

(C) Change
(D) Decrease

GENERATION STATION POWER RIDER

AVAILABILITY

Available to Generation Facilities that produce electric energy that will be sold at wholesale and are owned and/or operated by a qualified member of PJM Interconnection, L.L.C. (PJM), as defined in the PJM Operating Agreement. The net energy output must be reported on an hourly basis to PJM and is interconnected to the Company's facilities.

The net energy output is the difference in energy between the Generation Facility's output and Station Power over a monthly period, as determined by the PJM. Net Energy Output is positive when the output exceeds the Station Power and negative when the Station Power exceeds the output, all as measured by an electronic meter acceptable to the Company.

Station Power is the energy used for operating the electric equipment on the site of a Generation Facility.

DETERMINATION OF RATES

All bills for service are based on charges specified in the applicable rate schedule for firm service (including applicable riders and surcharges) under which the Customer is eligible to receive service, subject to the additional provisions of this rule.

(1) When the Generating Facility's Net Energy Output is positive for the monthly billing period:

a. Customers receiving metered service over 100 kilovolts shall pay the Company the Fixed Distribution Charge of the applicable rate schedule.

b. Customers receiving metered Service under 100 kilovolts shall pay the Company the Fixed Distribution Charge along with the Distribution Charge portion of the applicable rate schedule.

(2) When the Generation Facility's Net Energy Output is negative for the monthly billing period, the Company shall apply all Delivery Service components of the applicable rate schedule, using the negative Net Energy Output to determine the Billing kWh component and the peak monthly kW usage to determine the Billing kW component.

LED CONVERSION CHARGE RIDER

An LED Conversion Charge ("LEDC") shall be applied to each Billing Unit during a billing month to customers served under this Tariff.

Residential and Commercial rates will be calculated to the nearest one-thousandth of a cent per kWh. Industrial Customer Class rates will be calculated to the nearest one-hundredth of a dollar per kW PLC. The LEDC rates shall be calculated separately for each Customer Class according to the provisions of this rider and shall be non-bypassable.

For service rendered April 1, 2025 through March 31, 2026, the LEDC rates billed by Customer Class are as follows:

Rate District	Met-Ed		
Customer Class	Residential	Commercial	Industrial
Rate Schedule	RS, GS-V	GS-S, GS-M, MS, BRD, LED, STLT, OALS	GS-L, GP, TP
Charge	0.00 cents per kWh	0.00 cents per kWh	$0.00 per kW NSPL

Rate District	Penelec		
Customer Class	Residential	Commercial	Industrial
Rate Schedule	RS, GS-V	GS-S, GS-M, H, BRD, LED, STLT, Municipal Street Lighting, OALS	GS-L, GP, TP
Charge	0.00 cents per kWh	0.00 cents per kWh	$0.00 per kW NSPL

Rate District	Penn Power		
Customer Class	Residential	Commercial	Industrial
Rate Schedule	RS, GS-V	GS-S, PNP, GS-M, PLS, SV, SM, LED, OALS	GS-L, GP, TP, GS-S (GSDS)
Charge	0.00 cents per kWh	0.00 cents per kWh	$0.00 per kW NSPL

Rate District	West Penn		
Customer Class	Residential	Commercial	Industrial
Rate Schedule	RS, GS-V	GS-S, GS-M, 51-58, 71, LED, OALS	GS-L, GP, TP, 44, 46
Charge	0.00 cents per kWh	0.00 cents per kWh	$0.00 per kW NSPL

Rate District	PSU
Customer Class	Industrial
Rate Schedule	GP
Charge	$0.00 per kW NSPL

LED CONVERSION CHARGE RIDER (continued)

The LEDC rates by Customer Class shall be calculated annually in accordance with the formula set forth below:

$$LEDC = [(LEDC_C - E) / S] \times [1 / (1 - T)]$$

Where:

LEDC = The charge in cents or dollar per Billing Unit by Customer Class as defined by this rider applied to each Billing Unit for the Rate Schedules identified in this rider.

$LEDC_C$ = A projection of the remaining net asset value of the non-LED lighting fixtures that will be replaced during the LEDC Computational Year. Such costs will be allocated to each Customer Class based upon each Customer Class's contribution to the total Company Network Service Peak Load.

E = The cumulative over or under-collection of LEDC costs that results from billing the LEDC during the LEDC Reconciliation Year (an over-collection is denoted by a positive E and an under-collection by a negative E), including applicable interest. Interest shall be computed monthly at the legal rate determined pursuant to 41 P.S. § 202, from the month in which the over or under-collection occurs to the month in which the over-collection is refunded to or the under-collection is recovered from all Delivery Service Customers.

S = The Company's projected Billing Units (kWh sales delivered to all Customers in the residential and commercial customer class or kW PLC demand for the Industrial Customer Class) for the LEDC Computational Year.

T = The Pennsylvania gross receipts tax rate in effect during the billing month expressed in decimal form as reflected in the Company's base rates.

LED CONVERSION CHARGE RIDER (continued)

All capitalized terms not otherwise defined in this Rider shall have the definitions specified in the Definitions of Terms section of this tariff. For purposes of this rider, the following additional definitions shall apply:

1. LEDC Computational Year - The 12-month period from April 1 through the following March 31.

2. LEDC Reconciliation Year - The 12-month period ending January 31 immediately preceding the LEDC Computational Year.

The LEDC shall be filed with the Commission by March 1st of each year. Changes to the LEDC shall become effective on April 1st of each year unless otherwise ordered by the Commission and shall remain in effect for a period of one (1) year, unless revised on an interim basis subject to the approval of the Commission. Upon determining that the LEDC, if left unchanged, would result in material over or under-collection of all costs recoverable under the LEDC Rider incurred or expected to be incurred during the then current LEDC Computational Year, the Company may request that the Commission approve one or more interim revisions to the LEDC to become effective thirty (30) days from the date of filing, unless otherwise ordered by the Commission.

The Company shall file an annual report of collections under this Rider within sixty (60) days following the conclusion of each LEDC Reconciliation Year.

At the conclusion of the period during which this Rider is in effect, the Company shall be authorized to recover or refund any remaining amounts not reconciled at that time under such mechanism as approved by the Commission.

Application of the LEDC shall be subject to annual review and audit by the Commission.

Appendix B

Met-Ed Rate District
Summary of Distribution of Revenues ($ in Thousands)

Revenue Summary (w/ 2025 Forecasted Distribution Rider Revenues)

Line No.	Rate Group	End of Period Customers	Normalized Sales (MWH)	Normalized Demand (KW)	Present Rates: Normalized Base Revenues	Present Rates: Distribution Riders (DSIC, SMT STAS, TCJA)	Present Rates: Subtotal Base Dist. Rev. plus Rider Changes	Present Rates: Other Rider Charges	Present Rates: Total Present Rates	Proposed Rates: Base Revenues After Increase	Proposed Rates: Distribution Riders (DSIC, SMT STAS, TCJA)	Proposed Rates: Subtotal Base Dist. Rev. plus Rider Changes	Proposed Rates: Other Rider Charges	Proposed Rates: Total Revenue After Increase	Revenue Increase: Base Revenue Increase	Revenue Increase: Base Rev Percent Increase	Revenue Increase: Net Overall Increase	Revenue Increase: Net Overall Percent Increase
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
1	R	525,508	5,857,567	84,508	$ 352,337	$ (9,357)	$ 342,980	$ 753,049	$ 1,096,029	$ 372,135	$ -	$ 372,135	$ 753,049	$ 1,125,184	$ 29,155	8.5%	$ 29,155	2.7%
2	GSV	252	10,065	18,358	$ 567	$ (7)	$ 560	$ 1,288	$ 1,847	$ 605	$ -	$ 605	$ 1,288	$ 1,893	$ 45	8.1%	$ 45	2.5%
3	GSS	41,202	151,865	0	$ 16,997	$ 936	$ 17,934	$ 18,402	$ 36,335	$ 19,490	$ -	$ 19,490	$ 18,402	$ 37,892	$ 1,557	8.7%	$ 1,557	4.3%
4	GSM	26,308	2,610,564	8,863,323	$ 57,027	$ (74)	$ 56,954	$ 316,348	$ 373,302	$ 61,548	$ -	$ 61,548	$ 316,348	$ 377,896	$ 4,594	8.1%	$ 4,594	1.2%
5	GSL	399	862,657	2,196,516	$ 10,643	$ (211)	$ 10,432	$ 81,198	$ 91,630	$ 11,407	$ -	$ 11,407	$ 81,198	$ 92,604	$ 974	9.3%	$ 974	1.1%
6	GP	581	2,723,840	6,554,863	$ 26,365	$ (678)	$ 25,686	$ 255,703	$ 281,389	$ 27,780	$ -	$ 27,780	$ 255,703	$ 283,483	$ 2,094	8.2%	$ 2,094	0.7%
7	TP	31	1,848,232	5,693,641	$ 7,539	$ (784)	$ 6,755	$ 173,257	$ 180,012	$ 7,318	$ -	$ 7,318	$ 173,257	$ 180,575	$ 563	8.3%	$ 563	0.3%
8	BRD	70	1,092	0	$ 45	$ (1)	$ 44	$ 251	$ 295	$ 49	$ -	$ 49	$ 251	$ 300	$ 5	10.2%	$ 5	1.5%
9	MS	55	4,348	0	$ 159	$ (0)	$ 159	$ 527	$ 685	$ 171	$ -	$ 171	$ 527	$ 697	$ 12	7.5%	$ 12	1.7%
10	POL	783	4,008	0	$ 649	$ (6)	$ 642	$ 926	$ 1,568	$ 701	$ -	$ 701	$ 926	$ 1,627	$ 58	9.1%	$ 58	3.7%
11	STLT	610	25,935	0	$ 6,510	$ (62)	$ 6,448	$ 5,974	$ 12,422	$ 6,986	$ -	$ 6,986	$ 5,974	$ 12,960	$ 538	8.3%	$ 538	4.3%
12	Rider L	3	0	367,200	$ 62	$ -	$ 62	$ -	$ 62	$ 67	$ -	$ 67	$ -	$ 67	$ 5	8.3%	$ 5	8.3%
13	**TOTAL Met-Ed**	**595,801**	**14,100,172**	**23,778,410**	**$ 478,899**	**$ (10,244)**	**$ 468,656**	**$ 1,606,921**	**$ 2,075,577**	**$ 508,256**	**$ -**	**$ 508,256**	**$ 1,606,921**	**$ 2,115,177**	**$ 39,600**	**8.4%**	**$ 39,600**	**1.9%**

Penelec Rate District
Summary of Distribution of Revenues ($ in Thousands)

Revenue Summary (w/ 2025 Forecasted Distribution Rider Revenues)

					Present Rates					Proposed Rates					Revenue Increase			
Line No.	Rate Group	End of Period Customers	Normalized Sales (MWH)	Normalized Demand (KW)	Normalized Base Revenues	Distribution Riders (DSIC, SMT STAS, TCJA)	Subtotal Base Dist. Rev. plus Rider Changes	Other Rider Charges	Total Present Rates	Base Revenues After Increase	Distribution Riders (DSIC, SMT STAS, TCJA)	Subtotal Base Dist. Rev. plus Rider Changes	Other Rider Charges	Total Revenue After Increase	Base Revenue Increase	Base Rev Percent Increase	Net Overall Increase	Net Overall Percent Increase
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
1	R	496,418	4,312,760	53,581	$ 329,129	$ (7,149)	$ 321,981	$ 560,184	$ 882,165	$ 361,113	$ -	$ 361,113	$ 560,184	$ 921,297	$ 39,132	12.2%	$ 39,132	4.4%
2	GSV	622	13,948	24,373	$ 1,002	$ (12)	$ 990	$ 1,805	$ 2,795	$ 1,114	$ -	$ 1,114	$ 1,805	$ 2,919	$ 124	12.5%	$ 124	4.4%
3	GSS	52,935	202,621	0	$ 18,987	$ 242	$ 19,229	$ 24,667	$ 43,896	$ 21,890	$ -	$ 21,890	$ 24,667	$ 46,557	$ 2,661	13.8%	$ 2,661	6.1%
4	GSM	30,681	2,897,971	9,747,035	$ 73,008	$ (516)	$ 72,492	$ 352,799	$ 425,291	$ 81,128	$ -	$ 81,128	$ 352,799	$ 433,927	$ 8,636	11.9%	$ 8,636	2.0%
5	GSL	424	919,326	2,403,985	$ 17,351	$ (116)	$ 17,235	$ 49,398	$ 66,632	$ 19,297	$ -	$ 19,297	$ 49,398	$ 68,695	$ 2,063	12.0%	$ 2,063	3.1%
6	GP	442	1,495,019	3,975,322	$ 19,341	$ (237)	$ 19,104	$ 79,294	$ 98,398	$ 21,393	$ -	$ 21,393	$ 79,294	$ 100,686	$ 2,289	12.0%	$ 2,289	2.3%
7	TP	60	2,608,661	6,238,678	$ 9,156	$ (252)	$ 8,904	$ 135,756	$ 144,660	$ 9,989	$ -	$ 9,989	$ 135,756	$ 145,745	$ 1,085	12.2%	$ 1,085	0.8%
8	BRD	10	313	0	$ 16	$ (0)	$ 16	$ 38	$ 53	$ 19	$ -	$ 19	$ 38	$ 57	$ 4	22.8%	$ 4	6.7%
9	H	140	23,932	0	$ 852	$ (12)	$ 840	$ 2,913	$ 3,753	$ 939	$ -	$ 939	$ 2,913	$ 3,852	$ 99	11.8%	$ 99	2.6%
10	POL	1,928	11,027	0	$ 3,260	$ (28)	$ 3,232	$ 1,342	$ 4,574	$ 3,613	$ -	$ 3,613	$ 1,342	$ 4,955	$ 381	11.8%	$ 381	8.3%
11	STLT	713	31,976	0	$ 7,384	$ (64)	$ 7,320	$ 3,840	$ 11,160	$ 8,506	$ -	$ 8,506	$ 3,840	$ 12,346	$ 1,186	16.2%	$ 1,186	10.6%
12	Rider L	9		189,328	$ 251		$ 251	$ -	$ 251	$ 281	$ -	$ 281	$ -	$ 281	$ 30	12.0%	$ 30	12.0%
13	**TOTAL Penelec**	**584,383**	**12,517,554**	**22,632,301**	**$ 479,736**	**$ (8,144)**	**$ 471,592**	**$ 1,212,036**	**$ 1,683,628**	**$ 529,282**	**$ -**	**$ 529,282**	**$ 1,212,036**	**$ 1,741,318**	**$ 57,690**	**12.2%**	**$ 57,690**	**3.4%**

Penn Power Rate District
Summary of Distribution of Revenues ($ in Thousands)

Revenue Summary (w/ 2025 Forecasted Distribution Rider Revenues)

					Present Rates					Proposed Rates					Revenue Increase			
Line No.	Rate Group	End of Period Customers	Normalized Sales (MWH)	Normalized Demand (KW)	Normalized Base Revenues	Distribution Riders (DSIC, SMT STAS, TCJA)	Subtotal Base Dist. Rev. plus Rider Changes	Other Rider Charges	Total Present Rates	Base Revenues After Increase	Distribution Riders (DSIC, SMT STAS, TCJA)	Subtotal Base Dist. Rev. plus Rider Changes	Other Rider Charges	Total Revenue After Increase	Base Revenue Increase	Base Rev Percent Increase	Net Overall Increase	Net Overall Percent Increase
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
1	R	152,010	1,713,034	67,873	$ 96,200	$ (984)	$ 95,216	$ 210,566	$ 305,782	$ 114,099	$ -	$ 114,099	$ 210,566	$ 324,665	$ 18,883	19.8%	$ 18,883	6.2%
2	GSV	78	1,995	1,738	$ 102	$ (0)	$ 102	$ 245	$ 347	$ 123	$ -	$ 123	$ 245	$ 369	$ 22	21.1%	$ 22	6.2%
3	GSS	11,535	49,282	0	$ 5,231	$ 182	$ 5,412	$ 6,478	$ 11,890	$ 6,532	$ -	$ 6,532	$ 6,478	$ 13,010	$ 1,120	20.7%	$ 1,120	9.4%
4	GSM	8,839	839,944	3,039,157	$ 13,368	$ 193	$ 13,561	$ 110,369	$ 123,930	$ 16,162	$ -	$ 16,162	$ 110,369	$ 126,531	$ 2,601	19.2%	$ 2,601	2.1%
5	GSL	144	322,712	855,254	$ 4,027	$ (4)	$ 4,023	$ 12,128	$ 16,151	$ 4,727	$ -	$ 4,727	$ 12,128	$ 16,855	$ 704	17.5%	$ 704	4.4%
6	GP	126	393,670	920,483	$ 4,249	$ (19)	$ 4,229	$ 14,831	$ 19,061	$ 5,120	$ -	$ 5,120	$ 14,831	$ 19,951	$ 891	21.1%	$ 891	4.7%
7	TP	45	1,309,301	4,095,558	$ 2,803	$ (92)	$ 2,711	$ 49,666	$ 52,376	$ 3,117	$ -	$ 3,117	$ 49,666	$ 52,782	$ 406	15.0%	$ 406	0.8%
8	PNP	88	1,863	0	$ 80	$ 2	$ 82	$ 245	$ 327	$ 98	$ -	$ 98	$ 245	$ 343	$ 16	19.0%	$ 16	4.8%
9	POL	705	2,686	0	$ 568	$ (2)	$ 566	$ 353	$ 919	$ 679	$ -	$ 679	$ 353	$ 1,031	$ 113	19.9%	$ 113	12.2%
10	STLT	82	3,267	0	$ 1,003	$ (4)	$ 999	$ 429	$ 1,428	$ 1,226	$ -	$ 1,226	$ 429	$ 1,655	$ 227	22.7%	$ 227	15.9%
11	Rider L	0	0	0	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -	0.0%
12	**TOTAL Penn Power**	**173,652**	**4,637,753**	**8,980,062**	**$ 127,631**	**$ (729)**	**$ 126,902**	**$ 405,310**	**$ 532,212**	**$ 151,882**	**$ -**	**$ 151,882**	**$ 405,310**	**$ 557,192**	**$ 24,980**	**19.7%**	**$ 24,980**	**4.7%**

West Penn Rate District
Summary of Distribution of Revenues ($ in Thousands)

Revenue Summary (w/ 2025 Forecasted Distribution Rider Revenues)

Line No.	Rate Group	End of Period Customers	Normalized Sales (MWH)	Normalized Demand (KW)	Present Rates: Normalized Base Revenues	Present Rates: Distribution Riders (DSIC, SMT STAS, TCJA)	Present Rates: Subtotal Base Dist. Rev. plus Rider Changes	Present Rates: Other Rider Charges	Present Rates: Total Present Rates	Proposed Rates: Base Revenues After Increase	Proposed Rates: Distribution Riders (DSIC, SMT STAS, TCJA)	Proposed Rates: Subtotal Base Dist. Rev. plus Rider Changes	Proposed Rates: Other Rider Charges	Proposed Rates: Total Revenue After Increase	Revenue Increase: Base Revenue Increase	Revenue Increase: Base Rev Percent Increase	Revenue Increase: Net Overall Increase	Revenue Increase: Net Overall Percent Increase
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
1	RS	636,179	7,237,022	110,822	$ 309,426	$ (1,977)	$ 307,449	$ 825,093	$ 1,132,541	$ 380,655	$ -	$ 380,655	$ 825,093	$ 1,205,748	$ 73,206	23.8%	$ 73,206	6.5%
2	GSV	630	18,944	37,987	$ 810	$ (3)	$ 808	$ 2,161	$ 2,968	$ 999	$ -	$ 999	$ 2,161	$ 3,160	$ 192	23.8%	$ 192	6.5%
3	GSS	62,540	210,899	0	$ 14,587	$ 236	$ 14,823	$ 23,983	$ 38,807	$ 19,223	$ -	$ 19,223	$ 23,983	$ 43,207	$ 4,400	29.7%	$ 4,400	11.3%
4	GSM	37,351	3,335,031	11,942,335	$ 56,079	$ 1,025	$ 57,105	$ 379,093	$ 436,198	$ 70,335	$ -	$ 70,335	$ 379,093	$ 449,428	$ 13,230	23.2%	$ 13,230	3.0%
5	GSL	900	2,072,267	7,376,697	$ 21,553	$ 512	$ 22,065	$ 138,322	$ 160,387	$ 26,751	$ -	$ 26,751	$ 138,322	$ 165,073	$ 4,686	21.2%	$ 4,686	2.9%
6	GP/TP	190	5,177,947	13,682,342	$ 11,716	$ (80)	$ 11,637	$ 343,338	$ 354,974	$ 14,626	$ -	$ 14,626	$ 343,338	$ 357,963	$ 2,989	25.7%	$ 2,989	0.8%
7	PP44	1	71,779	0	$ 34	$ (5)	$ 29	$ 4,715	$ 4,744	$ 39	$ -	$ 39	$ 4,715	$ 4,755	$ 11	37.2%	$ 11	0.2%
8	PP46	3	1,012,139	0	$ 2,877	$ (156)	$ 2,721	$ 67,680	$ 70,401	$ 3,413	$ -	$ 3,413	$ 67,680	$ 71,093	$ 692	25.5%	$ 692	1.0%
9	POL	4,112	23,561	0	$ 4,305	$ 60	$ 4,364	$ 2,090	$ 6,454	$ 5,649	$ -	$ 5,649	$ 2,090	$ 7,739	$ 1,285	29.4%	$ 1,285	19.9%
10	STLT	571	21,689	0	$ 6,043	$ 77	$ 6,120	$ 2,930	$ 9,050	$ 7,922	$ -	$ 7,922	$ 2,930	$ 10,852	$ 1,802	29.4%	$ 1,802	19.9%
11	PSU	1	198,530	0	$ 921	$ (48)	$ 874	$ 13,213	$ 14,086	$ 1,095	$ -	$ 1,095	$ 13,213	$ 14,308	$ 222	25.4%	$ 222	1.6%
12	Rider L	7		368,423	$ 61	$ -	$ 61	$ -	$ 61	$ 76	$ -	$ 76	$ -	$ 76	$ 15	24.5%	$ 15	24.5%
13	**TOTAL West Penn**	**742,485**	**19,379,808**	**33,518,607**	**$ 428,413**	**$ (358)**	**$ 428,055**	**$ 1,802,617**	**$ 2,230,672**	**$ 530,785**	**$ -**	**$ 530,785**	**$ 1,802,617**	**$ 2,333,402**	**$ 102,730**	**24.0%**	**$ 102,730**	**4.6%**

Appendix C

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE RS

	ENERGY USAGE																
All kWh	0	50	100	250	500	750	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 11.25	$ 20.25	$ 29.24	$ 56.23	$ 101.22	$ 146.20	$ 191.19	$ 281.15	$ 371.12	$ 461.09	$ 551.06	$ 641.03	$ 731.00	$ 820.96	$ 910.93	$ 1,090.87
Total Current Bill	10.27	19.14	28.02	54.63	98.98	143.34	187.70	276.41	365.12	453.83	542.54	631.25	719.96	808.67	897.38	1,074.80
Increase ($)	$ 0.98	$ 1.10	$ 1.23	$ 1.61	$ 2.23	$ 2.86	$ 3.49	$ 4.75	$ 6.01	$ 7.26	$ 8.52	$ 9.78	$ 11.04	$ 12.29	$ 13.55	$ 16.07
Increase (%)	9.51%	5.76%	4.38%	2.94%	2.26%	2.00%	1.86%	1.72%	1.65%	1.60%	1.57%	1.55%	1.53%	1.5%	1.5%	1.5%
Overall Increase (%)	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%	1.89%
UNBUNDLED RATES - CURRENT																
Distribution																
Distribution Charge @ $11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25
All kWh @ 4.800 ¢/kWh	$ -	$ 2	$ 5	$ 12	$ 24	$ 36	$ 48	$ 72	$ 96	$ 120	$ 144	$ 168	$ 192	$ 216	$ 240	$ 288
Sub-Total	$ 11	$ 14	$ 16	$ 23	$ 35	$ 47	$ 59	$ 83	$ 107	$ 131	$ 155	$ 179	$ 203	$ 227	$ 251	$ 299
Riders																
Universal Service Charge @ 0.947 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 9	$ 14	$ 19	$ 24	$ 28	$ 33	$ 38	$ 43	$ 47	$ 57
TCJA @ -3.910 %	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (4)	$ (5)	$ (6)	$ (7)	$ (8)	$ (9)	$ (10)	$ (12)
Phase IV Energy Efficiency Charge @ 0.192 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 12
Smart Meter Charge @ $-1.00	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)
Default Service Support Charge @ 0.405 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 6	$ 8	$ 10	$ 12	$ 14	$ 16	$ 18	$ 20	$ 24
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ (1)	$ (1)	$ (0)	$ 2	$ 5	$ 9	$ 12	$ 19	$ 26	$ 33	$ 39	$ 46	$ 53	$ 60	$ 67	$ 80
DSIC @ 4.700 %	$ 0	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 5	$ 6	$ 7	$ 9	$ 10	$ 11	$ 13	$ 14	$ 17
PTC/HPS Charge																
All kWh @$ 0.11306 /kWh	$ -	$ 6	$ 11	$ 28	$ 57	$ 85	$ 113	$ 170	$ 226	$ 283	$ 339	$ 396	$ 452	$ 509	$ 565	$ 678
Sub Total	$ 10	$ 19	$ 28	$ 55	$ 99	$ 143	$ 188	$ 276	$ 365	$ 454	$ 542	$ 631	$ 720	$ 809	$ 897	$ 1,075
STAS @ 0.02 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Total Bill	**$ 10**	**$ 19**	**$ 28**	**$ 55**	**$ 99**	**$ 143**	**$ 188**	**$ 276**	**$ 365**	**$ 454**	**$ 543**	**$ 631**	**$ 720**	**$ 809**	**$ 897**	**$ 1,075**
UNBUNDLED RATES - PROPOSED																
Distribution																
Distribution Charge @ $11.25	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11
All kWh @ 5.138 ¢/kWh	$ -	$ 3	$ 5	$ 13	$ 26	$ 39	$ 51	$ 77	$ 103	$ 128	$ 154	$ 180	$ 206	$ 231	$ 257	$ 308
Sub-Total	$ 11	$ 14	$ 16	$ 24	$ 37	$ 50	$ 63	$ 88	$ 114	$ 140	$ 165	$ 191	$ 217	$ 242	$ 268	$ 320
Riders																
Universal Service Charge @ 0.947 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 9	$ 14	$ 19	$ 24	$ 28	$ 33	$ 38	$ 43	$ 47	$ 57
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.192 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 12
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.405 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 6	$ 8	$ 10	$ 12	$ 14	$ 16	$ 18	$ 20	$ 24
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ -	$ 1	$ 2	$ 4	$ 8	$ 12	$ 16	$ 23	$ 31	$ 39	$ 47	$ 54	$ 62	$ 70	$ 78	$ 93
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																
All kWh @ $ 0.11306 /kWh	$ -	$ 6	$ 11	$ 28	$ 57	$ 85	$ 113	$ 170	$ 226	$ 283	$ 339	$ 396	$ 452	$ 509	$ 565	$ 678
Sub Total	$ 11	$ 20	$ 29	$ 56	$ 101	$ 146	$ 191	$ 281	$ 371	$ 461	$ 551	$ 641	$ 731	$ 821	$ 911	$ 1,091
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 11**	**$ 20**	**$ 29**	**$ 56**	**$ 101**	**$ 146**	**$ 191**	**$ 281**	**$ 371**	**$ 461**	**$ 551**	**$ 641**	**$ 731**	**$ 821**	**$ 911**	**$ 1,091**
% Increase	**9.5%**	**5.8%**	**4.4%**	**2.9%**	**2.3%**	**2.0%**	**1.9%**	**1.7%**	**1.6%**	**1.6%**	**1.6%**	**1.5%**	**1.5%**	**1.5%**	**1.5%**	**1.5%**

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-V

ENERGY USAGE

All kWh	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 11.25	$ 20.22	$ 29.18	$ 56.08	$ 100.90	$ 145.73	$ 172.63	$ 190.56	$ 280.21	$ 369.86	$ 459.52	$ 549.17	$ 638.82	$ 728.48	$ 818.13	$ 907.78	$ 1,087.09
Total Current Bill	10.27	19.11	27.95	54.46	98.65	142.84	169.36	187.04	275.42	363.80	452.18	540.56	628.94	717.32	805.70	894.08	1,070.85
Increase ($)	$ 0.98	$ 1.10	$ 1.23	$ 1.61	$ 2.25	$ 2.89	$ 3.27	$ 3.52	$ 4.79	$ 6.07	$ 7.34	$ 8.61	$ 9.88	$ 11.15	$ 12.43	$ 13.70	$ 16.24
Increase (%)	9.51%	5.78%	4.41%	2.96%	2.28%	2.02%	1.93%	1.88%	1.74%	1.67%	1.62%	1.59%	1.57%	1.56%	1.5%	1.5%	1.5%
Overall Increase (%)	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%	1.75%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25
All kWh @ 4.800 ¢/kWh	$ -	$ 2	$ 5	$ 12	$ 24	$ 36	$ 43	$ 48	$ 72	$ 96	$ 120	$ 144	$ 168	$ 192	$ 216	$ 240	$ 288
Sub-Total	$ 11	$ 14	$ 16	$ 23	$ 35	$ 47	$ 54	$ 59	$ 83	$ 107	$ 131	$ 155	$ 179	$ 203	$ 227	$ 251	$ 299
Riders																	
Universal Service Charge @ 0.947 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 9	$ 9	$ 14	$ 19	$ 24	$ 28	$ 33	$ 38	$ 43	$ 47	$ 57
TCJA @ -3.910 %	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (2)	$ (3)	$ (4)	$ (5)	$ (6)	$ (7)	$ (8)	$ (9)	$ (10)	$ (12)
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 3	$ 3	$ 4	$ 5	$ 5	$ 6	$ 6	$ 8
Smart Meter Charge @ $-1.00	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)
Default Service Support Charge @ 0.405 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 6	$ 8	$ 10	$ 12	$ 14	$ 16	$ 18	$ 20	$ 24
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ (1)	$ (1)	$ (0)	$ 2	$ 5	$ 8	$ 10	$ 12	$ 18	$ 25	$ 31	$ 38	$ 44	$ 51	$ 57	$ 64	$ 77
DSIC @ 4.700 %	$ 0	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 3	$ 4	$ 6	$ 7	$ 8	$ 10	$ 11	$ 12	$ 14	$ 17
PTC/HPS Charge																	
All kWh @ $ 0.11306 /kWh	$ -	$ 6	$ 11	$ 28	$ 57	$ 85	$ 102	$ 113	$ 170	$ 226	$ 283	$ 339	$ 396	$ 452	$ 509	$ 565	$ 678
Sub Total	$ 10	$ 19	$ 28	$ 54	$ 99	$ 143	$ 169	$ 187	$ 275	$ 364	$ 452	$ 540	$ 629	$ 717	$ 806	$ 894	$ 1,071
STAS @ 0.02 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Total Bill	**$ 10**	**$ 19**	**$ 28**	**$ 54**	**$ 99**	**$ 143**	**$ 169**	**$ 187**	**$ 275**	**$ 364**	**$ 452**	**$ 541**	**$ 629**	**$ 717**	**$ 806**	**$ 894**	**$ 1,071**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $11.25	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11
All kWh @ 5.138 ¢/kWh	$ -	$ 3	$ 5	$ 13	$ 26	$ 39	$ 46	$ 51	$ 77	$ 103	$ 128	$ 154	$ 180	$ 206	$ 231	$ 257	$ 308
Sub-Total	$ 11	$ 14	$ 16	$ 24	$ 37	$ 50	$ 57	$ 63	$ 88	$ 114	$ 140	$ 165	$ 191	$ 217	$ 242	$ 268	$ 320
Riders																	
Universal Service Charge @ 0.947 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 9	$ 9	$ 14	$ 19	$ 24	$ 28	$ 33	$ 38	$ 43	$ 47	$ 57
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 3	$ 3	$ 4	$ 5	$ 5	$ 6	$ 6	$ 8
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.405 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 6	$ 8	$ 10	$ 12	$ 14	$ 16	$ 18	$ 20	$ 24
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ -	$ 1	$ 1	$ 4	$ 7	$ 11	$ 13	$ 15	$ 22	$ 30	$ 37	$ 45	$ 52	$ 59	$ 67	$ 74	$ 89
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.11306 /kWh	$ -	$ 6	$ 11	$ 28	$ 57	$ 85	$ 102	$ 113	$ 170	$ 226	$ 283	$ 339	$ 396	$ 452	$ 509	$ 565	$ 678
Sub Total	$ 11	$ 20	$ 29	$ 56	$ 101	$ 146	$ 173	$ 191	$ 280	$ 370	$ 460	$ 549	$ 639	$ 728	$ 818	$ 908	$ 1,087
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 11**	**$ 20**	**$ 29**	**$ 56**	**$ 101**	**$ 146**	**$ 173**	**$ 191**	**$ 280**	**$ 370**	**$ 460**	**$ 549**	**$ 639**	**$ 728**	**$ 818**	**$ 908**	**$ 1,087**
% Increase	**9.5%**	**5.8%**	**4.4%**	**3.0%**	**2.3%**	**2.0%**	**1.9%**	**1.9%**	**1.7%**	**1.7%**	**1.6%**	**1.6%**	**1.6%**	**1.6%**	**1.5%**	**1.5%**	**1.5%**

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - SMALL - SINGLE PHASE
At Average Levels of kWh Use

KW Demand																			
Total kW	0	1	1	1	1	1	1	1	3	3	3	3	3	5	5	5	5		
Hrs Use	0	100	200	300	400	500	600	730	100	200	300	400	500	100	200	300	500		
ENERGY USAGE																			
Monthly Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Proposed Bill	$ 23.78	$ 40.99	$ 58.20	$ 75.41	$ 92.62	$ 109.83	$ 127.03	$ 149.41	$ 75.41	$ 127.03	$ 178.66	$ 230.29	$ 281.92	$ 109.83	$ 195.87	$ 281.92	$ 454.01		
Total Current Bill	24.03	40.25	56.47	72.69	88.91	105.13	121.35	142.43	72.69	121.35	170.01	218.67	267.33	105.13	186.23	267.33	429.53		
Increase ($)	$ (0.25)	$ 0.74	$ 1.73	$ 2.72	$ 3.71	$ 4.70	$ 5.69	$ 6.97	$ 2.72	$ 5.69	$ 8.65	$ 11.62	$ 14.59	$ 4.70	$ 9.64	$ 14.59	$ 24.48		
Increase (%)	-1.03%	1.84%	3.06%	3.74%	4.17%	4.47%	4.69%	4.90%	3.74%	4.69%	5.09%	5.31%	5.46%	4.47%	5.2%	5.5%	5.7%		
Overall Increase (%)	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%	3.78%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $21.88	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22		
All kWh @ 4.069 ¢/kWh	$ -	$ 4	$ 8	$ 12	$ 16	$ 20	$ 24	$ 30	$ 12	$ 24	$ 37	$ 49	$ 61	$ 20	$ 41	$ 61	$ 102		
Sub-Total	$ 22	$ 26	$ 30	$ 34	$ 38	$ 42	$ 46	$ 52	$ 34	$ 46	$ 59	$ 71	$ 83	$ 42	$ 63	$ 83	$ 124		
Riders																			
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 0	$ 1	$ 1	$ 2	$ 2	$ 1	$ 1	$ 2	$ 3		
TCJA @ -3.910 %	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (2)	$ (1)	$ (2)	$ (2)	$ (3)	$ (3)	$ (2)	$ (2)	$ (3)	$ (5)		
Smart Meter Charge @ $1.92	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2		
Default Service Support Charge @ 0.110 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 1	$ 1	$ 2	$ 1	$ 1	$ 2	$ 3		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Sub-Total	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 1	$ 2	$ 2	$ 2	$ 2	$ 1	$ 2	$ 2	$ 3		
DSIC @ 4.700 %	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 4	$ 2	$ 3	$ 4	$ 6		
PTC/HPS Charge																			
All kWh @ $ 0.11872 /kWh	$ -	$ 12	$ 24	$ 36	$ 47	$ 59	$ 71	$ 87	$ 36	$ 71	$ 107	$ 142	$ 178	$ 59	$ 119	$ 178	$ 297		
Sub Total	$ 24	$ 40	$ 56	$ 73	$ 89	$ 105	$ 121	$ 142	$ 73	$ 121	$ 170	$ 219	$ 267	$ 105	$ 186	$ 267	$ 429		
STAS @ 0.02 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Total Bill	**$ 24**	**$ 40**	**$ 56**	**$ 73**	**$ 89**	**$ 105**	**$ 121**	**$ 142**	**$ 73**	**$ 121**	**$ 170**	**$ 219**	**$ 267**	**$ 105**	**$ 186**	**$ 267**	**$ 430**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $23.78	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24		
All kWh @ 5.092 ¢/kWh	$ -	$ 5	$ 10	$ 15	$ 20	$ 25	$ 31	$ 37	$ 15	$ 31	$ 46	$ 61	$ 76	$ 25	$ 51	$ 76	$ 127		
Sub-Total	$ 24	$ 29	$ 34	$ 39	$ 44	$ 49	$ 54	$ 61	$ 39	$ 54	$ 70	$ 85	$ 100	$ 49	$ 75	$ 100	$ 151		
Riders																			
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 0	$ 1	$ 1	$ 2	$ 2	$ 1	$ 1	$ 2	$ 3		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @ 0.110 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 1	$ 1	$ 2	$ 1	$ 1	$ 2	$ 3		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Sub-Total	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 1	$ 1	$ 2	$ 3	$ 4	$ 1	$ 2	$ 4	$ 6		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.11872 /kWh	$ -	$ 12	$ 24	$ 36	$ 47	$ 59	$ 71	$ 87	$ 36	$ 71	$ 107	$ 142	$ 178	$ 59	$ 119	$ 178	$ 297		
Sub Total	$ 24	$ 41	$ 58	$ 75	$ 93	$ 110	$ 127	$ 149	$ 75	$ 127	$ 179	$ 230	$ 282	$ 110	$ 196	$ 282	$ 454		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 24**	**$ 41**	**$ 58**	**$ 75**	**$ 93**	**$ 110**	**$ 127**	**$ 149**	**$ 75**	**$ 127**	**$ 179**	**$ 230**	**$ 282**	**$ 110**	**$ 196**	**$ 282**	**$ 454**		
% Increase	**-1.0%**	**1.8%**	**3.1%**	**3.7%**	**4.2%**	**4.5%**	**4.7%**	**4.9%**	**3.7%**	**4.7%**	**5.1%**	**5.3%**	**5.5%**	**4.5%**	**5.2%**	**5.5%**	**5.7%**		

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS MEDIUM - SINGLE PHASE
With Demands 10 - 20 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	0	10	10	10	10	10	10	10	10	20	20	20	20	20	20	20	20	20
Hrs Use	0	100	200	300	400	500	600	700	900	100	200	300	400	500	600	730	900	
ENERGY USAGE																		
Monthly Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,000	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000	
Total Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,000	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000	
Total Proposed Bill	$ 26.01	$ 202.32	$ 323.50	$ 444.68	$ 565.86	$ 687.04	$ 808.22	$ 929.40	$ 1,171.76	$ 378.64	$ 621.00	$ 863.36	$ 1,105.72	$ 1,348.08	$ 1,590.44	$ 1,905.50	$ 2,317.52	
Total Current Bill	26.23	198.92	320.18	441.45	562.71	683.98	805.24	926.51	1,169.04	371.60	614.13	856.66	1,099.19	1,341.72	1,584.25	1,899.54	2,311.84	
Increase ($)	$ (0.22)	$ 3.41	$ 3.32	$ 3.24	$ 3.15	$ 3.07	$ 2.98	$ 2.90	$ 2.73	$ 7.03	$ 6.86	$ 6.69	$ 6.53	$ 6.36	$ 6.19	$ 5.96	$ 5.68	
Increase (%)	-0.84%	1.71%	1.04%	0.73%	0.56%	0.45%	0.37%	0.31%	0.23%	1.89%	1.12%	0.78%	0.59%	0.47%	0.4%	0.3%	0.2%	
Overall Increase (%)	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $24.07	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	
All kW @ $5.11/kW	$ -	$ 51	$ 51	$ 51	$ 51	$ 51	$ 51	$ 51	$ 51	$ 102	$ 102	$ 102	$ 102	$ 102	$ 102	$ 102	$ 102	
Sub-Total	$ 24	$ 75	$ 75	$ 75	$ 75	$ 75	$ 75	$ 75	$ 75	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 1	$ 3	$ 4	$ 5	$ 6	$ 8	$ 9	$ 12	$ 3	$ 5	$ 8	$ 10	$ 13	$ 15	$ 19	$ 23	
TCJA @ -3.910 %	$ (1)	$ (3)	$ (3)	$ (3)	$ (3)	$ (3)	$ (3)	$ (3)	$ (3)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	
Smart Meter Charge @ $1.92	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 1	$ 2	$ 3	$ 4	$ 6	$ 7	$ 8	$ 10	$ 2	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 20	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	
Sub-Total	$ 1	$ 1	$ 4	$ 6	$ 9	$ 11	$ 14	$ 16	$ 21	$ 2	$ 7	$ 12	$ 17	$ 22	$ 27	$ 33	$ 41	
DSIC @ 4.700 %	$ 1	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 6	$ 6	$ 6	$ 6	$ 6	$ 7	$ 7	$ 7	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 119	$ 237	$ 356	$ 475	$ 594	$ 712	$ 831	$ 1,068	$ 237	$ 475	$ 712	$ 950	$ 1,187	$ 1,425	$ 1,733	$ 2,137	
Sub Total	$ 26	$ 199	$ 320	$ 441	$ 563	$ 684	$ 805	$ 926	$ 1,169	$ 372	$ 614	$ 856	$ 1,099	$ 1,341	$ 1,584	$ 1,899	$ 2,311	
STAS @ 0.02 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	
Total Bill	**$ 26**	**$ 199**	**$ 320**	**$ 441**	**$ 563**	**$ 684**	**$ 805**	**$ 927**	**$ 1,169**	**$ 372**	**$ 614**	**$ 857**	**$ 1,099**	**$ 1,342**	**$ 1,584**	**$ 1,900**	**$ 2,312**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $26.01	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	
All kW @ $5.51/kW	$ -	$ 55	$ 55	$ 55	$ 55	$ 55	$ 55	$ 55	$ 55	$ 110	$ 110	$ 110	$ 110	$ 110	$ 110	$ 110	$ 110	
Sub-Total	$ 26	$ 81	$ 81	$ 81	$ 81	$ 81	$ 81	$ 81	$ 81	$ 136	$ 136	$ 136	$ 136	$ 136	$ 136	$ 136	$ 136	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 1	$ 3	$ 4	$ 5	$ 6	$ 8	$ 9	$ 12	$ 3	$ 5	$ 8	$ 10	$ 13	$ 15	$ 19	$ 23	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 1	$ 2	$ 3	$ 4	$ 6	$ 7	$ 8	$ 10	$ 2	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 20	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	
Sub-Total	$ -	$ 2	$ 5	$ 7	$ 10	$ 12	$ 15	$ 17	$ 22	$ 5	$ 10	$ 15	$ 20	$ 25	$ 30	$ 36	$ 44	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 119	$ 237	$ 356	$ 475	$ 594	$ 712	$ 831	$ 1,068	$ 237	$ 475	$ 712	$ 950	$ 1,187	$ 1,425	$ 1,733	$ 2,137	
Sub Total	$ 26	$ 202	$ 324	$ 445	$ 566	$ 687	$ 808	$ 929	$ 1,172	$ 379	$ 621	$ 863	$ 1,106	$ 1,348	$ 1,590	$ 1,906	$ 2,318	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 26**	**$ 202**	**$ 324**	**$ 445**	**$ 566**	**$ 687**	**$ 808**	**$ 929**	**$ 1,172**	**$ 379**	**$ 621**	**$ 863**	**$ 1,106**	**$ 1,348**	**$ 1,590**	**$ 1,906**	**$ 2,318**	
% Increase	**-0.84%**	**1.71%**	**1.04%**	**0.73%**	**0.56%**	**0.45%**	**0.37%**	**0.31%**	**0.23%**	**1.89%**	**1.12%**	**0.78%**	**0.59%**	**0.47%**	**0.39%**	**0.31%**	**0.25%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM - THREE PHASE
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25	25	25	25	25	50	50	50	50	75	75	75	75	100	100	100	100	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	8	8	8	8	8	15	15	15	15	23	23	23	23	31	31	31	31	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Proposed Bill	$ 186.00	$ 488.95	$ 1,094.85	$ 1,700.75	$ 2,397.54	$ 931.40	$ 2,143.20	$ 3,355.00	$ 4,748.57	$ 1,373.86	$ 3,191.56	$ 5,009.26	$ 7,099.61	$ 1,816.31	$ 4,239.91	$ 6,663.51	$ 9,450.65	
Total Current Bill	175.42	478.58	1,084.90	1,691.23	2,388.50	911.85	2,124.50	3,337.14	4,731.69	1,345.12	3,164.09	4,983.06	7,074.88	1,778.38	4,203.68	6,628.98	9,418.07	
Increase ($)	$ 10.59	$ 10.37	$ 9.95	$ 9.52	$ 9.04	$ 19.56	$ 18.71	$ 17.86	$ 16.88	$ 28.74	$ 27.47	$ 26.19	$ 24.73	$ 37.92	$ 36.22	$ 34.53	$ 32.57	
Increase (%)	6.03%	2.17%	0.92%	0.56%	0.38%	2.14%	0.88%	0.54%	0.36%	2.14%	0.87%	0.53%	0.35%	2.13%	0.9%	0.5%	0.3%	
Overall Increase (%)	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $43.03	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	
All kW @ $5.11/kW	$ 128	$ 128	$ 128	$ 128	$ 128	$ 256	$ 256	$ 256	$ 256	$ 383	$ 383	$ 383	$ 383	$ 511	$ 511	$ 511	$ 511	
All rkVA @ $0.20 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 6	$ 6	$ 6	$ 6	
Sub-Total	$ 172	$ 172	$ 172	$ 172	$ 172	$ 302	$ 302	$ 302	$ 302	$ 431	$ 431	$ 431	$ 431	$ 560	$ 560	$ 560	$ 560	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 3	$ 10	$ 16	$ 24	$ 6	$ 19	$ 32	$ 47	$ 10	$ 29	$ 48	$ 71	$ 13	$ 39	$ 65	$ 94	
TCJA @ -3.910 %	$ (7)	$ (7)	$ (7)	$ (7)	$ (7)	$ (12)	$ (12)	$ (12)	$ (12)	$ (17)	$ (17)	$ (17)	$ (17)	$ (22)	$ (22)	$ (22)	$ (22)	
Smart Meter Charge @ $1.92	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 3	$ 8	$ 14	$ 20	$ 6	$ 17	$ 28	$ 41	$ 8	$ 25	$ 42	$ 61	$ 11	$ 33	$ 56	$ 81	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	
Sub-Total	$ (5)	$ 1	$ 14	$ 26	$ 40	$ 2	$ 27	$ 52	$ 80	$ 4	$ 40	$ 77	$ 120	$ 5	$ 54	$ 103	$ 160	
DSIC @ 4.700 %	$ 8	$ 8	$ 8	$ 9	$ 9	$ 14	$ 15	$ 15	$ 16	$ 20	$ 21	$ 22	$ 23	$ 26	$ 27	$ 28	$ 30	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 297	$ 890	$ 1,484	$ 2,167	$ 594	$ 1,781	$ 2,968	$ 4,333	$ 890	$ 2,671	$ 4,452	$ 6,500	$ 1,187	$ 3,562	$ 5,936	$ 8,667	
Sub Total	$ 175.38	$ 478.48	$ 1,084.69	$ 1,690.89	$ 2,388.02	$ 911.67	$ 2,124.07	$ 3,336.48	$ 4,730.74	$ 1,344.85	$ 3,163.46	$ 4,982.07	$ 7,073.47	$ 1,778.03	$ 4,202.84	$ 6,627.65	$ 9,416.19	
STAS @ 0.02 %	$ 0.04	$ 0.10	$ 0.22	$ 0.34	$ 0.48	$ 0.18	$ 0.42	$ 0.67	$ 0.95	$ 0.27	$ 0.63	$ 1.00	$ 1.41	$ 0.36	$ 0.84	$ 1.33	$ 1.88	
Total Bill	**$ 175.42**	**$ 478.58**	**$ 1,084.90**	**$ 1,691.23**	**$ 2,388.50**	**$ 911.85**	**$ 2,124.50**	**$ 3,337.14**	**$ 4,731.69**	**$ 1,345.12**	**$ 3,164.09**	**$ 4,983.06**	**$ 7,074.88**	**$ 1,778.38**	**$ 4,203.68**	**$ 6,628.98**	**$ 9,418.07**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $46.50	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	
All kW @ $5.51/kW	$ 138	$ 138	$ 138	$ 138	$ 138	$ 276	$ 276	$ 276	$ 276	$ 413	$ 413	$ 413	$ 413	$ 551	$ 551	$ 551	$ 551	
All rkVA @ $0.22 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 7	$ 7	$ 7	$ 7	
Sub-Total	$ 186	$ 186	$ 186	$ 186	$ 186	$ 326	$ 326	$ 326	$ 326	$ 465	$ 465	$ 465	$ 465	$ 605	$ 605	$ 605	$ 605	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 3	$ 10	$ 16	$ 24	$ 6	$ 19	$ 32	$ 47	$ 10	$ 29	$ 48	$ 71	$ 13	$ 39	$ 65	$ 94	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 3	$ 8	$ 14	$ 20	$ 6	$ 17	$ 28	$ 41	$ 8	$ 25	$ 42	$ 61	$ 11	$ 33	$ 56	$ 81	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	
Sub-Total	$ -	$ 6	$ 18	$ 31	$ 45	$ 12	$ 37	$ 62	$ 90	$ 18	$ 55	$ 92	$ 135	$ 25	$ 74	$ 123	$ 180	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 297	$ 890	$ 1,484	$ 2,167	$ 594	$ 1,781	$ 2,968	$ 4,333	$ 890	$ 2,671	$ 4,452	$ 6,500	$ 1,187	$ 3,562	$ 5,936	$ 8,667	
Sub Total	$ 186.00	$ 488.95	$ 1,094.85	$ 1,700.75	$ 2,397.54	$ 931.40	$ 2,143.20	$ 3,355.00	$ 4,748.57	$ 1,373.86	$ 3,191.56	$ 5,009.26	$ 7,099.61	$ 1,816.31	$ 4,239.91	$ 6,663.51	$ 9,450.65	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 186.00**	**$ 488.95**	**$ 1,094.85**	**$ 1,700.75**	**$ 2,397.54**	**$ 931.40**	**$ 2,143.20**	**$ 3,355.00**	**$ 4,748.57**	**$ 1,373.86**	**$ 3,191.56**	**$ 5,009.26**	**$ 7,099.61**	**$ 1,816.31**	**$ 4,239.91**	**$ 6,663.51**	**$ 9,450.65**	
% Increase	**6.03%**	**2.17%**	**0.92%**	**0.56%**	**0.38%**	**2.14%**	**0.88%**	**0.54%**	**0.36%**	**2.14%**	**0.87%**	**0.53%**	**0.35%**	**2.13%**	**0.86%**	**0.52%**	**0.35%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM - THREE PHASE
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	250	250	250	250	250	250	250	250	250	400	400	400	400	400	400	400	400	400
Hrs Use	0	100	200	300	400	500	600	730	900	100	200	300	400	500	600	730	900	
REACTIVE DEMAND																		
rkVA	77	77	77	77	77	77	77	77	77	124	124	124	124	124	124	124	124	
ENERGY USAGE																		
Monthly Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Proposed Bill	$ 1,441.51	$ 4,471.01	$ 7,500.51	$ 10,530.01	$ 13,559.51	$ 16,589.01	$ 19,618.51	$ 23,556.86	$ 28,707.01	$ 7,125.72	$ 11,972.92	$ 16,820.12	$ 21,667.32	$ 26,514.52	$ 31,361.72	$ 37,663.08	$ 45,903.32	
Total Current Bill	1,346.37	4,378.00	7,409.62	10,441.24	13,472.86	16,504.48	19,536.11	23,477.21	28,630.97	6,977.61	11,828.20	16,678.80	21,529.39	26,379.99	31,230.58	37,536.36	45,782.37	
Increase ($)	$ 95.14	$ 93.02	$ 90.90	$ 88.77	$ 86.65	$ 84.53	$ 82.41	$ 79.65	$ 76.04	$ 148.12	$ 144.72	$ 141.32	$ 137.93	$ 134.53	$ 131.14	$ 126.73	$ 120.95	
Increase (%)	7.07%	2.12%	1.23%	0.85%	0.64%	0.51%	0.42%	0.34%	0.27%	2.12%	1.22%	0.85%	0.64%	0.51%	0.4%	0.3%	0.3%	
Overall Increase (%)	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	0.88%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $43.03	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	$ 43	
All kW @ $5.11/kW	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 1,278	$ 2,044	$ 2,044	$ 2,044	$ 2,044	$ 2,044	$ 2,044	$ 2,044	$ 2,044	
All rkVA @ $0.20 /rkVA	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	
Sub-Total	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 1,336	$ 2,112	$ 2,112	$ 2,112	$ 2,112	$ 2,112	$ 2,112	$ 2,112	$ 2,112	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 32	$ 65	$ 97	$ 129	$ 161	$ 194	$ 235	$ 290	$ 52	$ 103	$ 155	$ 206	$ 258	$ 310	$ 377	$ 464	
TCJA @ -3.910 %	$ (52)	$ (52)	$ (52)	$ (52)	$ (52)	$ (52)	$ (52)	$ (52)	$ (52)	$ (83)	$ (83)	$ (83)	$ (83)	$ (83)	$ (83)	$ (83)	$ (83)	
Smart Meter Charge @ $1.92	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 28	$ 56	$ 83	$ 111	$ 139	$ 167	$ 203	$ 250	$ 44	$ 89	$ 133	$ 178	$ 222	$ 266	$ 324	$ 400	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 6	$ 8	$ 9	$ 11	$ 14	$ 2	$ 5	$ 7	$ 10	$ 12	$ 14	$ 18	$ 22	
Sub-Total	$ (50)	$ 11	$ 73	$ 134	$ 196	$ 257	$ 319	$ 399	$ 503	$ 18	$ 116	$ 215	$ 313	$ 411	$ 510	$ 638	$ 805	
DSIC @ 4.700 %	$ 60	$ 62	$ 63	$ 65	$ 66	$ 68	$ 70	$ 71	$ 74	$ 98	$ 100	$ 103	$ 105	$ 108	$ 110	$ 113	$ 117	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 2,968	$ 5,936	$ 8,904	$ 11,872	$ 14,840	$ 17,808	$ 21,666	$ 26,712	$ 4,749	$ 9,498	$ 14,246	$ 18,995	$ 23,744	$ 28,493	$ 34,666	$ 42,739	
Sub Total	$ 1,346.11	$ 4,377.12	$ 7,408.14	$ 10,439.15	$ 13,470.17	$ 16,501.18	$ 19,532.20	$ 23,472.52	$ 28,625.25	$ 6,976.21	$ 11,825.84	$ 16,675.46	$ 21,525.09	$ 26,374.71	$ 31,224.34	$ 37,528.85	$ 45,773.21	
STAS @ 0.02 %	$ 0.27	$ 0.88	$ 1.48	$ 2.09	$ 2.69	$ 3.30	$ 3.91	$ 4.69	$ 5.73	$ 1.40	$ 2.37	$ 3.34	$ 4.31	$ 5.27	$ 6.24	$ 7.51	$ 9.15	
Total Bill	**$ 1,346.37**	**$ 4,378.00**	**$ 7,409.62**	**$ 10,441.24**	**$ 13,472.86**	**$ 16,504.48**	**$ 19,536.11**	**$ 23,477.21**	**$ 28,630.97**	**$ 6,977.61**	**$ 11,828.20**	**$ 16,678.80**	**$ 21,529.39**	**$ 26,379.99**	**$ 31,230.58**	**$ 37,536.36**	**$ 45,782.37**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $46.50	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	$ 47	
All kW @ $5.51/kW	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 1,378	$ 2,205	$ 2,205	$ 2,205	$ 2,205	$ 2,205	$ 2,205	$ 2,205	$ 2,205	
All rkVA @ $0.22 /rkVA	$ 17	$ 17	$ 17	$ 17	$ 17	$ 17	$ 17	$ 17	$ 17	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	
Sub-Total	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 1,442	$ 2,279	$ 2,279	$ 2,279	$ 2,279	$ 2,279	$ 2,279	$ 2,279	$ 2,279	
Riders																		
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 32	$ 65	$ 97	$ 129	$ 161	$ 194	$ 235	$ 290	$ 52	$ 103	$ 155	$ 206	$ 258	$ 310	$ 377	$ 464	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 28	$ 56	$ 83	$ 111	$ 139	$ 167	$ 203	$ 250	$ 44	$ 89	$ 133	$ 178	$ 222	$ 266	$ 324	$ 400	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 6	$ 8	$ 9	$ 11	$ 14	$ 2	$ 5	$ 7	$ 10	$ 12	$ 14	$ 18	$ 22	
Sub-Total	$ -	$ 62	$ 123	$ 185	$ 246	$ 308	$ 369	$ 449	$ 554	$ 98	$ 197	$ 295	$ 394	$ 492	$ 590	$ 718	$ 886	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11872 /kWh	$ -	$ 2,968	$ 5,936	$ 8,904	$ 11,872	$ 14,840	$ 17,808	$ 21,666	$ 26,712	$ 4,749	$ 9,498	$ 14,246	$ 18,995	$ 23,744	$ 28,493	$ 34,666	$ 42,739	
Sub Total	$ 1,441.51	$ 4,471.01	$ 7,500.51	$ 10,530.01	$ 13,559.51	$ 16,589.01	$ 19,618.51	$ 23,556.86	$ 28,707.01	$ 7,125.72	$ 11,972.92	$ 16,820.12	$ 21,667.32	$ 26,514.52	$ 31,361.72	$ 37,663.08	$ 45,903.32	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 1,441.51**	**$ 4,471.01**	**$ 7,500.51**	**$ 10,530.01**	**$ 13,559.51**	**$ 16,589.01**	**$ 19,618.51**	**$ 23,556.86**	**$ 28,707.01**	**$ 7,125.72**	**$ 11,972.92**	**$ 16,820.12**	**$ 21,667.32**	**$ 26,514.52**	**$ 31,361.72**	**$ 37,663.08**	**$ 45,903.32**	
% Increase	**7.07%**	**2.12%**	**1.23%**	**0.85%**	**0.64%**	**0.51%**	**0.42%**	**0.34%**	**0.27%**	**2.12%**	**1.22%**	**0.85%**	**0.64%**	**0.51%**	**0.42%**	**0.34%**	**0.26%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 500 - 1,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	500	500	500	500	500	500	750	750	750	750	750	750	1,000	1,000	1,000	1,000	1,000	
Hrs Use	0	200	300	400	500	730	200	300	400	500	730	900	200	300	400	500	730	
REACTIVE DEMAND																		
rkVA	242	242	242	242	242	242	363	363	363	363	363	363	483	483	483	483	483	
ENERGY USAGE																		
Monthly Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000	
Total Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000	
Total Proposed Bill	$ 3,040.35	$ 12,255.35	$ 16,862.85	$ 21,470.35	$ 26,077.85	$ 36,675.10	$ 18,235.37	$ 25,146.62	$ 32,057.87	$ 38,969.12	$ 54,864.99	$ 66,614.12	$ 24,215.38	$ 33,430.38	$ 42,645.38	$ 51,860.38	$ 73,054.88	
Total Current Bill	2,898.57	12,115.41	16,723.83	21,332.26	25,940.68	36,540.05	18,033.72	24,946.36	31,858.99	38,771.62	54,670.68	66,422.15	23,952.04	33,168.88	42,385.72	51,602.57	72,801.30	
Increase ($)	$ 141.78	$ 139.94	$ 139.02	$ 138.09	$ 137.17	$ 135.05	$ 201.64	$ 200.26	$ 198.88	$ 197.50	$ 194.32	$ 191.97	$ 263.35	$ 261.50	$ 259.66	$ 257.82	$ 253.58	
Increase (%)	4.89%	1.16%	0.83%	0.65%	0.53%	0.37%	1.12%	0.80%	0.62%	0.51%	0.36%	0.29%	1.10%	0.79%	0.6%	0.5%	0.3%	
Overall Increase (%)	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $270.09	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	
All kW @ $4.16/kW	$ 2,080	$ 2,080	$ 2,080	$ 2,080	$ 2,080	$ 2,080	$ 3,120	$ 3,120	$ 3,120	$ 3,120	$ 3,120	$ 3,120	$ 4,160	$ 4,160	$ 4,160	$ 4,160	$ 4,160	
All rkVA @$ 0.20 /rkVA	$ 48	$ 48	$ 48	$ 48	$ 48	$ 48	$ 73	$ 73	$ 73	$ 73	$ 73	$ 73	$ 97	$ 97	$ 97	$ 97	$ 97	
Sub-Total	$ 2,398	$ 2,398	$ 2,398	$ 2,398	$ 2,398	$ 2,398	$ 3,463	$ 3,463	$ 3,463	$ 3,463	$ 3,463	$ 3,463	$ 4,527	$ 4,527	$ 4,527	$ 4,527	$ 4,527	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 160	$ 160	$ 160	$ 160	$ 160	$ 160	$ 240	$ 240	$ 240	$ 240	$ 240	$ 240	$ 320	$ 320	$ 320	$ 320	$ 320	
TCJA @ -3.910 %	$ (94)	$ (94)	$ (94)	$ (94)	$ (94)	$ (94)	$ (135)	$ (135)	$ (135)	$ (135)	$ (135)	$ (135)	$ (177)	$ (177)	$ (177)	$ (177)	$ (177)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 311	$ 311	$ 311	$ 311	$ 311	$ 311	$ 466	$ 466	$ 466	$ 466	$ 466	$ 466	$ 621	$ 621	$ 621	$ 621	$ 621	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 6	$ 9	$ 12	$ 15	$ 22	$ 9	$ 14	$ 18	$ 23	$ 33	$ 41	$ 12	$ 18	$ 24	$ 30	$ 44	
Sub-Total	$ 383	$ 389	$ 392	$ 395	$ 398	$ 405	$ 586	$ 591	$ 595	$ 600	$ 610	$ 618	$ 783	$ 789	$ 795	$ 801	$ 814	
DSIC @ 4.700 %	$ 116	$ 116	$ 116	$ 116	$ 116	$ 116	$ 168	$ 168	$ 168	$ 168	$ 168	$ 168	$ 220	$ 220	$ 220	$ 220	$ 220	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 9,209	$ 13,814	$ 18,418	$ 23,023	$ 33,613	$ 13,814	$ 20,720	$ 27,627	$ 34,534	$ 50,419	$ 62,161	$ 18,418	$ 27,627	$ 36,836	$ 46,045	$ 67,226	
Sub Total	$ 2,897.99	$ 12,112.99	$ 16,720.49	$ 21,327.99	$ 25,935.49	$ 36,532.74	$ 18,030.12	$ 24,941.37	$ 31,852.62	$ 38,763.87	$ 54,659.74	$ 66,408.87	$ 23,947.25	$ 33,162.25	$ 42,377.25	$ 51,592.25	$ 72,786.75	
STAS @ 0.02 %	$ 0.58	$ 2.42	$ 3.34	$ 4.27	$ 5.19	$ 7.31	$ 3.61	$ 4.99	$ 6.37	$ 7.75	$ 10.93	$ 13.28	$ 4.79	$ 6.63	$ 8.48	$ 10.32	$ 14.56	
Total Bill	**$ 2,898.57**	**$ 12,115.41**	**$ 16,723.83**	**$ 21,332.26**	**$ 25,940.68**	**$ 36,540.05**	**$ 18,033.72**	**$ 24,946.36**	**$ 31,858.99**	**$ 38,771.62**	**$ 54,670.68**	**$ 66,422.15**	**$ 23,952.04**	**$ 33,168.88**	**$ 42,385.72**	**$ 51,602.57**	**$ 72,801.30**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $295.31	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	
All kW @ $4.44/kW	$ 2,222	$ 2,222	$ 2,222	$ 2,222	$ 2,222	$ 2,222	$ 3,333	$ 3,333	$ 3,333	$ 3,333	$ 3,333	$ 3,333	$ 4,443	$ 4,443	$ 4,443	$ 4,443	$ 4,443	
All rkVA @$ 0.22 /rkVA	$ 53	$ 53	$ 53	$ 53	$ 53	$ 53	$ 79	$ 79	$ 79	$ 79	$ 79	$ 79	$ 106	$ 106	$ 106	$ 106	$ 106	
Sub-Total	$ 2,570	$ 2,570	$ 2,570	$ 2,570	$ 2,570	$ 2,570	$ 3,707	$ 3,707	$ 3,707	$ 3,707	$ 3,707	$ 3,707	$ 4,844	$ 4,844	$ 4,844	$ 4,844	$ 4,844	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 160	$ 160	$ 160	$ 160	$ 160	$ 160	$ 240	$ 240	$ 240	$ 240	$ 240	$ 240	$ 320	$ 320	$ 320	$ 320	$ 320	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 311	$ 311	$ 311	$ 311	$ 311	$ 311	$ 466	$ 466	$ 466	$ 466	$ 466	$ 466	$ 621	$ 621	$ 621	$ 621	$ 621	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 6	$ 9	$ 12	$ 15	$ 22	$ 9	$ 14	$ 18	$ 23	$ 33	$ 41	$ 12	$ 18	$ 24	$ 30	$ 44	
Sub-Total	$ 471	$ 477	$ 480	$ 483	$ 486	$ 492	$ 715	$ 719	$ 724	$ 728	$ 739	$ 746	$ 953	$ 959	$ 965	$ 971	$ 985	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 9,209	$ 13,814	$ 18,418	$ 23,023	$ 33,613	$ 13,814	$ 20,720	$ 27,627	$ 34,534	$ 50,419	$ 62,161	$ 18,418	$ 27,627	$ 36,836	$ 46,045	$ 67,226	
Sub Total	$ 3,040.35	$ 12,255.35	$ 16,862.85	$ 21,470.35	$ 26,077.85	$ 36,675.10	$ 18,235.37	$ 25,146.62	$ 32,057.87	$ 38,969.12	$ 54,864.99	$ 66,614.12	$ 24,215.38	$ 33,430.38	$ 42,645.38	$ 51,860.38	$ 73,054.88	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 3,040.35**	**$ 12,255.35**	**$ 16,862.85**	**$ 21,470.35**	**$ 26,077.85**	**$ 36,675.10**	**$ 18,235.37**	**$ 25,146.62**	**$ 32,057.87**	**$ 38,969.12**	**$ 54,864.99**	**$ 66,614.12**	**$ 24,215.38**	**$ 33,430.38**	**$ 42,645.38**	**$ 51,860.38**	**$ 73,054.88**	
% Increase	**4.89%**	**1.16%**	**0.83%**	**0.65%**	**0.53%**	**0.37%**	**1.12%**	**0.80%**	**0.62%**	**0.51%**	**0.36%**	**0.29%**	**1.10%**	**0.79%**	**0.61%**	**0.50%**	**0.35%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730
REACTIVE DEMAND																			
rkVA	725	725	725	725	725	967	967	967	967	1,208	1,208	1,208	1,208	1,450	1,450	1,450	1,450
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000
Total Proposed Bill	$ 8,530.42	$ 22,352.92	$ 49,997.92	$ 77,642.92	$ 109,434.67	$ 29,705.46	$ 66,565.46	$ 103,425.46	$ 145,814.46	$ 37,057.99	$ 83,132.99	$ 129,207.99	$ 182,194.24	$ 44,410.53	$ 99,700.53	$ 154,990.53	$ 218,574.03
Total Current Bill	8,138.13	21,963.40	49,613.93	77,264.45	109,062.56	29,191.60	66,058.97	102,926.34	145,323.82	36,419.80	82,504.02	128,588.23	181,585.08	43,648.01	98,949.06	154,250.12	217,846.34
Increase ($)	$ 392.29	$ 389.52	$ 383.99	$ 378.47	$ 372.11	$ 513.86	$ 506.48	$ 499.11	$ 490.63	$ 638.19	$ 628.97	$ 619.76	$ 609.16	$ 762.52	$ 751.46	$ 740.40	$ 727.69
Increase (%)	4.82%	1.77%	0.77%	0.49%	0.34%	1.76%	0.77%	0.48%	0.34%	1.75%	0.76%	0.48%	0.34%	1.75%	0.8%	0.5%	0.3%
Overall Increase (%)	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%	0.67%
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $270.09	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270	$ 270
All kW @ $4.16/kW	$ 6,240	$ 6,240	$ 6,240	$ 6,240	$ 6,240	$ 8,320	$ 8,320	$ 8,320	$ 8,320	$ 10,400	$ 10,400	$ 10,400	$ 10,400	$ 12,480	$ 12,480	$ 12,480	$ 12,480
All rkVA @$ 0.20 /rkVA	$ 145	$ 145	$ 145	$ 145	$ 145	$ 193	$ 193	$ 193	$ 193	$ 242	$ 242	$ 242	$ 242	$ 290	$ 290	$ 290	$ 290
Sub-Total	$ 6,655	$ 6,655	$ 6,655	$ 6,655	$ 6,655	$ 8,783	$ 8,783	$ 8,783	$ 8,783	$ 10,912	$ 10,912	$ 10,912	$ 10,912	$ 13,040	$ 13,040	$ 13,040	$ 13,040
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 480	$ 480	$ 480	$ 480	$ 480	$ 640	$ 640	$ 640	$ 640	$ 800	$ 800	$ 800	$ 800	$ 960	$ 960	$ 960	$ 960
TCJA @ -3.910 %	$ (260)	$ (260)	$ (260)	$ (260)	$ (260)	$ (343)	$ (343)	$ (343)	$ (343)	$ (427)	$ (427)	$ (427)	$ (427)	$ (510)	$ (510)	$ (510)	$ (510)
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7
Default Service Support Charge @$ 0.621 /kW NSPL	$ 932	$ 932	$ 932	$ 932	$ 932	$ 1,242	$ 1,242	$ 1,242	$ 1,242	$ 1,553	$ 1,553	$ 1,553	$ 1,553	$ 1,863	$ 1,863	$ 1,863	$ 1,863
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131
Sub-Total	$ 1,158	$ 1,167	$ 1,185	$ 1,203	$ 1,224	$ 1,557	$ 1,581	$ 1,605	$ 1,633	$ 1,948	$ 1,978	$ 2,008	$ 2,042	$ 2,338	$ 2,374	$ 2,410	$ 2,451
DSIC @ 4.700 %	$ 323	$ 323	$ 323	$ 323	$ 323	$ 427	$ 427	$ 427	$ 427	$ 531	$ 531	$ 531	$ 531	$ 634	$ 634	$ 634	$ 634
PTC/HPS Charge																			
All kWh @ $ 0.09209 /kWh	$ -	$ 13,814	$ 41,441	$ 69,068	$ 100,839	$ 18,418	$ 55,254	$ 92,090	$ 134,451	$ 23,023	$ 69,068	$ 115,113	$ 168,064	$ 27,627	$ 82,881	$ 138,135	$ 201,677
Sub Total	$ 8,136.51	$ 21,959.01	$ 49,604.01	$ 77,249.01	$ 109,040.76	$ 29,185.76	$ 66,045.76	$ 102,905.76	$ 145,294.76	$ 36,412.52	$ 82,487.52	$ 128,562.52	$ 181,548.77	$ 43,639.28	$ 98,929.28	$ 154,219.28	$ 217,802.78
STAS @ 0.02 %	$ 1.63	$ 4.39	$ 9.92	$ 15.45	$ 21.81	$ 5.84	$ 13.21	$ 20.58	$ 29.06	$ 7.28	$ 16.50	$ 25.71	$ 36.31	$ 8.73	$ 19.79	$ 30.84	$ 43.56
Total Bill	**$ 8,138.13**	**$ 21,963.40**	**$ 49,613.93**	**$ 77,264.45**	**$ 109,062.56**	**$ 29,191.60**	**$ 66,058.97**	**$ 102,926.34**	**$ 145,323.82**	**$ 36,419.80**	**$ 82,504.02**	**$ 128,588.23**	**$ 181,585.08**	**$ 43,648.01**	**$ 98,949.06**	**$ 154,250.12**	**$ 217,846.34**
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $295.31	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295	$ 295
All kW @ $4.44/kW	$ 6,665	$ 6,665	$ 6,665	$ 6,665	$ 6,665	$ 8,887	$ 8,887	$ 8,887	$ 8,887	$ 11,108	$ 11,108	$ 11,108	$ 11,108	$ 13,330	$ 13,330	$ 13,330	$ 13,330
All rkVA @$ 0.22 /rkVA	$ 159	$ 159	$ 159	$ 159	$ 159	$ 211	$ 211	$ 211	$ 211	$ 264	$ 264	$ 264	$ 264	$ 317	$ 317	$ 317	$ 317
Sub-Total	$ 7,119	$ 7,119	$ 7,119	$ 7,119	$ 7,119	$ 9,393	$ 9,393	$ 9,393	$ 9,393	$ 11,668	$ 11,668	$ 11,668	$ 11,668	$ 13,943	$ 13,943	$ 13,943	$ 13,943
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 480	$ 480	$ 480	$ 480	$ 480	$ 640	$ 640	$ 640	$ 640	$ 800	$ 800	$ 800	$ 800	$ 960	$ 960	$ 960	$ 960
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @$ 0.621 /kW NSPL	$ 932	$ 932	$ 932	$ 932	$ 932	$ 1,242	$ 1,242	$ 1,242	$ 1,242	$ 1,553	$ 1,553	$ 1,553	$ 1,553	$ 1,863	$ 1,863	$ 1,863	$ 1,863
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131
Sub-Total	$ 1,412	$ 1,421	$ 1,439	$ 1,457	$ 1,477	$ 1,894	$ 1,918	$ 1,942	$ 1,970	$ 2,368	$ 2,398	$ 2,428	$ 2,462	$ 2,841	$ 2,877	$ 2,913	$ 2,954
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																			
All kWh @ $ 0.09209 /kWh	$ -	$ 13,814	$ 41,441	$ 69,068	$ 100,839	$ 18,418	$ 55,254	$ 92,090	$ 134,451	$ 23,023	$ 69,068	$ 115,113	$ 168,064	$ 27,627	$ 82,881	$ 138,135	$ 201,677
Sub Total	$ 8,530.42	$ 22,352.92	$ 49,997.92	$ 77,642.92	$ 109,434.67	$ 29,705.46	$ 66,565.46	$ 103,425.46	$ 145,814.46	$ 37,057.99	$ 83,132.99	$ 129,207.99	$ 182,194.24	$ 44,410.53	$ 99,700.53	$ 154,990.53	$ 218,574.03
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 8,530.42**	**$ 22,352.92**	**$ 49,997.92**	**$ 77,642.92**	**$ 109,434.67**	**$ 29,705.46**	**$ 66,565.46**	**$ 103,425.46**	**$ 145,814.46**	**$ 37,057.99**	**$ 83,132.99**	**$ 129,207.99**	**$ 182,194.24**	**$ 44,410.53**	**$ 99,700.53**	**$ 154,990.53**	**$ 218,574.03**
% Increase	**4.82%**	**1.77%**	**0.77%**	**0.49%**	**0.34%**	**1.76%**	**0.77%**	**0.48%**	**0.34%**	**1.75%**	**0.76%**	**0.48%**	**0.34%**	**1.75%**	**0.76%**	**0.48%**	**0.33%**

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 25 - 150 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25	25	25	25	25	50	50	50	50	100	100	100	100	150	150	150	150	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	4	4	4	4	4	7	7	7	7	14	14	14	14	22	22	22	22	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500	
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500	
Total Proposed Bill	$ 1,131.17	$ 1,361.54	$ 1,822.29	$ 2,283.04	$ 2,812.90	$ 1,693.99	$ 2,615.49	$ 3,536.99	$ 4,596.72	$ 2,358.90	$ 4,201.90	$ 6,044.90	$ 8,164.35	$ 3,023.81	$ 5,788.31	$ 8,552.81	$ 11,731.98	
Total Current Bill	1,064.09	1,294.51	1,755.36	2,216.20	2,746.17	1,624.53	2,546.22	3,467.90	4,527.84	2,284.57	4,127.94	5,971.31	8,091.18	2,944.61	5,709.66	8,474.71	11,654.52	
Increase ($)	$ 67.07	$ 67.03	$ 66.93	$ 66.84	$ 66.74	$ 69.46	$ 69.28	$ 69.09	$ 68.88	$ 74.33	$ 73.96	$ 73.60	$ 73.17	$ 79.20	$ 78.65	$ 78.10	$ 77.46	
Increase (%)	6.30%	5.18%	3.81%	3.02%	2.43%	4.28%	2.72%	1.99%	1.52%	3.25%	1.79%	1.23%	0.90%	2.69%	1.4%	0.9%	0.7%	
Overall Increase (%)	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $951.53	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	
All kW @ $2.98/kW	$ 75	$ 75	$ 75	$ 75	$ 75	$ 149	$ 149	$ 149	$ 149	$ 298	$ 298	$ 298	$ 298	$ 447	$ 447	$ 447	$ 447	
All rkVA @$ 0.20 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 3	$ 3	$ 3	$ 3	$ 4	$ 4	$ 4	$ 4	
Sub-Total	$ 1,027	$ 1,027	$ 1,027	$ 1,027	$ 1,027	$ 1,102	$ 1,102	$ 1,102	$ 1,102	$ 1,252	$ 1,252	$ 1,252	$ 1,252	$ 1,403	$ 1,403	$ 1,403	$ 1,403	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8	$ 8	$ 8	$ 8	$ 8	$ 16	$ 16	$ 16	$ 16	$ 32	$ 32	$ 32	$ 32	$ 48	$ 48	$ 48	$ 48	
TCJA @ -3.910 %	$ (40)	$ (40)	$ (40)	$ (40)	$ (40)	$ (43)	$ (43)	$ (43)	$ (43)	$ (49)	$ (49)	$ (49)	$ (49)	$ (55)	$ (55)	$ (55)	$ (55)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 16	$ 16	$ 16	$ 16	$ 16	$ 31	$ 31	$ 31	$ 31	$ 62	$ 62	$ 62	$ 62	$ 93	$ 93	$ 93	$ 93	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 1	$ 2	$ 3	$ 4	$ 1	$ 3	$ 5	$ 7	
Sub-Total	$ (10)	$ (10)	$ (9)	$ (9)	$ (9)	$ 11	$ 12	$ 12	$ 13	$ 52	$ 54	$ 55	$ 56	$ 94	$ 96	$ 97	$ 100	
DSIC @ 4.700 %	$ 47	$ 47	$ 47	$ 47	$ 47	$ 51	$ 51	$ 51	$ 51	$ 58	$ 58	$ 58	$ 58	$ 66	$ 66	$ 66	$ 66	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230	$ 691	$ 1,151	$ 1,681	$ 460	$ 1,381	$ 2,302	$ 3,361	$ 921	$ 2,763	$ 4,605	$ 6,723	$ 1,381	$ 4,144	$ 6,907	$ 10,084	
Sub Total	$ 1,063.88	$ 1,294.26	$ 1,755.01	$ 2,215.76	$ 2,745.62	$ 1,624.21	$ 2,545.71	$ 3,467.21	$ 4,526.93	$ 2,284.11	$ 4,127.11	$ 5,970.11	$ 8,089.56	$ 2,944.02	$ 5,708.52	$ 8,473.02	$ 11,652.19	
STAS @ 0.02 %	$ 0.21	$ 0.26	$ 0.35	$ 0.44	$ 0.55	$ 0.32	$ 0.51	$ 0.69	$ 0.91	$ 0.46	$ 0.83	$ 1.19	$ 1.62	$ 0.59	$ 1.14	$ 1.69	$ 2.33	
Total Bill	**$ 1,064.09**	**$ 1,294.51**	**$ 1,755.36**	**$ 2,216.20**	**$ 2,746.17**	**$ 1,624.53**	**$ 2,546.22**	**$ 3,467.90**	**$ 4,527.84**	**$ 2,284.57**	**$ 4,127.94**	**$ 5,971.31**	**$ 8,091.18**	**$ 2,944.61**	**$ 5,709.66**	**$ 8,474.71**	**$ 11,654.52**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,029.09	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	
All kW @ $3.11/kW	$ 78	$ 78	$ 78	$ 78	$ 78	$ 156	$ 156	$ 156	$ 156	$ 311	$ 311	$ 311	$ 311	$ 467	$ 467	$ 467	$ 467	
All rkVA @$ 0.22 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	
Sub-Total	$ 1,108	$ 1,108	$ 1,108	$ 1,108	$ 1,108	$ 1,186	$ 1,186	$ 1,186	$ 1,186	$ 1,343	$ 1,343	$ 1,343	$ 1,343	$ 1,500	$ 1,500	$ 1,500	$ 1,500	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8	$ 8	$ 8	$ 8	$ 8	$ 16	$ 16	$ 16	$ 16	$ 32	$ 32	$ 32	$ 32	$ 48	$ 48	$ 48	$ 48	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 16	$ 16	$ 16	$ 16	$ 16	$ 31	$ 31	$ 31	$ 31	$ 62	$ 62	$ 62	$ 62	$ 93	$ 93	$ 93	$ 93	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 1	$ 2	$ 3	$ 4	$ 1	$ 3	$ 5	$ 7	
Sub-Total	$ 24	$ 24	$ 24	$ 24	$ 25	$ 47	$ 48	$ 49	$ 49	$ 95	$ 96	$ 97	$ 98	$ 142	$ 144	$ 146	$ 148	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230	$ 691	$ 1,151	$ 1,681	$ 460	$ 1,381	$ 2,302	$ 3,361	$ 921	$ 2,763	$ 4,605	$ 6,723	$ 1,381	$ 4,144	$ 6,907	$ 10,084	
Sub Total	$ 1,131.17	$ 1,361.54	$ 1,822.29	$ 2,283.04	$ 2,812.90	$ 1,693.99	$ 2,615.49	$ 3,536.99	$ 4,596.72	$ 2,358.90	$ 4,201.90	$ 6,044.90	$ 8,164.35	$ 3,023.81	$ 5,788.31	$ 8,552.81	$ 11,731.98	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 1,131.17**	**$ 1,361.54**	**$ 1,822.29**	**$ 2,283.04**	**$ 2,812.90**	**$ 1,693.99**	**$ 2,615.49**	**$ 3,536.99**	**$ 4,596.72**	**$ 2,358.90**	**$ 4,201.90**	**$ 6,044.90**	**$ 8,164.35**	**$ 3,023.81**	**$ 5,788.31**	**$ 8,552.81**	**$ 11,731.98**	
% Increase	**6.30%**	**5.18%**	**3.81%**	**3.02%**	**2.43%**	**4.28%**	**2.72%**	**1.99%**	**1.52%**	**3.25%**	**1.79%**	**1.23%**	**0.90%**	**2.69%**	**1.38%**	**0.92%**	**0.66%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 250 - 1,000 KW
At Average Levels of kWh Use

KW Demand																	
Total kW	250	250	250	250	250	500	500	500	500	750	750	750	750	1,000	1,000	1,000	1,000
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730
REACTIVE DEMAND																	
rkVA	36	36	36	36	36	72	72	72	72	108	108	108	108	144	144	144	144
ENERGY USAGE																	
Monthly Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000
Total Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000
Total Proposed Bill	$ 2,049.87	$ 4,353.62	$ 8,961.12	$ 13,568.62	$ 18,867.25	$ 7,678.16	$ 16,893.16	$ 26,108.16	$ 36,705.41	$ 11,002.69	$ 24,825.19	$ 38,647.69	$ 54,543.57	$ 14,327.23	$ 32,757.23	$ 51,187.23	$ 72,381.73
Total Current Bill	1,960.47	4,264.68	8,873.10	13,481.52	18,781.21	7,564.86	16,781.71	25,998.55	36,597.92	10,865.05	24,690.31	38,515.57	54,414.63	14,165.23	32,598.92	51,032.60	72,231.34
Increase ($)	$ 89.40	$ 88.94	$ 88.02	$ 87.10	$ 86.04	$ 113.30	$ 111.45	$ 109.61	$ 107.49	$ 137.65	$ 134.88	$ 132.12	$ 128.94	$ 162.00	$ 158.31	$ 154.63	$ 150.39
Increase (%)	4.56%	2.09%	0.99%	0.65%	0.46%	1.50%	0.66%	0.42%	0.29%	1.27%	0.55%	0.34%	0.24%	1.14%	0.5%	0.3%	0.2%
Overall Increase (%)	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $951.53	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952
All kW @ $2.98/kW	$ 745	$ 745	$ 745	$ 745	$ 745	$ 1,490	$ 1,490	$ 1,490	$ 1,490	$ 2,235	$ 2,235	$ 2,235	$ 2,235	$ 2,980	$ 2,980	$ 2,980	$ 2,980
All rkVA @$ 0.20 /rkVA	$ 7	$ 7	$ 7	$ 7	$ 7	$ 14	$ 14	$ 14	$ 14	$ 22	$ 22	$ 22	$ 22	$ 29	$ 29	$ 29	$ 29
Sub-Total	$ 1,704	$ 1,704	$ 1,704	$ 1,704	$ 1,704	$ 2,456	$ 2,456	$ 2,456	$ 2,456	$ 3,208	$ 3,208	$ 3,208	$ 3,208	$ 3,960	$ 3,960	$ 3,960	$ 3,960
Riders																	
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 80	$ 80	$ 80	$ 80	$ 80	$ 160	$ 160	$ 160	$ 160	$ 240	$ 240	$ 240	$ 240	$ 320	$ 320	$ 320	$ 320
TCJA @ -3.910 %	$ (67)	$ (67)	$ (67)	$ (67)	$ (67)	$ (96)	$ (96)	$ (96)	$ (96)	$ (125)	$ (125)	$ (125)	$ (125)	$ (155)	$ (155)	$ (155)	$ (155)
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7
Default Service Support Charge @$ 0.621 /kW NSPL	$ 155	$ 155	$ 155	$ 155	$ 155	$ 311	$ 311	$ 311	$ 311	$ 466	$ 466	$ 466	$ 466	$ 621	$ 621	$ 621	$ 621
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 5	$ 8	$ 11	$ 3	$ 9	$ 15	$ 22	$ 5	$ 14	$ 23	$ 33	$ 6	$ 18	$ 30	$ 44
Sub-Total	$ 175	$ 177	$ 180	$ 183	$ 186	$ 384	$ 390	$ 396	$ 403	$ 592	$ 601	$ 610	$ 620	$ 799	$ 811	$ 823	$ 837
DSIC @ 4.700 %	$ 81	$ 81	$ 81	$ 81	$ 81	$ 119	$ 119	$ 119	$ 119	$ 156	$ 156	$ 156	$ 156	$ 194	$ 194	$ 194	$ 194
PTC/HPS Charge																	
All kWh @ $ 0.09209 /kWh	$ -	$ 2,302	$ 6,907	$ 11,511	$ 16,806	$ 4,605	$ 13,814	$ 23,023	$ 33,613	$ 6,907	$ 20,720	$ 34,534	$ 50,419	$ 9,209	$ 27,627	$ 46,045	$ 67,226
Sub Total	$ 1,960.08	$ 4,263.83	$ 8,871.33	$ 13,478.83	$ 18,777.45	$ 7,563.35	$ 16,778.35	$ 25,993.35	$ 36,590.60	$ 10,862.87	$ 24,685.37	$ 38,507.87	$ 54,403.75	$ 14,162.40	$ 32,592.40	$ 51,022.40	$ 72,216.90
STAS @ 0.02 %	$ 0.39	$ 0.85	$ 1.77	$ 2.70	$ 3.76	$ 1.51	$ 3.36	$ 5.20	$ 7.32	$ 2.17	$ 4.94	$ 7.70	$ 10.88	$ 2.83	$ 6.52	$ 10.20	$ 14.44
Total Bill	**$ 1,960.47**	**$ 4,264.68**	**$ 8,873.10**	**$ 13,481.52**	**$ 18,781.21**	**$ 7,564.86**	**$ 16,781.71**	**$ 25,998.55**	**$ 36,597.92**	**$ 10,865.05**	**$ 24,690.31**	**$ 38,515.57**	**$ 54,414.63**	**$ 14,165.23**	**$ 32,598.92**	**$ 51,032.60**	**$ 72,231.34**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $1,029.09	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029
All kW @ $3.11/kW	$ 778	$ 778	$ 778	$ 778	$ 778	$ 1,555	$ 1,555	$ 1,555	$ 1,555	$ 2,333	$ 2,333	$ 2,333	$ 2,333	$ 3,111	$ 3,111	$ 3,111	$ 3,111
All rkVA @$ 0.22 /rkVA	$ 8	$ 8	$ 8	$ 8	$ 8	$ 16	$ 16	$ 16	$ 16	$ 23	$ 23	$ 23	$ 23	$ 31	$ 31	$ 31	$ 31
Sub-Total	$ 1,815	$ 1,815	$ 1,815	$ 1,815	$ 1,815	$ 2,600	$ 2,600	$ 2,600	$ 2,600	$ 3,386	$ 3,386	$ 3,386	$ 3,386	$ 4,171	$ 4,171	$ 4,171	$ 4,171
Riders																	
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 80	$ 80	$ 80	$ 80	$ 80	$ 160	$ 160	$ 160	$ 160	$ 240	$ 240	$ 240	$ 240	$ 320	$ 320	$ 320	$ 320
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @$ 0.621 /kW NSPL	$ 155	$ 155	$ 155	$ 155	$ 155	$ 311	$ 311	$ 311	$ 311	$ 466	$ 466	$ 466	$ 466	$ 621	$ 621	$ 621	$ 621
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 5	$ 8	$ 11	$ 3	$ 9	$ 15	$ 22	$ 5	$ 14	$ 23	$ 33	$ 6	$ 18	$ 30	$ 44
Sub-Total	$ 235	$ 237	$ 240	$ 243	$ 246	$ 474	$ 480	$ 486	$ 492	$ 710	$ 719	$ 728	$ 739	$ 947	$ 959	$ 971	$ 985
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.09209 /kWh	$ -	$ 2,302	$ 6,907	$ 11,511	$ 16,806	$ 4,605	$ 13,814	$ 23,023	$ 33,613	$ 6,907	$ 20,720	$ 34,534	$ 50,419	$ 9,209	$ 27,627	$ 46,045	$ 67,226
Sub Total	$ 2,049.87	$ 4,353.62	$ 8,961.12	$ 13,568.62	$ 18,867.25	$ 7,678.16	$ 16,893.16	$ 26,108.16	$ 36,705.41	$ 11,002.69	$ 24,825.19	$ 38,647.69	$ 54,543.57	$ 14,327.23	$ 32,757.23	$ 51,187.23	$ 72,381.73
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 2,049.87**	**$ 4,353.62**	**$ 8,961.12**	**$ 13,568.62**	**$ 18,867.25**	**$ 7,678.16**	**$ 16,893.16**	**$ 26,108.16**	**$ 36,705.41**	**$ 11,002.69**	**$ 24,825.19**	**$ 38,647.69**	**$ 54,543.57**	**$ 14,327.23**	**$ 32,757.23**	**$ 51,187.23**	**$ 72,381.73**
% Increase	**4.56%**	**2.09%**	**0.99%**	**0.65%**	**0.46%**	**1.50%**	**0.66%**	**0.42%**	**0.29%**	**1.27%**	**0.55%**	**0.34%**	**0.24%**	**1.14%**	**0.49%**	**0.30%**	**0.21%**

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	216	216	216	216	216	288	288	288	288	360	360	360	360	432	432	432	432	
ENERGY USAGE																		
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Proposed Bill	$ 7,153.80	$ 20,976.30	$ 48,621.30	$ 76,266.30	$ 108,058.05	$ 27,625.37	$ 64,485.37	$ 101,345.37	$ 143,734.37	$ 34,274.44	$ 80,349.44	$ 126,424.44	$ 179,410.69	$ 40,923.51	$ 96,213.51	$ 151,503.51	$ 215,087.01	
Total Current Bill	6,940.33	20,765.60	48,416.12	76,066.65	107,864.76	27,365.96	64,233.33	101,100.71	143,498.18	33,966.33	80,050.54	126,134.76	179,131.61	40,566.70	95,867.75	151,168.81	214,765.03	
Increase ($)	$ 213.47	$ 210.70	$ 205.17	$ 199.64	$ 193.29	$ 259.41	$ 252.03	$ 244.66	$ 236.18	$ 308.11	$ 298.89	$ 289.68	$ 279.08	$ 356.81	$ 345.75	$ 334.70	$ 321.98	
Increase (%)	3.08%	1.01%	0.42%	0.26%	0.18%	0.95%	0.39%	0.24%	0.16%	0.91%	0.37%	0.23%	0.16%	0.88%	0.4%	0.2%	0.1%	
Overall Increase (%)	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	0.38%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $951.53	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	$ 952	
All kW @ $2.98/kW	$ 4,470	$ 4,470	$ 4,470	$ 4,470	$ 4,470	$ 5,960	$ 5,960	$ 5,960	$ 5,960	$ 7,450	$ 7,450	$ 7,450	$ 7,450	$ 8,940	$ 8,940	$ 8,940	$ 8,940	
All rkVA @$ 0.20 /rkVA	$ 43	$ 43	$ 43	$ 43	$ 43	$ 58	$ 58	$ 58	$ 58	$ 72	$ 72	$ 72	$ 72	$ 86	$ 86	$ 86	$ 86	
Sub-Total	$ 5,465	$ 5,465	$ 5,465	$ 5,465	$ 5,465	$ 6,969	$ 6,969	$ 6,969	$ 6,969	$ 8,474	$ 8,474	$ 8,474	$ 8,474	$ 9,978	$ 9,978	$ 9,978	$ 9,978	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 480	$ 480	$ 480	$ 480	$ 480	$ 640	$ 640	$ 640	$ 640	$ 800	$ 800	$ 800	$ 800	$ 960	$ 960	$ 960	$ 960	
TCJA @ -3.910 %	$ (214)	$ (214)	$ (214)	$ (214)	$ (214)	$ (272)	$ (272)	$ (272)	$ (272)	$ (331)	$ (331)	$ (331)	$ (331)	$ (390)	$ (390)	$ (390)	$ (390)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 932	$ 932	$ 932	$ 932	$ 932	$ 1,242	$ 1,242	$ 1,242	$ 1,242	$ 1,553	$ 1,553	$ 1,553	$ 1,553	$ 1,863	$ 1,863	$ 1,863	$ 1,863	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131	
Sub-Total	$ 1,205	$ 1,214	$ 1,232	$ 1,250	$ 1,270	$ 1,628	$ 1,652	$ 1,676	$ 1,704	$ 2,043	$ 2,073	$ 2,103	$ 2,137	$ 2,458	$ 2,494	$ 2,530	$ 2,571	
DSIC @ 4.700 %	$ 270	$ 270	$ 270	$ 270	$ 270	$ 345	$ 345	$ 345	$ 345	$ 421	$ 421	$ 421	$ 421	$ 496	$ 496	$ 496	$ 496	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 13,814	$ 41,441	$ 69,068	$ 100,839	$ 18,418	$ 55,254	$ 92,090	$ 134,451	$ 23,023	$ 69,068	$ 115,113	$ 168,064	$ 27,627	$ 82,881	$ 138,135	$ 201,677	
Sub Total	$ 6,938.94	$ 20,761.44	$ 48,406.44	$ 76,051.44	$ 107,843.19	$ 27,360.49	$ 64,220.49	$ 101,080.49	$ 143,469.49	$ 33,959.54	$ 80,034.54	$ 126,109.54	$ 179,095.79	$ 40,558.58	$ 95,848.58	$ 151,138.58	$ 214,722.08	
STAS @ 0.02 %	$ 1.39	$ 4.15	$ 9.68	$ 15.21	$ 21.57	$ 5.47	$ 12.84	$ 20.22	$ 28.69	$ 6.79	$ 16.01	$ 25.22	$ 35.82	$ 8.11	$ 19.17	$ 30.23	$ 42.94	
Total Bill	**$ 6,940.33**	**$ 20,765.60**	**$ 48,416.12**	**$ 76,066.65**	**$ 107,864.76**	**$ 27,365.96**	**$ 64,233.33**	**$ 101,100.71**	**$ 143,498.18**	**$ 33,966.33**	**$ 80,050.54**	**$ 126,134.76**	**$ 179,131.61**	**$ 40,566.70**	**$ 95,867.75**	**$ 151,168.81**	**$ 214,765.03**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,029.09	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	$ 1,029	
All kW @ $3.11/kW	$ 4,666	$ 4,666	$ 4,666	$ 4,666	$ 4,666	$ 6,222	$ 6,222	$ 6,222	$ 6,222	$ 7,777	$ 7,777	$ 7,777	$ 7,777	$ 9,333	$ 9,333	$ 9,333	$ 9,333	
All rkVA @$ 0.22 /rkVA	$ 47	$ 47	$ 47	$ 47	$ 47	$ 62	$ 62	$ 62	$ 62	$ 78	$ 78	$ 78	$ 78	$ 93	$ 93	$ 93	$ 93	
Sub-Total	$ 5,742	$ 5,742	$ 5,742	$ 5,742	$ 5,742	$ 7,313	$ 7,313	$ 7,313	$ 7,313	$ 8,884	$ 8,884	$ 8,884	$ 8,884	$ 10,456	$ 10,456	$ 10,456	$ 10,456	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 480	$ 480	$ 480	$ 480	$ 480	$ 640	$ 640	$ 640	$ 640	$ 800	$ 800	$ 800	$ 800	$ 960	$ 960	$ 960	$ 960	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 932	$ 932	$ 932	$ 932	$ 932	$ 1,242	$ 1,242	$ 1,242	$ 1,242	$ 1,553	$ 1,553	$ 1,553	$ 1,553	$ 1,863	$ 1,863	$ 1,863	$ 1,863	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131	
Sub-Total	$ 1,412	$ 1,421	$ 1,439	$ 1,457	$ 1,477	$ 1,894	$ 1,918	$ 1,942	$ 1,970	$ 2,368	$ 2,398	$ 2,428	$ 2,462	$ 2,841	$ 2,877	$ 2,913	$ 2,954	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 13,814	$ 41,441	$ 69,068	$ 100,839	$ 18,418	$ 55,254	$ 92,090	$ 134,451	$ 23,023	$ 69,068	$ 115,113	$ 168,064	$ 27,627	$ 82,881	$ 138,135	$ 201,677	
Sub Total	$ 7,153.80	$ 20,976.30	$ 48,621.30	$ 76,266.30	$ 108,058.05	$ 27,625.37	$ 64,485.37	$ 101,345.37	$ 143,734.37	$ 34,274.44	$ 80,349.44	$ 126,424.44	$ 179,410.69	$ 40,923.51	$ 96,213.51	$ 151,503.51	$ 215,087.01	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 7,153.80**	**$ 20,976.30**	**$ 48,621.30**	**$ 76,266.30**	**$ 108,058.05**	**$ 27,625.37**	**$ 64,485.37**	**$ 101,345.37**	**$ 143,734.37**	**$ 34,274.44**	**$ 80,349.44**	**$ 126,424.44**	**$ 179,410.69**	**$ 40,923.51**	**$ 96,213.51**	**$ 151,503.51**	**$ 215,087.01**	
% Increase	**3.08%**	**1.01%**	**0.42%**	**0.26%**	**0.18%**	**0.95%**	**0.39%**	**0.24%**	**0.16%**	**0.91%**	**0.37%**	**0.23%**	**0.16%**	**0.88%**	**0.36%**	**0.22%**	**0.15%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
ENERGY USAGE																			
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000		
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000		
Total Proposed Bill	$ 14,890.64	$ 60,965.64	$ 153,115.64	$ 245,265.64	$ 351,238.14	$ 116,199.58	$ 300,499.58	$ 484,799.58	$ 696,744.58	$ 171,433.53	$ 447,883.53	$ 724,333.53	$ 1,042,251.03	$ 226,667.48	$ 595,267.48	$ 963,867.48	$ 1,387,757.48		
Total Current Bill	14,410.71	60,494.92	152,663.35	244,831.78	350,825.48	115,898.32	300,235.18	484,572.04	696,559.43	171,301.72	447,807.01	724,312.30	1,042,293.38	226,705.12	595,378.84	964,052.56	1,388,027.33		
Increase ($)	$ 479.93	$ 470.71	$ 452.28	$ 433.85	$ 412.66	$ 301.26	$ 264.40	$ 227.54	$ 185.15	$ 131.81	$ 76.52	$ 21.23	$ (42.35)	$ (37.64)	$ (111.36)	$ (185.08)	$ (269.86)		
Increase (%)	3.33%	0.78%	0.30%	0.18%	0.12%	0.26%	0.09%	0.05%	0.03%	0.08%	0.02%	0.00%	0.00%	-0.02%	0.0%	0.0%	0.0%		
Overall Increase (%)	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $5,290.68	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291		
All kW @ $0.96/kW	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 9,600	$ 9,600	$ 9,600	$ 9,600	$ 14,400	$ 14,400	$ 14,400	$ 14,400	$ 19,200	$ 19,200	$ 19,200	$ 19,200		
Sub-Total	$ 10,091	$ 10,091	$ 10,091	$ 10,091	$ 10,091	$ 14,891	$ 14,891	$ 14,891	$ 14,891	$ 19,691	$ 19,691	$ 19,691	$ 19,691	$ 24,491	$ 24,491	$ 24,491	$ 24,491		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 3,200	$ 3,200	$ 3,200	$ 3,200	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 6,400	$ 6,400	$ 6,400	$ 6,400		
TCJA @ -3.910 %	$ (395)	$ (395)	$ (395)	$ (395)	$ (395)	$ (582)	$ (582)	$ (582)	$ (582)	$ (770)	$ (770)	$ (770)	$ (770)	$ (958)	$ (958)	$ (958)	$ (958)		
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7		
Default Service Support Charge @ $ 0.621 /kW NSPL	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 6,210	$ 6,210	$ 6,210	$ 6,210	$ 9,315	$ 9,315	$ 9,315	$ 9,315	$ 12,420	$ 12,420	$ 12,420	$ 12,420		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876		
Sub-Total	$ 4,317	$ 4,347	$ 4,407	$ 4,467	$ 4,536	$ 8,894	$ 9,014	$ 9,134	$ 9,272	$ 13,442	$ 13,622	$ 13,802	$ 14,009	$ 17,989	$ 18,229	$ 18,469	$ 18,745		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.09209 /kWh	$ -	$ 46,045	$ 138,135	$ 230,225	$ 336,129	$ 92,090	$ 276,270	$ 460,450	$ 672,257	$ 138,135	$ 414,405	$ 690,675	$ 1,008,386	$ 184,180	$ 552,540	$ 920,900	$ 1,344,514		
Sub Total	$ 14,408	$ 60,483	$ 152,633	$ 244,783	$ 350,755	$ 115,875	$ 300,175	$ 484,475	$ 696,420	$ 171,267	$ 447,717	$ 724,167	$ 1,042,085	$ 226,660	$ 595,260	$ 963,860	$ 1,387,750		
STAS @ 0.02 %	$ 3	$ 12	$ 31	$ 49	$ 70	$ 23	$ 60	$ 97	$ 139	$ 34	$ 90	$ 145	$ 208	$ 45	$ 119	$ 193	$ 278		
Total Bill	**$ 14,411**	**$ 60,495**	**$ 152,663**	**$ 244,832**	**$ 350,825**	**$ 115,898**	**$ 300,235**	**$ 484,572**	**$ 696,559**	**$ 171,302**	**$ 447,807**	**$ 724,312**	**$ 1,042,293**	**$ 226,705**	**$ 595,379**	**$ 964,053**	**$ 1,388,027**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $5,731.69	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732		
All kW @ $0.89/kW	$ 4,454	$ 4,454	$ 4,454	$ 4,454	$ 4,454	$ 8,908	$ 8,908	$ 8,908	$ 8,908	$ 13,362	$ 13,362	$ 13,362	$ 13,362	$ 17,816	$ 17,816	$ 17,816	$ 17,816		
Sub-Total	$ 10,186	$ 10,186	$ 10,186	$ 10,186	$ 10,186	$ 14,640	$ 14,640	$ 14,640	$ 14,640	$ 19,094	$ 19,094	$ 19,094	$ 19,094	$ 23,547	$ 23,547	$ 23,547	$ 23,547		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 3,200	$ 3,200	$ 3,200	$ 3,200	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 6,400	$ 6,400	$ 6,400	$ 6,400		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 0.621 /kW NSPL	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 6,210	$ 6,210	$ 6,210	$ 6,210	$ 9,315	$ 9,315	$ 9,315	$ 9,315	$ 12,420	$ 12,420	$ 12,420	$ 12,420		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876		
Sub-Total	$ 4,705	$ 4,735	$ 4,795	$ 4,855	$ 4,924	$ 9,470	$ 9,590	$ 9,710	$ 9,848	$ 14,205	$ 14,385	$ 14,565	$ 14,772	$ 18,940	$ 19,180	$ 19,420	$ 19,696		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.09209 /kWh	$ -	$ 46,045	$ 138,135	$ 230,225	$ 336,129	$ 92,090	$ 276,270	$ 460,450	$ 672,257	$ 138,135	$ 414,405	$ 690,675	$ 1,008,386	$ 184,180	$ 552,540	$ 920,900	$ 1,344,514		
Sub Total	$ 14,891	$ 60,966	$ 153,116	$ 245,266	$ 351,238	$ 116,200	$ 300,500	$ 484,800	$ 696,745	$ 171,434	$ 447,884	$ 724,334	$ 1,042,251	$ 226,667	$ 595,267	$ 963,867	$ 1,387,757		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 14,891**	**$ 60,966**	**$ 153,116**	**$ 245,266**	**$ 351,238**	**$ 116,200**	**$ 300,500**	**$ 484,800**	**$ 696,745**	**$ 171,434**	**$ 447,884**	**$ 724,334**	**$ 1,042,251**	**$ 226,667**	**$ 595,267**	**$ 963,867**	**$ 1,387,757**		
% Increase	**3.33%**	**0.78%**	**0.30%**	**0.18%**	**0.12%**	**0.26%**	**0.09%**	**0.05%**	**0.03%**	**0.08%**	**0.02%**	**0.00%**	**0.00%**	**-0.02%**	**-0.02%**	**-0.02%**	**-0.02%**		

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP - 115 KV OR GREATER DISCOUNT
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Proposed Bill	$ 11,410.99	$ 57,485.99	$ 149,635.99	$ 241,785.99	$ 347,758.49	$ 109,240.29	$ 293,540.29	$ 477,840.29	$ 689,785.29	$ 160,994.59	$ 437,444.59	$ 713,894.59	$ 1,031,812.09	$ 212,748.89	$ 581,348.89	$ 949,948.89	$ 1,373,838.89	
Total Current Bill	10,806.61	56,890.83	149,059.26	241,227.69	347,221.38	108,690.13	293,026.99	477,363.85	689,351.24	160,489.43	436,994.72	713,500.01	1,031,481.09	212,288.73	580,962.45	949,636.17	1,373,610.95	
Increase ($)	$ 604.38	$ 595.16	$ 576.73	$ 558.30	$ 537.11	$ 550.16	$ 513.30	$ 476.44	$ 434.05	$ 505.16	$ 449.87	$ 394.58	$ 331.00	$ 460.16	$ 386.44	$ 312.72	$ 227.94	
Increase (%)	5.59%	1.05%	0.39%	0.23%	0.15%	0.51%	0.18%	0.10%	0.06%	0.31%	0.10%	0.06%	0.03%	0.22%	0.1%	0.0%	0.0%	
Overall Increase (%)	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $5,290.68	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	
All kW @ $0.21/kW	$ 1,050	$ 1,050	$ 1,050	$ 1,050	$ 1,050	$ 2,100	$ 2,100	$ 2,100	$ 2,100	$ 3,150	$ 3,150	$ 3,150	$ 3,150	$ 4,200	$ 4,200	$ 4,200	$ 4,200	
Sub-Total	$ 6,341	$ 6,341	$ 6,341	$ 6,341	$ 6,341	$ 7,391	$ 7,391	$ 7,391	$ 7,391	$ 8,441	$ 8,441	$ 8,441	$ 8,441	$ 9,491	$ 9,491	$ 9,491	$ 9,491	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 3,200	$ 3,200	$ 3,200	$ 3,200	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 6,400	$ 6,400	$ 6,400	$ 6,400	
TCJA @ -3.910 %	$ (248)	$ (248)	$ (248)	$ (248)	$ (248)	$ (289)	$ (289)	$ (289)	$ (289)	$ (330)	$ (330)	$ (330)	$ (330)	$ (371)	$ (371)	$ (371)	$ (371)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 6,210	$ 6,210	$ 6,210	$ 6,210	$ 9,315	$ 9,315	$ 9,315	$ 9,315	$ 12,420	$ 12,420	$ 12,420	$ 12,420	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876	
Sub-Total	$ 4,464	$ 4,494	$ 4,554	$ 4,614	$ 4,683	$ 9,188	$ 9,308	$ 9,428	$ 9,566	$ 13,882	$ 14,062	$ 14,242	$ 14,449	$ 18,576	$ 18,816	$ 19,056	$ 19,332	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 46,045	$ 138,135	$ 230,225	$ 336,129	$ 92,090	$ 276,270	$ 460,450	$ 672,257	$ 138,135	$ 414,405	$ 690,675	$ 1,008,386	$ 184,180	$ 552,540	$ 920,900	$ 1,344,514	
Sub Total	$ 10,804	$ 56,879	$ 149,029	$ 241,179	$ 347,152	$ 108,668	$ 292,968	$ 477,268	$ 689,213	$ 160,457	$ 436,907	$ 713,357	$ 1,031,275	$ 212,246	$ 580,846	$ 949,446	$ 1,373,336	
STAS @ 0.02 %	$ 2	$ 11	$ 30	$ 48	$ 69	$ 22	$ 59	$ 95	$ 138	$ 32	$ 87	$ 143	$ 206	$ 42	$ 116	$ 190	$ 275	
Total Bill	**$ 10,807**	**$ 56,891**	**$ 149,059**	**$ 241,228**	**$ 347,221**	**$ 108,690**	**$ 293,027**	**$ 477,364**	**$ 689,351**	**$ 160,489**	**$ 436,995**	**$ 713,500**	**$ 1,031,481**	**$ 212,289**	**$ 580,962**	**$ 949,636**	**$ 1,373,611**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $5,731.69	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	
All kW @ $0.19/kW	$ 974	$ 974	$ 974	$ 974	$ 974	$ 1,949	$ 1,949	$ 1,949	$ 1,949	$ 2,923	$ 2,923	$ 2,923	$ 2,923	$ 3,897	$ 3,897	$ 3,897	$ 3,897	
Sub-Total	$ 6,706	$ 6,706	$ 6,706	$ 6,706	$ 6,706	$ 7,680	$ 7,680	$ 7,680	$ 7,680	$ 8,655	$ 8,655	$ 8,655	$ 8,655	$ 9,629	$ 9,629	$ 9,629	$ 9,629	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 1,600	$ 3,200	$ 3,200	$ 3,200	$ 3,200	$ 4,800	$ 4,800	$ 4,800	$ 4,800	$ 6,400	$ 6,400	$ 6,400	$ 6,400	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 3,105	$ 6,210	$ 6,210	$ 6,210	$ 6,210	$ 9,315	$ 9,315	$ 9,315	$ 9,315	$ 12,420	$ 12,420	$ 12,420	$ 12,420	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876	
Sub-Total	$ 4,705	$ 4,735	$ 4,795	$ 4,855	$ 4,924	$ 9,470	$ 9,590	$ 9,710	$ 9,848	$ 14,205	$ 14,385	$ 14,565	$ 14,772	$ 18,940	$ 19,180	$ 19,420	$ 19,696	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 46,045	$ 138,135	$ 230,225	$ 336,129	$ 92,090	$ 276,270	$ 460,450	$ 672,257	$ 138,135	$ 414,405	$ 690,675	$ 1,008,386	$ 184,180	$ 552,540	$ 920,900	$ 1,344,514	
Sub Total	$ 11,411	$ 57,486	$ 149,636	$ 241,786	$ 347,758	$ 109,240	$ 293,540	$ 477,840	$ 689,785	$ 160,995	$ 437,445	$ 713,895	$ 1,031,812	$ 212,749	$ 581,349	$ 949,949	$ 1,373,839	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 11,411**	**$ 57,486**	**$ 149,636**	**$ 241,786**	**$ 347,758**	**$ 109,240**	**$ 293,540**	**$ 477,840**	**$ 689,785**	**$ 160,995**	**$ 437,445**	**$ 713,895**	**$ 1,031,812**	**$ 212,749**	**$ 581,349**	**$ 949,949**	**$ 1,373,839**	
% Increase	**5.59%**	**1.05%**	**0.39%**	**0.23%**	**0.15%**	**0.51%**	**0.18%**	**0.10%**	**0.06%**	**0.31%**	**0.10%**	**0.06%**	**0.03%**	**0.22%**	**0.07%**	**0.03%**	**0.02%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 51,526.43	$ 281,901.43	$ 742,651.43	$ 1,203,401.43	$ 1,733,263.93	$ 337,135.37	$ 890,035.37	$ 1,442,935.37	$ 2,078,770.37	$ 392,369.32	$ 1,037,419.32	$ 1,682,469.32	$ 2,424,276.82	$ 447,603.27	$ 1,184,803.27	$ 1,922,003.27	$ 2,769,783.27	
Total Current Bill	51,687.44	282,108.51	742,950.66	1,203,792.81	1,733,761.29	337,511.91	890,522.49	1,443,533.07	2,079,495.24	392,915.31	1,038,094.32	1,683,273.33	2,425,229.19	448,318.71	1,185,666.15	1,923,013.59	2,770,963.15	
Increase ($)	$ (161.01)	$ (207.09)	$ (299.24)	$ (391.39)	$ (497.36)	$ (376.54)	$ (487.12)	$ (597.70)	$ (724.87)	$ (545.99)	$ (675.00)	$ (804.01)	$ (952.37)	$ (715.44)	$ (862.88)	$ (1,010.32)	$ (1,179.88)	
Increase (%)	-0.31%	-0.07%	-0.04%	-0.03%	-0.03%	-0.11%	-0.05%	-0.04%	-0.03%	-0.14%	-0.07%	-0.05%	-0.04%	-0.16%	-0.1%	-0.1%	0.0%	
Overall Increase (%)	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $5,290.68	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	
All kW @ $0.96/kW	$ 24,000	$ 24,000	$ 24,000	$ 24,000	$ 24,000	$ 28,800	$ 28,800	$ 28,800	$ 28,800	$ 33,600	$ 33,600	$ 33,600	$ 33,600	$ 38,400	$ 38,400	$ 38,400	$ 38,400	
Sub-Total	$ 29,291	$ 29,291	$ 29,291	$ 29,291	$ 29,291	$ 34,091	$ 34,091	$ 34,091	$ 34,091	$ 38,891	$ 38,891	$ 38,891	$ 38,891	$ 43,691	$ 43,691	$ 43,691	$ 43,691	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 9,600	$ 9,600	$ 9,600	$ 9,600	$ 11,200	$ 11,200	$ 11,200	$ 11,200	$ 12,800	$ 12,800	$ 12,800	$ 12,800	
TCJA @ -3.910 %	$ (1,145)	$ (1,145)	$ (1,145)	$ (1,145)	$ (1,145)	$ (1,333)	$ (1,333)	$ (1,333)	$ (1,333)	$ (1,521)	$ (1,521)	$ (1,521)	$ (1,521)	$ (1,708)	$ (1,708)	$ (1,708)	$ (1,708)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @ $ 0.621 /kW NSPL	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 18,630	$ 18,630	$ 18,630	$ 18,630	$ 21,735	$ 21,735	$ 21,735	$ 21,735	$ 24,840	$ 24,840	$ 24,840	$ 24,840	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ 22,386	$ 22,536	$ 22,836	$ 23,136	$ 23,481	$ 27,084	$ 27,444	$ 27,804	$ 28,218	$ 31,631	$ 32,051	$ 32,471	$ 32,954	$ 36,178	$ 36,658	$ 37,138	$ 37,690	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230,225	$ 690,675	$ 1,151,125	$ 1,680,643	$ 276,270	$ 828,810	$ 1,381,350	$ 2,016,771	$ 322,315	$ 966,945	$ 1,611,575	$ 2,352,900	$ 368,360	$ 1,105,080	$ 1,841,800	$ 2,689,028	
Sub Total	$ 51,677	$ 282,052	$ 742,802	$ 1,203,552	$ 1,733,415	$ 337,444	$ 890,344	$ 1,443,244	$ 2,079,079	$ 392,837	$ 1,037,887	$ 1,682,937	$ 2,424,744	$ 448,229	$ 1,185,429	$ 1,922,629	$ 2,770,409	
STAS @ 0.02 %	$ 10	$ 56	$ 149	$ 241	$ 347	$ 67	$ 178	$ 289	$ 416	$ 79	$ 208	$ 337	$ 485	$ 90	$ 237	$ 385	$ 554	
Total Bill	**$ 51,687**	**$ 282,109**	**$ 742,951**	**$ 1,203,793**	**$ 1,733,761**	**$ 337,512**	**$ 890,522**	**$ 1,443,533**	**$ 2,079,495**	**$ 392,915**	**$ 1,038,094**	**$ 1,683,273**	**$ 2,425,229**	**$ 448,319**	**$ 1,185,666**	**$ 1,923,014**	**$ 2,770,963**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $5,731.69	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	
All kW @ $0.89/kW	$ 22,270	$ 22,270	$ 22,270	$ 22,270	$ 22,270	$ 26,724	$ 26,724	$ 26,724	$ 26,724	$ 31,178	$ 31,178	$ 31,178	$ 31,178	$ 35,632	$ 35,632	$ 35,632	$ 35,632	
Sub-Total	$ 28,001	$ 28,001	$ 28,001	$ 28,001	$ 28,001	$ 32,455	$ 32,455	$ 32,455	$ 32,455	$ 36,909	$ 36,909	$ 36,909	$ 36,909	$ 41,363	$ 41,363	$ 41,363	$ 41,363	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 9,600	$ 9,600	$ 9,600	$ 9,600	$ 11,200	$ 11,200	$ 11,200	$ 11,200	$ 12,800	$ 12,800	$ 12,800	$ 12,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 18,630	$ 18,630	$ 18,630	$ 18,630	$ 21,735	$ 21,735	$ 21,735	$ 21,735	$ 24,840	$ 24,840	$ 24,840	$ 24,840	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ 23,525	$ 23,675	$ 23,975	$ 24,275	$ 24,620	$ 28,410	$ 28,770	$ 29,130	$ 29,544	$ 33,145	$ 33,565	$ 33,985	$ 34,468	$ 37,880	$ 38,360	$ 38,840	$ 39,392	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230,225	$ 690,675	$ 1,151,125	$ 1,680,643	$ 276,270	$ 828,810	$ 1,381,350	$ 2,016,771	$ 322,315	$ 966,945	$ 1,611,575	$ 2,352,900	$ 368,360	$ 1,105,080	$ 1,841,800	$ 2,689,028	
Sub Total	$ 51,526	$ 281,901	$ 742,651	$ 1,203,401	$ 1,733,264	$ 337,135	$ 890,035	$ 1,442,935	$ 2,078,770	$ 392,369	$ 1,037,419	$ 1,682,469	$ 2,424,277	$ 447,603	$ 1,184,803	$ 1,922,003	$ 2,769,783	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 51,526**	**$ 281,901**	**$ 742,651**	**$ 1,203,401**	**$ 1,733,264**	**$ 337,135**	**$ 890,035**	**$ 1,442,935**	**$ 2,078,770**	**$ 392,369**	**$ 1,037,419**	**$ 1,682,469**	**$ 2,424,277**	**$ 447,603**	**$ 1,184,803**	**$ 1,922,003**	**$ 2,769,783**	
% Increase	**-0.31%**	**-0.07%**	**-0.04%**	**-0.03%**	**-0.03%**	**-0.11%**	**-0.05%**	**-0.04%**	**-0.03%**	**-0.14%**	**-0.07%**	**-0.05%**	**-0.04%**	**-0.16%**	**-0.07%**	**-0.05%**	**-0.04%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP - 115 KV OR GREATER DISCOUNT
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 34,128.19	$ 264,503.19	$ 725,253.19	$ 1,186,003.19	$ 1,715,865.69	$ 316,257.50	$ 869,157.50	$ 1,422,057.50	$ 2,057,892.50	$ 368,011.80	$ 1,013,061.80	$ 1,658,111.80	$ 2,399,919.30	$ 419,766.10	$ 1,156,966.10	$ 1,894,166.10	$ 2,741,946.10	
Total Current Bill	33,666.96	264,088.04	724,930.19	1,185,772.34	1,715,740.81	315,887.34	868,897.92	1,421,908.50	2,057,870.67	367,686.64	1,012,865.65	1,658,044.66	2,400,000.52	419,485.94	1,156,833.38	1,894,180.82	2,742,130.38	
Increase ($)	$ 461.23	$ 415.16	$ 323.01	$ 230.86	$ 124.88	$ 370.16	$ 259.58	$ 149.00	$ 21.83	$ 325.15	$ 196.14	$ 67.13	$ (81.23)	$ 280.15	$ 132.71	$ (14.73)	$ (184.28)	
Increase (%)	1.37%	0.16%	0.04%	0.02%	0.01%	0.12%	0.03%	0.01%	0.00%	0.09%	0.02%	0.00%	0.00%	0.07%	0.0%	0.0%	0.0%	
Overall Increase (%)	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $5,290.68	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	$ 5,291	
All kW @ $0.21/kW	$ 5,250	$ 5,250	$ 5,250	$ 5,250	$ 5,250	$ 6,300	$ 6,300	$ 6,300	$ 6,300	$ 7,350	$ 7,350	$ 7,350	$ 7,350	$ 8,400	$ 8,400	$ 8,400	$ 8,400	
Sub-Total	$ 10,541	$ 10,541	$ 10,541	$ 10,541	$ 10,541	$ 11,591	$ 11,591	$ 11,591	$ 11,591	$ 12,641	$ 12,641	$ 12,641	$ 12,641	$ 13,691	$ 13,691	$ 13,691	$ 13,691	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 9,600	$ 9,600	$ 9,600	$ 9,600	$ 11,200	$ 11,200	$ 11,200	$ 11,200	$ 12,800	$ 12,800	$ 12,800	$ 12,800	
TCJA @ -3.910 %	$ (412)	$ (412)	$ (412)	$ (412)	$ (412)	$ (453)	$ (453)	$ (453)	$ (453)	$ (494)	$ (494)	$ (494)	$ (494)	$ (535)	$ (535)	$ (535)	$ (535)	
Smart Meter Charge @ $6.69	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 18,630	$ 18,630	$ 18,630	$ 18,630	$ 21,735	$ 21,735	$ 21,735	$ 21,735	$ 24,840	$ 24,840	$ 24,840	$ 24,840	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ 23,120	$ 23,270	$ 23,570	$ 23,870	$ 24,215	$ 27,963	$ 28,323	$ 28,683	$ 29,097	$ 32,657	$ 33,077	$ 33,497	$ 33,980	$ 37,351	$ 37,831	$ 38,311	$ 38,863	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230,225	$ 690,675	$ 1,151,125	$ 1,680,643	$ 276,270	$ 828,810	$ 1,381,350	$ 2,016,771	$ 322,315	$ 966,945	$ 1,611,575	$ 2,352,900	$ 368,360	$ 1,105,080	$ 1,841,800	$ 2,689,028	
Sub Total	$ 33,660	$ 264,035	$ 724,785	$ 1,185,535	$ 1,715,398	$ 315,824	$ 868,724	$ 1,421,624	$ 2,057,459	$ 367,613	$ 1,012,663	$ 1,657,713	$ 2,399,521	$ 419,402	$ 1,156,602	$ 1,893,802	$ 2,741,582	
STAS @ 0.02 %	$ 7	$ 53	$ 145	$ 237	$ 343	$ 63	$ 174	$ 284	$ 411	$ 74	$ 203	$ 332	$ 480	$ 84	$ 231	$ 379	$ 548	
Total Bill	**$ 33,667**	**$ 264,088**	**$ 724,930**	**$ 1,185,772**	**$ 1,715,741**	**$ 315,887**	**$ 868,898**	**$ 1,421,908**	**$ 2,057,871**	**$ 367,687**	**$ 1,012,866**	**$ 1,658,045**	**$ 2,400,001**	**$ 419,486**	**$ 1,156,833**	**$ 1,894,181**	**$ 2,742,130**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $5,731.69	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	$ 5,732	
All kW @ $0.19/kW	$ 4,872	$ 4,872	$ 4,872	$ 4,872	$ 4,872	$ 5,846	$ 5,846	$ 5,846	$ 5,846	$ 6,820	$ 6,820	$ 6,820	$ 6,820	$ 7,794	$ 7,794	$ 7,794	$ 7,794	
Sub-Total	$ 10,603	$ 10,603	$ 10,603	$ 10,603	$ 10,603	$ 11,577	$ 11,577	$ 11,577	$ 11,577	$ 12,552	$ 12,552	$ 12,552	$ 12,552	$ 13,526	$ 13,526	$ 13,526	$ 13,526	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.32 /kW PLC	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 8,000	$ 9,600	$ 9,600	$ 9,600	$ 9,600	$ 11,200	$ 11,200	$ 11,200	$ 11,200	$ 12,800	$ 12,800	$ 12,800	$ 12,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 0.621 /kW NSPL	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 15,525	$ 18,630	$ 18,630	$ 18,630	$ 18,630	$ 21,735	$ 21,735	$ 21,735	$ 21,735	$ 24,840	$ 24,840	$ 24,840	$ 24,840	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ 23,525	$ 23,675	$ 23,975	$ 24,275	$ 24,620	$ 28,410	$ 28,770	$ 29,130	$ 29,544	$ 33,145	$ 33,565	$ 33,985	$ 34,468	$ 37,880	$ 38,360	$ 38,840	$ 39,392	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.09209 /kWh	$ -	$ 230,225	$ 690,675	$ 1,151,125	$ 1,680,643	$ 276,270	$ 828,810	$ 1,381,350	$ 2,016,771	$ 322,315	$ 966,945	$ 1,611,575	$ 2,352,900	$ 368,360	$ 1,105,080	$ 1,841,800	$ 2,689,028	
Sub Total	$ 34,128	$ 264,503	$ 725,253	$ 1,186,003	$ 1,715,866	$ 316,257	$ 869,157	$ 1,422,057	$ 2,057,892	$ 368,012	$ 1,013,062	$ 1,658,112	$ 2,399,919	$ 419,766	$ 1,156,966	$ 1,894,166	$ 2,741,946	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 34,128**	**$ 264,503**	**$ 725,253**	**$ 1,186,003**	**$ 1,715,866**	**$ 316,257**	**$ 869,157**	**$ 1,422,057**	**$ 2,057,892**	**$ 368,012**	**$ 1,013,062**	**$ 1,658,112**	**$ 2,399,919**	**$ 419,766**	**$ 1,156,966**	**$ 1,894,166**	**$ 2,741,946**	
% Increase	**1.37%**	**0.16%**	**0.04%**	**0.02%**	**0.01%**	**0.12%**	**0.03%**	**0.01%**	**0.00%**	**0.09%**	**0.02%**	**0.00%**	**0.00%**	**0.07%**	**0.01%**	**0.00%**	**-0.01%**	

Met-Ed Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE MS

ENERGY USAGE																		
All kWh	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000
Total Energy Usage	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000
Total Proposed Bill	$ 32.23	$ 47.78	$ 63.33	$ 94.42	$ 125.52	$ 187.71	$ 265.46	$ 343.20	$ 498.68	$ 809.65	$ 1,120.62	$ 1,431.59	$ 1,898.04	$ 2,364.49	$ 3,141.91	$ 3,919.33	$ 4,696.76
Total Current Bill	34.44	49.75	65.05	95.66	126.27	187.50	264.02	340.55	493.60	799.71	1,105.81	1,411.92	1,871.08	2,330.23	3,095.50	3,860.76	4,626.02
Increase ($)	$ (2.21)	$ (1.97)	$ (1.73)	$ (1.24)	$ (0.75)	$ 0.22	$ 1.43	$ 2.65	$ 5.08	$ 9.94	$ 14.81	$ 19.67	$ 26.96	$ 34.26	$ 46.42	$ 58.57	$ 70.73
Increase (%)	-6.42%	-3.96%	-2.65%	-1.30%	-0.60%	0.12%	0.54%	0.78%	1.03%	1.24%	1.34%	1.39%	1.44%	1.47%	1.5%	1.5%	1.5%
Overall Increase (%)	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%	1.32%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $32.23	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32
All kWh @ 3.159 ¢/kWh	$ -	$ 3	$ 6	$ 13	$ 19	$ 32	$ 47	$ 63	$ 95	$ 158	$ 221	$ 284	$ 379	$ 474	$ 632	$ 790	$ 948
Sub-Total	$ 32	$ 35	$ 39	$ 45	$ 51	$ 64	$ 80	$ 95	$ 127	$ 190	$ 253	$ 317	$ 411	$ 506	$ 664	$ 822	$ 980
Riders																	
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 2	$ 3	$ 4	$ 6	$ 9	$ 12	$ 15	$ 19	$ 26	$ 32	$ 39
TCJA @ -3.910 %	$ (1)	$ (1)	$ (2)	$ (2)	$ (2)	$ (2)	$ (3)	$ (4)	$ (5)	$ (7)	$ (10)	$ (12)	$ (16)	$ (20)	$ (26)	$ (32)	$ (38)
Smart Meter Charge @ $1.92	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2	$ 2
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 6	$ 8	$ 10	$ 13	$ 17	$ 22	$ 28	$ 33
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2
Sub-Total	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 4	$ 7	$ 9	$ 12	$ 15	$ 19	$ 25	$ 31	$ 37
DSIC @ 4.700 %	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 9	$ 12	$ 15	$ 19	$ 24	$ 31	$ 39	$ 46
PTC/HPS Charge																	
All kWh @ $ 0.11872 /kWh	$ -	$ 12	$ 24	$ 47	$ 71	$ 119	$ 178	$ 237	$ 356	$ 594	$ 831	$ 1,068	$ 1,425	$ 1,781	$ 2,374	$ 2,968	$ 3,562
Sub Total	$ 34	$ 50	$ 65	$ 96	$ 126	$ 187	$ 264	$ 340	$ 494	$ 800	$ 1,106	$ 1,412	$ 1,871	$ 2,330	$ 3,095	$ 3,860	$ 4,625
STAS @ 0.02 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1
Total Bill	**$ 34**	**$ 50**	**$ 65**	**$ 96**	**$ 126**	**$ 187**	**$ 264**	**$ 341**	**$ 494**	**$ 800**	**$ 1,106**	**$ 1,412**	**$ 1,871**	**$ 2,330**	**$ 3,095**	**$ 3,861**	**$ 4,626**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $32.23	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32
All kWh @ 3.430 ¢/kWh	$ -	$ 3	$ 7	$ 14	$ 21	$ 34	$ 51	$ 69	$ 103	$ 172	$ 240	$ 309	$ 412	$ 515	$ 686	$ 858	$ 1,029
Sub-Total	$ 32	$ 36	$ 39	$ 46	$ 53	$ 67	$ 84	$ 101	$ 135	$ 204	$ 272	$ 341	$ 444	$ 547	$ 718	$ 890	$ 1,061
Riders																	
Phase IV Energy Efficiency Charge @ 0.129 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 2	$ 3	$ 4	$ 6	$ 9	$ 12	$ 15	$ 19	$ 26	$ 32	$ 39
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.111 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 6	$ 8	$ 10	$ 13	$ 17	$ 22	$ 28	$ 33
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2
Sub-Total	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 4	$ 5	$ 7	$ 12	$ 17	$ 22	$ 30	$ 37	$ 49	$ 62	$ 74
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.11872 /kWh	$ -	$ 12	$ 24	$ 47	$ 71	$ 119	$ 178	$ 237	$ 356	$ 594	$ 831	$ 1,068	$ 1,425	$ 1,781	$ 2,374	$ 2,968	$ 3,562
Sub Total	$ 32	$ 48	$ 63	$ 94	$ 126	$ 188	$ 265	$ 343	$ 499	$ 810	$ 1,121	$ 1,432	$ 1,898	$ 2,364	$ 3,142	$ 3,919	$ 4,697
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 32**	**$ 48**	**$ 63**	**$ 94**	**$ 126**	**$ 188**	**$ 265**	**$ 343**	**$ 499**	**$ 810**	**$ 1,121**	**$ 1,432**	**$ 1,898**	**$ 2,364**	**$ 3,142**	**$ 3,919**	**$ 4,697**
% Increase	**$ (0)**	**$ (0)**	**$ (0)**	**$ (0)**	**$ (0)**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE RS

	ENERGY USAGE																	
All kWh	0	50	100	250	500	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 11.25	$ 21.15	$ 31.05	$ 60.76	$ 110.27	$ 189.49	$ 209.29	$ 308.31	$ 407.33	$ 506.35	$ 605.37	$ 704.40	$ 803.42	$ 902.44	$ 1,001.46	$ 1,199.50
Total Current Bill	10.23	19.76	29.30	57.91	105.59	181.89	200.96	296.33	391.69	487.06	582.43	677.79	773.16	868.53	963.89	1,154.63
Increase ($)	$ 1.02	$ 1.39	$ 1.75	$ 2.85	$ 4.68	$ 7.60	$ 8.33	$ 11.98	$ 15.64	$ 19.29	$ 22.95	$ 26.60	$ 30.26	$ 33.91	$ 37.56	$ 44.87
Increase (%)	10.00%	7.02%	5.98%	4.92%	4.43%	4.18%	4.15%	4.04%	3.99%	3.96%	3.94%	3.92%	3.91%	3.90%	3.90%	3.89%
Overall Increase (%)	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%	4.26%
UNBUNDLED RATES - CURRENT																
Distribution																
Distribution Charge @ $11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25
All kWh @ 6.074 ¢/kWh	$ -	$ 3	$ 6	$ 15	$ 30	$ 55	$ 61	$ 91	$ 121	$ 152	$ 182	$ 213	$ 243	$ 273	$ 304	$ 364
Sub-Total	$ 11	$ 14	$ 17	$ 26	$ 42	$ 66	$ 72	$ 102	$ 133	$ 163	$ 193	$ 224	$ 254	$ 285	$ 315	$ 376
Riders																
Universal Service Charge @ 1.306 ¢/kWh	$ -	$ 1	$ 1	$ 3	$ 7	$ 12	$ 13	$ 20	$ 26	$ 33	$ 39	$ 46	$ 52	$ 59	$ 65	$ 78
TCJA @ -6.010 %	$ (1)	$ (1)	$ (1)	$ (2)	$ (3)	$ (4)	$ (4)	$ (6)	$ (8)	$ (10)	$ (12)	$ (13)	$ (15)	$ (17)	$ (19)	$ (23)
Phase IV Energy Efficiency Charge @ 0.226 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 11	$ 14
Smart Meter Charge @ $-0.84	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)
Default Service Support Charge @ 0.842 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 8	$ 8	$ 13	$ 17	$ 21	$ 25	$ 29	$ 34	$ 38	$ 42	$ 51
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ (2)	$ (1)	$ 1	$ 4	$ 9	$ 17	$ 19	$ 29	$ 39	$ 49	$ 59	$ 69	$ 79	$ 89	$ 99	$ 120
DSIC @ 5.000 %	$ 0	$ 1	$ 1	$ 1	$ 2	$ 4	$ 4	$ 6	$ 8	$ 10	$ 11	$ 13	$ 15	$ 17	$ 19	$ 22
PTC/HPS Charge																
All kWh @$ 0.10607 /kWh	$ -	$ 5	$ 11	$ 27	$ 53	$ 95	$ 106	$ 159	$ 212	$ 265	$ 318	$ 371	$ 424	$ 477	$ 530	$ 636
Sub Total	$ 10	$ 20	$ 29	$ 58	$ 106	$ 182	$ 201	$ 296	$ 391	$ 487	$ 582	$ 677	$ 773	$ 868	$ 963	$ 1,154
STAS @ 0.07 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1
Total Bill	**$ 10**	**$ 20**	**$ 29**	**$ 58**	**$ 106**	**$ 182**	**$ 201**	**$ 296**	**$ 392**	**$ 487**	**$ 582**	**$ 678**	**$ 773**	**$ 869**	**$ 964**	**$ 1,155**
UNBUNDLED RATES - PROPOSED																
Distribution																
Distribution Charge @ $11.25	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11
All kWh @ 6.815 ¢/kWh	$ -	$ 3	$ 7	$ 17	$ 34	$ 61	$ 68	$ 102	$ 136	$ 170	$ 204	$ 239	$ 273	$ 307	$ 341	$ 409
Sub-Total	$ 11	$ 15	$ 18	$ 28	$ 45	$ 73	$ 79	$ 113	$ 148	$ 182	$ 216	$ 250	$ 284	$ 318	$ 352	$ 420
Riders																
Universal Service Charge @ 1.306 ¢/kWh	$ -	$ 1	$ 1	$ 3	$ 7	$ 12	$ 13	$ 20	$ 26	$ 33	$ 39	$ 46	$ 52	$ 59	$ 65	$ 78
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.226 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 11	$ 14
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.842 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 8	$ 8	$ 13	$ 17	$ 21	$ 25	$ 29	$ 34	$ 38	$ 42	$ 51
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ -	$ 1	$ 2	$ 6	$ 12	$ 21	$ 24	$ 36	$ 48	$ 60	$ 71	$ 83	$ 95	$ 107	$ 119	$ 143
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																
All kWh @ $ 0.10607 /kWh	$ -	$ 5	$ 11	$ 27	$ 53	$ 95	$ 106	$ 159	$ 212	$ 265	$ 318	$ 371	$ 424	$ 477	$ 530	$ 636
Sub Total	$ 11	$ 21	$ 31	$ 61	$ 110	$ 189	$ 209	$ 308	$ 407	$ 506	$ 605	$ 704	$ 803	$ 902	$ 1,001	$ 1,199
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 11**	**$ 21**	**$ 31**	**$ 61**	**$ 110**	**$ 189**	**$ 209**	**$ 308**	**$ 407**	**$ 506**	**$ 605**	**$ 704**	**$ 803**	**$ 902**	**$ 1,001**	**$ 1,199**
% Increase	**10.0%**	**7.0%**	**6.0%**	**4.9%**	**4.4%**	**4.2%**	**4.1%**	**4.0%**	**4.0%**	**4.0%**	**3.9%**	**3.9%**	**3.9%**	**3.9%**	**3.9%**	**3.9%**

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-V

	ENERGY USAGE																	
All kWh	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 11.25	$ 21.13	$ 31.00	$ 60.63	$ 110.02	$ 159.40	$ 189.03	$ 208.78	$ 307.55	$ 406.31	$ 505.08	$ 603.84	$ 702.61	$ 801.38	$ 900.14	$ 998.91	$ 1,196.44
Total Current Bill	10.23	19.74	29.25	57.78	105.33	152.88	181.41	200.43	295.52	390.62	485.72	580.82	675.92	771.02	866.12	961.22	1,151.41
Increase ($)	$ 1.02	$ 1.39	$ 1.76	$ 2.86	$ 4.69	$ 6.52	$ 7.62	$ 8.36	$ 12.02	$ 15.69	$ 19.36	$ 23.02	$ 26.69	$ 30.36	$ 34.03	$ 37.69	$ 45.03
Increase (%)	10.00%	7.04%	6.00%	4.94%	4.45%	4.27%	4.20%	4.17%	4.07%	4.02%	3.99%	3.96%	3.95%	3.94%	3.93%	3.92%	3.91%
Overall Increase (%)	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%	4.27%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25	$ 11.25
All kWh @ 6.074 ¢/kWh	$ -	$ 3	$ 6	$ 15	$ 30	$ 46	$ 55	$ 61	$ 91	$ 121	$ 152	$ 182	$ 213	$ 243	$ 273	$ 304	$ 364
Sub-Total	$ 11	$ 14	$ 17	$ 26	$ 42	$ 57	$ 66	$ 72	$ 102	$ 133	$ 163	$ 193	$ 224	$ 254	$ 285	$ 315	$ 376
Riders																	
Universal Service Charge @ 1.306 ¢/kWh	$ -	$ 1	$ 1	$ 3	$ 7	$ 10	$ 12	$ 13	$ 20	$ 26	$ 33	$ 39	$ 46	$ 52	$ 59	$ 65	$ 78
TCJA @ -6.010 %	$ (1)	$ (1)	$ (1)	$ (2)	$ (3)	$ (3)	$ (4)	$ (4)	$ (6)	$ (8)	$ (10)	$ (12)	$ (13)	$ (15)	$ (17)	$ (19)	$ (23)
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 4	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 11
Smart Meter Charge @ $-0.84	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)
Default Service Support Charge @ 0.842 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 8	$ 8	$ 13	$ 17	$ 21	$ 25	$ 29	$ 34	$ 38	$ 42	$ 51
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ (2)	$ (1)	$ 0	$ 3	$ 8	$ 13	$ 16	$ 18	$ 28	$ 38	$ 48	$ 57	$ 67	$ 77	$ 87	$ 97	$ 116
DSIC @ 5.000 %	$ 0	$ 1	$ 1	$ 1	$ 2	$ 3	$ 4	$ 4	$ 6	$ 8	$ 9	$ 11	$ 13	$ 15	$ 17	$ 18	$ 22
PTC/HPS Charge																	
All kWh @ $ 0.10607 /kWh	$ -	$ 5	$ 11	$ 27	$ 53	$ 80	$ 95	$ 106	$ 159	$ 212	$ 265	$ 318	$ 371	$ 424	$ 477	$ 530	$ 636
Sub Total	$ 10	$ 20	$ 29	$ 58	$ 105	$ 153	$ 181	$ 200	$ 295	$ 390	$ 485	$ 580	$ 675	$ 770	$ 866	$ 961	$ 1,151
STAS @ 0.07 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1
Total Bill	**$ 10**	**$ 20**	**$ 29**	**$ 58**	**$ 105**	**$ 153**	**$ 181**	**$ 200**	**$ 296**	**$ 391**	**$ 486**	**$ 581**	**$ 676**	**$ 771**	**$ 866**	**$ 961**	**$ 1,151**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $11.25	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11
All kWh @ 6.815 ¢/kWh	$ -	$ 3	$ 7	$ 17	$ 34	$ 51	$ 61	$ 68	$ 102	$ 136	$ 170	$ 204	$ 239	$ 273	$ 307	$ 341	$ 409
Sub-Total	$ 11	$ 15	$ 18	$ 28	$ 45	$ 62	$ 73	$ 79	$ 113	$ 148	$ 182	$ 216	$ 250	$ 284	$ 318	$ 352	$ 420
Riders																	
Universal Service Charge @ 1.306 ¢/kWh	$ -	$ 1	$ 1	$ 3	$ 7	$ 10	$ 12	$ 13	$ 20	$ 26	$ 33	$ 39	$ 46	$ 52	$ 59	$ 65	$ 78
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 4	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 11
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.842 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 8	$ 8	$ 13	$ 17	$ 21	$ 25	$ 29	$ 34	$ 38	$ 42	$ 51
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ -	$ 1	$ 2	$ 6	$ 12	$ 17	$ 21	$ 23	$ 35	$ 47	$ 58	$ 70	$ 82	$ 93	$ 105	$ 117	$ 140
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.10607 /kWh	$ -	$ 5	$ 11	$ 27	$ 53	$ 80	$ 95	$ 106	$ 159	$ 212	$ 265	$ 318	$ 371	$ 424	$ 477	$ 530	$ 636
Sub Total	$ 11	$ 21	$ 31	$ 61	$ 110	$ 159	$ 189	$ 209	$ 308	$ 406	$ 505	$ 604	$ 703	$ 801	$ 900	$ 999	$ 1,196
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 11**	**$ 21**	**$ 31**	**$ 61**	**$ 110**	**$ 159**	**$ 189**	**$ 209**	**$ 308**	**$ 406**	**$ 505**	**$ 604**	**$ 703**	**$ 801**	**$ 900**	**$ 999**	**$ 1,196**
% Increase	**10.0%**	**7.0%**	**6.0%**	**4.9%**	**4.5%**	**4.3%**	**4.2%**	**4.2%**	**4.1%**	**4.0%**	**4.0%**	**4.0%**	**3.9%**	**3.9%**	**3.9%**	**3.9%**	**3.9%**

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - SMALL - SINGLE PHASE
At Average Levels of kWh Use

KW Demand																			
Total kW	0	1	1	1	1	1	1	1	3	3	3	3	3	5	5	5	5		
Hrs Use	0	100	200	300	400	500	600	730	100	200	300	400	500	100	200	300	500		
ENERGY USAGE																			
Monthly Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Proposed Bill	$ 20.87	$ 37.30	$ 53.74	$ 70.17	$ 86.61	$ 103.05	$ 119.48	$ 140.85	$ 70.17	$ 119.48	$ 168.79	$ 218.10	$ 267.40	$ 103.05	$ 185.22	$ 267.40	$ 431.76		
Total Current Bill	18.65	34.42	50.19	65.96	81.73	97.50	113.27	133.77	65.96	113.27	160.58	207.89	255.20	97.50	176.35	255.20	412.91		
Increase ($)	$ 2.22	$ 2.88	$ 3.55	$ 4.21	$ 4.88	$ 5.55	$ 6.21	$ 7.08	$ 4.21	$ 6.21	$ 8.21	$ 10.20	$ 12.20	$ 5.55	$ 8.87	$ 12.20	$ 18.85		
Increase (%)	11.89%	8.38%	7.07%	6.39%	5.97%	5.69%	5.48%	5.29%	6.39%	5.48%	5.11%	4.91%	4.78%	5.69%	5.03%	4.78%	4.57%		
Overall Increase (%)	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%	6.30%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $18.33	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18		
All kWh @ 3.624 ¢/kWh	$ -	$ 4	$ 7	$ 11	$ 14	$ 18	$ 22	$ 26	$ 11	$ 22	$ 33	$ 43	$ 54	$ 18	$ 36	$ 54	$ 91		
Sub-Total	$ 18	$ 22	$ 26	$ 29	$ 33	$ 36	$ 40	$ 45	$ 29	$ 40	$ 51	$ 62	$ 73	$ 36	$ 55	$ 73	$ 109		
Riders																			
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4		
TCJA @ -6.010 %	$ (1)	$ (1)	$ (2)	$ (2)	$ (2)	$ (2)	$ (2)	$ (3)	$ (2)	$ (2)	$ (3)	$ (4)	$ (4)	$ (2)	$ (3)	$ (4)	$ (7)		
Smart Meter Charge @ $0.52	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1		
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5	$ 6	$ 2	$ 4	$ 6	$ 10		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Sub-Total	$ (1)	$ (0)	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 0	$ 2	$ 3	$ 4	$ 5	$ 1	$ 3	$ 5	$ 8		
DSIC @ 5.000 %	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 2	$ 1	$ 2	$ 2	$ 3	$ 4	$ 2	$ 3	$ 4	$ 5		
PTC/HPS Charge																			
All kWh @ $ 0.11603 /kWh	$ -	$ 12	$ 23	$ 35	$ 46	$ 58	$ 70	$ 85	$ 35	$ 70	$ 104	$ 139	$ 174	$ 58	$ 116	$ 174	$ 290		
Sub Total	$ 19	$ 34	$ 50	$ 66	$ 82	$ 97	$ 113	$ 134	$ 66	$ 113	$ 160	$ 208	$ 255	$ 97	$ 176	$ 255	$ 413		
STAS @ 0.07 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Total Bill	**$ 19**	**$ 34**	**$ 50**	**$ 66**	**$ 82**	**$ 98**	**$ 113**	**$ 134**	**$ 66**	**$ 113**	**$ 161**	**$ 208**	**$ 255**	**$ 98**	**$ 176**	**$ 255**	**$ 413**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $20.87	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21	$ 21		
All kWh @ 4.262 ¢/kWh	$ -	$ 4	$ 9	$ 13	$ 17	$ 21	$ 26	$ 31	$ 13	$ 26	$ 38	$ 51	$ 64	$ 21	$ 43	$ 64	$ 107		
Sub-Total	$ 21	$ 25	$ 29	$ 34	$ 38	$ 42	$ 46	$ 52	$ 34	$ 46	$ 59	$ 72	$ 85	$ 42	$ 63	$ 85	$ 127		
Riders																			
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5	$ 6	$ 2	$ 4	$ 6	$ 10		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0		
Sub-Total	$ -	$ 1	$ 1	$ 2	$ 2	$ 3	$ 3	$ 4	$ 2	$ 3	$ 5	$ 7	$ 9	$ 3	$ 6	$ 9	$ 14		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.11603 /kWh	$ -	$ 12	$ 23	$ 35	$ 46	$ 58	$ 70	$ 85	$ 35	$ 70	$ 104	$ 139	$ 174	$ 58	$ 116	$ 174	$ 290		
Sub Total	$ 21	$ 37	$ 54	$ 70	$ 87	$ 103	$ 119	$ 141	$ 70	$ 119	$ 169	$ 218	$ 267	$ 103	$ 185	$ 267	$ 432		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 21**	**$ 37**	**$ 54**	**$ 70**	**$ 87**	**$ 103**	**$ 119**	**$ 141**	**$ 70**	**$ 119**	**$ 169**	**$ 218**	**$ 267**	**$ 103**	**$ 185**	**$ 267**	**$ 432**		
% Increase	**11.9%**	**8.4%**	**7.1%**	**6.4%**	**6.0%**	**5.7%**	**5.5%**	**5.3%**	**6.4%**	**5.5%**	**5.1%**	**4.9%**	**4.8%**	**5.7%**	**5.0%**	**4.8%**	**4.6%**		

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS MEDIUM - SINGLE PHASE
With Demands 10 - 20 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	0	10	10	10	10	10	10	10	10	20	20	20	20	20	20	20	20	20
Hrs Use	0	100	200	300	400	500	600	730	900	100	200	300	400	500	600	730	900	
ENERGY USAGE																		
Monthly Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,300	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000	
Total Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,300	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000	
Total Proposed Bill	$ 21.91	$ 213.57	$ 335.31	$ 457.05	$ 578.79	$ 700.53	$ 822.27	$ 980.53	$ 1,187.49	$ 405.22	$ 648.70	$ 892.18	$ 1,135.66	$ 1,379.14	$ 1,622.62	$ 1,939.14	$ 2,353.06	
Total Current Bill	19.88	204.01	325.93	447.84	569.75	691.67	813.58	972.06	1,179.32	388.14	631.97	875.80	1,119.62	1,363.45	1,607.27	1,924.25	2,338.75	
Increase ($)	$ 2.03	$ 9.55	$ 9.38	$ 9.21	$ 9.03	$ 8.86	$ 8.69	$ 8.46	$ 8.17	$ 17.07	$ 16.73	$ 16.38	$ 16.04	$ 15.69	$ 15.35	$ 14.90	$ 14.31	
Increase (%)	10.21%	4.68%	2.88%	2.06%	1.59%	1.28%	1.07%	0.87%	0.69%	4.40%	2.65%	1.87%	1.43%	1.15%	0.95%	0.77%	0.61%	
Overall Increase (%)	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	
UNBUNDLED RATES - CURRENT																		
Distribution Charge @ $19.58	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	$ 20	
All kW @ $6.30/kW	$ -	$ 63	$ 63	$ 63	$ 63	$ 63	$ 63	$ 63	$ 63	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	$ 126	
Sub-Total	$ 20	$ 83	$ 83	$ 83	$ 83	$ 83	$ 83	$ 83	$ 83	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 2	$ 4	$ 5	$ 7	$ 9	$ 11	$ 13	$ 16	$ 4	$ 7	$ 11	$ 14	$ 18	$ 21	$ 26	$ 32	
TCJA @ -6.010 %	$ (1)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (5)	$ (9)	$ (9)	$ (9)	$ (9)	$ (9)	$ (9)	$ (9)	$ (9)	
Smart Meter Charge @ $0.52	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 4	$ 8	$ 12	$ 16	$ 19	$ 23	$ 28	$ 35	$ 8	$ 16	$ 23	$ 31	$ 39	$ 47	$ 57	$ 70	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	
Sub-Total	$ (1)	$ 1	$ 7	$ 13	$ 18	$ 24	$ 30	$ 37	$ 47	$ 3	$ 15	$ 26	$ 37	$ 49	$ 60	$ 75	$ 95	
DSIC @ 5.000 %	$ 1	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 5	$ 5	$ 7	$ 7	$ 7	$ 8	$ 8	$ 8	$ 8	$ 8	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 116	$ 232	$ 348	$ 464	$ 580	$ 696	$ 847	$ 1,044	$ 232	$ 464	$ 696	$ 928	$ 1,160	$ 1,392	$ 1,694	$ 2,089	
Sub Total	$ 20	$ 204	$ 326	$ 448	$ 569	$ 691	$ 813	$ 971	$ 1,178	$ 388	$ 632	$ 875	$ 1,119	$ 1,362	$ 1,606	$ 1,923	$ 2,337	
STAS @ 0.07 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	
Total Bill	**$ 20**	**$ 204**	**$ 326**	**$ 448**	**$ 570**	**$ 692**	**$ 814**	**$ 972**	**$ 1,179**	**$ 388**	**$ 632**	**$ 876**	**$ 1,120**	**$ 1,363**	**$ 1,607**	**$ 1,924**	**$ 2,339**	
UNBUNDLED RATES - PROPOSED																		
Distribution Charge @ $21.91	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	$ 22	
All kW @ $6.99/kW	$ -	$ 70	$ 70	$ 70	$ 70	$ 70	$ 70	$ 70	$ 70	$ 140	$ 140	$ 140	$ 140	$ 140	$ 140	$ 140	$ 140	
Sub-Total	$ 22	$ 92	$ 92	$ 92	$ 92	$ 92	$ 92	$ 92	$ 92	$ 162	$ 162	$ 162	$ 162	$ 162	$ 162	$ 162	$ 162	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 2	$ 4	$ 5	$ 7	$ 9	$ 11	$ 13	$ 16	$ 4	$ 7	$ 11	$ 14	$ 18	$ 21	$ 26	$ 32	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 4	$ 8	$ 12	$ 16	$ 19	$ 23	$ 28	$ 35	$ 8	$ 16	$ 23	$ 31	$ 39	$ 47	$ 57	$ 70	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	
Sub-Total	$ -	$ 6	$ 11	$ 17	$ 23	$ 29	$ 34	$ 42	$ 51	$ 11	$ 23	$ 34	$ 46	$ 57	$ 69	$ 83	$ 103	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 116	$ 232	$ 348	$ 464	$ 580	$ 696	$ 847	$ 1,044	$ 232	$ 464	$ 696	$ 928	$ 1,160	$ 1,392	$ 1,694	$ 2,089	
Sub Total	$ 22	$ 214	$ 335	$ 457	$ 579	$ 701	$ 822	$ 981	$ 1,187	$ 405	$ 649	$ 892	$ 1,136	$ 1,379	$ 1,623	$ 1,939	$ 2,353	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 22**	**$ 214**	**$ 335**	**$ 457**	**$ 579**	**$ 701**	**$ 822**	**$ 981**	**$ 1,187**	**$ 405**	**$ 649**	**$ 892**	**$ 1,136**	**$ 1,379**	**$ 1,623**	**$ 1,939**	**$ 2,353**	
% Increase	**10.21%**	**4.68%**	**2.88%**	**2.06%**	**1.59%**	**1.28%**	**1.07%**	**0.87%**	**0.69%**	**4.40%**	**2.65%**	**1.87%**	**1.43%**	**1.15%**	**0.95%**	**0.77%**	**0.61%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM - THREE PHASE
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	250	250	250	250	250	250	250	250	250	400	400	400	400	400	400	400	400	400
Hrs Use	0	100	200	300	400	500	600	730	900	100	200	300	400	500	600	730	900	
REACTIVE DEMAND																		
rKVA	80	80	80	80	80	80	80	80	80	128	128	128	128	128	128	128	128	
ENERGY USAGE																		
Monthly Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Proposed Bill	$ 1,809.86	$ 4,853.36	$ 7,896.86	$ 10,940.36	$ 13,983.86	$ 17,027.36	$ 20,070.86	$ 24,027.41	$ 29,201.36	$ 7,738.93	$ 12,608.53	$ 17,478.13	$ 22,347.73	$ 27,217.33	$ 32,086.93	$ 38,417.41	$ 46,695.73	
Total Current Bill	1,610.74	4,658.56	7,706.38	10,754.20	13,802.02	16,849.84	19,897.66	23,859.82	29,041.12	7,430.03	12,306.54	17,183.05	22,059.57	26,936.08	31,812.59	38,152.05	46,442.12	
Increase ($)	$ 199.12	$ 194.80	$ 190.48	$ 186.16	$ 181.84	$ 177.52	$ 173.20	$ 167.59	$ 160.25	$ 308.90	$ 301.99	$ 295.08	$ 288.17	$ 281.26	$ 274.35	$ 265.36	$ 253.61	
Increase (%)	12.36%	4.18%	2.47%	1.73%	1.32%	1.05%	0.87%	0.70%	0.55%	4.16%	2.45%	1.72%	1.31%	1.04%	0.86%	0.70%	0.55%	
Overall Increase (%)	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $39.38	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	
All kW @ $6.30/kW	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 1,575	$ 2,520	$ 2,520	$ 2,520	$ 2,520	$ 2,520	$ 2,520	$ 2,520	$ 2,520	
All rkVA @ $0.20 /rkVA	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	$ 26	
Sub-Total	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 1,630	$ 2,585	$ 2,585	$ 2,585	$ 2,585	$ 2,585	$ 2,585	$ 2,585	$ 2,585	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 44	$ 88	$ 131	$ 175	$ 219	$ 263	$ 319	$ 394	$ 70	$ 140	$ 210	$ 280	$ 350	$ 420	$ 511	$ 630	
TCJA @ -6.010 %	$ (98)	$ (98)	$ (98)	$ (98)	$ (98)	$ (98)	$ (98)	$ (98)	$ (98)	$ (155)	$ (155)	$ (155)	$ (155)	$ (155)	$ (155)	$ (155)	$ (155)	
Smart Meter Charge @ $0.52	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 97	$ 194	$ 291	$ 388	$ 485	$ 582	$ 708	$ 873	$ 155	$ 310	$ 466	$ 621	$ 776	$ 931	$ 1,133	$ 1,397	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 2	$ 4	$ 6	$ 8	$ 10	$ 12	$ 15	$ 18	$ 3	$ 6	$ 10	$ 13	$ 16	$ 19	$ 23	$ 29	
Sub-Total	$ (97)	$ 45	$ 188	$ 331	$ 474	$ 616	$ 759	$ 945	$ 1,187	$ 74	$ 302	$ 530	$ 759	$ 987	$ 1,216	$ 1,512	$ 1,901	
DSIC @ 5.000 %	$ 77	$ 79	$ 81	$ 83	$ 85	$ 88	$ 90	$ 93	$ 96	$ 125	$ 129	$ 132	$ 136	$ 139	$ 143	$ 147	$ 153	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 2,901	$ 5,802	$ 8,702	$ 11,603	$ 14,504	$ 17,405	$ 21,175	$ 26,107	$ 4,641	$ 9,282	$ 13,924	$ 18,565	$ 23,206	$ 27,847	$ 33,881	$ 41,771	
Sub Total	$ 1,609.61	$ 4,655.30	$ 7,700.99	$ 10,746.68	$ 13,792.36	$ 16,838.05	$ 19,883.74	$ 23,843.13	$ 29,020.80	$ 7,424.83	$ 12,297.93	$ 17,171.03	$ 22,044.13	$ 26,917.23	$ 31,790.33	$ 38,125.36	$ 46,409.63	
STAS @ 0.07 %	$ 1.13	$ 3.26	$ 5.39	$ 7.52	$ 9.65	$ 11.79	$ 13.92	$ 16.69	$ 20.31	$ 5.20	$ 8.61	$ 12.02	$ 15.43	$ 18.84	$ 22.25	$ 26.69	$ 32.49	
Total Bill	**$ 1,610.74**	**$ 4,658.56**	**$ 7,706.38**	**$ 10,754.20**	**$ 13,802.02**	**$ 16,849.84**	**$ 19,897.66**	**$ 23,859.82**	**$ 29,041.12**	**$ 7,430.03**	**$ 12,306.54**	**$ 17,183.05**	**$ 22,059.57**	**$ 26,936.08**	**$ 31,812.59**	**$ 38,152.05**	**$ 46,442.12**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $44.07	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	
All kW @ $6.99/kW	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 1,748	$ 2,797	$ 2,797	$ 2,797	$ 2,797	$ 2,797	$ 2,797	$ 2,797	$ 2,797	
All rkVA @ $0.22 /rkVA	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	
Sub-Total	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 1,810	$ 2,869	$ 2,869	$ 2,869	$ 2,869	$ 2,869	$ 2,869	$ 2,869	$ 2,869	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 44	$ 88	$ 131	$ 175	$ 219	$ 263	$ 319	$ 394	$ 70	$ 140	$ 210	$ 280	$ 350	$ 420	$ 511	$ 630	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 97	$ 194	$ 291	$ 388	$ 485	$ 582	$ 708	$ 873	$ 155	$ 310	$ 466	$ 621	$ 776	$ 931	$ 1,133	$ 1,397	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 2	$ 4	$ 6	$ 8	$ 10	$ 12	$ 15	$ 18	$ 3	$ 6	$ 10	$ 13	$ 16	$ 19	$ 23	$ 29	
Sub-Total	$ -	$ 143	$ 286	$ 428	$ 571	$ 714	$ 857	$ 1,042	$ 1,285	$ 228	$ 457	$ 685	$ 914	$ 1,142	$ 1,370	$ 1,667	$ 2,056	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 2,901	$ 5,802	$ 8,702	$ 11,603	$ 14,504	$ 17,405	$ 21,175	$ 26,107	$ 4,641	$ 9,282	$ 13,924	$ 18,565	$ 23,206	$ 27,847	$ 33,881	$ 41,771	
Sub Total	$ 1,809.86	$ 4,853.36	$ 7,896.86	$ 10,940.36	$ 13,983.86	$ 17,027.36	$ 20,070.86	$ 24,027.41	$ 29,201.36	$ 7,738.93	$ 12,608.53	$ 17,478.13	$ 22,347.73	$ 27,217.33	$ 32,086.93	$ 38,417.41	$ 46,695.73	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 1,809.86**	**$ 4,853.36**	**$ 7,896.86**	**$ 10,940.36**	**$ 13,983.86**	**$ 17,027.36**	**$ 20,070.86**	**$ 24,027.41**	**$ 29,201.36**	**$ 7,738.93**	**$ 12,608.53**	**$ 17,478.13**	**$ 22,347.73**	**$ 27,217.33**	**$ 32,086.93**	**$ 38,417.41**	**$ 46,695.73**	
% Increase	**12.36%**	**4.18%**	**2.47%**	**1.73%**	**1.32%**	**1.05%**	**0.87%**	**0.70%**	**0.55%**	**4.16%**	**2.45%**	**1.72%**	**1.31%**	**1.04%**	**0.86%**	**0.70%**	**0.55%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM - THREE PHASE
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25	25	25	25	25	50	50	50	50	75	75	75	75	100	100	100	100	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rKVA	8	8	8	8	8	16	16	16	16	24	24	24	24	32	32	32	32	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Proposed Bill	$ 220.65	$ 525.00	$ 1,133.70	$ 1,742.40	$ 2,442.41	$ 1,005.93	$ 2,223.33	$ 3,440.73	$ 4,840.74	$ 1,486.86	$ 3,312.96	$ 5,139.06	$ 7,239.07	$ 1,967.79	$ 4,402.59	$ 6,837.39	$ 9,637.41	
Total Current Bill	196.57	501.35	1,110.91	1,720.48	2,421.48	963.26	2,182.39	3,401.52	4,803.51	1,425.17	3,253.87	5,082.56	7,185.55	1,887.09	4,325.34	6,763.60	9,567.59	
Increase ($)	$ 24.08	$ 23.65	$ 22.79	$ 21.92	$ 20.93	$ 42.67	$ 40.94	$ 39.21	$ 37.22	$ 61.68	$ 59.09	$ 56.50	$ 53.52	$ 80.70	$ 77.25	$ 73.79	$ 69.82	
Increase (%)	12.25%	4.72%	2.05%	1.27%	0.86%	4.43%	1.88%	1.15%	0.77%	4.33%	1.82%	1.11%	0.74%	4.28%	1.79%	1.09%	0.73%	
Overall Increase (%)	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	1.96%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $39.38	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	$ 39	
All kW @ $6.30/kW	$ 158	$ 158	$ 158	$ 158	$ 158	$ 315	$ 315	$ 315	$ 315	$ 473	$ 473	$ 473	$ 473	$ 630	$ 630	$ 630	$ 630	
All rkVA @ $0.20 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 6	$ 6	$ 6	$ 6	
Sub-Total	$ 198	$ 198	$ 198	$ 198	$ 198	$ 358	$ 358	$ 358	$ 358	$ 517	$ 517	$ 517	$ 517	$ 676	$ 676	$ 676	$ 676	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 4	$ 13	$ 22	$ 32	$ 9	$ 26	$ 44	$ 64	$ 13	$ 39	$ 66	$ 96	$ 18	$ 53	$ 88	$ 128	
TCJA @ -6.010 %	$ (12)	$ (12)	$ (12)	$ (12)	$ (12)	$ (21)	$ (21)	$ (21)	$ (21)	$ (31)	$ (31)	$ (31)	$ (31)	$ (41)	$ (41)	$ (41)	$ (41)	
Smart Meter Charge @ $0.52	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 10	$ 29	$ 49	$ 71	$ 19	$ 58	$ 97	$ 142	$ 29	$ 87	$ 146	$ 212	$ 39	$ 116	$ 194	$ 283	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	$ 1	$ 2	$ 4	$ 6	
Sub-Total	$ (11)	$ 3	$ 31	$ 60	$ 93	$ 8	$ 65	$ 122	$ 187	$ 12	$ 98	$ 184	$ 282	$ 17	$ 131	$ 245	$ 377	
DSIC @ 5.000 %	$ 9	$ 10	$ 10	$ 10	$ 11	$ 17	$ 18	$ 19	$ 20	$ 25	$ 26	$ 28	$ 29	$ 33	$ 34	$ 36	$ 38	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 290	$ 870	$ 1,450	$ 2,118	$ 580	$ 1,740	$ 2,901	$ 4,235	$ 870	$ 2,611	$ 4,351	$ 6,353	$ 1,160	$ 3,481	$ 5,802	$ 8,470	
Sub Total	$ 196.43	$ 501.00	$ 1,110.14	$ 1,719.27	$ 2,419.78	$ 962.59	$ 2,180.86	$ 3,399.14	$ 4,800.15	$ 1,424.18	$ 3,251.59	$ 5,079.00	$ 7,180.53	$ 1,885.77	$ 4,322.32	$ 6,758.87	$ 9,560.90	
STAS @ 0.07 %	$ 0.14	$ 0.35	$ 0.78	$ 1.20	$ 1.69	$ 0.67	$ 1.53	$ 2.38	$ 3.36	$ 1.00	$ 2.28	$ 3.56	$ 5.03	$ 1.32	$ 3.03	$ 4.73	$ 6.69	
Total Bill	**$ 196.57**	**$ 501.35**	**$ 1,110.91**	**$ 1,720.48**	**$ 2,421.48**	**$ 963.26**	**$ 2,182.39**	**$ 3,401.52**	**$ 4,803.51**	**$ 1,425.17**	**$ 3,253.87**	**$ 5,082.56**	**$ 7,185.55**	**$ 1,887.09**	**$ 4,325.34**	**$ 6,763.60**	**$ 9,567.59**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $44.07	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	$ 44	
All kW @ $6.99/kW	$ 175	$ 175	$ 175	$ 175	$ 175	$ 350	$ 350	$ 350	$ 350	$ 524	$ 524	$ 524	$ 524	$ 699	$ 699	$ 699	$ 699	
All rkVA @ $0.22 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 4	$ 4	$ 4	$ 4	$ 5	$ 5	$ 5	$ 5	$ 7	$ 7	$ 7	$ 7	
Sub-Total	$ 221	$ 221	$ 221	$ 221	$ 221	$ 397	$ 397	$ 397	$ 397	$ 574	$ 574	$ 574	$ 574	$ 750	$ 750	$ 750	$ 750	
Riders																		
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 4	$ 13	$ 22	$ 32	$ 9	$ 26	$ 44	$ 64	$ 13	$ 39	$ 66	$ 96	$ 18	$ 53	$ 88	$ 128	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 10	$ 29	$ 49	$ 71	$ 19	$ 58	$ 97	$ 142	$ 29	$ 87	$ 146	$ 212	$ 39	$ 116	$ 194	$ 283	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	$ 1	$ 2	$ 4	$ 6	
Sub-Total	$ -	$ 14	$ 43	$ 71	$ 104	$ 29	$ 86	$ 143	$ 208	$ 43	$ 128	$ 214	$ 313	$ 57	$ 171	$ 286	$ 417	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.11603 /kWh	$ -	$ 290	$ 870	$ 1,450	$ 2,118	$ 580	$ 1,740	$ 2,901	$ 4,235	$ 870	$ 2,611	$ 4,351	$ 6,353	$ 1,160	$ 3,481	$ 5,802	$ 8,470	
Sub Total	$ 220.65	$ 525.00	$ 1,133.70	$ 1,742.40	$ 2,442.41	$ 1,005.93	$ 2,223.33	$ 3,440.73	$ 4,840.74	$ 1,486.86	$ 3,312.96	$ 5,139.06	$ 7,239.07	$ 1,967.79	$ 4,402.59	$ 6,837.39	$ 9,637.41	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 220.65**	**$ 525.00**	**$ 1,133.70**	**$ 1,742.40**	**$ 2,442.41**	**$ 1,005.93**	**$ 2,223.33**	**$ 3,440.73**	**$ 4,840.74**	**$ 1,486.86**	**$ 3,312.96**	**$ 5,139.06**	**$ 7,239.07**	**$ 1,967.79**	**$ 4,402.59**	**$ 6,837.39**	**$ 9,637.41**	
% Increase	**12.25%**	**4.72%**	**2.05%**	**1.27%**	**0.86%**	**4.43%**	**1.88%**	**1.15%**	**0.77%**	**4.33%**	**1.82%**	**1.11%**	**0.74%**	**4.28%**	**1.79%**	**1.09%**	**0.73%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 500 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	500	500	500	500	500	500	750	750	750	750	750	750	1,000	1,000	1,000	1,000	1,000		
Hrs Use	0	200	300	400	500	730	200	300	400	500	730	900	200	300	400	500	730		
REACTIVE DEMAND																			
rKVA	274	274	274	274	274	274	410	410	410	410	410	410	547	547	547	547	547		
ENERGY USAGE																			
Monthly Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Proposed Bill	$ 5,526.13	$ 10,236.13	$ 12,591.13	$ 14,946.13	$ 17,301.13	$ 22,717.63	$ 15,239.55	$ 18,772.05	$ 22,304.55	$ 25,837.05	$ 33,961.80	$ 39,967.05	$ 20,242.97	$ 24,952.97	$ 29,662.97	$ 34,372.97	$ 45,205.97		
Total Current Bill	5,095.55	9,808.85	12,165.50	14,522.15	16,878.80	22,299.09	14,606.97	18,141.94	21,676.91	25,211.89	33,342.32	39,351.78	19,405.08	24,118.38	28,831.68	33,544.97	44,385.56		
Increase ($)	$ 430.58	$ 427.28	$ 425.64	$ 423.99	$ 422.34	$ 418.55	$ 632.58	$ 630.11	$ 627.64	$ 625.17	$ 619.48	$ 615.28	$ 837.89	$ 834.59	$ 831.29	$ 827.99	$ 820.41		
Increase (%)	8.45%	4.36%	3.50%	2.92%	2.50%	1.88%	4.33%	3.47%	2.90%	2.48%	1.86%	1.56%	4.32%	3.46%	2.88%	2.47%	1.85%		
Overall Increase (%)	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $204.79	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205		
All kW @ $6.68/kW	$ 3,340	$ 3,340	$ 3,340	$ 3,340	$ 3,340	$ 3,340	$ 5,010	$ 5,010	$ 5,010	$ 5,010	$ 5,010	$ 5,010	$ 6,680	$ 6,680	$ 6,680	$ 6,680	$ 6,680		
All rkVA @$ 0.19 /rkVA	$ 52	$ 52	$ 52	$ 52	$ 52	$ 52	$ 78	$ 78	$ 78	$ 78	$ 78	$ 78	$ 104	$ 104	$ 104	$ 104	$ 104		
Sub-Total	$ 3,597	$ 3,597	$ 3,597	$ 3,597	$ 3,597	$ 3,597	$ 5,293	$ 5,293	$ 5,293	$ 5,293	$ 5,293	$ 5,293	$ 6,989	$ 6,989	$ 6,989	$ 6,989	$ 6,989		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 120	$ 120	$ 120	$ 120	$ 120	$ 120	$ 180	$ 180	$ 180	$ 180	$ 180	$ 180	$ 240	$ 240	$ 240	$ 240	$ 240		
TCJA @ -6.010 %	$ (216)	$ (216)	$ (216)	$ (216)	$ (216)	$ (216)	$ (318)	$ (318)	$ (318)	$ (318)	$ (318)	$ (318)	$ (420)	$ (420)	$ (420)	$ (420)	$ (420)		
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10		
Default Service Support Charge @$ 2.812 /kW NSPL	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,812	$ 2,812	$ 2,812	$ 2,812	$ 2,812		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 8	$ 12	$ 16	$ 20	$ 29	$ 12	$ 18	$ 24	$ 30	$ 44	$ 54	$ 16	$ 24	$ 32	$ 40	$ 58		
Sub-Total	$ 1,320	$ 1,328	$ 1,332	$ 1,336	$ 1,340	$ 1,349	$ 1,993	$ 1,999	$ 2,005	$ 2,011	$ 2,025	$ 2,035	$ 2,658	$ 2,666	$ 2,674	$ 2,682	$ 2,700		
DSIC @ 5.000 %	$ 176	$ 176	$ 176	$ 176	$ 176	$ 176	$ 258	$ 258	$ 258	$ 258	$ 258	$ 258	$ 341	$ 341	$ 341	$ 341	$ 341		
PTC/HPS Charge																			
All kWh @ $ 0.04702 /kWh	$ -	$ 4,702	$ 7,053	$ 9,404	$ 11,755	$ 17,162	$ 7,053	$ 10,580	$ 14,106	$ 17,633	$ 25,743	$ 31,739	$ 9,404	$ 14,106	$ 18,808	$ 23,510	$ 34,325		
Sub Total	$ 5,091.99	$ 9,801.99	$ 12,156.99	$ 14,511.99	$ 16,866.99	$ 22,283.49	$ 14,596.75	$ 18,129.25	$ 21,661.75	$ 25,194.25	$ 33,319.00	$ 39,324.25	$ 19,391.51	$ 24,101.51	$ 28,811.51	$ 33,521.51	$ 44,354.51		
STAS @ 0.07 %	$ 3.56	$ 6.86	$ 8.51	$ 10.16	$ 11.81	$ 15.60	$ 10.22	$ 12.69	$ 15.16	$ 17.64	$ 23.32	$ 27.53	$ 13.57	$ 16.87	$ 20.17	$ 23.47	$ 31.05		
Total Bill	**$ 5,095.55**	**$ 9,808.85**	**$ 12,165.50**	**$ 14,522.15**	**$ 16,878.80**	**$ 22,299.09**	**$ 14,606.97**	**$ 18,141.94**	**$ 21,676.91**	**$ 25,211.89**	**$ 33,342.32**	**$ 39,351.78**	**$ 19,405.08**	**$ 24,118.38**	**$ 28,831.68**	**$ 33,544.97**	**$ 44,385.56**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $229.30	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229		
All kW @ $7.43/kW	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 5,569	$ 5,569	$ 5,569	$ 5,569	$ 5,569	$ 5,569	$ 7,425	$ 7,425	$ 7,425	$ 7,425	$ 7,425		
All rkVA @$ 0.21 /rkVA	$ 58	$ 58	$ 58	$ 58	$ 58	$ 58	$ 87	$ 87	$ 87	$ 87	$ 87	$ 87	$ 116	$ 116	$ 116	$ 116	$ 116		
Sub-Total	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 5,886	$ 5,886	$ 5,886	$ 5,886	$ 5,886	$ 5,886	$ 7,771	$ 7,771	$ 7,771	$ 7,771	$ 7,771		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 120	$ 120	$ 120	$ 120	$ 120	$ 120	$ 180	$ 180	$ 180	$ 180	$ 180	$ 180	$ 240	$ 240	$ 240	$ 240	$ 240		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 2.812 /kW NSPL	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,812	$ 2,812	$ 2,812	$ 2,812	$ 2,812		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 8	$ 12	$ 16	$ 20	$ 29	$ 12	$ 18	$ 24	$ 30	$ 44	$ 54	$ 16	$ 24	$ 32	$ 40	$ 58		
Sub-Total	$ 1,526	$ 1,534	$ 1,538	$ 1,542	$ 1,546	$ 1,555	$ 2,301	$ 2,307	$ 2,313	$ 2,319	$ 2,333	$ 2,343	$ 3,068	$ 3,076	$ 3,084	$ 3,092	$ 3,110		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.04702 /kWh	$ -	$ 4,702	$ 7,053	$ 9,404	$ 11,755	$ 17,162	$ 7,053	$ 10,580	$ 14,106	$ 17,633	$ 25,743	$ 31,739	$ 9,404	$ 14,106	$ 18,808	$ 23,510	$ 34,325		
Sub Total	$ 5,526.13	$ 10,236.13	$ 12,591.13	$ 14,946.13	$ 17,301.13	$ 22,717.63	$ 15,239.55	$ 18,772.05	$ 22,304.55	$ 25,837.05	$ 33,961.80	$ 39,967.05	$ 20,242.97	$ 24,952.97	$ 29,662.97	$ 34,372.97	$ 45,205.97		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 5,526.13**	**$ 10,236.13**	**$ 12,591.13**	**$ 14,946.13**	**$ 17,301.13**	**$ 22,717.63**	**$ 15,239.55**	**$ 18,772.05**	**$ 22,304.55**	**$ 25,837.05**	**$ 33,961.80**	**$ 39,967.05**	**$ 20,242.97**	**$ 24,952.97**	**$ 29,662.97**	**$ 34,372.97**	**$ 45,205.97**		
% Increase	**8.45%**	**4.36%**	**3.50%**	**2.92%**	**2.50%**	**1.88%**	**4.33%**	**3.47%**	**2.90%**	**2.48%**	**1.86%**	**1.56%**	**4.32%**	**3.46%**	**2.88%**	**2.47%**	**1.85%**		

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	821	821	821	821	821	1,094	1,094	1,094	1,094	1,368	1,368	1,368	1,368	1,641	1,641	1,641	1,641	
ENERGY USAGE																		
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Proposed Bill	$ 16,119.80	$ 23,184.80	$ 37,314.80	$ 51,444.80	$ 67,694.30	$ 30,836.64	$ 49,676.64	$ 68,516.64	$ 90,182.64	$ 38,488.47	$ 62,038.47	$ 85,588.47	$ 112,670.97	$ 46,140.30	$ 74,400.30	$ 102,660.30	$ 135,159.30	
Total Current Bill	14,861.42	21,931.37	36,071.26	50,211.15	66,472.03	29,170.95	48,024.14	66,877.33	88,558.50	36,410.54	59,977.02	83,543.51	110,644.97	43,650.12	71,929.90	100,209.69	132,731.43	
Increase ($)	$ 1,258.38	$ 1,253.43	$ 1,243.54	$ 1,233.65	$ 1,222.28	$ 1,665.68	$ 1,652.49	$ 1,639.31	$ 1,624.14	$ 2,077.93	$ 2,061.45	$ 2,044.96	$ 2,026.00	$ 2,490.18	$ 2,470.40	$ 2,450.62	$ 2,427.87	
Increase (%)	8.47%	5.72%	3.45%	2.46%	1.84%	5.71%	3.44%	2.45%	1.83%	5.71%	3.44%	2.45%	1.83%	5.70%	3.43%	2.45%	1.83%	
Overall Increase (%)	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	3.08%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $204.79	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	$ 205	
All kW @ $6.68/kW	$ 10,020	$ 10,020	$ 10,020	$ 10,020	$ 10,020	$ 13,360	$ 13,360	$ 13,360	$ 13,360	$ 16,700	$ 16,700	$ 16,700	$ 16,700	$ 20,040	$ 20,040	$ 20,040	$ 20,040	
All rkVA @$ 0.19 /rkVA	$ 156	$ 156	$ 156	$ 156	$ 156	$ 208	$ 208	$ 208	$ 208	$ 260	$ 260	$ 260	$ 260	$ 312	$ 312	$ 312	$ 312	
Sub-Total	$ 10,381	$ 10,381	$ 10,381	$ 10,381	$ 10,381	$ 13,773	$ 13,773	$ 13,773	$ 13,773	$ 17,165	$ 17,165	$ 17,165	$ 17,165	$ 20,557	$ 20,557	$ 20,557	$ 20,557	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 360	$ 360	$ 360	$ 360	$ 360	$ 480	$ 480	$ 480	$ 480	$ 600	$ 600	$ 600	$ 600	$ 720	$ 720	$ 720	$ 720	
TCJA @ -6.010 %	$ (624)	$ (624)	$ (624)	$ (624)	$ (624)	$ (828)	$ (828)	$ (828)	$ (828)	$ (1,032)	$ (1,032)	$ (1,032)	$ (1,032)	$ (1,235)	$ (1,235)	$ (1,235)	$ (1,235)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 5,624	$ 5,624	$ 5,624	$ 5,624	$ 7,030	$ 7,030	$ 7,030	$ 7,030	$ 8,436	$ 8,436	$ 8,436	$ 8,436	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 12	$ 36	$ 60	$ 88	$ 16	$ 48	$ 80	$ 117	$ 20	$ 60	$ 100	$ 146	$ 24	$ 72	$ 120	$ 175	
Sub-Total	$ 3,964	$ 3,976	$ 4,000	$ 4,024	$ 4,052	$ 5,302	$ 5,334	$ 5,366	$ 5,403	$ 6,628	$ 6,668	$ 6,708	$ 6,754	$ 7,954	$ 8,002	$ 8,050	$ 8,106	
DSIC @ 5.000 %	$ 506	$ 506	$ 506	$ 506	$ 506	$ 672	$ 672	$ 672	$ 672	$ 837	$ 837	$ 837	$ 837	$ 1,003	$ 1,003	$ 1,003	$ 1,003	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 7,053	$ 21,159	$ 35,265	$ 51,487	$ 9,404	$ 28,212	$ 47,020	$ 68,649	$ 11,755	$ 35,265	$ 58,775	$ 85,812	$ 14,106	$ 42,318	$ 70,530	$ 102,974	
Sub Total	$ 14,851.03	$ 21,916.03	$ 36,046.03	$ 50,176.03	$ 66,425.53	$ 29,150.55	$ 47,990.55	$ 66,830.55	$ 88,496.55	$ 36,385.07	$ 59,935.07	$ 83,485.07	$ 110,567.57	$ 43,619.59	$ 71,879.59	$ 100,139.59	$ 132,638.59	
STAS @ 0.07 %	$ 10.40	$ 15.34	$ 25.23	$ 35.12	$ 46.50	$ 20.41	$ 33.59	$ 46.78	$ 61.95	$ 25.47	$ 41.95	$ 58.44	$ 77.40	$ 30.53	$ 50.32	$ 70.10	$ 92.85	
Total Bill	**$ 14,861.42**	**$ 21,931.37**	**$ 36,071.26**	**$ 50,211.15**	**$ 66,472.03**	**$ 29,170.95**	**$ 48,024.14**	**$ 66,877.33**	**$ 88,558.50**	**$ 36,410.54**	**$ 59,977.02**	**$ 83,543.51**	**$ 110,644.97**	**$ 43,650.12**	**$ 71,929.90**	**$ 100,209.69**	**$ 132,731.43**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $229.30	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	$ 229	
All kW @ $7.43/kW	$ 11,138	$ 11,138	$ 11,138	$ 11,138	$ 11,138	$ 14,851	$ 14,851	$ 14,851	$ 14,851	$ 18,563	$ 18,563	$ 18,563	$ 18,563	$ 22,276	$ 22,276	$ 22,276	$ 22,276	
All rkVA @$ 0.21 /rkVA	$ 175	$ 175	$ 175	$ 175	$ 175	$ 233	$ 233	$ 233	$ 233	$ 291	$ 291	$ 291	$ 291	$ 349	$ 349	$ 349	$ 349	
Sub-Total	$ 11,542	$ 11,542	$ 11,542	$ 11,542	$ 11,542	$ 15,313	$ 15,313	$ 15,313	$ 15,313	$ 19,083	$ 19,083	$ 19,083	$ 19,083	$ 22,854	$ 22,854	$ 22,854	$ 22,854	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 360	$ 360	$ 360	$ 360	$ 360	$ 480	$ 480	$ 480	$ 480	$ 600	$ 600	$ 600	$ 600	$ 720	$ 720	$ 720	$ 720	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 5,624	$ 5,624	$ 5,624	$ 5,624	$ 7,030	$ 7,030	$ 7,030	$ 7,030	$ 8,436	$ 8,436	$ 8,436	$ 8,436	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 12	$ 36	$ 60	$ 88	$ 16	$ 48	$ 80	$ 117	$ 20	$ 60	$ 100	$ 146	$ 24	$ 72	$ 120	$ 175	
Sub-Total	$ 4,578	$ 4,590	$ 4,614	$ 4,638	$ 4,666	$ 6,120	$ 6,152	$ 6,184	$ 6,221	$ 7,650	$ 7,690	$ 7,730	$ 7,776	$ 9,180	$ 9,228	$ 9,276	$ 9,331	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 7,053	$ 21,159	$ 35,265	$ 51,487	$ 9,404	$ 28,212	$ 47,020	$ 68,649	$ 11,755	$ 35,265	$ 58,775	$ 85,812	$ 14,106	$ 42,318	$ 70,530	$ 102,974	
Sub Total	$ 16,119.80	$ 23,184.80	$ 37,314.80	$ 51,444.80	$ 67,694.30	$ 30,836.64	$ 49,676.64	$ 68,516.64	$ 90,182.64	$ 38,488.47	$ 62,038.47	$ 85,588.47	$ 112,670.97	$ 46,140.30	$ 74,400.30	$ 102,660.30	$ 135,159.30	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 16,119.80**	**$ 23,184.80**	**$ 37,314.80**	**$ 51,444.80**	**$ 67,694.30**	**$ 30,836.64**	**$ 49,676.64**	**$ 68,516.64**	**$ 90,182.64**	**$ 38,488.47**	**$ 62,038.47**	**$ 85,588.47**	**$ 112,670.97**	**$ 46,140.30**	**$ 74,400.30**	**$ 102,660.30**	**$ 135,159.30**	
% Increase	**8.47%**	**5.72%**	**3.45%**	**2.46%**	**1.84%**	**5.71%**	**3.44%**	**2.45%**	**1.83%**	**5.71%**	**3.44%**	**2.45%**	**1.83%**	**5.70%**	**3.43%**	**2.45%**	**1.83%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 25 - 150 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25	25	25	25	25	50	50	50	50	100	100	100	100	150	150	150	150	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rKVA	7	7	7	7	7	13	13	13	13	26	26	26	26	40	40	40	40	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500	
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500	
Total Proposed Bill	$ 1,288.81	$ 1,406.56	$ 1,642.06	$ 1,877.56	$ 2,148.39	$ 1,697.21	$ 2,168.21	$ 2,639.21	$ 3,180.86	$ 2,278.50	$ 3,220.50	$ 4,162.50	$ 5,245.80	$ 2,859.80	$ 4,272.80	$ 5,685.80	$ 7,310.75	
Total Current Bill	1,157.84	1,275.67	1,511.33	1,747.00	2,018.01	1,556.82	2,028.15	2,499.48	3,041.51	2,119.12	3,061.78	4,004.44	5,088.49	2,681.42	4,095.40	5,509.39	7,135.48	
Increase ($)	$ 130.97	$ 130.89	$ 130.73	$ 130.56	$ 130.37	$ 140.39	$ 140.06	$ 139.73	$ 139.35	$ 159.39	$ 158.73	$ 158.07	$ 157.31	$ 178.39	$ 177.40	$ 176.41	$ 175.27	
Increase (%)	11.31%	10.26%	8.65%	7.47%	6.46%	9.02%	6.91%	5.59%	4.58%	7.52%	5.18%	3.95%	3.09%	6.65%	4.33%	3.20%	2.46%	
Overall Increase (%)	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $996.52	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	
All kW @ $3.46/kW	$ 87	$ 87	$ 87	$ 87	$ 87	$ 173	$ 173	$ 173	$ 173	$ 346	$ 346	$ 346	$ 346	$ 519	$ 519	$ 519	$ 519	
All rkVA @$ 0.19 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 8	$ 8	$ 8	$ 8	
Sub-Total	$ 1,084	$ 1,084	$ 1,084	$ 1,084	$ 1,084	$ 1,172	$ 1,172	$ 1,172	$ 1,172	$ 1,348	$ 1,348	$ 1,348	$ 1,348	$ 1,523	$ 1,523	$ 1,523	$ 1,523	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6	$ 6	$ 6	$ 6	$ 6	$ 12	$ 12	$ 12	$ 12	$ 24	$ 24	$ 24	$ 24	$ 36	$ 36	$ 36	$ 36	
TCJA @ -6.010 %	$ (65)	$ (65)	$ (65)	$ (65)	$ (65)	$ (70)	$ (70)	$ (70)	$ (70)	$ (81)	$ (81)	$ (81)	$ (81)	$ (92)	$ (92)	$ (92)	$ (92)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 70	$ 70	$ 70	$ 70	$ 70	$ 141	$ 141	$ 141	$ 141	$ 281	$ 281	$ 281	$ 281	$ 422	$ 422	$ 422	$ 422	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 4	$ 6	$ 1	$ 4	$ 6	$ 9	
Sub-Total	$ 21	$ 21	$ 22	$ 22	$ 22	$ 92	$ 93	$ 94	$ 95	$ 235	$ 236	$ 238	$ 240	$ 377	$ 380	$ 382	$ 385	
DSIC @ 5.000 %	$ 52	$ 52	$ 52	$ 52	$ 52	$ 56	$ 56	$ 56	$ 56	$ 65	$ 65	$ 65	$ 65	$ 74	$ 74	$ 74	$ 74	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 118	$ 353	$ 588	$ 858	$ 235	$ 705	$ 1,176	$ 1,716	$ 470	$ 1,411	$ 2,351	$ 3,432	$ 705	$ 2,116	$ 3,527	$ 5,149	
Sub Total	$ 1,157.03	$ 1,274.78	$ 1,510.28	$ 1,745.78	$ 2,016.60	$ 1,555.73	$ 2,026.73	$ 2,497.73	$ 3,039.38	$ 2,117.63	$ 3,059.63	$ 4,001.63	$ 5,084.93	$ 2,679.54	$ 4,092.54	$ 5,505.54	$ 7,130.49	
STAS @ 0.07 %	$ 0.81	$ 0.89	$ 1.06	$ 1.22	$ 1.41	$ 1.09	$ 1.42	$ 1.75	$ 2.13	$ 1.48	$ 2.14	$ 2.80	$ 3.56	$ 1.88	$ 2.86	$ 3.85	$ 4.99	
Total Bill	**$ 1,157.84**	**$ 1,275.67**	**$ 1,511.33**	**$ 1,747.00**	**$ 2,018.01**	**$ 1,556.82**	**$ 2,028.15**	**$ 2,499.48**	**$ 3,041.51**	**$ 2,119.12**	**$ 3,061.78**	**$ 4,004.44**	**$ 5,088.49**	**$ 2,681.42**	**$ 4,095.40**	**$ 5,509.39**	**$ 7,135.48**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,115.91	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	
All kW @ $3.81/kW	$ 95	$ 95	$ 95	$ 95	$ 95	$ 190	$ 190	$ 190	$ 190	$ 381	$ 381	$ 381	$ 381	$ 571	$ 571	$ 571	$ 571	
All rkVA @$ 0.21 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 3	$ 3	$ 3	$ 3	$ 6	$ 6	$ 6	$ 6	$ 8	$ 8	$ 8	$ 8	
Sub-Total	$ 1,213	$ 1,213	$ 1,213	$ 1,213	$ 1,213	$ 1,309	$ 1,309	$ 1,309	$ 1,309	$ 1,502	$ 1,502	$ 1,502	$ 1,502	$ 1,696	$ 1,696	$ 1,696	$ 1,696	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6	$ 6	$ 6	$ 6	$ 6	$ 12	$ 12	$ 12	$ 12	$ 24	$ 24	$ 24	$ 24	$ 36	$ 36	$ 36	$ 36	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 70	$ 70	$ 70	$ 70	$ 70	$ 141	$ 141	$ 141	$ 141	$ 281	$ 281	$ 281	$ 281	$ 422	$ 422	$ 422	$ 422	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 1	$ 1	$ 1	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 4	$ 6	$ 1	$ 4	$ 6	$ 9	
Sub-Total	$ 76	$ 77	$ 77	$ 77	$ 78	$ 153	$ 154	$ 155	$ 156	$ 306	$ 308	$ 309	$ 311	$ 459	$ 461	$ 464	$ 467	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 118	$ 353	$ 588	$ 858	$ 235	$ 705	$ 1,176	$ 1,716	$ 470	$ 1,411	$ 2,351	$ 3,432	$ 705	$ 2,116	$ 3,527	$ 5,149	
Sub Total	$ 1,288.81	$ 1,406.56	$ 1,642.06	$ 1,877.56	$ 2,148.39	$ 1,697.21	$ 2,168.21	$ 2,639.21	$ 3,180.86	$ 2,278.50	$ 3,220.50	$ 4,162.50	$ 5,245.80	$ 2,859.80	$ 4,272.80	$ 5,685.80	$ 7,310.75	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 1,288.81**	**$ 1,406.56**	**$ 1,642.06**	**$ 1,877.56**	**$ 2,148.39**	**$ 1,697.21**	**$ 2,168.21**	**$ 2,639.21**	**$ 3,180.86**	**$ 2,278.50**	**$ 3,220.50**	**$ 4,162.50**	**$ 5,245.80**	**$ 2,859.80**	**$ 4,272.80**	**$ 5,685.80**	**$ 7,310.75**	
% Increase	**11.31%**	**10.26%**	**8.65%**	**7.47%**	**6.46%**	**9.02%**	**6.91%**	**5.59%**	**4.58%**	**7.52%**	**5.18%**	**3.95%**	**3.09%**	**6.65%**	**4.33%**	**3.20%**	**2.46%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 250 - 1,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	250	250	250	250	250	500	500	500	500	750	750	750	750	1,000	1,000	1,000	1,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rKVA	66	66	66	66	66	132	132	132	132	198	198	198	198	264	264	264	264	
ENERGY USAGE																		
Monthly Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000	
Total Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000	
Total Proposed Bill	$ 2,844.89	$ 4,022.39	$ 6,377.39	$ 8,732.39	$ 11,440.64	$ 6,928.87	$ 11,638.87	$ 16,348.87	$ 21,765.37	$ 9,835.36	$ 16,900.36	$ 23,965.36	$ 32,090.11	$ 12,741.84	$ 22,161.84	$ 31,581.84	$ 42,414.84	
Total Current Bill	2,627.69	3,806.01	6,162.66	8,519.31	11,229.46	6,617.51	11,330.80	16,044.10	21,464.39	9,429.00	16,498.94	23,568.89	31,699.33	12,240.49	21,667.08	31,093.68	41,934.26	
Increase ($)	$ 217.21	$ 216.38	$ 214.73	$ 213.08	$ 211.19	$ 311.37	$ 308.07	$ 304.78	$ 300.98	$ 406.36	$ 401.41	$ 396.47	$ 390.78	$ 501.35	$ 494.75	$ 488.16	$ 480.58	
Increase (%)	8.27%	5.69%	3.48%	2.50%	1.88%	4.71%	2.72%	1.90%	1.40%	4.31%	2.43%	1.68%	1.23%	4.10%	2.28%	1.57%	1.15%	
Overall Increase (%)	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $996.52	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	
All kW @ $3.46/kW	$ 865	$ 865	$ 865	$ 865	$ 865	$ 1,730	$ 1,730	$ 1,730	$ 1,730	$ 2,595	$ 2,595	$ 2,595	$ 2,595	$ 3,460	$ 3,460	$ 3,460	$ 3,460	
All rkVA @$ 0.19 /rkVA	$ 13	$ 13	$ 13	$ 13	$ 13	$ 25	$ 25	$ 25	$ 25	$ 38	$ 38	$ 38	$ 38	$ 50	$ 50	$ 50	$ 50	
Sub-Total	$ 1,874	$ 1,874	$ 1,874	$ 1,874	$ 1,874	$ 2,752	$ 2,752	$ 2,752	$ 2,752	$ 3,629	$ 3,629	$ 3,629	$ 3,629	$ 4,507	$ 4,507	$ 4,507	$ 4,507	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 60	$ 60	$ 60	$ 60	$ 60	$ 120	$ 120	$ 120	$ 120	$ 180	$ 180	$ 180	$ 180	$ 240	$ 240	$ 240	$ 240	
TCJA @ -6.010 %	$ (113)	$ (113)	$ (113)	$ (113)	$ (113)	$ (165)	$ (165)	$ (165)	$ (165)	$ (218)	$ (218)	$ (218)	$ (218)	$ (271)	$ (271)	$ (271)	$ (271)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 703	$ 703	$ 703	$ 703	$ 703	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,812	$ 2,812	$ 2,812	$ 2,812	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 2	$ 6	$ 10	$ 15	$ 4	$ 12	$ 20	$ 29	$ 6	$ 18	$ 30	$ 44	$ 8	$ 24	$ 40	$ 58	
Sub-Total	$ 660	$ 662	$ 666	$ 670	$ 675	$ 1,375	$ 1,383	$ 1,391	$ 1,400	$ 2,087	$ 2,099	$ 2,111	$ 2,125	$ 2,799	$ 2,815	$ 2,831	$ 2,849	
DSIC @ 5.000 %	$ 92	$ 92	$ 92	$ 92	$ 92	$ 136	$ 136	$ 136	$ 136	$ 180	$ 180	$ 180	$ 180	$ 224	$ 224	$ 224	$ 224	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 1,176	$ 3,527	$ 5,878	$ 8,581	$ 2,351	$ 7,053	$ 11,755	$ 17,162	$ 3,527	$ 10,580	$ 17,633	$ 25,743	$ 4,702	$ 14,106	$ 23,510	$ 34,325	
Sub Total	$ 2,625.85	$ 3,803.35	$ 6,158.35	$ 8,513.35	$ 11,221.60	$ 6,612.88	$ 11,322.88	$ 16,032.88	$ 21,449.38	$ 9,422.40	$ 16,487.40	$ 23,552.40	$ 31,677.15	$ 12,231.93	$ 21,651.93	$ 31,071.93	$ 41,904.93	
STAS @ 0.07 %	$ 1.84	$ 2.66	$ 4.31	$ 5.96	$ 7.86	$ 4.63	$ 7.93	$ 11.22	$ 15.01	$ 6.60	$ 11.54	$ 16.49	$ 22.17	$ 8.56	$ 15.16	$ 21.75	$ 29.33	
Total Bill	**$ 2,627.69**	**$ 3,806.01**	**$ 6,162.66**	**$ 8,519.31**	**$ 11,229.46**	**$ 6,617.51**	**$ 11,330.80**	**$ 16,044.10**	**$ 21,464.39**	**$ 9,429.00**	**$ 16,498.94**	**$ 23,568.89**	**$ 31,699.33**	**$ 12,240.49**	**$ 21,667.08**	**$ 31,093.68**	**$ 41,934.26**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,115.91	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	
All kW @ $3.81/kW	$ 952	$ 952	$ 952	$ 952	$ 952	$ 1,904	$ 1,904	$ 1,904	$ 1,904	$ 2,856	$ 2,856	$ 2,856	$ 2,856	$ 3,808	$ 3,808	$ 3,808	$ 3,808	
All rkVA @$ 0.21 /rkVA	$ 14	$ 14	$ 14	$ 14	$ 14	$ 28	$ 28	$ 28	$ 28	$ 42	$ 42	$ 42	$ 42	$ 56	$ 56	$ 56	$ 56	
Sub-Total	$ 2,082	$ 2,082	$ 2,082	$ 2,082	$ 2,082	$ 3,048	$ 3,048	$ 3,048	$ 3,048	$ 4,014	$ 4,014	$ 4,014	$ 4,014	$ 4,980	$ 4,980	$ 4,980	$ 4,980	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 60	$ 60	$ 60	$ 60	$ 60	$ 120	$ 120	$ 120	$ 120	$ 180	$ 180	$ 180	$ 180	$ 240	$ 240	$ 240	$ 240	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 703	$ 703	$ 703	$ 703	$ 703	$ 1,406	$ 1,406	$ 1,406	$ 1,406	$ 2,109	$ 2,109	$ 2,109	$ 2,109	$ 2,812	$ 2,812	$ 2,812	$ 2,812	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 2	$ 6	$ 10	$ 15	$ 4	$ 12	$ 20	$ 29	$ 6	$ 18	$ 30	$ 44	$ 8	$ 24	$ 40	$ 58	
Sub-Total	$ 763	$ 765	$ 769	$ 773	$ 778	$ 1,530	$ 1,538	$ 1,546	$ 1,555	$ 2,295	$ 2,307	$ 2,319	$ 2,333	$ 3,060	$ 3,076	$ 3,092	$ 3,110	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 1,176	$ 3,527	$ 5,878	$ 8,581	$ 2,351	$ 7,053	$ 11,755	$ 17,162	$ 3,527	$ 10,580	$ 17,633	$ 25,743	$ 4,702	$ 14,106	$ 23,510	$ 34,325	
Sub Total	$ 2,844.89	$ 4,022.39	$ 6,377.39	$ 8,732.39	$ 11,440.64	$ 6,928.87	$ 11,638.87	$ 16,348.87	$ 21,765.37	$ 9,835.36	$ 16,900.36	$ 23,965.36	$ 32,090.11	$ 12,741.84	$ 22,161.84	$ 31,581.84	$ 42,414.84	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 2,844.89**	**$ 4,022.39**	**$ 6,377.39**	**$ 8,732.39**	**$ 11,440.64**	**$ 6,928.87**	**$ 11,638.87**	**$ 16,348.87**	**$ 21,765.37**	**$ 9,835.36**	**$ 16,900.36**	**$ 23,965.36**	**$ 32,090.11**	**$ 12,741.84**	**$ 22,161.84**	**$ 31,581.84**	**$ 42,414.84**	
% Increase	**8.27%**	**5.69%**	**3.48%**	**2.50%**	**1.88%**	**4.71%**	**2.72%**	**1.90%**	**1.40%**	**4.31%**	**2.43%**	**1.68%**	**1.23%**	**4.10%**	**2.28%**	**1.57%**	**1.15%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	396	396	396	396	396	527	527	527	527	659	659	659	659	791	791	791	791	
ENERGY USAGE																		
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Proposed Bill	$ 11,489.80	$ 18,554.80	$ 32,684.80	$ 46,814.80	$ 63,064.30	$ 24,367.76	$ 43,207.76	$ 62,047.76	$ 83,713.76	$ 30,180.73	$ 53,730.73	$ 77,280.73	$ 104,363.23	$ 35,993.69	$ 64,253.69	$ 92,513.69	$ 125,012.69	
Total Current Bill	10,793.53	17,863.48	32,003.37	46,143.26	62,404.13	23,486.46	42,339.65	61,192.84	82,874.00	29,109.45	52,675.93	76,242.42	103,343.87	34,732.43	63,012.21	91,292.00	123,813.75	
Increase ($)	$ 696.27	$ 691.32	$ 681.43	$ 671.54	$ 660.17	$ 881.30	$ 868.11	$ 854.93	$ 839.76	$ 1,071.28	$ 1,054.79	$ 1,038.31	$ 1,019.35	$ 1,261.26	$ 1,241.47	$ 1,221.69	$ 1,198.94	
Increase (%)	6.45%	3.87%	2.13%	1.46%	1.06%	3.75%	2.05%	1.40%	1.01%	3.68%	2.00%	1.36%	0.99%	3.63%	1.97%	1.34%	0.97%	
Overall Increase (%)	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	2.18%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $996.52	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	$ 997	
All kW @ $3.46/kW	$ 5,190	$ 5,190	$ 5,190	$ 5,190	$ 5,190	$ 6,920	$ 6,920	$ 6,920	$ 6,920	$ 8,650	$ 8,650	$ 8,650	$ 8,650	$ 10,380	$ 10,380	$ 10,380	$ 10,380	
All rkVA @$ 0.19 /rkVA	$ 75	$ 75	$ 75	$ 75	$ 75	$ 100	$ 100	$ 100	$ 100	$ 125	$ 125	$ 125	$ 125	$ 150	$ 150	$ 150	$ 150	
Sub-Total	$ 6,262	$ 6,262	$ 6,262	$ 6,262	$ 6,262	$ 8,017	$ 8,017	$ 8,017	$ 8,017	$ 9,772	$ 9,772	$ 9,772	$ 9,772	$ 11,527	$ 11,527	$ 11,527	$ 11,527	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 360	$ 360	$ 360	$ 360	$ 360	$ 480	$ 480	$ 480	$ 480	$ 600	$ 600	$ 600	$ 600	$ 720	$ 720	$ 720	$ 720	
TCJA @ -6.010 %	$ (376)	$ (376)	$ (376)	$ (376)	$ (376)	$ (482)	$ (482)	$ (482)	$ (482)	$ (587)	$ (587)	$ (587)	$ (587)	$ (693)	$ (693)	$ (693)	$ (693)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 5,624	$ 5,624	$ 5,624	$ 5,624	$ 7,030	$ 7,030	$ 7,030	$ 7,030	$ 8,436	$ 8,436	$ 8,436	$ 8,436	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 12	$ 36	$ 60	$ 88	$ 16	$ 48	$ 80	$ 117	$ 20	$ 60	$ 100	$ 146	$ 24	$ 72	$ 120	$ 175	
Sub-Total	$ 4,212	$ 4,224	$ 4,248	$ 4,272	$ 4,299	$ 5,648	$ 5,680	$ 5,712	$ 5,749	$ 7,073	$ 7,113	$ 7,153	$ 7,199	$ 8,497	$ 8,545	$ 8,593	$ 8,648	
DSIC @ 5.000 %	$ 313	$ 313	$ 313	$ 313	$ 313	$ 401	$ 401	$ 401	$ 401	$ 490	$ 490	$ 490	$ 490	$ 578	$ 578	$ 578	$ 578	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 7,053	$ 21,159	$ 35,265	$ 51,487	$ 9,404	$ 28,212	$ 47,020	$ 68,649	$ 11,755	$ 35,265	$ 58,775	$ 85,812	$ 14,106	$ 42,318	$ 70,530	$ 102,974	
Sub Total	$ 10,785.98	$ 17,850.98	$ 31,980.98	$ 46,110.98	$ 62,360.48	$ 23,470.03	$ 42,310.03	$ 61,150.03	$ 82,816.03	$ 29,089.08	$ 52,639.08	$ 76,189.08	$ 103,271.58	$ 34,708.14	$ 62,968.14	$ 91,228.14	$ 123,727.14	
STAS @ 0.07 %	$ 7.55	$ 12.50	$ 22.39	$ 32.28	$ 43.65	$ 16.43	$ 29.62	$ 42.81	$ 57.97	$ 20.36	$ 36.85	$ 53.33	$ 72.29	$ 24.30	$ 44.08	$ 63.86	$ 86.61	
Total Bill	**$ 10,793.53**	**$ 17,863.48**	**$ 32,003.37**	**$ 46,143.26**	**$ 62,404.13**	**$ 23,486.46**	**$ 42,339.65**	**$ 61,192.84**	**$ 82,874.00**	**$ 29,109.45**	**$ 52,675.93**	**$ 76,242.42**	**$ 103,343.87**	**$ 34,732.43**	**$ 63,012.21**	**$ 91,292.00**	**$ 123,813.75**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,115.91	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	$ 1,116	
All kW @ $3.81/kW	$ 5,712	$ 5,712	$ 5,712	$ 5,712	$ 5,712	$ 7,616	$ 7,616	$ 7,616	$ 7,616	$ 9,520	$ 9,520	$ 9,520	$ 9,520	$ 11,423	$ 11,423	$ 11,423	$ 11,423	
All rkVA @$ 0.21 /rkVA	$ 84	$ 84	$ 84	$ 84	$ 84	$ 112	$ 112	$ 112	$ 112	$ 140	$ 140	$ 140	$ 140	$ 168	$ 168	$ 168	$ 168	
Sub-Total	$ 6,912	$ 6,912	$ 6,912	$ 6,912	$ 6,912	$ 8,844	$ 8,844	$ 8,844	$ 8,844	$ 10,776	$ 10,776	$ 10,776	$ 10,776	$ 12,708	$ 12,708	$ 12,708	$ 12,708	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 360	$ 360	$ 360	$ 360	$ 360	$ 480	$ 480	$ 480	$ 480	$ 600	$ 600	$ 600	$ 600	$ 720	$ 720	$ 720	$ 720	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 4,218	$ 5,624	$ 5,624	$ 5,624	$ 5,624	$ 7,030	$ 7,030	$ 7,030	$ 7,030	$ 8,436	$ 8,436	$ 8,436	$ 8,436	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 12	$ 36	$ 60	$ 88	$ 16	$ 48	$ 80	$ 117	$ 20	$ 60	$ 100	$ 146	$ 24	$ 72	$ 120	$ 175	
Sub-Total	$ 4,578	$ 4,590	$ 4,614	$ 4,638	$ 4,666	$ 6,120	$ 6,152	$ 6,184	$ 6,221	$ 7,650	$ 7,690	$ 7,730	$ 7,776	$ 9,180	$ 9,228	$ 9,276	$ 9,331	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 7,053	$ 21,159	$ 35,265	$ 51,487	$ 9,404	$ 28,212	$ 47,020	$ 68,649	$ 11,755	$ 35,265	$ 58,775	$ 85,812	$ 14,106	$ 42,318	$ 70,530	$ 102,974	
Sub Total	$ 11,489.80	$ 18,554.80	$ 32,684.80	$ 46,814.80	$ 63,064.30	$ 24,367.76	$ 43,207.76	$ 62,047.76	$ 83,713.76	$ 30,180.73	$ 53,730.73	$ 77,280.73	$ 104,363.23	$ 35,993.69	$ 64,253.69	$ 92,513.69	$ 125,012.69	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 11,489.80**	**$ 18,554.80**	**$ 32,684.80**	**$ 46,814.80**	**$ 63,064.30**	**$ 24,367.76**	**$ 43,207.76**	**$ 62,047.76**	**$ 83,713.76**	**$ 30,180.73**	**$ 53,730.73**	**$ 77,280.73**	**$ 104,363.23**	**$ 35,993.69**	**$ 64,253.69**	**$ 92,513.69**	**$ 125,012.69**	
% Increase	**6.45%**	**3.87%**	**2.13%**	**1.46%**	**1.06%**	**3.75%**	**2.05%**	**1.40%**	**1.01%**	**3.68%**	**2.00%**	**1.36%**	**0.99%**	**3.63%**	**1.97%**	**1.34%**	**0.97%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Proposed Bill	$ 29,129.19	$ 52,679.19	$ 99,779.19	$ 146,879.19	$ 201,044.19	$ 101,528.38	$ 195,728.38	$ 289,928.38	$ 398,258.38	$ 150,377.58	$ 291,677.58	$ 432,977.58	$ 595,472.58	$ 199,226.78	$ 387,626.78	$ 576,026.78	$ 792,686.78	
Total Current Bill	27,897.24	51,463.73	98,596.70	145,729.67	199,932.58	99,545.48	193,811.42	288,077.36	396,483.19	147,627.24	289,026.15	430,425.06	593,033.81	195,709.00	384,240.88	572,772.76	789,584.42	
Increase ($)	$ 1,231.94	$ 1,215.46	$ 1,182.49	$ 1,149.52	$ 1,111.60	$ 1,982.90	$ 1,916.96	$ 1,851.02	$ 1,775.19	$ 2,750.34	$ 2,651.43	$ 2,552.52	$ 2,438.78	$ 3,517.79	$ 3,385.91	$ 3,254.03	$ 3,102.36	
Increase (%)	4.42%	2.36%	1.20%	0.79%	0.56%	1.99%	0.99%	0.64%	0.45%	1.86%	0.92%	0.59%	0.41%	1.80%	0.88%	0.57%	0.39%	
Overall Increase (%)	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $3,413.98	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	
All kW @ $1.86/kW	$ 9,300	$ 9,300	$ 9,300	$ 9,300	$ 9,300	$ 18,600	$ 18,600	$ 18,600	$ 18,600	$ 27,900	$ 27,900	$ 27,900	$ 27,900	$ 37,200	$ 37,200	$ 37,200	$ 37,200	
Sub-Total	$ 12,714	$ 12,714	$ 12,714	$ 12,714	$ 12,714	$ 22,014	$ 22,014	$ 22,014	$ 22,014	$ 31,314	$ 31,314	$ 31,314	$ 31,314	$ 40,614	$ 40,614	$ 40,614	$ 40,614	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 2,400	$ 2,400	$ 2,400	$ 2,400	$ 3,600	$ 3,600	$ 3,600	$ 3,600	$ 4,800	$ 4,800	$ 4,800	$ 4,800	
TCJA @ -6.010 %	$ (764)	$ (764)	$ (764)	$ (764)	$ (764)	$ (1,323)	$ (1,323)	$ (1,323)	$ (1,323)	$ (1,882)	$ (1,882)	$ (1,882)	$ (1,882)	$ (2,441)	$ (2,441)	$ (2,441)	$ (2,441)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @ $ 2.812 /kW NSPL	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 28,120	$ 28,120	$ 28,120	$ 28,120	$ 42,180	$ 42,180	$ 42,180	$ 42,180	$ 56,240	$ 56,240	$ 56,240	$ 56,240	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 40	$ 120	$ 200	$ 292	$ 80	$ 240	$ 400	$ 584	$ 120	$ 360	$ 600	$ 876	$ 160	$ 480	$ 800	$ 1,168	
Sub-Total	$ 14,506	$ 14,546	$ 14,626	$ 14,706	$ 14,798	$ 29,287	$ 29,447	$ 29,607	$ 29,791	$ 44,028	$ 44,268	$ 44,508	$ 44,784	$ 58,769	$ 59,089	$ 59,409	$ 59,777	
DSIC @ 5.000 %	$ 658	$ 658	$ 658	$ 658	$ 658	$ 1,155	$ 1,155	$ 1,155	$ 1,155	$ 1,652	$ 1,652	$ 1,652	$ 1,652	$ 2,149	$ 2,149	$ 2,149	$ 2,149	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 23,510	$ 70,530	$ 117,550	$ 171,623	$ 47,020	$ 141,060	$ 235,100	$ 343,246	$ 70,530	$ 211,590	$ 352,650	$ 514,869	$ 94,040	$ 282,120	$ 470,200	$ 686,492	
Sub Total	$ 27,878	$ 51,428	$ 98,528	$ 145,628	$ 199,793	$ 99,476	$ 193,676	$ 287,876	$ 396,206	$ 147,524	$ 288,824	$ 430,124	$ 592,619	$ 195,572	$ 383,972	$ 572,372	$ 789,032	
STAS @ 0.07 %	$ 20	$ 36	$ 69	$ 102	$ 140	$ 70	$ 136	$ 202	$ 277	$ 103	$ 202	$ 301	$ 415	$ 137	$ 269	$ 401	$ 552	
Total Bill	**$ 27,897**	**$ 51,464**	**$ 98,597**	**$ 145,730**	**$ 199,933**	**$ 99,545**	**$ 193,811**	**$ 288,077**	**$ 396,483**	**$ 147,627**	**$ 289,026**	**$ 430,425**	**$ 593,034**	**$ 195,709**	**$ 384,241**	**$ 572,773**	**$ 789,584**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $3,829.99	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	
All kW @ $2.01/kW	$ 10,039	$ 10,039	$ 10,039	$ 10,039	$ 10,039	$ 20,078	$ 20,078	$ 20,078	$ 20,078	$ 30,118	$ 30,118	$ 30,118	$ 30,118	$ 40,157	$ 40,157	$ 40,157	$ 40,157	
Sub-Total	$ 13,869	$ 13,869	$ 13,869	$ 13,869	$ 13,869	$ 23,908	$ 23,908	$ 23,908	$ 23,908	$ 33,948	$ 33,948	$ 33,948	$ 33,948	$ 43,987	$ 43,987	$ 43,987	$ 43,987	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 2,400	$ 2,400	$ 2,400	$ 2,400	$ 3,600	$ 3,600	$ 3,600	$ 3,600	$ 4,800	$ 4,800	$ 4,800	$ 4,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 28,120	$ 28,120	$ 28,120	$ 28,120	$ 42,180	$ 42,180	$ 42,180	$ 42,180	$ 56,240	$ 56,240	$ 56,240	$ 56,240	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 40	$ 120	$ 200	$ 292	$ 80	$ 240	$ 400	$ 584	$ 120	$ 360	$ 600	$ 876	$ 160	$ 480	$ 800	$ 1,168	
Sub-Total	$ 15,260	$ 15,300	$ 15,380	$ 15,460	$ 15,552	$ 30,600	$ 30,760	$ 30,920	$ 31,104	$ 45,900	$ 46,140	$ 46,380	$ 46,656	$ 61,200	$ 61,520	$ 61,840	$ 62,208	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 23,510	$ 70,530	$ 117,550	$ 171,623	$ 47,020	$ 141,060	$ 235,100	$ 343,246	$ 70,530	$ 211,590	$ 352,650	$ 514,869	$ 94,040	$ 282,120	$ 470,200	$ 686,492	
Sub Total	$ 29,129	$ 52,679	$ 99,779	$ 146,879	$ 201,044	$ 101,528	$ 195,728	$ 289,928	$ 398,258	$ 150,378	$ 291,678	$ 432,978	$ 595,473	$ 199,227	$ 387,627	$ 576,027	$ 792,687	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 29,129**	**$ 52,679**	**$ 99,779**	**$ 146,879**	**$ 201,044**	**$ 101,528**	**$ 195,728**	**$ 289,928**	**$ 398,258**	**$ 150,378**	**$ 291,678**	**$ 432,978**	**$ 595,473**	**$ 199,227**	**$ 387,627**	**$ 576,027**	**$ 792,687**	
% Increase	**4.42%**	**2.36%**	**1.20%**	**0.79%**	**0.56%**	**1.99%**	**0.99%**	**0.64%**	**0.45%**	**1.86%**	**0.92%**	**0.59%**	**0.41%**	**1.80%**	**0.88%**	**0.57%**	**0.39%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP - 115 KV OR GREATER DISCOUNT
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Proposed Bill	$ 21,087.03	$ 44,637.03	$ 91,737.03	$ 138,837.03	$ 193,002.03	$ 85,444.08	$ 179,644.08	$ 273,844.08	$ 382,174.08	$ 126,251.12	$ 267,551.12	$ 408,851.12	$ 571,346.12	$ 167,058.17	$ 355,458.17	$ 543,858.17	$ 760,518.17	
Total Current Bill	20,539.73	44,106.21	91,239.18	138,372.15	192,575.07	84,830.45	179,096.39	273,362.33	381,768.17	125,554.70	266,953.61	408,352.52	570,961.26	166,278.94	354,810.82	543,342.70	760,154.36	
Increase ($)	$ 547.30	$ 530.82	$ 497.85	$ 464.88	$ 426.96	$ 613.62	$ 547.68	$ 481.74	$ 405.91	$ 696.42	$ 597.51	$ 498.60	$ 384.86	$ 779.23	$ 647.35	$ 515.47	$ 363.81	
Increase (%)	2.66%	1.20%	0.55%	0.34%	0.22%	0.72%	0.31%	0.18%	0.11%	0.55%	0.22%	0.12%	0.07%	0.47%	0.18%	0.09%	0.05%	
Overall Increase (%)	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $3,413.98	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	
All kW @ $0.37/kW	$ 1,850	$ 1,850	$ 1,850	$ 1,850	$ 1,850	$ 3,700	$ 3,700	$ 3,700	$ 3,700	$ 5,550	$ 5,550	$ 5,550	$ 5,550	$ 7,400	$ 7,400	$ 7,400	$ 7,400	
Sub-Total	$ 5,264	$ 5,264	$ 5,264	$ 5,264	$ 5,264	$ 7,114	$ 7,114	$ 7,114	$ 7,114	$ 8,964	$ 8,964	$ 8,964	$ 8,964	$ 10,814	$ 10,814	$ 10,814	$ 10,814	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 2,400	$ 2,400	$ 2,400	$ 2,400	$ 3,600	$ 3,600	$ 3,600	$ 3,600	$ 4,800	$ 4,800	$ 4,800	$ 4,800	
TCJA @ -6.010 %	$ (316)	$ (316)	$ (316)	$ (316)	$ (316)	$ (428)	$ (428)	$ (428)	$ (428)	$ (539)	$ (539)	$ (539)	$ (539)	$ (650)	$ (650)	$ (650)	$ (650)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 28,120	$ 28,120	$ 28,120	$ 28,120	$ 42,180	$ 42,180	$ 42,180	$ 42,180	$ 56,240	$ 56,240	$ 56,240	$ 56,240	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 40	$ 120	$ 200	$ 292	$ 80	$ 240	$ 400	$ 584	$ 120	$ 360	$ 600	$ 876	$ 160	$ 480	$ 800	$ 1,168	
Sub-Total	$ 14,954	$ 14,994	$ 15,074	$ 15,154	$ 15,246	$ 30,182	$ 30,342	$ 30,502	$ 30,686	$ 45,371	$ 45,611	$ 45,851	$ 46,127	$ 60,560	$ 60,880	$ 61,200	$ 61,568	
DSIC @ 5.000 %	$ 308	$ 308	$ 308	$ 308	$ 308	$ 455	$ 455	$ 455	$ 455	$ 602	$ 602	$ 602	$ 602	$ 749	$ 749	$ 749	$ 749	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 23,510	$ 70,530	$ 117,550	$ 171,623	$ 47,020	$ 141,060	$ 235,100	$ 343,246	$ 70,530	$ 211,590	$ 352,650	$ 514,869	$ 94,040	$ 282,120	$ 470,200	$ 686,492	
Sub Total	$ 20,525	$ 44,075	$ 91,175	$ 138,275	$ 192,440	$ 84,771	$ 178,971	$ 273,171	$ 381,501	$ 125,467	$ 266,767	$ 408,067	$ 570,562	$ 166,163	$ 354,563	$ 542,963	$ 759,623	
STAS @ 0.07 %	$ 14	$ 31	$ 64	$ 97	$ 135	$ 59	$ 125	$ 191	$ 267	$ 88	$ 187	$ 286	$ 399	$ 116	$ 248	$ 380	$ 532	
Total Bill	**$ 20,540**	**$ 44,106**	**$ 91,239**	**$ 138,372**	**$ 192,575**	**$ 84,830**	**$ 179,096**	**$ 273,362**	**$ 381,768**	**$ 125,555**	**$ 266,954**	**$ 408,353**	**$ 570,961**	**$ 166,279**	**$ 354,811**	**$ 543,343**	**$ 760,154**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $3,829.99	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	
All kW @ $0.40/kW	$ 1,997	$ 1,997	$ 1,997	$ 1,997	$ 1,997	$ 3,994	$ 3,994	$ 3,994	$ 3,994	$ 5,991	$ 5,991	$ 5,991	$ 5,991	$ 7,988	$ 7,988	$ 7,988	$ 7,988	
Sub-Total	$ 5,827	$ 5,827	$ 5,827	$ 5,827	$ 5,827	$ 7,824	$ 7,824	$ 7,824	$ 7,824	$ 9,821	$ 9,821	$ 9,821	$ 9,821	$ 11,818	$ 11,818	$ 11,818	$ 11,818	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 1,200	$ 2,400	$ 2,400	$ 2,400	$ 2,400	$ 3,600	$ 3,600	$ 3,600	$ 3,600	$ 4,800	$ 4,800	$ 4,800	$ 4,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 14,060	$ 28,120	$ 28,120	$ 28,120	$ 28,120	$ 42,180	$ 42,180	$ 42,180	$ 42,180	$ 56,240	$ 56,240	$ 56,240	$ 56,240	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 40	$ 120	$ 200	$ 292	$ 80	$ 240	$ 400	$ 584	$ 120	$ 360	$ 600	$ 876	$ 160	$ 480	$ 800	$ 1,168	
Sub-Total	$ 15,260	$ 15,300	$ 15,380	$ 15,460	$ 15,552	$ 30,600	$ 30,760	$ 30,920	$ 31,104	$ 45,900	$ 46,140	$ 46,380	$ 46,656	$ 61,200	$ 61,520	$ 61,840	$ 62,208	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 23,510	$ 70,530	$ 117,550	$ 171,623	$ 47,020	$ 141,060	$ 235,100	$ 343,246	$ 70,530	$ 211,590	$ 352,650	$ 514,869	$ 94,040	$ 282,120	$ 470,200	$ 686,492	
Sub Total	$ 21,087	$ 44,637	$ 91,737	$ 138,837	$ 193,002	$ 85,444	$ 179,644	$ 273,844	$ 382,174	$ 126,251	$ 267,551	$ 408,851	$ 571,346	$ 167,058	$ 355,458	$ 543,858	$ 760,518	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 21,087**	**$ 44,637**	**$ 91,737**	**$ 138,837**	**$ 193,002**	**$ 85,444**	**$ 179,644**	**$ 273,844**	**$ 382,174**	**$ 126,251**	**$ 267,551**	**$ 408,851**	**$ 571,346**	**$ 167,058**	**$ 355,458**	**$ 543,858**	**$ 760,518**	
% Increase	**2.66%**	**1.20%**	**0.55%**	**0.34%**	**0.22%**	**0.72%**	**0.31%**	**0.18%**	**0.11%**	**0.55%**	**0.22%**	**0.12%**	**0.07%**	**0.47%**	**0.18%**	**0.09%**	**0.05%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 130,325.98	$ 248,075.98	$ 483,575.98	$ 719,075.98	$ 989,900.98	$ 296,925.18	$ 579,525.18	$ 862,125.18	$ 1,187,115.18	$ 345,774.38	$ 675,474.38	$ 1,005,174.38	$ 1,384,329.38	$ 394,623.58	$ 771,423.58	$ 1,148,223.58	$ 1,581,543.58	
Total Current Bill	125,958.33	243,790.75	479,455.60	715,120.45	986,135.03	291,872.51	574,670.33	857,468.15	1,182,685.65	339,954.27	669,885.06	999,815.85	1,379,236.26	388,036.03	765,099.79	1,142,163.55	1,575,786.87	
Increase ($)	$ 4,367.65	$ 4,285.23	$ 4,120.38	$ 3,955.53	$ 3,765.95	$ 5,052.67	$ 4,854.85	$ 4,657.03	$ 4,429.54	$ 5,820.11	$ 5,589.32	$ 5,358.53	$ 5,093.12	$ 6,587.55	$ 6,323.79	$ 6,060.03	$ 5,756.71	
Increase (%)	3.47%	1.76%	0.86%	0.55%	0.38%	1.73%	0.84%	0.54%	0.37%	1.71%	0.83%	0.54%	0.37%	1.70%	0.83%	0.53%	0.37%	
Overall Increase (%)	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $3,413.98	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	
All kW @ $1.86/kW	$ 46,500	$ 46,500	$ 46,500	$ 46,500	$ 46,500	$ 55,800	$ 55,800	$ 55,800	$ 55,800	$ 65,100	$ 65,100	$ 65,100	$ 65,100	$ 74,400	$ 74,400	$ 74,400	$ 74,400	
Sub-Total	$ 49,914	$ 49,914	$ 49,914	$ 49,914	$ 49,914	$ 59,214	$ 59,214	$ 59,214	$ 59,214	$ 68,514	$ 68,514	$ 68,514	$ 68,514	$ 77,814	$ 77,814	$ 77,814	$ 77,814	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 7,200	$ 7,200	$ 7,200	$ 7,200	$ 8,400	$ 8,400	$ 8,400	$ 8,400	$ 9,600	$ 9,600	$ 9,600	$ 9,600	
TCJA @ -6.010 %	$ (3,000)	$ (3,000)	$ (3,000)	$ (3,000)	$ (3,000)	$ (3,559)	$ (3,559)	$ (3,559)	$ (3,559)	$ (4,118)	$ (4,118)	$ (4,118)	$ (4,118)	$ (4,677)	$ (4,677)	$ (4,677)	$ (4,677)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @ $ 2.812 /kW NSPL	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 84,360	$ 84,360	$ 84,360	$ 84,360	$ 98,420	$ 98,420	$ 98,420	$ 98,420	$ 112,480	$ 112,480	$ 112,480	$ 112,480	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 200	$ 600	$ 1,000	$ 1,460	$ 240	$ 720	$ 1,200	$ 1,752	$ 280	$ 840	$ 1,400	$ 2,044	$ 320	$ 960	$ 1,600	$ 2,336	
Sub-Total	$ 73,310	$ 73,510	$ 73,910	$ 74,310	$ 74,770	$ 88,251	$ 88,731	$ 89,211	$ 89,763	$ 102,992	$ 103,552	$ 104,112	$ 104,756	$ 117,733	$ 118,373	$ 119,013	$ 119,749	
DSIC @ 5.000 %	$ 2,646	$ 2,646	$ 2,646	$ 2,646	$ 2,646	$ 3,143	$ 3,143	$ 3,143	$ 3,143	$ 3,640	$ 3,640	$ 3,640	$ 3,640	$ 4,137	$ 4,137	$ 4,137	$ 4,137	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 117,550	$ 352,650	$ 587,750	$ 858,115	$ 141,060	$ 423,180	$ 705,300	$ 1,029,738	$ 164,570	$ 493,710	$ 822,850	$ 1,201,361	$ 188,080	$ 564,240	$ 940,400	$ 1,372,984	
Sub Total	$ 125,870	$ 243,620	$ 479,120	$ 714,620	$ 985,445	$ 291,668	$ 574,268	$ 856,868	$ 1,181,858	$ 339,716	$ 669,416	$ 999,116	$ 1,378,271	$ 387,765	$ 764,565	$ 1,141,365	$ 1,574,685	
STAS @ 0.07 %	$ 88	$ 171	$ 335	$ 500	$ 690	$ 204	$ 402	$ 600	$ 827	$ 238	$ 469	$ 699	$ 965	$ 271	$ 535	$ 799	$ 1,102	
Total Bill	**$ 125,958**	**$ 243,791**	**$ 479,456**	**$ 715,120**	**$ 986,135**	**$ 291,873**	**$ 574,670**	**$ 857,468**	**$ 1,182,686**	**$ 339,954**	**$ 669,885**	**$ 999,816**	**$ 1,379,236**	**$ 388,036**	**$ 765,100**	**$ 1,142,164**	**$ 1,575,787**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $3,829.99	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	
All kW @ $2.01/kW	$ 50,196	$ 50,196	$ 50,196	$ 50,196	$ 50,196	$ 60,235	$ 60,235	$ 60,235	$ 60,235	$ 70,274	$ 70,274	$ 70,274	$ 70,274	$ 80,314	$ 80,314	$ 80,314	$ 80,314	
Sub-Total	$ 54,026	$ 54,026	$ 54,026	$ 54,026	$ 54,026	$ 64,065	$ 64,065	$ 64,065	$ 64,065	$ 74,104	$ 74,104	$ 74,104	$ 74,104	$ 84,144	$ 84,144	$ 84,144	$ 84,144	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 7,200	$ 7,200	$ 7,200	$ 7,200	$ 8,400	$ 8,400	$ 8,400	$ 8,400	$ 9,600	$ 9,600	$ 9,600	$ 9,600	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 84,360	$ 84,360	$ 84,360	$ 84,360	$ 98,420	$ 98,420	$ 98,420	$ 98,420	$ 112,480	$ 112,480	$ 112,480	$ 112,480	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 200	$ 600	$ 1,000	$ 1,460	$ 240	$ 720	$ 1,200	$ 1,752	$ 280	$ 840	$ 1,400	$ 2,044	$ 320	$ 960	$ 1,600	$ 2,336	
Sub-Total	$ 76,300	$ 76,500	$ 76,900	$ 77,300	$ 77,760	$ 91,800	$ 92,280	$ 92,760	$ 93,312	$ 107,100	$ 107,660	$ 108,220	$ 108,864	$ 122,400	$ 123,040	$ 123,680	$ 124,416	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 117,550	$ 352,650	$ 587,750	$ 858,115	$ 141,060	$ 423,180	$ 705,300	$ 1,029,738	$ 164,570	$ 493,710	$ 822,850	$ 1,201,361	$ 188,080	$ 564,240	$ 940,400	$ 1,372,984	
Sub Total	$ 130,326	$ 248,076	$ 483,576	$ 719,076	$ 989,901	$ 296,925	$ 579,525	$ 862,125	$ 1,187,115	$ 345,774	$ 675,474	$ 1,005,174	$ 1,384,329	$ 394,624	$ 771,424	$ 1,148,224	$ 1,581,544	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 130,326**	**$ 248,076**	**$ 483,576**	**$ 719,076**	**$ 989,901**	**$ 296,925**	**$ 579,525**	**$ 862,125**	**$ 1,187,115**	**$ 345,774**	**$ 675,474**	**$ 1,005,174**	**$ 1,384,329**	**$ 394,624**	**$ 771,424**	**$ 1,148,224**	**$ 1,581,544**	
% Increase	**3.47%**	**1.76%**	**0.86%**	**0.55%**	**0.38%**	**1.73%**	**0.84%**	**0.54%**	**0.37%**	**1.71%**	**0.83%**	**0.54%**	**0.37%**	**1.70%**	**0.83%**	**0.53%**	**0.37%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP - 115 KV OR GREATER DISCOUNT
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 90,115.21	$ 207,865.21	$ 443,365.21	$ 678,865.21	$ 949,690.21	$ 248,672.26	$ 531,272.26	$ 813,872.26	$ 1,138,862.26	$ 289,479.30	$ 619,179.30	$ 948,879.30	$ 1,328,034.30	$ 330,286.35	$ 707,086.35	$ 1,083,886.35	$ 1,517,206.35	
Total Current Bill	89,170.76	207,003.18	442,668.03	678,332.88	949,347.46	247,727.43	530,525.25	813,323.07	1,138,540.56	288,451.67	618,382.46	948,313.25	1,327,733.66	329,175.91	706,239.67	1,083,303.43	1,516,926.76	
Increase ($)	$ 944.45	$ 862.03	$ 697.18	$ 532.33	$ 342.75	$ 944.83	$ 747.01	$ 549.19	$ 321.70	$ 1,027.64	$ 796.85	$ 566.06	$ 300.65	$ 1,110.44	$ 846.68	$ 582.92	$ 279.59	
Increase (%)	1.06%	0.42%	0.16%	0.08%	0.04%	0.38%	0.14%	0.07%	0.03%	0.36%	0.13%	0.06%	0.02%	0.34%	0.12%	0.05%	0.02%	
Overall Increase (%)	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	0.55%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $3,413.98	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	$ 3,414	
All kW @ $0.37/kW	$ 9,250	$ 9,250	$ 9,250	$ 9,250	$ 9,250	$ 11,100	$ 11,100	$ 11,100	$ 11,100	$ 12,950	$ 12,950	$ 12,950	$ 12,950	$ 14,800	$ 14,800	$ 14,800	$ 14,800	
Sub-Total	$ 12,664	$ 12,664	$ 12,664	$ 12,664	$ 12,664	$ 14,514	$ 14,514	$ 14,514	$ 14,514	$ 16,364	$ 16,364	$ 16,364	$ 16,364	$ 18,214	$ 18,214	$ 18,214	$ 18,214	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 7,200	$ 7,200	$ 7,200	$ 7,200	$ 8,400	$ 8,400	$ 8,400	$ 8,400	$ 9,600	$ 9,600	$ 9,600	$ 9,600	
TCJA @ -6.010 %	$ (761)	$ (761)	$ (761)	$ (761)	$ (761)	$ (872)	$ (872)	$ (872)	$ (872)	$ (983)	$ (983)	$ (983)	$ (983)	$ (1,095)	$ (1,095)	$ (1,095)	$ (1,095)	
Smart Meter Charge @ $9.87	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 84,360	$ 84,360	$ 84,360	$ 84,360	$ 98,420	$ 98,420	$ 98,420	$ 98,420	$ 112,480	$ 112,480	$ 112,480	$ 112,480	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 200	$ 600	$ 1,000	$ 1,460	$ 240	$ 720	$ 1,200	$ 1,752	$ 280	$ 840	$ 1,400	$ 2,044	$ 320	$ 960	$ 1,600	$ 2,336	
Sub-Total	$ 75,549	$ 75,749	$ 76,149	$ 76,549	$ 77,009	$ 90,938	$ 91,418	$ 91,898	$ 92,450	$ 106,126	$ 106,686	$ 107,246	$ 107,890	$ 121,315	$ 121,955	$ 122,595	$ 123,331	
DSIC @ 5.000 %	$ 896	$ 896	$ 896	$ 896	$ 896	$ 1,043	$ 1,043	$ 1,043	$ 1,043	$ 1,190	$ 1,190	$ 1,190	$ 1,190	$ 1,336	$ 1,336	$ 1,336	$ 1,336	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 117,550	$ 352,650	$ 587,750	$ 858,115	$ 141,060	$ 423,180	$ 705,300	$ 1,029,738	$ 164,570	$ 493,710	$ 822,850	$ 1,201,361	$ 188,080	$ 564,240	$ 940,400	$ 1,372,984	
Sub Total	$ 89,108	$ 206,858	$ 442,358	$ 677,858	$ 948,683	$ 247,554	$ 530,154	$ 812,754	$ 1,137,744	$ 288,250	$ 617,950	$ 947,650	$ 1,326,805	$ 328,946	$ 705,746	$ 1,082,546	$ 1,515,866	
STAS @ 0.07 %	$ 62	$ 145	$ 310	$ 475	$ 664	$ 173	$ 371	$ 569	$ 796	$ 202	$ 433	$ 663	$ 929	$ 230	$ 494	$ 758	$ 1,061	
Total Bill	**$ 89,171**	**$ 207,003**	**$ 442,668**	**$ 678,333**	**$ 949,347**	**$ 247,727**	**$ 530,525**	**$ 813,323**	**$ 1,138,541**	**$ 288,452**	**$ 618,382**	**$ 948,313**	**$ 1,327,734**	**$ 329,176**	**$ 706,240**	**$ 1,083,303**	**$ 1,516,927**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $3,829.99	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	$ 3,830	
All kW @ $0.40/kW	$ 9,985	$ 9,985	$ 9,985	$ 9,985	$ 9,985	$ 11,982	$ 11,982	$ 11,982	$ 11,982	$ 13,979	$ 13,979	$ 13,979	$ 13,979	$ 15,976	$ 15,976	$ 15,976	$ 15,976	
Sub-Total	$ 13,815	$ 13,815	$ 13,815	$ 13,815	$ 13,815	$ 15,812	$ 15,812	$ 15,812	$ 15,812	$ 17,809	$ 17,809	$ 17,809	$ 17,809	$ 19,806	$ 19,806	$ 19,806	$ 19,806	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.24 /kW PLC	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 6,000	$ 7,200	$ 7,200	$ 7,200	$ 7,200	$ 8,400	$ 8,400	$ 8,400	$ 8,400	$ 9,600	$ 9,600	$ 9,600	$ 9,600	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 2.812 /kW NSPL	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 70,300	$ 84,360	$ 84,360	$ 84,360	$ 84,360	$ 98,420	$ 98,420	$ 98,420	$ 98,420	$ 112,480	$ 112,480	$ 112,480	$ 112,480	
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 200	$ 600	$ 1,000	$ 1,460	$ 240	$ 720	$ 1,200	$ 1,752	$ 280	$ 840	$ 1,400	$ 2,044	$ 320	$ 960	$ 1,600	$ 2,336	
Sub-Total	$ 76,300	$ 76,500	$ 76,900	$ 77,300	$ 77,760	$ 91,800	$ 92,280	$ 92,760	$ 93,312	$ 107,100	$ 107,660	$ 108,220	$ 108,864	$ 122,400	$ 123,040	$ 123,680	$ 124,416	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.04702 /kWh	$ -	$ 117,550	$ 352,650	$ 587,750	$ 858,115	$ 141,060	$ 423,180	$ 705,300	$ 1,029,738	$ 164,570	$ 493,710	$ 822,850	$ 1,201,361	$ 188,080	$ 564,240	$ 940,400	$ 1,372,984	
Sub Total	$ 90,115	$ 207,865	$ 443,365	$ 678,865	$ 949,690	$ 248,672	$ 531,272	$ 813,872	$ 1,138,862	$ 289,479	$ 619,179	$ 948,879	$ 1,328,034	$ 330,286	$ 707,086	$ 1,083,886	$ 1,517,206	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 90,115**	**$ 207,865**	**$ 443,365**	**$ 678,865**	**$ 949,690**	**$ 248,672**	**$ 531,272**	**$ 813,872**	**$ 1,138,862**	**$ 289,479**	**$ 619,179**	**$ 948,879**	**$ 1,328,034**	**$ 330,286**	**$ 707,086**	**$ 1,083,886**	**$ 1,517,206**	
% Increase	**1.06%**	**0.42%**	**0.16%**	**0.08%**	**0.04%**	**0.38%**	**0.14%**	**0.07%**	**0.03%**	**0.36%**	**0.13%**	**0.06%**	**0.02%**	**0.34%**	**0.12%**	**0.05%**	**0.02%**	

Penelec Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE H

ENERGY USAGE																			
All kWh	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000		
Total Energy Usage	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000		
Total Proposed Bill	$ 35.13	$ 50.98	$ 66.83	$ 98.53	$ 130.23	$ 193.64	$ 272.89	$ 352.14	$ 510.65	$ 827.66	$ 1,144.67	$ 1,461.68	$ 1,937.19	$ 2,412.71	$ 3,205.23	$ 3,997.76	$ 4,790.29		
Total Current Bill	35.24	50.70	66.16	97.09	128.01	189.86	267.17	344.48	499.11	808.35	1,117.59	1,426.83	1,890.70	2,354.56	3,127.67	3,900.78	4,673.89		
Increase ($)	$ (0.11)	$ 0.28	$ 0.67	$ 1.44	$ 2.22	$ 3.77	$ 5.72	$ 7.66	$ 11.54	$ 19.31	$ 27.07	$ 34.84	$ 46.49	$ 58.14	$ 77.56	$ 96.98	$ 116.40		
Increase (%)	-0.31%	0.55%	1.01%	1.49%	1.73%	1.99%	2.14%	2.22%	2.31%	2.39%	2.42%	2.44%	2.46%	2.47%	2.48%	2.49%	2.49%		
Overall Increase (%)	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%	2.47%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $35.13	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35		
All kWh @ 3.312 ¢/kWh	$ -	$ 3	$ 7	$ 13	$ 20	$ 33	$ 50	$ 66	$ 99	$ 166	$ 232	$ 298	$ 397	$ 497	$ 662	$ 828	$ 994		
Sub-Total	$ 35	$ 38	$ 42	$ 48	$ 55	$ 68	$ 85	$ 101	$ 134	$ 201	$ 267	$ 333	$ 433	$ 532	$ 698	$ 863	$ 1,029		
Riders																			
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 5	$ 9	$ 12	$ 16	$ 21	$ 26	$ 35	$ 44	$ 53		
TCJA @ -6.010 %	$ (2)	$ (2)	$ (3)	$ (3)	$ (3)	$ (4)	$ (5)	$ (6)	$ (8)	$ (12)	$ (16)	$ (20)	$ (26)	$ (32)	$ (42)	$ (52)	$ (62)		
Smart Meter Charge @ $0.52	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1		
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 2	$ 4	$ 6	$ 8	$ 12	$ 19	$ 27	$ 35	$ 47	$ 58	$ 78	$ 97	$ 116		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2		
Sub-Total	$ (2)	$ (1)	$ (1)	$ (0)	$ 1	$ 2	$ 4	$ 6	$ 10	$ 17	$ 24	$ 32	$ 43	$ 54	$ 73	$ 91	$ 110		
DSIC @ 5.000 %	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 4	$ 5	$ 7	$ 10	$ 13	$ 16	$ 21	$ 26	$ 35	$ 43	$ 51		
PTC/HPS Charge																			
All kWh @ $ 0.11603 /kWh	$ -	$ 12	$ 23	$ 46	$ 70	$ 116	$ 174	$ 232	$ 348	$ 580	$ 812	$ 1,044	$ 1,392	$ 1,740	$ 2,321	$ 2,901	$ 3,481		
Sub Total	$ 35	$ 51	$ 66	$ 97	$ 128	$ 190	$ 267	$ 344	$ 499	$ 808	$ 1,117	$ 1,426	$ 1,889	$ 2,353	$ 3,125	$ 3,898	$ 4,671		
STAS @ 0.07 %	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 3		
Total Bill	**$ 35**	**$ 51**	**$ 66**	**$ 97**	**$ 128**	**$ 190**	**$ 267**	**$ 344**	**$ 499**	**$ 808**	**$ 1,118**	**$ 1,427**	**$ 1,891**	**$ 2,355**	**$ 3,128**	**$ 3,901**	**$ 4,674**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $35.13	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35		
All kWh @ 3.677 ¢/kWh	$ -	$ 4	$ 7	$ 15	$ 22	$ 37	$ 55	$ 74	$ 110	$ 184	$ 257	$ 331	$ 441	$ 551	$ 735	$ 919	$ 1,103		
Sub-Total	$ 35	$ 39	$ 42	$ 50	$ 57	$ 72	$ 90	$ 109	$ 145	$ 219	$ 292	$ 366	$ 476	$ 587	$ 770	$ 954	$ 1,138		
Riders																			
Phase IV Energy Efficiency Charge @ 0.175 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 5	$ 9	$ 12	$ 16	$ 21	$ 26	$ 35	$ 44	$ 53		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @ 0.388 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 2	$ 4	$ 6	$ 8	$ 12	$ 19	$ 27	$ 35	$ 47	$ 58	$ 78	$ 97	$ 116		
Solar Photovoltaic Requirements Charge @ 0.008 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2		
Sub-Total	$ -	$ 1	$ 1	$ 2	$ 3	$ 6	$ 9	$ 11	$ 17	$ 29	$ 40	$ 51	$ 69	$ 86	$ 114	$ 143	$ 171		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.11603 /kWh	$ -	$ 12	$ 23	$ 46	$ 70	$ 116	$ 174	$ 232	$ 348	$ 580	$ 812	$ 1,044	$ 1,392	$ 1,740	$ 2,321	$ 2,901	$ 3,481		
Sub Total	$ 35	$ 51	$ 67	$ 99	$ 130	$ 194	$ 273	$ 352	$ 511	$ 828	$ 1,145	$ 1,462	$ 1,937	$ 2,413	$ 3,205	$ 3,998	$ 4,790		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 35**	**$ 51**	**$ 67**	**$ 99**	**$ 130**	**$ 194**	**$ 273**	**$ 352**	**$ 511**	**$ 828**	**$ 1,145**	**$ 1,462**	**$ 1,937**	**$ 2,413**	**$ 3,205**	**$ 3,998**	**$ 4,790**		
% Increase	**$ (0)**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**	**$ 0**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE RS

											ENERGY USAGE													
All kWh		0		50		100		250		500		750		1,000		1,500		2,000		2,500		3,000		3,500		4,000		4,500		5,000		6,000
Total Energy Usage		0		50		100		250		500		750		1,000		1,500		2,000		2,500		3,000		3,500		4,000		4,500		5,000		6,000
Total Proposed Bill	$	11.00	$	19.89	$	28.77	$	55.43	$	99.86	$	144.29	$	188.72	$	277.59	$	366.45	$	455.31	$	544.17	$	633.03	$	721.90	$	810.76	$	899.62	$	1,077.34
Total Current Bill		10.78		19.27		27.76		53.23		95.68		138.14		180.59		265.50		350.40		435.31		520.21		605.12		690.03		774.93		859.84		1,029.65
Increase ($)	$	0.22	$	0.62	$	1.01	$	2.20	$	4.18	$	6.16	$	8.13	$	12.09	$	16.05	$	20.00	$	23.96	$	27.91	$	31.87	$	35.83	$	39.78	$	47.69
Increase (%)		2.07%		3.21%		3.65%		4.13%		4.37%		4.46%		4.50%		4.55%		4.58%		4.59%		4.61%		4.61%		4.62%		4.62%		4.63%		4.63%
Overall Increase (%)		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%		4.50%
UNBUNDLED RATES - CURRENT																															
Distribution																															
Distribution Charge @ $11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00	$	11.00
All kWh @ 4.437 ¢/kWh	$	-	$	2	$	4	$	11	$	22	$	33	$	44	$	67	$	89	$	111	$	133	$	155	$	177	$	200	$	222	$	266
Sub-Total	$	11	$	13	$	15	$	22	$	33	$	44	$	55	$	78	$	100	$	122	$	144	$	166	$	188	$	211	$	233	$	277
Riders																															
Universal Service Charge @ 0.927 ¢/kWh	$	-	$	0	$	1	$	2	$	5	$	7	$	9	$	14	$	19	$	23	$	28	$	32	$	37	$	42	$	46	$	56
TCJA @ -3.390 %	$	(0)	$	(0)	$	(1)	$	(1)	$	(1)	$	(2)	$	(2)	$	(3)	$	(3)	$	(4)	$	(5)	$	(6)	$	(6)	$	(7)	$	(8)	$	(9)
Phase IV Energy Efficiency Charge @ 0.200 ¢/kWh	$	-	$	0	$	0	$	1	$	1	$	2	$	2	$	3	$	4	$	5	$	6	$	7	$	8	$	9	$	10	$	12
Smart Meter Charge @ $-0.60	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)	$	(1)
Default Service Support Charge @ -0.072 ¢/kWh	$	-	$	(0)	$	(0)	$	(0)	$	(0)	$	(1)	$	(1)	$	(1)	$	(1)	$	(2)	$	(2)	$	(3)	$	(3)	$	(3)	$	(4)	$	(4)
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$	-	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0
Sub-Total	$	(1)	$	(1)	$	(0)	$	1	$	4	$	6	$	8	$	13	$	17	$	22	$	26	$	31	$	35	$	40	$	45	$	54
DSIC @ 7.500 %	$	1	$	1	$	1	$	2	$	3	$	4	$	5	$	7	$	9	$	11	$	13	$	15	$	17	$	19	$	21	$	25
PTC/HPS Charge																															
All kWh @$ 0.11231 /kWh	$	-	$	6	$	11	$	28	$	56	$	84	$	112	$	168	$	225	$	281	$	337	$	393	$	449	$	505	$	562	$	674
Sub Total	$	11	$	19	$	28	$	53	$	96	$	138	$	181	$	266	$	350	$	435	$	520	$	605	$	690	$	775	$	860	$	1,030
STAS @ -0.02 %	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)	$	(0)
Total Bill	**$**	**11**	**$**	**19**	**$**	**28**	**$**	**53**	**$**	**96**	**$**	**138**	**$**	**181**	**$**	**265**	**$**	**350**	**$**	**435**	**$**	**520**	**$**	**605**	**$**	**690**	**$**	**775**	**$**	**860**	**$**	**1,030**
UNBUNDLED RATES - PROPOSED																															
Distribution																															
Distribution Charge @ $11.00	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11	$	11
All kWh @ 5.480 ¢/kWh	$	-	$	3	$	5	$	14	$	27	$	41	$	55	$	82	$	110	$	137	$	164	$	192	$	219	$	247	$	274	$	329
Sub-Total	$	11	$	14	$	16	$	25	$	38	$	52	$	66	$	93	$	121	$	148	$	175	$	203	$	230	$	258	$	285	$	340
Riders																															
Universal Service Charge @ 0.927 ¢/kWh	$	-	$	0	$	1	$	2	$	5	$	7	$	9	$	14	$	19	$	23	$	28	$	32	$	37	$	42	$	46	$	56
TCJA @ 0.000 %	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-
Phase IV Energy Efficiency Charge @ 0.200 ¢/kWh	$	-	$	0	$	0	$	1	$	1	$	2	$	2	$	3	$	4	$	5	$	6	$	7	$	8	$	9	$	10	$	12
Smart Meter Charge @ $0.00	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-
Default Service Support Charge @ -0.072 ¢/kWh	$	-	$	(0)	$	(0)	$	(0)	$	(0)	$	(1)	$	(1)	$	(1)	$	(1)	$	(2)	$	(2)	$	(3)	$	(3)	$	(3)	$	(4)	$	(4)
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$	-	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0	$	0
Sub-Total	$	-	$	1	$	1	$	3	$	5	$	8	$	11	$	16	$	21	$	27	$	32	$	37	$	42	$	48	$	53	$	64
DSIC @ 0.000 %	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-
PTC/HPS Charge																															
All kWh @ $ 0.11231 /kWh	$	-	$	6	$	11	$	28	$	56	$	84	$	112	$	168	$	225	$	281	$	337	$	393	$	449	$	505	$	562	$	674
Sub Total	$	11	$	20	$	29	$	55	$	100	$	144	$	189	$	278	$	366	$	455	$	544	$	633	$	722	$	811	$	900	$	1,077
STAS @ 0.00 %	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-	$	-
Total Bill	**$**	**11**	**$**	**20**	**$**	**29**	**$**	**55**	**$**	**100**	**$**	**144**	**$**	**189**	**$**	**278**	**$**	**366**	**$**	**455**	**$**	**544**	**$**	**633**	**$**	**722**	**$**	**811**	**$**	**900**	**$**	**1,077**
% Increase		**2.1%**		**3.2%**		**3.7%**		**4.1%**		**4.4%**		**4.5%**		**4.5%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**		**4.6%**

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-V

ENERGY USAGE

All kWh	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 11.00	$ 19.89	$ 28.78	$ 55.45	$ 99.89	$ 144.34	$ 171.01	$ 188.78	$ 277.68	$ 366.57	$ 455.46	$ 544.35	$ 633.24	$ 722.14	$ 811.03	$ 899.92	$ 1,077.70
Total Current Bill	10.78	19.27	27.76	53.25	95.72	138.18	163.67	180.65	265.59	350.53	435.47	520.41	605.34	690.28	775.22	860.16	1,030.04
Increase ($)	$ 0.22	$ 0.62	$ 1.01	$ 2.20	$ 4.18	$ 6.15	$ 7.34	$ 8.13	$ 12.08	$ 16.04	$ 19.99	$ 23.94	$ 27.90	$ 31.85	$ 35.81	$ 39.76	$ 47.67
Increase (%)	2.07%	3.21%	3.65%	4.13%	4.36%	4.45%	4.48%	4.50%	4.55%	4.58%	4.59%	4.60%	4.61%	4.61%	4.62%	4.62%	4.63%
Overall Increase (%)	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%	4.68%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00	$ 11.00
All kWh @ 4.437 ¢/kWh	$ -	$ 2	$ 4	$ 11	$ 22	$ 33	$ 40	$ 44	$ 67	$ 89	$ 111	$ 133	$ 155	$ 177	$ 200	$ 222	$ 266
Sub-Total	$ 11	$ 13	$ 15	$ 22	$ 33	$ 44	$ 51	$ 55	$ 78	$ 100	$ 122	$ 144	$ 166	$ 188	$ 211	$ 233	$ 277
Riders																	
Universal Service Charge @ 0.927 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 8	$ 9	$ 14	$ 19	$ 23	$ 28	$ 32	$ 37	$ 42	$ 46	$ 56
TCJA @ -3.390 %	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (2)	$ (3)	$ (3)	$ (4)	$ (5)	$ (6)	$ (6)	$ (7)	$ (8)	$ (9)
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 12
Smart Meter Charge @ $-0.60	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)
Default Service Support Charge @ -0.072 ¢/kWh	$ -	$ (0)	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (3)	$ (3)	$ (4)	$ (4)
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ (1)	$ (1)	$ (0)	$ 1	$ 4	$ 6	$ 7	$ 8	$ 13	$ 17	$ 22	$ 27	$ 31	$ 36	$ 40	$ 45	$ 54
DSIC @ 7.500 %	$ 1	$ 1	$ 1	$ 2	$ 3	$ 4	$ 4	$ 5	$ 7	$ 9	$ 11	$ 13	$ 15	$ 17	$ 19	$ 21	$ 25
PTC/HPS Charge																	
All kWh @ $ 0.11231 /kWh	$ -	$ 6	$ 11	$ 28	$ 56	$ 84	$ 101	$ 112	$ 168	$ 225	$ 281	$ 337	$ 393	$ 449	$ 505	$ 562	$ 674
Sub Total	$ 11	$ 19	$ 28	$ 53	$ 96	$ 138	$ 164	$ 181	$ 266	$ 351	$ 436	$ 521	$ 605	$ 690	$ 775	$ 860	$ 1,030
STAS @ -0.02 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)
Total Bill	**$ 11**	**$ 19**	**$ 28**	**$ 53**	**$ 96**	**$ 138**	**$ 164**	**$ 181**	**$ 266**	**$ 351**	**$ 435**	**$ 520**	**$ 605**	**$ 690**	**$ 775**	**$ 860**	**$ 1,030**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $11.00	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11	$ 11
All kWh @ 5.480 ¢/kWh	$ -	$ 3	$ 5	$ 14	$ 27	$ 41	$ 49	$ 55	$ 82	$ 110	$ 137	$ 164	$ 192	$ 219	$ 247	$ 274	$ 329
Sub-Total	$ 11	$ 14	$ 16	$ 25	$ 38	$ 52	$ 60	$ 66	$ 93	$ 121	$ 148	$ 175	$ 203	$ 230	$ 258	$ 285	$ 340
Riders																	
Universal Service Charge @ 0.927 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 5	$ 7	$ 8	$ 9	$ 14	$ 19	$ 23	$ 28	$ 32	$ 37	$ 42	$ 46	$ 56
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 12
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ -0.072 ¢/kWh	$ -	$ (0)	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (3)	$ (3)	$ (4)	$ (4)
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Sub-Total	$ -	$ 1	$ 1	$ 3	$ 5	$ 8	$ 10	$ 11	$ 16	$ 21	$ 27	$ 32	$ 37	$ 43	$ 48	$ 53	$ 64
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.11231 /kWh	$ -	$ 6	$ 11	$ 28	$ 56	$ 84	$ 101	$ 112	$ 168	$ 225	$ 281	$ 337	$ 393	$ 449	$ 505	$ 562	$ 674
Sub Total	$ 11	$ 20	$ 29	$ 55	$ 100	$ 144	$ 171	$ 189	$ 278	$ 367	$ 455	$ 544	$ 633	$ 722	$ 811	$ 900	$ 1,078
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 11**	**$ 20**	**$ 29**	**$ 55**	**$ 100**	**$ 144**	**$ 171**	**$ 189**	**$ 278**	**$ 367**	**$ 455**	**$ 544**	**$ 633**	**$ 722**	**$ 811**	**$ 900**	**$ 1,078**
% Increase	**2.1%**	**3.2%**	**3.7%**	**4.1%**	**4.4%**	**4.5%**	**4.5%**	**4.5%**	**4.5%**	**4.6%**	**4.6%**	**4.6%**	**4.6%**	**4.6%**	**4.6%**	**4.6%**	**4.6%**

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - SMALL - SINGLE PHASE
At Average Levels of kWh Use

KW Demand																		
Total kW	0	1	1	1	1	1	1	1	3	3	3	3	3	5	5	5	5	
Hrs Use	0	100	200	300	400	500	600	730	100	200	300	400	500	100	200	300	500	
ENERGY USAGE																		
Monthly Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500	
Total Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500	
Total Proposed Bill	$ 30.04	$ 48.00	$ 65.96	$ 83.93	$ 101.89	$ 119.85	$ 137.81	$ 161.16	$ 83.93	$ 137.81	$ 191.70	$ 245.59	$ 299.47	$ 119.85	$ 209.66	$ 299.47	$ 479.10	
Total Current Bill	26.96	43.88	60.80	77.72	94.64	111.56	128.48	150.48	77.72	128.48	179.24	230.00	280.76	111.56	196.16	280.76	449.96	
Increase ($)	$ 3.08	$ 4.12	$ 5.16	$ 6.21	$ 7.25	$ 8.29	$ 9.33	$ 10.69	$ 6.21	$ 9.33	$ 12.46	$ 15.59	$ 18.72	$ 8.29	$ 13.50	$ 18.72	$ 29.14	
Increase (%)	11.41%	9.39%	8.49%	7.98%	7.66%	7.43%	7.26%	7.10%	7.98%	7.26%	6.95%	6.78%	6.67%	7.43%	6.88%	6.67%	6.48%	
Overall Increase (%)	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	7.79%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $24.89	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	$ 25	
All kWh @ 3.623 ¢/kWh	$ -	$ 4	$ 7	$ 11	$ 14	$ 18	$ 22	$ 26	$ 11	$ 22	$ 33	$ 43	$ 54	$ 18	$ 36	$ 54	$ 91	
Sub-Total	$ 25	$ 29	$ 32	$ 36	$ 39	$ 43	$ 47	$ 51	$ 36	$ 47	$ 57	$ 68	$ 79	$ 43	$ 61	$ 79	$ 115	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5	
TCJA @ -3.390 %	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (1)	$ (2)	$ (2)	$ (2)	$ (3)	$ (1)	$ (2)	$ (3)	$ (4)	
Smart Meter Charge @ $1.04	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ -0.176 ¢/kWh	$ -	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (1)	$ (2)	$ (3)	$ (4)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	
Sub-Total	$ 0	$ 0	$ 0	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (0)	$ (1)	$ (1)	$ (2)	
DSIC @ 7.500 %	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 4	$ 4	$ 3	$ 4	$ 4	$ 5	$ 6	$ 3	$ 5	$ 6	$ 9	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 13	$ 26	$ 39	$ 52	$ 66	$ 79	$ 96	$ 39	$ 79	$ 118	$ 157	$ 197	$ 66	$ 131	$ 197	$ 328	
Sub Total	$ 27	$ 44	$ 61	$ 78	$ 95	$ 112	$ 129	$ 151	$ 78	$ 129	$ 179	$ 230	$ 281	$ 112	$ 196	$ 281	$ 450	
STAS @ -0.02 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	
Total Bill	**$ 27**	**$ 44**	**$ 61**	**$ 78**	**$ 95**	**$ 112**	**$ 128**	**$ 150**	**$ 78**	**$ 128**	**$ 179**	**$ 230**	**$ 281**	**$ 112**	**$ 196**	**$ 281**	**$ 450**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $30.04	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	$ 30	
All kWh @ 4.817 ¢/kWh	$ -	$ 5	$ 10	$ 14	$ 19	$ 24	$ 29	$ 35	$ 14	$ 29	$ 43	$ 58	$ 72	$ 24	$ 48	$ 72	$ 120	
Sub-Total	$ 30	$ 35	$ 40	$ 44	$ 49	$ 54	$ 59	$ 65	$ 44	$ 59	$ 73	$ 88	$ 102	$ 54	$ 78	$ 102	$ 150	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ -0.176 ¢/kWh	$ -	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (1)	$ (2)	$ (3)	$ (4)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	
Sub-Total	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 0	$ 0	$ 1	$ 1	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 13	$ 26	$ 39	$ 52	$ 66	$ 79	$ 96	$ 39	$ 79	$ 118	$ 157	$ 197	$ 66	$ 131	$ 197	$ 328	
Sub Total	$ 30	$ 48	$ 66	$ 84	$ 102	$ 120	$ 138	$ 161	$ 84	$ 138	$ 192	$ 246	$ 299	$ 120	$ 210	$ 299	$ 479	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 30**	**$ 48**	**$ 66**	**$ 84**	**$ 102**	**$ 120**	**$ 138**	**$ 161**	**$ 84**	**$ 138**	**$ 192**	**$ 246**	**$ 299**	**$ 120**	**$ 210**	**$ 299**	**$ 479**	
% Increase	**11.4%**	**9.4%**	**8.5%**	**8.0%**	**7.7%**	**7.4%**	**7.3%**	**7.1%**	**8.0%**	**7.3%**	**7.0%**	**6.8%**	**6.7%**	**7.4%**	**6.9%**	**6.7%**	**6.5%**	

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25	25	25	25	25	50	50	50	50	75	75	75	75	100	100	100	100	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	8	8	8	8	8	15	15	15	15	23	23	23	23	30	30	30	30	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000	
Total Proposed Bill	$ 137.03	$ 465.53	$ 1,122.53	$ 1,779.53	$ 2,535.08	$ 899.03	$ 2,213.03	$ 3,527.03	$ 5,038.13	$ 1,332.54	$ 3,303.54	$ 5,274.54	$ 7,541.19	$ 1,766.05	$ 4,394.05	$ 7,022.05	$ 10,044.25	
Total Current Bill	118.86	447.68	1,105.32	1,762.96	2,519.25	866.34	2,181.62	3,496.90	5,009.47	1,285.00	3,257.92	5,230.84	7,499.70	1,703.65	4,334.22	6,964.78	9,989.93	
Increase ($)	$ 18.17	$ 17.85	$ 17.21	$ 16.57	$ 15.83	$ 32.70	$ 31.42	$ 30.13	$ 28.66	$ 47.54	$ 45.62	$ 43.70	$ 41.49	$ 62.39	$ 59.83	$ 57.26	$ 54.31	
Increase (%)	15.29%	3.99%	1.56%	0.94%	0.63%	3.77%	1.44%	0.86%	0.57%	3.70%	1.40%	0.84%	0.55%	3.66%	1.38%	0.82%	0.54%	
Overall Increase (%)	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $26.87	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	
All kW @ $3.40/kW	$ 85	$ 85	$ 85	$ 85	$ 85	$ 170	$ 170	$ 170	$ 170	$ 255	$ 255	$ 255	$ 255	$ 340	$ 340	$ 340	$ 340	
All rkVA @ $0.20 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 6	$ 6	$ 6	$ 6	
Sub-Total	$ 113	$ 113	$ 113	$ 113	$ 113	$ 200	$ 200	$ 200	$ 200	$ 286	$ 286	$ 286	$ 286	$ 373	$ 373	$ 373	$ 373	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 5	$ 15	$ 26	$ 38	$ 10	$ 31	$ 52	$ 75	$ 15	$ 46	$ 77	$ 113	$ 21	$ 62	$ 103	$ 150	
TCJA @ -3.390 %	$ (4)	$ (4)	$ (4)	$ (4)	$ (4)	$ (7)	$ (7)	$ (7)	$ (7)	$ (10)	$ (10)	$ (10)	$ (10)	$ (13)	$ (13)	$ (13)	$ (13)	
Smart Meter Charge @ $1.04	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (5)	$ (14)	$ (23)	$ (33)	$ (9)	$ (27)	$ (45)	$ (66)	$ (14)	$ (41)	$ (68)	$ (99)	$ (18)	$ (54)	$ (91)	$ (132)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	
Sub-Total	$ (3)	$ (2)	$ (0)	$ 1	$ 3	$ (4)	$ (1)	$ 2	$ 6	$ (6)	$ (2)	$ 3	$ 8	$ (9)	$ (2)	$ 4	$ 11	
DSIC @ 7.500 %	$ 8	$ 9	$ 9	$ 10	$ 11	$ 15	$ 17	$ 18	$ 20	$ 22	$ 24	$ 27	$ 29	$ 29	$ 32	$ 35	$ 38	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 328	$ 983	$ 1,639	$ 2,392	$ 655	$ 1,966	$ 3,277	$ 4,785	$ 983	$ 2,950	$ 4,916	$ 7,177	$ 1,311	$ 3,933	$ 6,555	$ 9,570	
Sub Total	$ 118.88	$ 447.77	$ 1,105.54	$ 1,763.31	$ 2,519.75	$ 866.51	$ 2,182.05	$ 3,497.60	$ 5,010.48	$ 1,285.25	$ 3,258.57	$ 5,231.89	$ 7,501.20	$ 1,704.00	$ 4,335.09	$ 6,966.18	$ 9,991.93	
STAS @ -0.02 %	$ (0.02)	$ (0.09)	$ (0.22)	$ (0.35)	$ (0.50)	$ (0.17)	$ (0.44)	$ (0.70)	$ (1.00)	$ (0.26)	$ (0.65)	$ (1.05)	$ (1.50)	$ (0.34)	$ (0.87)	$ (1.39)	$ (2.00)	
Total Bill	**$ 118.86**	**$ 447.68**	**$ 1,105.32**	**$ 1,762.96**	**$ 2,519.25**	**$ 866.34**	**$ 2,181.62**	**$ 3,496.90**	**$ 5,009.47**	**$ 1,285.00**	**$ 3,257.92**	**$ 5,230.84**	**$ 7,499.70**	**$ 1,703.65**	**$ 4,334.22**	**$ 6,964.78**	**$ 9,989.93**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $32.02	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	
All kW @ $4.13/kW	$ 103	$ 103	$ 103	$ 103	$ 103	$ 206	$ 206	$ 206	$ 206	$ 310	$ 310	$ 310	$ 310	$ 413	$ 413	$ 413	$ 413	
All rkVA @ $0.24 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 4	$ 4	$ 4	$ 4	$ 5	$ 5	$ 5	$ 5	$ 7	$ 7	$ 7	$ 7	
Sub-Total	$ 137	$ 137	$ 137	$ 137	$ 137	$ 242	$ 242	$ 242	$ 242	$ 347	$ 347	$ 347	$ 347	$ 452	$ 452	$ 452	$ 452	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 5	$ 15	$ 26	$ 38	$ 10	$ 31	$ 52	$ 75	$ 15	$ 46	$ 77	$ 113	$ 21	$ 62	$ 103	$ 150	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (5)	$ (14)	$ (23)	$ (33)	$ (9)	$ (27)	$ (45)	$ (66)	$ (14)	$ (41)	$ (68)	$ (99)	$ (18)	$ (54)	$ (91)	$ (132)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 0	$ 1	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	
Sub-Total	$ -	$ 1	$ 2	$ 4	$ 6	$ 2	$ 5	$ 8	$ 11	$ 2	$ 7	$ 12	$ 17	$ 3	$ 9	$ 16	$ 23	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 328	$ 983	$ 1,639	$ 2,392	$ 655	$ 1,966	$ 3,277	$ 4,785	$ 983	$ 2,950	$ 4,916	$ 7,177	$ 1,311	$ 3,933	$ 6,555	$ 9,570	
Sub Total	$ 137.03	$ 465.53	$ 1,122.53	$ 1,779.53	$ 2,535.08	$ 899.03	$ 2,213.03	$ 3,527.03	$ 5,038.13	$ 1,332.54	$ 3,303.54	$ 5,274.54	$ 7,541.19	$ 1,766.05	$ 4,394.05	$ 7,022.05	$ 10,044.25	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 137.03**	**$ 465.53**	**$ 1,122.53**	**$ 1,779.53**	**$ 2,535.08**	**$ 899.03**	**$ 2,213.03**	**$ 3,527.03**	**$ 5,038.13**	**$ 1,332.54**	**$ 3,303.54**	**$ 5,274.54**	**$ 7,541.19**	**$ 1,766.05**	**$ 4,394.05**	**$ 7,022.05**	**$ 10,044.25**	
% Increase	**15.29%**	**3.99%**	**1.56%**	**0.94%**	**0.63%**	**3.77%**	**1.44%**	**0.86%**	**0.57%**	**3.70%**	**1.40%**	**0.84%**	**0.55%**	**3.66%**	**1.38%**	**0.82%**	**0.54%**	

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM
With Demands 250-400 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	250	250	250	250	250	250	250	250	250	400	400	400	400	400	400	400	400	400
Hrs Use	0	100	200	300	400	500	600	730	900	100	200	300	400	500	600	730	900	
REACTIVE DEMAND																		
rkVA	76	76	76	76	76	76	76	76	76	122	122	122	122	122	122	122	122	122
ENERGY USAGE																		
Monthly Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Energy Usage	0	25,000	50,000	75,000	100,000	125,000	150,000	182,500	225,000	40,000	80,000	120,000	160,000	200,000	240,000	292,000	360,000	
Total Proposed Bill	$ 1,082.08	$ 4,367.08	$ 7,652.08	$ 10,937.08	$ 14,222.08	$ 17,507.08	$ 20,792.08	$ 25,062.58	$ 30,647.08	$ 6,968.11	$ 12,224.11	$ 17,480.11	$ 22,736.11	$ 27,992.11	$ 33,248.11	$ 40,080.91	$ 49,016.11	
Total Current Bill	927.41	4,215.61	7,503.81	10,792.02	14,080.22	17,368.43	20,656.63	24,931.30	30,521.25	6,727.56	11,988.69	17,249.82	22,510.95	27,772.08	33,033.20	39,872.67	48,816.59	
Increase ($)	$ 154.67	$ 151.47	$ 148.26	$ 145.06	$ 141.86	$ 138.65	$ 135.45	$ 131.28	$ 125.83	$ 240.55	$ 235.42	$ 230.29	$ 225.17	$ 220.04	$ 214.91	$ 208.24	$ 199.53	
Increase (%)	16.68%	3.59%	1.98%	1.34%	1.01%	0.80%	0.66%	0.53%	0.41%	3.58%	1.96%	1.34%	1.00%	0.79%	0.65%	0.52%	0.41%	
Overall Increase (%)	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	1.65%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $26.87	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	$ 27	
All kW @ $3.40/kW	$ 850	$ 850	$ 850	$ 850	$ 850	$ 850	$ 850	$ 850	$ 850	$ 1,360	$ 1,360	$ 1,360	$ 1,360	$ 1,360	$ 1,360	$ 1,360	$ 1,360	
All rkVA @ $0.20 /rkVA	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 15	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	$ 24	
Sub-Total	$ 892	$ 892	$ 892	$ 892	$ 892	$ 892	$ 892	$ 892	$ 892	$ 1,411	$ 1,411	$ 1,411	$ 1,411	$ 1,411	$ 1,411	$ 1,411	$ 1,411	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 52	$ 103	$ 155	$ 206	$ 258	$ 309	$ 376	$ 464	$ 82	$ 165	$ 247	$ 330	$ 412	$ 494	$ 602	$ 742	
TCJA @ -3.390 %	$ (30)	$ (30)	$ (30)	$ (30)	$ (30)	$ (30)	$ (30)	$ (30)	$ (30)	$ (48)	$ (48)	$ (48)	$ (48)	$ (48)	$ (48)	$ (48)	$ (48)	
Smart Meter Charge @ $1.04	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (45)	$ (91)	$ (136)	$ (181)	$ (226)	$ (272)	$ (330)	$ (407)	$ (72)	$ (145)	$ (217)	$ (290)	$ (362)	$ (434)	$ (529)	$ (652)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 6	$ 8	$ 9	$ 11	$ 14	$ 2	$ 5	$ 7	$ 10	$ 12	$ 14	$ 18	$ 22	
Sub-Total	$ (29)	$ (21)	$ (14)	$ (6)	$ 2	$ 10	$ 17	$ 27	$ 41	$ (34)	$ (22)	$ (10)	$ 3	$ 15	$ 28	$ 44	$ 65	
DSIC @ 7.500 %	$ 65	$ 69	$ 72	$ 76	$ 80	$ 84	$ 88	$ 93	$ 99	$ 109	$ 115	$ 121	$ 127	$ 133	$ 139	$ 147	$ 158	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 3,277	$ 6,555	$ 9,832	$ 13,109	$ 16,386	$ 19,664	$ 23,924	$ 29,495	$ 5,244	$ 10,487	$ 15,731	$ 20,974	$ 26,218	$ 31,462	$ 38,278	$ 47,192	
Sub Total	$ 927.59	$ 4,216.45	$ 7,505.32	$ 10,794.18	$ 14,083.04	$ 17,371.90	$ 20,660.77	$ 24,936.29	$ 30,527.35	$ 6,728.91	$ 11,991.09	$ 17,253.27	$ 22,515.45	$ 27,777.63	$ 33,039.81	$ 39,880.64	$ 48,826.35	
STAS @ -0.02 %	$ (0.19)	$ (0.84)	$ (1.50)	$ (2.16)	$ (2.82)	$ (3.47)	$ (4.13)	$ (4.99)	$ (6.11)	$ (1.35)	$ (2.40)	$ (3.45)	$ (4.50)	$ (5.56)	$ (6.61)	$ (7.98)	$ (9.77)	
Total Bill	**$ 927.41**	**$ 4,215.61**	**$ 7,503.81**	**$ 10,792.02**	**$ 14,080.22**	**$ 17,368.43**	**$ 20,656.63**	**$ 24,931.30**	**$ 30,521.25**	**$ 6,727.56**	**$ 11,988.69**	**$ 17,249.82**	**$ 22,510.95**	**$ 27,772.08**	**$ 33,033.20**	**$ 39,872.67**	**$ 48,816.59**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $32.02	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	$ 32	
All kW @ $4.13/kW	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,032	$ 1,651	$ 1,651	$ 1,651	$ 1,651	$ 1,651	$ 1,651	$ 1,651	$ 1,651	
All rkVA @ $0.24 /rkVA	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	$ 29	
Sub-Total	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,082	$ 1,712	$ 1,712	$ 1,712	$ 1,712	$ 1,712	$ 1,712	$ 1,712	$ 1,712	
Riders																		
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 52	$ 103	$ 155	$ 206	$ 258	$ 309	$ 376	$ 464	$ 82	$ 165	$ 247	$ 330	$ 412	$ 494	$ 602	$ 742	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (45)	$ (91)	$ (136)	$ (181)	$ (226)	$ (272)	$ (330)	$ (407)	$ (72)	$ (145)	$ (217)	$ (290)	$ (362)	$ (434)	$ (529)	$ (652)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 6	$ 8	$ 9	$ 11	$ 14	$ 2	$ 5	$ 7	$ 10	$ 12	$ 14	$ 18	$ 22	
Sub-Total	$ -	$ 8	$ 16	$ 23	$ 31	$ 39	$ 46	$ 57	$ 70	$ 12	$ 25	$ 37	$ 50	$ 62	$ 74	$ 91	$ 112	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.13109 /kWh	$ -	$ 3,277	$ 6,555	$ 9,832	$ 13,109	$ 16,386	$ 19,664	$ 23,924	$ 29,495	$ 5,244	$ 10,487	$ 15,731	$ 20,974	$ 26,218	$ 31,462	$ 38,278	$ 47,192	
Sub Total	$ 1,082.08	$ 4,367.08	$ 7,652.08	$ 10,937.08	$ 14,222.08	$ 17,507.08	$ 20,792.08	$ 25,062.58	$ 30,647.08	$ 6,968.11	$ 12,224.11	$ 17,480.11	$ 22,736.11	$ 27,992.11	$ 33,248.11	$ 40,080.91	$ 49,016.11	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 1,082.08**	**$ 4,367.08**	**$ 7,652.08**	**$ 10,937.08**	**$ 14,222.08**	**$ 17,507.08**	**$ 20,792.08**	**$ 25,062.58**	**$ 30,647.08**	**$ 6,968.11**	**$ 12,224.11**	**$ 17,480.11**	**$ 22,736.11**	**$ 27,992.11**	**$ 33,248.11**	**$ 40,080.91**	**$ 49,016.11**	
% Increase	**16.68%**	**3.59%**	**1.98%**	**1.34%**	**1.01%**	**0.80%**	**0.66%**	**0.53%**	**0.41%**	**3.58%**	**1.96%**	**1.34%**	**1.00%**	**0.79%**	**0.65%**	**0.52%**	**0.41%**	

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 500 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	500	500	500	500	500	500	750	750	750	750	750	750	1,000	1,000	1,000	1,000	1,000		
Hrs Use	0	200	300	400	500	730	200	300	400	500	730	900	200	300	400	500	730		
REACTIVE DEMAND																			
rkVA	212	212	212	212	212	212	317	317	317	317	317	317	423	423	423	423	423		
ENERGY USAGE																			
Monthly Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Proposed Bill	$ 2,560.34	$ 6,405.34	$ 8,327.84	$ 10,250.34	$ 12,172.84	$ 16,594.59	$ 9,531.60	$ 12,415.35	$ 15,299.10	$ 18,182.85	$ 24,815.47	$ 29,717.85	$ 12,657.85	$ 16,502.85	$ 20,347.85	$ 24,192.85	$ 33,036.35		
Total Current Bill	2,263.35	6,107.58	8,029.70	9,951.81	11,873.93	16,294.79	9,091.24	11,974.41	14,857.59	17,740.76	24,372.06	29,273.45	12,074.89	15,919.13	19,763.36	23,607.59	32,449.32		
Increase ($)	$ 296.99	$ 297.76	$ 298.14	$ 298.53	$ 298.91	$ 299.80	$ 440.36	$ 440.93	$ 441.51	$ 442.09	$ 443.41	$ 444.39	$ 582.95	$ 583.72	$ 584.49	$ 585.26	$ 587.03		
Increase (%)	13.12%	4.88%	3.71%	3.00%	2.52%	1.84%	4.84%	3.68%	2.97%	2.49%	1.82%	1.52%	4.83%	3.67%	2.96%	2.48%	1.81%		
Overall Increase (%)	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $130.07	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130		
All kW @ $4.36/kW	$ 2,180	$ 2,180	$ 2,180	$ 2,180	$ 2,180	$ 2,180	$ 3,270	$ 3,270	$ 3,270	$ 3,270	$ 3,270	$ 3,270	$ 4,360	$ 4,360	$ 4,360	$ 4,360	$ 4,360		
All rkVA @$ 0.20 /rkVA	$ 42	$ 42	$ 42	$ 42	$ 42	$ 42	$ 63	$ 63	$ 63	$ 63	$ 63	$ 63	$ 85	$ 85	$ 85	$ 85	$ 85		
Sub-Total	$ 2,352	$ 2,352	$ 2,352	$ 2,352	$ 2,352	$ 2,352	$ 3,464	$ 3,464	$ 3,464	$ 3,464	$ 3,464	$ 3,464	$ 4,575	$ 4,575	$ 4,575	$ 4,575	$ 4,575		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 220	$ 220	$ 220	$ 220	$ 220	$ 220	$ 330	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 440		
TCJA @ -3.390 %	$ (80)	$ (80)	$ (80)	$ (80)	$ (80)	$ (80)	$ (117)	$ (117)	$ (117)	$ (117)	$ (117)	$ (117)	$ (155)	$ (155)	$ (155)	$ (155)	$ (155)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (421)	$ (421)	$ (421)	$ (421)	$ (421)	$ (421)	$ (632)	$ (632)	$ (632)	$ (632)	$ (632)	$ (632)	$ (842)	$ (842)	$ (842)	$ (842)	$ (842)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 6	$ 9	$ 12	$ 15	$ 22	$ 9	$ 14	$ 18	$ 23	$ 33	$ 41	$ 12	$ 18	$ 24	$ 30	$ 44		
Sub-Total	$ (276)	$ (270)	$ (267)	$ (264)	$ (261)	$ (254)	$ (405)	$ (401)	$ (396)	$ (392)	$ (381)	$ (374)	$ (540)	$ (534)	$ (528)	$ (522)	$ (508)		
DSIC @ 7.500 %	$ 187	$ 187	$ 187	$ 187	$ 187	$ 187	$ 276	$ 276	$ 276	$ 276	$ 276	$ 276	$ 365	$ 365	$ 365	$ 365	$ 365		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 3,839	$ 5,759	$ 7,678	$ 9,598	$ 14,012	$ 5,759	$ 8,638	$ 11,517	$ 14,396	$ 21,019	$ 25,913	$ 7,678	$ 11,517	$ 15,356	$ 19,195	$ 28,025		
Sub Total	$ 2,263.80	$ 6,108.80	$ 8,031.30	$ 9,953.80	$ 11,876.30	$ 16,298.05	$ 9,093.06	$ 11,976.81	$ 14,860.56	$ 17,744.31	$ 24,376.93	$ 29,279.31	$ 12,077.31	$ 15,922.31	$ 19,767.31	$ 23,612.31	$ 32,455.81		
STAS @ -0.02 %	$ (0.45)	$ (1.22)	$ (1.61)	$ (1.99)	$ (2.38)	$ (3.26)	$ (1.82)	$ (2.40)	$ (2.97)	$ (3.55)	$ (4.88)	$ (5.86)	$ (2.42)	$ (3.18)	$ (3.95)	$ (4.72)	$ (6.49)		
Total Bill	**$ 2,263.35**	**$ 6,107.58**	**$ 8,029.70**	**$ 9,951.81**	**$ 11,873.93**	**$ 16,294.79**	**$ 9,091.24**	**$ 11,974.41**	**$ 14,857.59**	**$ 17,740.76**	**$ 24,372.06**	**$ 29,273.45**	**$ 12,074.89**	**$ 15,919.13**	**$ 19,763.36**	**$ 23,607.59**	**$ 32,449.32**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $152.83	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153		
All kW @ $5.12/kW	$ 2,559	$ 2,559	$ 2,559	$ 2,559	$ 2,559	$ 2,559	$ 3,838	$ 3,838	$ 3,838	$ 3,838	$ 3,838	$ 3,838	$ 5,118	$ 5,118	$ 5,118	$ 5,118	$ 5,118		
All rkVA @$ 0.24 /rkVA	$ 50	$ 50	$ 50	$ 50	$ 50	$ 50	$ 75	$ 75	$ 75	$ 75	$ 75	$ 75	$ 99	$ 99	$ 99	$ 99	$ 99		
Sub-Total	$ 2,761	$ 2,761	$ 2,761	$ 2,761	$ 2,761	$ 2,761	$ 4,066	$ 4,066	$ 4,066	$ 4,066	$ 4,066	$ 4,066	$ 5,370	$ 5,370	$ 5,370	$ 5,370	$ 5,370		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 220	$ 220	$ 220	$ 220	$ 220	$ 220	$ 330	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 440		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (421)	$ (421)	$ (421)	$ (421)	$ (421)	$ (421)	$ (632)	$ (632)	$ (632)	$ (632)	$ (632)	$ (632)	$ (842)	$ (842)	$ (842)	$ (842)	$ (842)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 6	$ 9	$ 12	$ 15	$ 22	$ 9	$ 14	$ 18	$ 23	$ 33	$ 41	$ 12	$ 18	$ 24	$ 30	$ 44		
Sub-Total	$ (201)	$ (195)	$ (192)	$ (189)	$ (186)	$ (179)	$ (293)	$ (288)	$ (284)	$ (279)	$ (269)	$ (261)	$ (390)	$ (384)	$ (378)	$ (372)	$ (358)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 3,839	$ 5,759	$ 7,678	$ 9,598	$ 14,012	$ 5,759	$ 8,638	$ 11,517	$ 14,396	$ 21,019	$ 25,913	$ 7,678	$ 11,517	$ 15,356	$ 19,195	$ 28,025		
Sub Total	$ 2,560.34	$ 6,405.34	$ 8,327.84	$ 10,250.34	$ 12,172.84	$ 16,594.59	$ 9,531.60	$ 12,415.35	$ 15,299.10	$ 18,182.85	$ 24,815.47	$ 29,717.85	$ 12,657.85	$ 16,502.85	$ 20,347.85	$ 24,192.85	$ 33,036.35		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 2,560.34**	**$ 6,405.34**	**$ 8,327.84**	**$ 10,250.34**	**$ 12,172.84**	**$ 16,594.59**	**$ 9,531.60**	**$ 12,415.35**	**$ 15,299.10**	**$ 18,182.85**	**$ 24,815.47**	**$ 29,717.85**	**$ 12,657.85**	**$ 16,502.85**	**$ 20,347.85**	**$ 24,192.85**	**$ 33,036.35**		
% Increase	**13.12%**	**4.88%**	**3.71%**	**3.00%**	**2.52%**	**1.84%**	**4.84%**	**3.68%**	**2.97%**	**2.49%**	**1.82%**	**1.52%**	**4.83%**	**3.67%**	**2.96%**	**2.48%**	**1.81%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	635	635	635	635	635	846	846	846	846	1,058	1,058	1,058	1,058	1,270	1,270	1,270	1,270		
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Proposed Bill	$ 7,375.36	$ 13,142.86	$ 24,677.86	$ 36,212.86	$ 49,478.11	$ 17,472.87	$ 32,852.87	$ 48,232.87	$ 65,919.87	$ 21,802.87	$ 41,027.87	$ 60,252.87	$ 82,361.62	$ 26,132.88	$ 49,202.88	$ 72,272.88	$ 98,803.38		
Total Current Bill	6,509.51	12,275.86	23,808.55	35,341.25	48,603.84	16,321.06	31,697.98	47,074.90	64,758.37	20,366.25	39,587.41	58,808.56	80,912.89	24,411.45	47,476.83	70,542.22	97,067.41		
Increase ($)	$ 865.84	$ 867.00	$ 869.30	$ 871.61	$ 874.26	$ 1,151.81	$ 1,154.89	$ 1,157.96	$ 1,161.50	$ 1,436.62	$ 1,440.47	$ 1,444.31	$ 1,448.73	$ 1,721.43	$ 1,726.05	$ 1,730.66	$ 1,735.97		
Increase (%)	13.30%	7.06%	3.65%	2.47%	1.80%	7.06%	3.64%	2.46%	1.79%	7.05%	3.64%	2.46%	1.79%	7.05%	3.64%	2.45%	1.79%		
Overall Increase (%)	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%	3.16%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $130.07	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130	$ 130		
All kW @ $4.36/kW	$ 6,540	$ 6,540	$ 6,540	$ 6,540	$ 6,540	$ 8,720	$ 8,720	$ 8,720	$ 8,720	$ 10,900	$ 10,900	$ 10,900	$ 10,900	$ 13,080	$ 13,080	$ 13,080	$ 13,080		
All rkVA @$ 0.20 /rkVA	$ 127	$ 127	$ 127	$ 127	$ 127	$ 169	$ 169	$ 169	$ 169	$ 212	$ 212	$ 212	$ 212	$ 254	$ 254	$ 254	$ 254		
Sub-Total	$ 6,797	$ 6,797	$ 6,797	$ 6,797	$ 6,797	$ 9,019	$ 9,019	$ 9,019	$ 9,019	$ 11,242	$ 11,242	$ 11,242	$ 11,242	$ 13,464	$ 13,464	$ 13,464	$ 13,464		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 660	$ 660	$ 660	$ 660	$ 660	$ 880	$ 880	$ 880	$ 880	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,320	$ 1,320	$ 1,320	$ 1,320		
TCJA @ -3.390 %	$ (230)	$ (230)	$ (230)	$ (230)	$ (230)	$ (306)	$ (306)	$ (306)	$ (306)	$ (381)	$ (381)	$ (381)	$ (381)	$ (456)	$ (456)	$ (456)	$ (456)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,684)	$ (1,684)	$ (1,684)	$ (1,684)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,526)	$ (2,526)	$ (2,526)	$ (2,526)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131		
Sub-Total	$ (829)	$ (820)	$ (802)	$ (784)	$ (763)	$ (1,093)	$ (1,069)	$ (1,045)	$ (1,017)	$ (1,366)	$ (1,336)	$ (1,306)	$ (1,272)	$ (1,640)	$ (1,604)	$ (1,568)	$ (1,526)		
DSIC @ 7.500 %	$ 542	$ 542	$ 542	$ 542	$ 542	$ 720	$ 720	$ 720	$ 720	$ 897	$ 897	$ 897	$ 897	$ 1,075	$ 1,075	$ 1,075	$ 1,075		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 5,759	$ 17,276	$ 28,793	$ 42,037	$ 7,678	$ 23,034	$ 38,390	$ 56,049	$ 9,598	$ 28,793	$ 47,988	$ 70,062	$ 11,517	$ 34,551	$ 57,585	$ 84,074		
Sub Total	$ 6,510.82	$ 12,278.32	$ 23,813.32	$ 35,348.32	$ 48,613.57	$ 16,324.32	$ 31,704.32	$ 47,084.32	$ 64,771.32	$ 20,370.33	$ 39,595.33	$ 58,820.33	$ 80,929.08	$ 24,416.33	$ 47,486.33	$ 70,556.33	$ 97,086.83		
STAS @ -0.02 %	$ (1.30)	$ (2.46)	$ (4.76)	$ (7.07)	$ (9.72)	$ (3.26)	$ (6.34)	$ (9.42)	$ (12.95)	$ (4.07)	$ (7.92)	$ (11.76)	$ (16.19)	$ (4.88)	$ (9.50)	$ (14.11)	$ (19.42)		
Total Bill	**$ 6,509.51**	**$ 12,275.86**	**$ 23,808.55**	**$ 35,341.25**	**$ 48,603.84**	**$ 16,321.06**	**$ 31,697.98**	**$ 47,074.90**	**$ 64,758.37**	**$ 20,366.25**	**$ 39,587.41**	**$ 58,808.56**	**$ 80,912.89**	**$ 24,411.45**	**$ 47,476.83**	**$ 70,542.22**	**$ 97,067.41**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $152.83	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153	$ 153		
All kW @ $5.12/kW	$ 7,676	$ 7,676	$ 7,676	$ 7,676	$ 7,676	$ 10,235	$ 10,235	$ 10,235	$ 10,235	$ 12,794	$ 12,794	$ 12,794	$ 12,794	$ 15,353	$ 15,353	$ 15,353	$ 15,353		
All rkVA @$ 0.24 /rkVA	$ 149	$ 149	$ 149	$ 149	$ 149	$ 199	$ 199	$ 199	$ 199	$ 249	$ 249	$ 249	$ 249	$ 298	$ 298	$ 298	$ 298		
Sub-Total	$ 7,978	$ 7,978	$ 7,978	$ 7,978	$ 7,978	$ 10,587	$ 10,587	$ 10,587	$ 10,587	$ 13,195	$ 13,195	$ 13,195	$ 13,195	$ 15,804	$ 15,804	$ 15,804	$ 15,804		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 660	$ 660	$ 660	$ 660	$ 660	$ 880	$ 880	$ 880	$ 880	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,320	$ 1,320	$ 1,320	$ 1,320		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,684)	$ (1,684)	$ (1,684)	$ (1,684)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,526)	$ (2,526)	$ (2,526)	$ (2,526)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131		
Sub-Total	$ (603)	$ (594)	$ (576)	$ (558)	$ (537)	$ (792)	$ (768)	$ (744)	$ (716)	$ (990)	$ (960)	$ (930)	$ (896)	$ (1,188)	$ (1,152)	$ (1,116)	$ (1,075)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 5,759	$ 17,276	$ 28,793	$ 42,037	$ 7,678	$ 23,034	$ 38,390	$ 56,049	$ 9,598	$ 28,793	$ 47,988	$ 70,062	$ 11,517	$ 34,551	$ 57,585	$ 84,074		
Sub Total	$ 7,375.36	$ 13,142.86	$ 24,677.86	$ 36,212.86	$ 49,478.11	$ 17,472.87	$ 32,852.87	$ 48,232.87	$ 65,919.87	$ 21,802.87	$ 41,027.87	$ 60,252.87	$ 82,361.62	$ 26,132.88	$ 49,202.88	$ 72,272.88	$ 98,803.38		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 7,375.36**	**$ 13,142.86**	**$ 24,677.86**	**$ 36,212.86**	**$ 49,478.11**	**$ 17,472.87**	**$ 32,852.87**	**$ 48,232.87**	**$ 65,919.87**	**$ 21,802.87**	**$ 41,027.87**	**$ 60,252.87**	**$ 82,361.62**	**$ 26,132.88**	**$ 49,202.88**	**$ 72,272.88**	**$ 98,803.38**		
% Increase	**13.30%**	**7.06%**	**3.65%**	**2.47%**	**1.80%**	**7.06%**	**3.64%**	**2.46%**	**1.79%**	**7.05%**	**3.64%**	**2.46%**	**1.79%**	**7.05%**	**3.64%**	**2.45%**	**1.79%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 25 - 150 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	25	25	25	25	25	50	50	50	50	100	100	100	100	150	150	150	150		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	11	11	11	11	11	22	22	22	22	44	44	44	44	66	66	66	66		
ENERGY USAGE																			
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500		
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500		
Total Proposed Bill	$ 261.77	$ 357.89	$ 550.14	$ 742.39	$ 963.48	$ 577.35	$ 961.85	$ 1,346.35	$ 1,788.53	$ 1,016.28	$ 1,785.28	$ 2,554.28	$ 3,438.63	$ 1,455.21	$ 2,608.71	$ 3,762.21	$ 5,088.73		
Total Current Bill	229.69	325.79	518.00	710.21	931.26	527.64	912.06	1,296.48	1,738.57	931.32	1,700.17	2,469.01	3,353.19	1,335.01	2,488.28	3,641.55	4,967.81		
Increase ($)	$ 32.08	$ 32.10	$ 32.14	$ 32.18	$ 32.22	$ 49.72	$ 49.80	$ 49.87	$ 49.96	$ 84.96	$ 85.11	$ 85.27	$ 85.44	$ 120.20	$ 120.43	$ 120.66	$ 120.93		
Increase (%)	13.97%	9.85%	6.20%	4.53%	3.46%	9.42%	5.46%	3.85%	2.87%	9.12%	5.01%	3.45%	2.55%	9.00%	4.84%	3.31%	2.43%		
Overall Increase (%)	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $114.35	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114		
All kW @ $4.34/kW	$ 109	$ 109	$ 109	$ 109	$ 109	$ 217	$ 217	$ 217	$ 217	$ 434	$ 434	$ 434	$ 434	$ 651	$ 651	$ 651	$ 651		
All rkVA @$ 0.20 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 4	$ 4	$ 4	$ 4	$ 9	$ 9	$ 9	$ 9	$ 13	$ 13	$ 13	$ 13		
Sub-Total	$ 225	$ 225	$ 225	$ 225	$ 225	$ 336	$ 336	$ 336	$ 336	$ 557	$ 557	$ 557	$ 557	$ 779	$ 779	$ 779	$ 779		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 11	$ 11	$ 11	$ 11	$ 11	$ 22	$ 22	$ 22	$ 22	$ 44	$ 44	$ 44	$ 44	$ 66	$ 66	$ 66	$ 66		
TCJA @ -3.390 %	$ (8)	$ (8)	$ (8)	$ (8)	$ (8)	$ (11)	$ (11)	$ (11)	$ (11)	$ (19)	$ (19)	$ (19)	$ (19)	$ (26)	$ (26)	$ (26)	$ (26)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (21)	$ (21)	$ (21)	$ (21)	$ (21)	$ (42)	$ (42)	$ (42)	$ (42)	$ (84)	$ (84)	$ (84)	$ (84)	$ (126)	$ (126)	$ (126)	$ (126)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 1	$ 2	$ 3	$ 4	$ 1	$ 3	$ 5	$ 7		
Sub-Total	$ (13)	$ (13)	$ (12)	$ (12)	$ (12)	$ (26)	$ (26)	$ (25)	$ (24)	$ (54)	$ (52)	$ (51)	$ (50)	$ (81)	$ (79)	$ (77)	$ (75)		
DSIC @ 7.500 %	$ 17	$ 17	$ 17	$ 17	$ 17	$ 26	$ 26	$ 26	$ 26	$ 44	$ 44	$ 44	$ 44	$ 62	$ 62	$ 62	$ 62		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 96	$ 288	$ 480	$ 701	$ 192	$ 576	$ 960	$ 1,401	$ 384	$ 1,152	$ 1,920	$ 2,802	$ 576	$ 1,728	$ 2,879	$ 4,204		
Sub Total	$ 229.73	$ 325.86	$ 518.11	$ 710.36	$ 931.44	$ 527.74	$ 912.24	$ 1,296.74	$ 1,738.92	$ 931.51	$ 1,700.51	$ 2,469.51	$ 3,353.86	$ 1,335.28	$ 2,488.78	$ 3,642.28	$ 4,968.80		
STAS @ -0.02 %	$ (0.05)	$ (0.07)	$ (0.10)	$ (0.14)	$ (0.19)	$ (0.11)	$ (0.18)	$ (0.26)	$ (0.35)	$ (0.19)	$ (0.34)	$ (0.49)	$ (0.67)	$ (0.27)	$ (0.50)	$ (0.73)	$ (0.99)		
Total Bill	**$ 229.69**	**$ 325.79**	**$ 518.00**	**$ 710.21**	**$ 931.26**	**$ 527.64**	**$ 912.06**	**$ 1,296.48**	**$ 1,738.57**	**$ 931.32**	**$ 1,700.17**	**$ 2,469.01**	**$ 3,353.19**	**$ 1,335.01**	**$ 2,488.28**	**$ 3,641.55**	**$ 4,967.81**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $138.43	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138		
All kW @ $5.23/kW	$ 131	$ 131	$ 131	$ 131	$ 131	$ 261	$ 261	$ 261	$ 261	$ 523	$ 523	$ 523	$ 523	$ 784	$ 784	$ 784	$ 784		
All rkVA @$ 0.24 /rkVA	$ 3	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5	$ 11	$ 11	$ 11	$ 11	$ 16	$ 16	$ 16	$ 16		
Sub-Total	$ 272	$ 272	$ 272	$ 272	$ 272	$ 405	$ 405	$ 405	$ 405	$ 672	$ 672	$ 672	$ 672	$ 939	$ 939	$ 939	$ 939		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 11	$ 11	$ 11	$ 11	$ 11	$ 22	$ 22	$ 22	$ 22	$ 44	$ 44	$ 44	$ 44	$ 66	$ 66	$ 66	$ 66		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (21)	$ (21)	$ (21)	$ (21)	$ (21)	$ (42)	$ (42)	$ (42)	$ (42)	$ (84)	$ (84)	$ (84)	$ (84)	$ (126)	$ (126)	$ (126)	$ (126)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 0	$ 1	$ 2	$ 2	$ 1	$ 2	$ 3	$ 4	$ 1	$ 3	$ 5	$ 7		
Sub-Total	$ (10)	$ (10)	$ (10)	$ (9)	$ (9)	$ (20)	$ (19)	$ (19)	$ (18)	$ (40)	$ (38)	$ (37)	$ (36)	$ (59)	$ (58)	$ (56)	$ (54)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 96	$ 288	$ 480	$ 701	$ 192	$ 576	$ 960	$ 1,401	$ 384	$ 1,152	$ 1,920	$ 2,802	$ 576	$ 1,728	$ 2,879	$ 4,204		
Sub Total	$ 261.77	$ 357.89	$ 550.14	$ 742.39	$ 963.48	$ 577.35	$ 961.85	$ 1,346.35	$ 1,788.53	$ 1,016.28	$ 1,785.28	$ 2,554.28	$ 3,438.63	$ 1,455.21	$ 2,608.71	$ 3,762.21	$ 5,088.73		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 261.77**	**$ 357.89**	**$ 550.14**	**$ 742.39**	**$ 963.48**	**$ 577.35**	**$ 961.85**	**$ 1,346.35**	**$ 1,788.53**	**$ 1,016.28**	**$ 1,785.28**	**$ 2,554.28**	**$ 3,438.63**	**$ 1,455.21**	**$ 2,608.71**	**$ 3,762.21**	**$ 5,088.73**		
% Increase	**13.97%**	**9.85%**	**6.20%**	**4.53%**	**3.46%**	**9.42%**	**5.46%**	**3.85%**	**2.87%**	**9.12%**	**5.01%**	**3.45%**	**2.55%**	**9.00%**	**4.84%**	**3.31%**	**2.43%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 250 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	250	250	250	250	250	500	500	500	500	750	750	750	750	1,000	1,000	1,000	1,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	111	111	111	111	111	222	222	222	222	332	332	332	332	443	443	443	443		
ENERGY USAGE																			
Monthly Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Proposed Bill	$ 1,371.81	$ 2,333.06	$ 4,255.56	$ 6,178.06	$ 8,388.94	$ 4,527.70	$ 8,372.70	$ 12,217.70	$ 16,639.45	$ 6,722.34	$ 12,489.84	$ 18,257.34	$ 24,889.96	$ 8,916.97	$ 16,606.97	$ 24,296.97	$ 33,140.47		
Total Current Bill	1,181.33	2,142.38	4,064.50	5,986.61	8,197.05	4,160.82	8,005.05	11,849.28	16,270.15	6,179.26	11,945.60	17,711.95	24,343.25	8,197.69	15,886.15	23,574.62	32,416.35		
Increase ($)	$ 190.49	$ 190.68	$ 191.06	$ 191.45	$ 191.89	$ 366.88	$ 367.65	$ 368.42	$ 369.30	$ 543.08	$ 544.24	$ 545.39	$ 546.72	$ 719.28	$ 720.82	$ 722.36	$ 724.13		
Increase (%)	16.12%	8.90%	4.70%	3.20%	2.34%	8.82%	4.59%	3.11%	2.27%	8.79%	4.56%	3.08%	2.25%	8.77%	4.54%	3.06%	2.23%		
Overall Increase (%)	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $114.35	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114		
All kW @ $4.34/kW	$ 1,085	$ 1,085	$ 1,085	$ 1,085	$ 1,085	$ 2,170	$ 2,170	$ 2,170	$ 2,170	$ 3,255	$ 3,255	$ 3,255	$ 3,255	$ 4,340	$ 4,340	$ 4,340	$ 4,340		
All rkVA @$ 0.20 /rkVA	$ 22	$ 22	$ 22	$ 22	$ 22	$ 44	$ 44	$ 44	$ 44	$ 66	$ 66	$ 66	$ 66	$ 89	$ 89	$ 89	$ 89		
Sub-Total	$ 1,222	$ 1,222	$ 1,222	$ 1,222	$ 1,222	$ 2,329	$ 2,329	$ 2,329	$ 2,329	$ 3,436	$ 3,436	$ 3,436	$ 3,436	$ 4,543	$ 4,543	$ 4,543	$ 4,543		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 110	$ 110	$ 110	$ 110	$ 110	$ 220	$ 220	$ 220	$ 220	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440		
TCJA @ -3.390 %	$ (41)	$ (41)	$ (41)	$ (41)	$ (41)	$ (79)	$ (79)	$ (79)	$ (79)	$ (116)	$ (116)	$ (116)	$ (116)	$ (154)	$ (154)	$ (154)	$ (154)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (211)	$ (211)	$ (211)	$ (211)	$ (211)	$ (421)	$ (421)	$ (421)	$ (421)	$ (632)	$ (632)	$ (632)	$ (632)	$ (842)	$ (842)	$ (842)	$ (842)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 5	$ 8	$ 11	$ 3	$ 9	$ 15	$ 22	$ 5	$ 14	$ 23	$ 33	$ 6	$ 18	$ 30	$ 44		
Sub-Total	$ (137)	$ (136)	$ (133)	$ (130)	$ (126)	$ (272)	$ (266)	$ (260)	$ (253)	$ (409)	$ (400)	$ (391)	$ (380)	$ (545)	$ (533)	$ (521)	$ (507)		
DSIC @ 7.500 %	$ 97	$ 97	$ 97	$ 97	$ 97	$ 186	$ 186	$ 186	$ 186	$ 274	$ 274	$ 274	$ 274	$ 363	$ 363	$ 363	$ 363		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 960	$ 2,879	$ 4,799	$ 7,006	$ 1,920	$ 5,759	$ 9,598	$ 14,012	$ 2,879	$ 8,638	$ 14,396	$ 21,019	$ 3,839	$ 11,517	$ 19,195	$ 28,025		
Sub Total	$ 1,181.56	$ 2,142.81	$ 4,065.31	$ 5,987.81	$ 8,198.69	$ 4,161.65	$ 8,006.65	$ 11,851.65	$ 16,273.40	$ 6,180.49	$ 11,947.99	$ 17,715.49	$ 24,348.12	$ 8,199.33	$ 15,889.33	$ 23,579.33	$ 32,422.83		
STAS @ -0.02 %	$ (0.24)	$ (0.43)	$ (0.81)	$ (1.20)	$ (1.64)	$ (0.83)	$ (1.60)	$ (2.37)	$ (3.25)	$ (1.24)	$ (2.39)	$ (3.54)	$ (4.87)	$ (1.64)	$ (3.18)	$ (4.72)	$ (6.48)		
Total Bill	**$ 1,181.33**	**$ 2,142.38**	**$ 4,064.50**	**$ 5,986.61**	**$ 8,197.05**	**$ 4,160.82**	**$ 8,005.05**	**$ 11,849.28**	**$ 16,270.15**	**$ 6,179.26**	**$ 11,945.60**	**$ 17,711.95**	**$ 24,343.25**	**$ 8,197.69**	**$ 15,886.15**	**$ 23,574.62**	**$ 32,416.35**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $138.43	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138		
All kW @ $5.23/kW	$ 1,307	$ 1,307	$ 1,307	$ 1,307	$ 1,307	$ 2,614	$ 2,614	$ 2,614	$ 2,614	$ 3,921	$ 3,921	$ 3,921	$ 3,921	$ 5,228	$ 5,228	$ 5,228	$ 5,228		
All rkVA @$ 0.24 /rkVA	$ 27	$ 27	$ 27	$ 27	$ 27	$ 54	$ 54	$ 54	$ 54	$ 80	$ 80	$ 80	$ 80	$ 107	$ 107	$ 107	$ 107		
Sub-Total	$ 1,472	$ 1,472	$ 1,472	$ 1,472	$ 1,472	$ 2,806	$ 2,806	$ 2,806	$ 2,806	$ 4,140	$ 4,140	$ 4,140	$ 4,140	$ 5,474	$ 5,474	$ 5,474	$ 5,474		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 110	$ 110	$ 110	$ 110	$ 110	$ 220	$ 220	$ 220	$ 220	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (211)	$ (211)	$ (211)	$ (211)	$ (211)	$ (421)	$ (421)	$ (421)	$ (421)	$ (632)	$ (632)	$ (632)	$ (632)	$ (842)	$ (842)	$ (842)	$ (842)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 2	$ 5	$ 8	$ 11	$ 3	$ 9	$ 15	$ 22	$ 5	$ 14	$ 23	$ 33	$ 6	$ 18	$ 30	$ 44		
Sub-Total	$ (101)	$ (99)	$ (96)	$ (93)	$ (90)	$ (198)	$ (192)	$ (186)	$ (179)	$ (297)	$ (288)	$ (279)	$ (269)	$ (396)	$ (384)	$ (372)	$ (358)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 960	$ 2,879	$ 4,799	$ 7,006	$ 1,920	$ 5,759	$ 9,598	$ 14,012	$ 2,879	$ 8,638	$ 14,396	$ 21,019	$ 3,839	$ 11,517	$ 19,195	$ 28,025		
Sub Total	$ 1,371.81	$ 2,333.06	$ 4,255.56	$ 6,178.06	$ 8,388.94	$ 4,527.70	$ 8,372.70	$ 12,217.70	$ 16,639.45	$ 6,722.34	$ 12,489.84	$ 18,257.34	$ 24,889.96	$ 8,916.97	$ 16,606.97	$ 24,296.97	$ 33,140.47		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 1,371.81**	**$ 2,333.06**	**$ 4,255.56**	**$ 6,178.06**	**$ 8,388.94**	**$ 4,527.70**	**$ 8,372.70**	**$ 12,217.70**	**$ 16,639.45**	**$ 6,722.34**	**$ 12,489.84**	**$ 18,257.34**	**$ 24,889.96**	**$ 8,916.97**	**$ 16,606.97**	**$ 24,296.97**	**$ 33,140.47**		
% Increase	**16.12%**	**8.90%**	**4.70%**	**3.20%**	**2.34%**	**8.82%**	**4.59%**	**3.11%**	**2.27%**	**8.79%**	**4.56%**	**3.08%**	**2.25%**	**8.77%**	**4.54%**	**3.06%**	**2.23%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	665	665	665	665	665	886	886	886	886	1,108	1,108	1,108	1,108	1,329	1,329	1,329	1,329		
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Proposed Bill	$ 7,538.75	$ 13,306.25	$ 24,841.25	$ 36,376.25	$ 49,641.50	$ 17,695.52	$ 33,075.52	$ 48,455.52	$ 66,142.52	$ 22,084.80	$ 41,309.80	$ 60,534.80	$ 82,643.55	$ 26,474.07	$ 49,544.07	$ 72,614.07	$ 99,144.57		
Total Current Bill	6,468.22	12,234.56	23,767.26	35,299.95	48,562.55	16,271.44	31,648.36	47,025.28	64,708.75	20,308.31	39,529.46	58,750.62	80,854.95	24,345.18	47,410.57	70,475.95	97,001.14		
Increase ($)	$ 1,070.53	$ 1,071.69	$ 1,073.99	$ 1,076.30	$ 1,078.95	$ 1,424.09	$ 1,427.16	$ 1,430.24	$ 1,433.78	$ 1,776.49	$ 1,780.33	$ 1,784.18	$ 1,788.60	$ 2,128.89	$ 2,133.51	$ 2,138.12	$ 2,143.43		
Increase (%)	16.55%	8.76%	4.52%	3.05%	2.22%	8.75%	4.51%	3.04%	2.22%	8.75%	4.50%	3.04%	2.21%	8.74%	4.50%	3.03%	2.21%		
Overall Increase (%)	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%	3.52%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $114.35	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114	$ 114		
All kW @ $4.34/kW	$ 6,510	$ 6,510	$ 6,510	$ 6,510	$ 6,510	$ 8,680	$ 8,680	$ 8,680	$ 8,680	$ 10,850	$ 10,850	$ 10,850	$ 10,850	$ 13,020	$ 13,020	$ 13,020	$ 13,020		
All rkVA @$ 0.20 /rkVA	$ 133	$ 133	$ 133	$ 133	$ 133	$ 177	$ 177	$ 177	$ 177	$ 222	$ 222	$ 222	$ 222	$ 266	$ 266	$ 266	$ 266		
Sub-Total	$ 6,757	$ 6,757	$ 6,757	$ 6,757	$ 6,757	$ 8,972	$ 8,972	$ 8,972	$ 8,972	$ 11,186	$ 11,186	$ 11,186	$ 11,186	$ 13,400	$ 13,400	$ 13,400	$ 13,400		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 660	$ 660	$ 660	$ 660	$ 660	$ 880	$ 880	$ 880	$ 880	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,320	$ 1,320	$ 1,320	$ 1,320		
TCJA @ -3.390 %	$ (229)	$ (229)	$ (229)	$ (229)	$ (229)	$ (304)	$ (304)	$ (304)	$ (304)	$ (379)	$ (379)	$ (379)	$ (379)	$ (454)	$ (454)	$ (454)	$ (454)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,684)	$ (1,684)	$ (1,684)	$ (1,684)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,526)	$ (2,526)	$ (2,526)	$ (2,526)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131		
Sub-Total	$ (827)	$ (818)	$ (800)	$ (782)	$ (762)	$ (1,091)	$ (1,067)	$ (1,043)	$ (1,016)	$ (1,364)	$ (1,334)	$ (1,304)	$ (1,270)	$ (1,637)	$ (1,601)	$ (1,565)	$ (1,524)		
DSIC @ 7.500 %	$ 539	$ 539	$ 539	$ 539	$ 539	$ 716	$ 716	$ 716	$ 716	$ 893	$ 893	$ 893	$ 893	$ 1,070	$ 1,070	$ 1,070	$ 1,070		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 5,759	$ 17,276	$ 28,793	$ 42,037	$ 7,678	$ 23,034	$ 38,390	$ 56,049	$ 9,598	$ 28,793	$ 47,988	$ 70,062	$ 11,517	$ 34,551	$ 57,585	$ 84,074		
Sub Total	$ 6,469.51	$ 12,237.01	$ 23,772.01	$ 35,307.01	$ 48,572.26	$ 16,274.69	$ 31,654.69	$ 47,034.69	$ 64,721.69	$ 20,312.37	$ 39,537.37	$ 58,762.37	$ 80,871.12	$ 24,350.05	$ 47,420.05	$ 70,490.05	$ 97,020.55		
STAS @ -0.02 %	$ (1.29)	$ (2.45)	$ (4.75)	$ (7.06)	$ (9.71)	$ (3.25)	$ (6.33)	$ (9.41)	$ (12.94)	$ (4.06)	$ (7.91)	$ (11.75)	$ (16.17)	$ (4.87)	$ (9.48)	$ (14.10)	$ (19.40)		
Total Bill	**$ 6,468.22**	**$ 12,234.56**	**$ 23,767.26**	**$ 35,299.95**	**$ 48,562.55**	**$ 16,271.44**	**$ 31,648.36**	**$ 47,025.28**	**$ 64,708.75**	**$ 20,308.31**	**$ 39,529.46**	**$ 58,750.62**	**$ 80,854.95**	**$ 24,345.18**	**$ 47,410.57**	**$ 70,475.95**	**$ 97,001.14**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $138.43	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138	$ 138		
All kW @ $5.23/kW	$ 7,842	$ 7,842	$ 7,842	$ 7,842	$ 7,842	$ 10,457	$ 10,457	$ 10,457	$ 10,457	$ 13,071	$ 13,071	$ 13,071	$ 13,071	$ 15,685	$ 15,685	$ 15,685	$ 15,685		
All rkVA @$ 0.24 /rkVA	$ 161	$ 161	$ 161	$ 161	$ 161	$ 215	$ 215	$ 215	$ 215	$ 268	$ 268	$ 268	$ 268	$ 322	$ 322	$ 322	$ 322		
Sub-Total	$ 8,142	$ 8,142	$ 8,142	$ 8,142	$ 8,142	$ 10,810	$ 10,810	$ 10,810	$ 10,810	$ 13,477	$ 13,477	$ 13,477	$ 13,477	$ 16,145	$ 16,145	$ 16,145	$ 16,145		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 660	$ 660	$ 660	$ 660	$ 660	$ 880	$ 880	$ 880	$ 880	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,320	$ 1,320	$ 1,320	$ 1,320		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,263)	$ (1,684)	$ (1,684)	$ (1,684)	$ (1,684)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,105)	$ (2,526)	$ (2,526)	$ (2,526)	$ (2,526)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 9	$ 27	$ 45	$ 66	$ 12	$ 36	$ 60	$ 88	$ 15	$ 45	$ 75	$ 110	$ 18	$ 54	$ 90	$ 131		
Sub-Total	$ (603)	$ (594)	$ (576)	$ (558)	$ (537)	$ (792)	$ (768)	$ (744)	$ (716)	$ (990)	$ (960)	$ (930)	$ (896)	$ (1,188)	$ (1,152)	$ (1,116)	$ (1,075)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 5,759	$ 17,276	$ 28,793	$ 42,037	$ 7,678	$ 23,034	$ 38,390	$ 56,049	$ 9,598	$ 28,793	$ 47,988	$ 70,062	$ 11,517	$ 34,551	$ 57,585	$ 84,074		
Sub Total	$ 7,538.75	$ 13,306.25	$ 24,841.25	$ 36,376.25	$ 49,641.50	$ 17,695.52	$ 33,075.52	$ 48,455.52	$ 66,142.52	$ 22,084.80	$ 41,309.80	$ 60,534.80	$ 82,643.55	$ 26,474.07	$ 49,544.07	$ 72,614.07	$ 99,144.57		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 7,538.75**	**$ 13,306.25**	**$ 24,841.25**	**$ 36,376.25**	**$ 49,641.50**	**$ 17,695.52**	**$ 33,075.52**	**$ 48,455.52**	**$ 66,142.52**	**$ 22,084.80**	**$ 41,309.80**	**$ 60,534.80**	**$ 82,643.55**	**$ 26,474.07**	**$ 49,544.07**	**$ 72,614.07**	**$ 99,144.57**		
% Increase	**16.55%**	**8.76%**	**4.52%**	**3.05%**	**2.22%**	**8.75%**	**4.51%**	**3.04%**	**2.22%**	**8.75%**	**4.50%**	**3.04%**	**2.21%**	**8.74%**	**4.50%**	**3.03%**	**2.21%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	2,528	2,528	2,528	2,528	2,528	5,057	5,057	5,057	5,057	7,585	7,585	7,585	7,585	10,114	10,114	10,114	10,114		
ENERGY USAGE																			
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000		
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000		
Total Proposed Bill	$ 1,919.34	$ 21,144.34	$ 59,594.34	$ 98,044.34	$ 142,261.84	$ 41,915.81	$ 118,815.81	$ 195,715.81	$ 284,150.81	$ 62,687.27	$ 178,037.27	$ 293,387.27	$ 426,039.77	$ 83,458.74	$ 237,258.74	$ 391,058.74	$ 567,928.74		
Total Current Bill	1,825.92	21,047.08	59,489.39	97,931.70	142,140.35	41,752.22	118,636.84	195,521.46	283,938.77	62,457.36	177,784.29	293,111.22	425,737.19	83,162.50	236,931.74	390,700.98	567,535.60		
Increase ($)	$ 93.42	$ 97.26	$ 104.95	$ 112.64	$ 121.48	$ 163.59	$ 178.97	$ 194.35	$ 212.04	$ 229.92	$ 252.99	$ 276.06	$ 302.59	$ 296.24	$ 327.00	$ 357.76	$ 393.14		
Increase (%)	5.12%	0.46%	0.18%	0.12%	0.09%	0.39%	0.15%	0.10%	0.07%	0.37%	0.14%	0.09%	0.07%	0.36%	0.14%	0.09%	0.07%		
Overall Increase (%)	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $324.29	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324		
All kVA @ $0.20/kVA	$ 506	$ 506	$ 506	$ 506	$ 506	$ 1,011	$ 1,011	$ 1,011	$ 1,011	$ 1,517	$ 1,517	$ 1,517	$ 1,517	$ 2,023	$ 2,023	$ 2,023	$ 2,023		
All kW @ $0.54/kW	$ 2,700	$ 2,700	$ 2,700	$ 2,700	$ 2,700	$ 5,400	$ 5,400	$ 5,400	$ 5,400	$ 8,100	$ 8,100	$ 8,100	$ 8,100	$ 10,800	$ 10,800	$ 10,800	$ 10,800		
Sub-Total	$ 3,530	$ 3,530	$ 3,530	$ 3,530	$ 3,530	$ 6,736	$ 6,736	$ 6,736	$ 6,736	$ 9,941	$ 9,941	$ 9,941	$ 9,941	$ 13,147	$ 13,147	$ 13,147	$ 13,147		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 4,400	$ 4,400	$ 4,400	$ 4,400	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 8,800	$ 8,800	$ 8,800	$ 8,800		
TCJA @ -3.390 %	$ (120)	$ (120)	$ (120)	$ (120)	$ (120)	$ (228)	$ (228)	$ (228)	$ (228)	$ (337)	$ (337)	$ (337)	$ (337)	$ (446)	$ (446)	$ (446)	$ (446)		
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5		
Default Service Support Charge @ $ -0.842 /kW NSPL	$ (4,210)	$ (4,210)	$ (4,210)	$ (4,210)	$ (4,210)	$ (8,420)	$ (8,420)	$ (8,420)	$ (8,420)	$ (12,630)	$ (12,630)	$ (12,630)	$ (12,630)	$ (16,840)	$ (16,840)	$ (16,840)	$ (16,840)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876		
Sub-Total	$ (2,125)	$ (2,095)	$ (2,035)	$ (1,975)	$ (1,906)	$ (4,183)	$ (4,063)	$ (3,943)	$ (3,805)	$ (6,272)	$ (6,092)	$ (5,912)	$ (5,705)	$ (8,361)	$ (8,121)	$ (7,881)	$ (7,605)		
DSIC @ 7.500 %	$ 421	$ 421	$ 421	$ 421	$ 421	$ 818	$ 818	$ 818	$ 818	$ 1,216	$ 1,216	$ 1,216	$ 1,216	$ 1,613	$ 1,613	$ 1,613	$ 1,613		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 19,195	$ 57,585	$ 95,975	$ 140,124	$ 38,390	$ 115,170	$ 191,950	$ 280,247	$ 57,585	$ 172,755	$ 287,925	$ 420,371	$ 76,780	$ 230,340	$ 383,900	$ 560,494		
Sub Total	$ 1,826	$ 21,051	$ 59,501	$ 97,951	$ 142,169	$ 41,761	$ 118,661	$ 195,561	$ 283,996	$ 62,470	$ 177,820	$ 293,170	$ 425,822	$ 83,179	$ 236,979	$ 390,779	$ 567,649		
STAS @ -0.02 %	$ (0)	$ (4)	$ (12)	$ (20)	$ (28)	$ (8)	$ (24)	$ (39)	$ (57)	$ (12)	$ (36)	$ (59)	$ (85)	$ (17)	$ (47)	$ (78)	$ (114)		
Total Bill	**$ 1,826**	**$ 21,047**	**$ 59,489**	**$ 97,932**	**$ 142,140**	**$ 41,752**	**$ 118,637**	**$ 195,521**	**$ 283,939**	**$ 62,457**	**$ 177,784**	**$ 293,111**	**$ 425,737**	**$ 83,162**	**$ 236,932**	**$ 390,701**	**$ 567,536**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $372.87	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373		
All kVA @ $0.22/kVA	$ 561	$ 561	$ 561	$ 561	$ 561	$ 1,122	$ 1,122	$ 1,122	$ 1,122	$ 1,683	$ 1,683	$ 1,683	$ 1,683	$ 2,244	$ 2,244	$ 2,244	$ 2,244		
All kW @ $0.60/kW	$ 2,995	$ 2,995	$ 2,995	$ 2,995	$ 2,995	$ 5,991	$ 5,991	$ 5,991	$ 5,991	$ 8,986	$ 8,986	$ 8,986	$ 8,986	$ 11,982	$ 11,982	$ 11,982	$ 11,982		
Sub-Total	$ 3,929	$ 3,929	$ 3,929	$ 3,929	$ 3,929	$ 7,486	$ 7,486	$ 7,486	$ 7,486	$ 11,042	$ 11,042	$ 11,042	$ 11,042	$ 14,599	$ 14,599	$ 14,599	$ 14,599		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 4,400	$ 4,400	$ 4,400	$ 4,400	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 8,800	$ 8,800	$ 8,800	$ 8,800		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ -0.842 /kW NSPL	$ (4,210)	$ (4,210)	$ (4,210)	$ (4,210)	$ (4,210)	$ (8,420)	$ (8,420)	$ (8,420)	$ (8,420)	$ (12,630)	$ (12,630)	$ (12,630)	$ (12,630)	$ (16,840)	$ (16,840)	$ (16,840)	$ (16,840)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 30	$ 90	$ 150	$ 219	$ 60	$ 180	$ 300	$ 438	$ 90	$ 270	$ 450	$ 657	$ 120	$ 360	$ 600	$ 876		
Sub-Total	$ (2,010)	$ (1,980)	$ (1,920)	$ (1,860)	$ (1,791)	$ (3,960)	$ (3,840)	$ (3,720)	$ (3,582)	$ (5,940)	$ (5,760)	$ (5,580)	$ (5,373)	$ (7,920)	$ (7,680)	$ (7,440)	$ (7,164)		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.03839 /kWh	$ -	$ 19,195	$ 57,585	$ 95,975	$ 140,124	$ 38,390	$ 115,170	$ 191,950	$ 280,247	$ 57,585	$ 172,755	$ 287,925	$ 420,371	$ 76,780	$ 230,340	$ 383,900	$ 560,494		
Sub Total	$ 1,919	$ 21,144	$ 59,594	$ 98,044	$ 142,262	$ 41,916	$ 118,816	$ 195,716	$ 284,151	$ 62,687	$ 178,037	$ 293,387	$ 426,040	$ 83,459	$ 237,259	$ 391,059	$ 567,929		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 1,919**	**$ 21,144**	**$ 59,594**	**$ 98,044**	**$ 142,262**	**$ 41,916**	**$ 118,816**	**$ 195,716**	**$ 284,151**	**$ 62,687**	**$ 178,037**	**$ 293,387**	**$ 426,040**	**$ 83,459**	**$ 237,259**	**$ 391,059**	**$ 567,929**		
% Increase	**5.12%**	**0.46%**	**0.18%**	**0.12%**	**0.09%**	**0.39%**	**0.15%**	**0.10%**	**0.07%**	**0.37%**	**0.14%**	**0.09%**	**0.07%**	**0.36%**	**0.14%**	**0.09%**	**0.07%**		

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE TP
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	12,642	12,642	12,642	12,642	12,642	15,170	15,170	15,170	15,170	17,699	17,699	17,699	17,699	20,227	20,227	20,227	20,227	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 8,105.21	$ 104,230.21	$ 296,480.21	$ 488,730.21	$ 709,817.71	$ 125,001.68	$ 355,701.68	$ 586,401.68	$ 851,706.68	$ 145,773.14	$ 414,923.14	$ 684,073.14	$ 993,595.64	$ 166,544.61	$ 474,144.61	$ 781,744.61	$ 1,135,484.61	
Total Current Bill	7,761.86	103,867.64	296,079.19	488,290.74	709,334.02	124,572.77	355,226.63	585,880.49	851,132.43	145,277.91	414,374.08	683,470.25	992,930.85	165,983.05	473,521.53	781,060.01	1,134,729.27	
Increase ($)	$ 343.35	$ 362.57	$ 401.02	$ 439.47	$ 483.69	$ 428.90	$ 475.04	$ 521.18	$ 574.24	$ 495.23	$ 549.06	$ 602.89	$ 664.79	$ 561.56	$ 623.08	$ 684.60	$ 755.34	
Increase (%)	4.42%	0.35%	0.14%	0.09%	0.07%	0.34%	0.13%	0.09%	0.07%	0.34%	0.13%	0.09%	0.07%	0.34%	0.13%	0.09%	0.07%	
Overall Increase (%)	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	0.30%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $324.29	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	$ 324	
All kVA @ $0.20/kVA	$ 2,528	$ 2,528	$ 2,528	$ 2,528	$ 2,528	$ 3,034	$ 3,034	$ 3,034	$ 3,034	$ 3,540	$ 3,540	$ 3,540	$ 3,540	$ 4,045	$ 4,045	$ 4,045	$ 4,045	
All kW @ $0.54/kW	$ 13,500	$ 13,500	$ 13,500	$ 13,500	$ 13,500	$ 16,200	$ 16,200	$ 16,200	$ 16,200	$ 18,900	$ 18,900	$ 18,900	$ 18,900	$ 21,600	$ 21,600	$ 21,600	$ 21,600	
Sub-Total	$ 16,353	$ 16,353	$ 16,353	$ 16,353	$ 16,353	$ 19,558	$ 19,558	$ 19,558	$ 19,558	$ 22,764	$ 22,764	$ 22,764	$ 22,764	$ 25,970	$ 25,970	$ 25,970	$ 25,970	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 11,000	$ 11,000	$ 11,000	$ 11,000	$ 11,000	$ 13,200	$ 13,200	$ 13,200	$ 13,200	$ 15,400	$ 15,400	$ 15,400	$ 15,400	$ 17,600	$ 17,600	$ 17,600	$ 17,600	
TCJA @ -3.390 %	$ (554)	$ (554)	$ (554)	$ (554)	$ (554)	$ (663)	$ (663)	$ (663)	$ (663)	$ (772)	$ (772)	$ (772)	$ (772)	$ (880)	$ (880)	$ (880)	$ (880)	
Smart Meter Charge @ $4.85	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	
Default Service Support Charge @ $ -0.842 /kW NSPL	$ (21,050)	$ (21,050)	$ (21,050)	$ (21,050)	$ (21,050)	$ (25,260)	$ (25,260)	$ (25,260)	$ (25,260)	$ (29,470)	$ (29,470)	$ (29,470)	$ (29,470)	$ (33,680)	$ (33,680)	$ (33,680)	$ (33,680)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ (10,600)	$ (10,450)	$ (10,150)	$ (9,850)	$ (9,505)	$ (12,538)	$ (12,178)	$ (11,818)	$ (11,404)	$ (14,627)	$ (14,207)	$ (13,787)	$ (13,304)	$ (16,716)	$ (16,236)	$ (15,756)	$ (15,204)	
DSIC @ 7.500 %	$ 2,010	$ 2,010	$ 2,010	$ 2,010	$ 2,010	$ 2,408	$ 2,408	$ 2,408	$ 2,408	$ 2,805	$ 2,805	$ 2,805	$ 2,805	$ 3,202	$ 3,202	$ 3,202	$ 3,202	
PTC/HPS Charge																		
All kWh @ $ 0.03839 /kWh	$ -	$ 95,975	$ 287,925	$ 479,875	$ 700,618	$ 115,170	$ 345,510	$ 575,850	$ 840,741	$ 134,365	$ 403,095	$ 671,825	$ 980,865	$ 153,560	$ 460,680	$ 767,800	$ 1,120,988	
Sub Total	$ 7,763	$ 103,888	$ 296,138	$ 488,388	$ 709,476	$ 124,598	$ 355,298	$ 585,998	$ 851,303	$ 145,307	$ 414,457	$ 683,607	$ 993,129	$ 166,016	$ 473,616	$ 781,216	$ 1,134,956	
STAS @ -0.02 %	$ (2)	$ (21)	$ (59)	$ (98)	$ (142)	$ (25)	$ (71)	$ (117)	$ (170)	$ (29)	$ (83)	$ (137)	$ (199)	$ (33)	$ (95)	$ (156)	$ (227)	
Total Bill	**$ 7,762**	**$ 103,868**	**$ 296,079**	**$ 488,291**	**$ 709,334**	**$ 124,573**	**$ 355,227**	**$ 585,880**	**$ 851,132**	**$ 145,278**	**$ 414,374**	**$ 683,470**	**$ 992,931**	**$ 165,983**	**$ 473,522**	**$ 781,060**	**$ 1,134,729**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $372.87	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	$ 373	
All kVA @ $0.22/kVA	$ 2,805	$ 2,805	$ 2,805	$ 2,805	$ 2,805	$ 3,366	$ 3,366	$ 3,366	$ 3,366	$ 3,927	$ 3,927	$ 3,927	$ 3,927	$ 4,488	$ 4,488	$ 4,488	$ 4,488	
All kW @ $0.60/kW	$ 14,977	$ 14,977	$ 14,977	$ 14,977	$ 14,977	$ 17,973	$ 17,973	$ 17,973	$ 17,973	$ 20,968	$ 20,968	$ 20,968	$ 20,968	$ 23,964	$ 23,964	$ 23,964	$ 23,964	
Sub-Total	$ 18,155	$ 18,155	$ 18,155	$ 18,155	$ 18,155	$ 21,712	$ 21,712	$ 21,712	$ 21,712	$ 25,268	$ 25,268	$ 25,268	$ 25,268	$ 28,825	$ 28,825	$ 28,825	$ 28,825	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.44 /kW PLC	$ 11,000	$ 11,000	$ 11,000	$ 11,000	$ 11,000	$ 13,200	$ 13,200	$ 13,200	$ 13,200	$ 15,400	$ 15,400	$ 15,400	$ 15,400	$ 17,600	$ 17,600	$ 17,600	$ 17,600	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ -0.842 /kW NSPL	$ (21,050)	$ (21,050)	$ (21,050)	$ (21,050)	$ (21,050)	$ (25,260)	$ (25,260)	$ (25,260)	$ (25,260)	$ (29,470)	$ (29,470)	$ (29,470)	$ (29,470)	$ (33,680)	$ (33,680)	$ (33,680)	$ (33,680)	
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 150	$ 450	$ 750	$ 1,095	$ 180	$ 540	$ 900	$ 1,314	$ 210	$ 630	$ 1,050	$ 1,533	$ 240	$ 720	$ 1,200	$ 1,752	
Sub-Total	$ (10,050)	$ (9,900)	$ (9,600)	$ (9,300)	$ (8,955)	$ (11,880)	$ (11,520)	$ (11,160)	$ (10,746)	$ (13,860)	$ (13,440)	$ (13,020)	$ (12,537)	$ (15,840)	$ (15,360)	$ (14,880)	$ (14,328)	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.03839 /kWh	$ -	$ 95,975	$ 287,925	$ 479,875	$ 700,618	$ 115,170	$ 345,510	$ 575,850	$ 840,741	$ 134,365	$ 403,095	$ 671,825	$ 980,865	$ 153,560	$ 460,680	$ 767,800	$ 1,120,988	
Sub Total	$ 8,105	$ 104,230	$ 296,480	$ 488,730	$ 709,818	$ 125,002	$ 355,702	$ 586,402	$ 851,707	$ 145,773	$ 414,923	$ 684,073	$ 993,596	$ 166,545	$ 474,145	$ 781,745	$ 1,135,485	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 8,105**	**$ 104,230**	**$ 296,480**	**$ 488,730**	**$ 709,818**	**$ 125,002**	**$ 355,702**	**$ 586,402**	**$ 851,707**	**$ 145,773**	**$ 414,923**	**$ 684,073**	**$ 993,596**	**$ 166,545**	**$ 474,145**	**$ 781,745**	**$ 1,135,485**	
% Increase	**4.42%**	**0.35%**	**0.14%**	**0.09%**	**0.07%**	**0.34%**	**0.13%**	**0.09%**	**0.07%**	**0.34%**	**0.13%**	**0.09%**	**0.07%**	**0.34%**	**0.13%**	**0.09%**	**0.07%**	

Penn Power Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE PNP

ENERGY USAGE																			
All kWh	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000		
Total Energy Usage	0	100	200	400	600	1,000	1,500	2,000	3,000	5,000	7,000	9,000	12,000	15,000	20,000	25,000	30,000		
Total Proposed Bill	$ 15.56	$ 33.07	$ 50.58	$ 85.60	$ 120.62	$ 190.66	$ 278.21	$ 365.75	$ 540.85	$ 891.05	$ 1,241.24	$ 1,591.44	$ 2,116.73	$ 2,642.02	$ 3,517.51	$ 4,392.99	$ 5,268.48		
Total Current Bill	17.27	33.99	50.70	84.12	117.54	184.39	267.95	351.51	518.62	852.86	1,187.09	1,521.32	2,022.67	2,524.02	3,359.60	4,195.18	5,030.76		
Increase ($)	$ (1.71)	$ (0.92)	$ (0.12)	$ 1.48	$ 3.07	$ 6.27	$ 10.26	$ 14.25	$ 22.23	$ 38.19	$ 54.15	$ 70.12	$ 94.06	$ 118.00	$ 157.91	$ 197.81	$ 237.72		
Increase (%)	-9.93%	-2.70%	-0.23%	1.76%	2.62%	3.40%	3.83%	4.05%	4.29%	4.48%	4.56%	4.61%	4.65%	4.68%	4.70%	4.72%	4.73%		
Overall Increase (%)	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%	3.89%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $15.56	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16		
All kWh @ 3.440 ¢/kWh	$ -	$ 3	$ 7	$ 14	$ 21	$ 34	$ 52	$ 69	$ 103	$ 172	$ 241	$ 310	$ 413	$ 516	$ 688	$ 860	$ 1,032		
Sub-Total	$ 16	$ 19	$ 22	$ 29	$ 36	$ 50	$ 67	$ 84	$ 119	$ 188	$ 256	$ 325	$ 428	$ 532	$ 704	$ 876	$ 1,048		
Riders																			
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 6	$ 10	$ 14	$ 19	$ 25	$ 31	$ 41	$ 52	$ 62		
TCJA @ -3.390 %	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (4)	$ (6)	$ (9)	$ (11)	$ (15)	$ (18)	$ (24)	$ (30)	$ (36)		
Smart Meter Charge @ $1.04	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1		
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (0)	$ (0)	$ (1)	$ (1)	$ (2)	$ (3)	$ (4)	$ (5)	$ (9)	$ (13)	$ (16)	$ (22)	$ (27)	$ (36)	$ (45)	$ (54)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2		
Sub-Total	$ 1	$ 0	$ 0	$ 0	$ (0)	$ (0)	$ (1)	$ (1)	$ (2)	$ (4)	$ (5)	$ (7)	$ (10)	$ (12)	$ (17)	$ (21)	$ (25)		
DSIC @ 7.500 %	$ 1	$ 1	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 9	$ 14	$ 19	$ 24	$ 31	$ 39	$ 52	$ 64	$ 77		
PTC/HPS Charge																			
All kWh @ $ 0.13109 /kWh	$ -	$ 13	$ 26	$ 52	$ 79	$ 131	$ 197	$ 262	$ 393	$ 655	$ 918	$ 1,180	$ 1,573	$ 1,966	$ 2,622	$ 3,277	$ 3,933		
Sub Total	$ 17	$ 34	$ 51	$ 84	$ 118	$ 184	$ 268	$ 352	$ 519	$ 853	$ 1,187	$ 1,522	$ 2,023	$ 2,525	$ 3,360	$ 4,196	$ 5,032		
STAS @ -0.02 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)		
Total Bill	**$ 17**	**$ 34**	**$ 51**	**$ 84**	**$ 118**	**$ 184**	**$ 268**	**$ 352**	**$ 519**	**$ 853**	**$ 1,187**	**$ 1,521**	**$ 2,023**	**$ 2,524**	**$ 3,360**	**$ 4,195**	**$ 5,031**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $15.56	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16	$ 16		
All kWh @ 4.370 ¢/kWh	$ -	$ 4	$ 9	$ 17	$ 26	$ 44	$ 66	$ 87	$ 131	$ 218	$ 306	$ 393	$ 524	$ 655	$ 874	$ 1,092	$ 1,311		
Sub-Total	$ 16	$ 20	$ 24	$ 33	$ 42	$ 59	$ 81	$ 103	$ 147	$ 234	$ 321	$ 409	$ 540	$ 671	$ 890	$ 1,108	$ 1,326		
Riders																			
Phase IV Energy Efficiency Charge @ 0.206 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 2	$ 3	$ 4	$ 6	$ 10	$ 14	$ 19	$ 25	$ 31	$ 41	$ 52	$ 62		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @ -0.181 ¢/kWh	$ -	$ (0)	$ (0)	$ (1)	$ (1)	$ (2)	$ (3)	$ (4)	$ (5)	$ (9)	$ (13)	$ (16)	$ (22)	$ (27)	$ (36)	$ (45)	$ (54)		
Solar Photovoltaic Requirements Charge @ 0.006 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2		
Sub-Total	$ -	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 8	$ 9		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.13109 /kWh	$ -	$ 13	$ 26	$ 52	$ 79	$ 131	$ 197	$ 262	$ 393	$ 655	$ 918	$ 1,180	$ 1,573	$ 1,966	$ 2,622	$ 3,277	$ 3,933		
Sub Total	$ 16	$ 33	$ 51	$ 86	$ 121	$ 191	$ 278	$ 366	$ 541	$ 891	$ 1,241	$ 1,591	$ 2,117	$ 2,642	$ 3,518	$ 4,393	$ 5,268		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 16**	**$ 33**	**$ 51**	**$ 86**	**$ 121**	**$ 191**	**$ 278**	**$ 366**	**$ 541**	**$ 891**	**$ 1,241**	**$ 1,591**	**$ 2,117**	**$ 2,642**	**$ 3,518**	**$ 4,393**	**$ 5,268**		
% Increase	**-9.9%**	**-2.7%**	**-0.2%**	**1.8%**	**2.6%**	**3.4%**	**3.8%**	**4.1%**	**4.3%**	**4.5%**	**4.6%**	**4.6%**	**4.7%**	**4.7%**	**4.7%**	**4.7%**	**4.7%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE RS

ENERGY USAGE

All kWh	0	50	100	250	500	750	948	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	948	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 9.00	$ 16.85	$ 24.71	$ 48.27	$ 87.53	$ 126.80	$ 157.90	$ 166.07	$ 244.60	$ 323.14	$ 401.67	$ 480.20	$ 558.74	$ 637.27	$ 715.80	$ 794.34	$ 951.41
Total Current Bill	7.56	15.00	22.44	44.76	81.96	119.16	148.62	156.36	230.76	305.16	379.56	453.96	528.36	602.76	677.16	751.56	900.36
Increase ($)	$ 1.44	$ 1.85	$ 2.26	$ 3.50	$ 5.57	$ 7.64	$ 9.27	$ 9.70	$ 13.84	$ 17.97	$ 22.11	$ 26.24	$ 30.37	$ 34.51	$ 38.64	$ 42.77	$ 51.04
Increase (%)	18.99%	12.33%	10.08%	7.83%	6.80%	6.41%	6.24%	6.21%	6.00%	5.89%	5.82%	5.78%	5.75%	5.72%	5.71%	5.69%	5.67%
Overall Increase (%)	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%	6.24%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44
All kWh @ 3.487 ¢/kWh	$ -	$ 2	$ 3	$ 9	$ 17	$ 26	$ 33	$ 35	$ 52	$ 70	$ 87	$ 105	$ 122	$ 139	$ 157	$ 174	$ 209
Sub-Total	$ 7	$ 9	$ 11	$ 16	$ 25	$ 34	$ 40	$ 42	$ 60	$ 77	$ 95	$ 112	$ 129	$ 147	$ 164	$ 182	$ 217
Riders																	
Universal Service Charge @ 0.795 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 8	$ 8	$ 12	$ 16	$ 20	$ 24	$ 28	$ 32	$ 36	$ 40	$ 48
TCJA @ -3.130 %	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (4)	$ (4)	$ (5)	$ (5)	$ (6)	$ (7)
Phase IV Energy Efficiency Charge @ 0.162 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 6	$ 7	$ 8	$ 10
Smart Meter Charge @ $0.00	$ -	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (3)	$ (4)	$ (4)	$ (5)	$ (5)	$ (6)
Default Service Support Charge @ 0.443 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 18	$ 20	$ 22	$ 27
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Sub-Total	$ (0)	$ 0	$ 1	$ 3	$ 6	$ 9	$ 11	$ 12	$ 18	$ 24	$ 29	$ 35	$ 41	$ 47	$ 53	$ 59	$ 71
DSIC @ 5.000 %	$ 0	$ 0	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 11	$ 13
PTC/HPS Charge																	
All kWh @$ 0.10001 /kWh	$ -	$ 5	$ 10	$ 25	$ 50	$ 75	$ 95	$ 100	$ 150	$ 200	$ 250	$ 300	$ 350	$ 400	$ 450	$ 500	$ 600
Sub Total	$ 8	$ 15	$ 22	$ 45	$ 82	$ 119	$ 149	$ 156	$ 231	$ 305	$ 380	$ 454	$ 529	$ 603	$ 678	$ 752	$ 901
STAS @ -0.05 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)
Total Bill	**$ 8**	**$ 15**	**$ 22**	**$ 45**	**$ 82**	**$ 119**	**$ 149**	**$ 156**	**$ 231**	**$ 305**	**$ 380**	**$ 454**	**$ 528**	**$ 603**	**$ 677**	**$ 752**	**$ 900**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $9.00	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9
All kWh @ 4.306 ¢/kWh	$ -	$ 2	$ 4	$ 11	$ 22	$ 32	$ 41	$ 43	$ 65	$ 86	$ 108	$ 129	$ 151	$ 172	$ 194	$ 215	$ 258
Sub-Total	$ 9	$ 11	$ 13	$ 20	$ 31	$ 41	$ 50	$ 52	$ 74	$ 95	$ 117	$ 138	$ 160	$ 181	$ 203	$ 224	$ 267
Riders																	
Universal Service Charge @ 0.795 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 8	$ 8	$ 12	$ 16	$ 20	$ 24	$ 28	$ 32	$ 36	$ 40	$ 48
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.162 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 2	$ 3	$ 4	$ 5	$ 6	$ 6	$ 7	$ 8	$ 10
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.443 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 18	$ 20	$ 22	$ 27
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Sub-Total	$ -	$ 1	$ 1	$ 4	$ 7	$ 11	$ 13	$ 14	$ 21	$ 28	$ 35	$ 42	$ 49	$ 56	$ 63	$ 70	$ 84
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.10001 /kWh	$ -	$ 5	$ 10	$ 25	$ 50	$ 75	$ 95	$ 100	$ 150	$ 200	$ 250	$ 300	$ 350	$ 400	$ 450	$ 500	$ 600
Sub Total	$ 9	$ 17	$ 25	$ 48	$ 88	$ 127	$ 158	$ 166	$ 245	$ 323	$ 402	$ 480	$ 559	$ 637	$ 716	$ 794	$ 951
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 9**	**$ 17**	**$ 25**	**$ 48**	**$ 88**	**$ 127**	**$ 158**	**$ 166**	**$ 245**	**$ 323**	**$ 402**	**$ 480**	**$ 559**	**$ 637**	**$ 716**	**$ 794**	**$ 951**
% Increase	**19.0%**	**12.3%**	**10.1%**	**7.8%**	**6.8%**	**6.4%**	**6.2%**	**6.2%**	**6.0%**	**5.9%**	**5.8%**	**5.8%**	**5.7%**	**5.7%**	**5.7%**	**5.7%**	**5.7%**

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-V

ENERGY USAGE

All kWh	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Energy Usage	0	50	100	250	500	750	900	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	6,000
Total Proposed Bill	$ 9.00	$ 16.86	$ 24.71	$ 48.28	$ 87.56	$ 126.84	$ 150.41	$ 166.12	$ 244.68	$ 323.24	$ 401.79	$ 480.35	$ 558.91	$ 637.47	$ 716.03	$ 794.59	$ 951.71
Total Current Bill	7.56	15.01	22.45	44.78	81.99	119.20	141.53	156.42	230.84	305.27	379.70	454.12	528.55	602.97	677.40	751.83	900.68
Increase ($)	$ 1.44	$ 1.85	$ 2.26	$ 3.50	$ 5.57	$ 7.64	$ 8.88	$ 9.70	$ 13.83	$ 17.97	$ 22.10	$ 26.23	$ 30.36	$ 34.50	$ 38.63	$ 42.76	$ 51.03
Increase (%)	18.99%	12.33%	10.08%	7.82%	6.79%	6.41%	6.27%	6.20%	5.99%	5.89%	5.82%	5.78%	5.74%	5.72%	5.70%	5.69%	5.67%
Overall Increase (%)	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%	6.33%
UNBUNDLED RATES - CURRENT																	
Distribution																	
Distribution Charge @ $7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44	$ 7.44
All kWh @ 3.487 ¢/kWh	$ -	$ 2	$ 3	$ 9	$ 17	$ 26	$ 31	$ 35	$ 52	$ 70	$ 87	$ 105	$ 122	$ 139	$ 157	$ 174	$ 209
Sub-Total	$ 7	$ 9	$ 11	$ 16	$ 25	$ 34	$ 39	$ 42	$ 60	$ 77	$ 95	$ 112	$ 129	$ 147	$ 164	$ 182	$ 217
Riders																	
Universal Service Charge @ 0.795 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 7	$ 8	$ 12	$ 16	$ 20	$ 24	$ 28	$ 32	$ 36	$ 40	$ 48
TCJA @ -3.130 %	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (4)	$ (4)	$ (5)	$ (5)	$ (6)	$ (7)
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 8	$ 10
Smart Meter Charge @ $0.00	$ -	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (3)	$ (3)	$ (4)	$ (4)	$ (5)	$ (5)	$ (6)
Default Service Support Charge @ 0.443 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 18	$ 20	$ 22	$ 27
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Sub-Total	$ (0)	$ 0	$ 1	$ 3	$ 6	$ 9	$ 11	$ 12	$ 18	$ 24	$ 30	$ 36	$ 42	$ 47	$ 53	$ 59	$ 71
DSIC @ 5.000 %	$ 0	$ 0	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 4	$ 5	$ 6	$ 7	$ 8	$ 9	$ 10	$ 11	$ 13
PTC/HPS Charge																	
All kWh @ $ 0.10001 /kWh	$ -	$ 5	$ 10	$ 25	$ 50	$ 75	$ 90	$ 100	$ 150	$ 200	$ 250	$ 300	$ 350	$ 400	$ 450	$ 500	$ 600
Sub Total	$ 8	$ 15	$ 22	$ 45	$ 82	$ 119	$ 142	$ 156	$ 231	$ 305	$ 380	$ 454	$ 529	$ 603	$ 678	$ 752	$ 901
STAS @ -0.05 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)
Total Bill	**$ 8**	**$ 15**	**$ 22**	**$ 45**	**$ 82**	**$ 119**	**$ 142**	**$ 156**	**$ 231**	**$ 305**	**$ 380**	**$ 454**	**$ 529**	**$ 603**	**$ 677**	**$ 752**	**$ 901**
UNBUNDLED RATES - PROPOSED																	
Distribution																	
Distribution Charge @ $9.00	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9	$ 9
All kWh @ 4.306 ¢/kWh	$ -	$ 2	$ 4	$ 11	$ 22	$ 32	$ 39	$ 43	$ 65	$ 86	$ 108	$ 129	$ 151	$ 172	$ 194	$ 215	$ 258
Sub-Total	$ 9	$ 11	$ 13	$ 20	$ 31	$ 41	$ 48	$ 52	$ 74	$ 95	$ 117	$ 138	$ 160	$ 181	$ 203	$ 224	$ 267
Riders																	
Universal Service Charge @ 0.795 ¢/kWh	$ -	$ 0	$ 1	$ 2	$ 4	$ 6	$ 7	$ 8	$ 12	$ 16	$ 20	$ 24	$ 28	$ 32	$ 36	$ 40	$ 48
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 0	$ 0	$ 0	$ 1	$ 1	$ 2	$ 2	$ 3	$ 3	$ 4	$ 5	$ 6	$ 7	$ 8	$ 8	$ 10
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Default Service Support Charge @ 0.443 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 2	$ 3	$ 4	$ 4	$ 7	$ 9	$ 11	$ 13	$ 16	$ 18	$ 20	$ 22	$ 27
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Sub-Total	$ -	$ 1	$ 1	$ 4	$ 7	$ 11	$ 13	$ 14	$ 21	$ 28	$ 35	$ 42	$ 49	$ 56	$ 63	$ 70	$ 84
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
PTC/HPS Charge																	
All kWh @ $ 0.10001 /kWh	$ -	$ 5	$ 10	$ 25	$ 50	$ 75	$ 90	$ 100	$ 150	$ 200	$ 250	$ 300	$ 350	$ 400	$ 450	$ 500	$ 600
Sub Total	$ 9	$ 17	$ 25	$ 48	$ 88	$ 127	$ 150	$ 166	$ 245	$ 323	$ 402	$ 480	$ 559	$ 637	$ 716	$ 795	$ 952
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total Bill	**$ 9**	**$ 17**	**$ 25**	**$ 48**	**$ 88**	**$ 127**	**$ 150**	**$ 166**	**$ 245**	**$ 323**	**$ 402**	**$ 480**	**$ 559**	**$ 637**	**$ 716**	**$ 795**	**$ 952**
% Increase	**19.0%**	**12.3%**	**10.1%**	**7.8%**	**6.8%**	**6.4%**	**6.3%**	**6.2%**	**6.0%**	**5.9%**	**5.8%**	**5.8%**	**5.7%**	**5.7%**	**5.7%**	**5.7%**	**5.7%**

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - SMALL - SINGLE PHASE
At Average Levels of kWh Use

KW Demand																			
Total kW	0	1	1	1	1	1	1	1	3	3	3	3	3	5	5	5	5		
Hrs Use	0	100	200	300	400	500	600	730	100	200	300	400	500	100	200	300	500		
ENERGY USAGE																			
Monthly Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Energy Usage	0	100	200	300	400	500	600	730	300	600	900	1,200	1,500	500	1,000	1,500	2,500		
Total Proposed Bill	$ 12.35	$ 28.44	$ 44.53	$ 60.63	$ 76.72	$ 92.81	$ 108.91	$ 129.83	$ 60.63	$ 108.91	$ 157.19	$ 205.47	$ 253.75	$ 92.81	$ 173.28	$ 253.75	$ 414.69		
Total Current Bill	9.64	24.60	39.56	54.52	69.49	84.45	99.41	118.86	54.52	99.41	144.30	189.18	234.07	84.45	159.26	234.07	383.69		
Increase ($)	$ 2.71	$ 3.84	$ 4.97	$ 6.10	$ 7.23	$ 8.37	$ 9.50	$ 10.97	$ 6.10	$ 9.50	$ 12.89	$ 16.29	$ 19.68	$ 8.37	$ 14.02	$ 19.68	$ 30.99		
Increase (%)	28.12%	15.61%	12.57%	11.19%	10.41%	9.91%	9.55%	9.23%	11.19%	9.55%	8.93%	8.61%	8.41%	9.91%	8.81%	8.41%	8.08%		
Overall Increase (%)	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%	11.39%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $9.52	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10	$ 10		
All kWh @ 3.529 ¢/kWh	$ -	$ 4	$ 7	$ 11	$ 14	$ 18	$ 21	$ 26	$ 11	$ 21	$ 32	$ 42	$ 53	$ 18	$ 35	$ 53	$ 88		
Sub-Total	$ 10	$ 13	$ 17	$ 20	$ 24	$ 27	$ 31	$ 35	$ 20	$ 31	$ 41	$ 52	$ 62	$ 27	$ 45	$ 62	$ 98		
Riders																			
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4		
TCJA @ -3.130 %	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)	$ (2)	$ (2)	$ (1)	$ (1)	$ (2)	$ (3)		
Smart Meter Charge @ $-0.04	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)		
Default Service Support Charge @ 0.182 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ (0)	$ (0)	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 0	$ 1	$ 2	$ 3	$ 3	$ 1	$ 2	$ 3	$ 6		
DSIC @ 5.000 %	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 1	$ 2	$ 2	$ 3	$ 3	$ 1	$ 2	$ 3	$ 5		
PTC/HPS Charge																			
All kWh @ $ 0.11023 /kWh	$ -	$ 11	$ 22	$ 33	$ 44	$ 55	$ 66	$ 80	$ 33	$ 66	$ 99	$ 132	$ 165	$ 55	$ 110	$ 165	$ 276		
Sub Total	$ 10	$ 25	$ 40	$ 55	$ 70	$ 84	$ 99	$ 119	$ 55	$ 99	$ 144	$ 189	$ 234	$ 84	$ 159	$ 234	$ 384		
STAS @ -0.05 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)		
Total Bill	**$ 10**	**$ 25**	**$ 40**	**$ 55**	**$ 69**	**$ 84**	**$ 99**	**$ 119**	**$ 55**	**$ 99**	**$ 144**	**$ 189**	**$ 234**	**$ 84**	**$ 159**	**$ 234**	**$ 384**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $12.35	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12	$ 12		
All kWh @ 4.722 ¢/kWh	$ -	$ 5	$ 9	$ 14	$ 19	$ 24	$ 28	$ 34	$ 14	$ 28	$ 42	$ 57	$ 71	$ 24	$ 47	$ 71	$ 118		
Sub-Total	$ 12	$ 17	$ 22	$ 27	$ 31	$ 36	$ 41	$ 47	$ 27	$ 41	$ 55	$ 69	$ 83	$ 36	$ 60	$ 83	$ 130		
Riders																			
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @ 0.182 ¢/kWh	$ -	$ 0	$ 0	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 5		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ -	$ 0	$ 1	$ 1	$ 1	$ 2	$ 2	$ 3	$ 1	$ 2	$ 3	$ 4	$ 5	$ 2	$ 3	$ 5	$ 9		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.11023 /kWh	$ -	$ 11	$ 22	$ 33	$ 44	$ 55	$ 66	$ 80	$ 33	$ 66	$ 99	$ 132	$ 165	$ 55	$ 110	$ 165	$ 276		
Sub Total	$ 12	$ 28	$ 45	$ 61	$ 77	$ 93	$ 109	$ 130	$ 61	$ 109	$ 157	$ 205	$ 254	$ 93	$ 173	$ 254	$ 415		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 12**	**$ 28**	**$ 45**	**$ 61**	**$ 77**	**$ 93**	**$ 109**	**$ 130**	**$ 61**	**$ 109**	**$ 157**	**$ 205**	**$ 254**	**$ 93**	**$ 173**	**$ 254**	**$ 415**		
% Increase	**28.1%**	**15.6%**	**12.6%**	**11.2%**	**10.4%**	**9.9%**	**9.6%**	**9.2%**	**11.2%**	**9.6%**	**8.9%**	**8.6%**	**8.4%**	**9.9%**	**8.8%**	**8.4%**	**8.1%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS-MEDIUM - THREE PHASE
With Demands 25-100 KW
At Average Levels of kWh Use

KW Demand																				
Total kW	25	25	25	25	25	50	50	50	50	75	75	75	75	100	100	100	100			
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730			
REACTIVE DEMAND																				
rkVA	8	8	8	8	8	16	16	16	16	25	25	25	25	33	33	33	33			
ENERGY USAGE																				
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000			
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	7,500	22,500	37,500	54,750	10,000	30,000	50,000	73,000			
Total Proposed Bill	$ 111.63	$ 409.07	$ 1,003.95	$ 1,598.83	$ 2,282.94	$ 794.85	$ 1,984.61	$ 3,174.36	$ 4,542.58	$ 1,180.63	$ 2,965.27	$ 4,749.90	$ 6,802.22	$ 1,566.41	$ 3,945.92	$ 6,325.43	$ 9,061.87			
Total Current Bill	92.10	386.51	975.32	1,564.14	2,241.28	753.83	1,931.46	3,109.10	4,463.37	1,121.16	2,887.61	4,654.05	6,685.47	1,488.48	3,843.75	6,199.01	8,907.56			
Increase ($)	$ 19.53	$ 22.56	$ 28.63	$ 34.69	$ 41.66	$ 41.02	$ 53.14	$ 65.27	$ 79.21	$ 59.47	$ 77.66	$ 95.84	$ 116.76	$ 77.93	$ 102.18	$ 126.42	$ 154.31			
Increase (%)	21.21%	5.84%	2.93%	2.22%	1.86%	5.44%	2.75%	2.10%	1.77%	5.30%	2.69%	2.06%	1.75%	5.24%	2.66%	2.04%	1.73%			
Overall Increase (%)	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%			
UNBUNDLED RATES - CURRENT																				
Distribution																				
Distribution Charge @ $18.91	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19			
All kW @ $2.81/kW	$ 70	$ 70	$ 70	$ 70	$ 70	$ 141	$ 141	$ 141	$ 141	$ 211	$ 211	$ 211	$ 211	$ 281	$ 281	$ 281	$ 281			
All kWh @ 0.400 ¢/kWh	$ -	$ 10	$ 30	$ 50	$ 73	$ 20	$ 60	$ 100	$ 146	$ 30	$ 90	$ 150	$ 219	$ 40	$ 120	$ 200	$ 292			
All rkVA @ $0.18 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 3	$ 3	$ 3	$ 3	$ 4	$ 4	$ 4	$ 4	$ 6	$ 6	$ 6	$ 6			
Sub-Total	$ 91	$ 101	$ 121	$ 141	$ 164	$ 182	$ 222	$ 262	$ 308	$ 264	$ 324	$ 384	$ 453	$ 346	$ 426	$ 506	$ 598			
Riders																				
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 4	$ 13	$ 21	$ 30	$ 8	$ 25	$ 42	$ 61	$ 13	$ 38	$ 63	$ 91	$ 17	$ 50	$ 84	$ 122			
TCJA @ -3.130 %	$ (3)	$ (3)	$ (4)	$ (4)	$ (5)	$ (6)	$ (7)	$ (8)	$ (10)	$ (8)	$ (10)	$ (12)	$ (14)	$ (11)	$ (13)	$ (16)	$ (19)			
Smart Meter Charge @ $-0.04	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)			
Default Service Support Charge @ 0.177 ¢/kWh	$ -	$ 4	$ 13	$ 22	$ 32	$ 9	$ 27	$ 44	$ 65	$ 13	$ 40	$ 66	$ 97	$ 18	$ 53	$ 89	$ 129			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ (3)	$ 5	$ 22	$ 39	$ 58	$ 11	$ 45	$ 78	$ 116	$ 17	$ 67	$ 117	$ 174	$ 24	$ 90	$ 156	$ 232			
DSIC @ 5.000 %	$ 4	$ 5	$ 6	$ 8	$ 9	$ 9	$ 12	$ 15	$ 18	$ 13	$ 18	$ 22	$ 27	$ 18	$ 23	$ 29	$ 35			
PTC/HPS Charge																				
All kWh @ $ 0.11023 /kWh	$ -	$ 276	$ 827	$ 1,378	$ 2,012	$ 551	$ 1,653	$ 2,756	$ 4,023	$ 827	$ 2,480	$ 4,134	$ 6,035	$ 1,102	$ 3,307	$ 5,512	$ 8,047			
Sub Total	$ 92.15	$ 386.70	$ 975.81	$ 1,564.92	$ 2,242.40	$ 754.21	$ 1,932.43	$ 3,110.65	$ 4,465.60	$ 1,121.72	$ 2,889.05	$ 4,656.38	$ 6,688.81	$ 1,489.23	$ 3,845.67	$ 6,202.11	$ 8,912.02			
STAS @ -0.05 %	$ (0.05)	$ (0.19)	$ (0.49)	$ (0.78)	$ (1.12)	$ (0.38)	$ (0.97)	$ (1.56)	$ (2.23)	$ (0.56)	$ (1.44)	$ (2.33)	$ (3.34)	$ (0.74)	$ (1.92)	$ (3.10)	$ (4.46)			
Total Bill	**$ 92.10**	**$ 386.51**	**$ 975.32**	**$ 1,564.14**	**$ 2,241.28**	**$ 753.83**	**$ 1,931.46**	**$ 3,109.10**	**$ 4,463.37**	**$ 1,121.16**	**$ 2,887.61**	**$ 4,654.05**	**$ 6,685.47**	**$ 1,488.48**	**$ 3,843.75**	**$ 6,199.01**	**$ 8,907.56**			
UNBUNDLED RATES - PROPOSED																				
Distribution																				
Distribution Charge @ $23.29	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23			
All kW @ $3.46/kW	$ 87	$ 87	$ 87	$ 87	$ 87	$ 173	$ 173	$ 173	$ 173	$ 260	$ 260	$ 260	$ 260	$ 346	$ 346	$ 346	$ 346			
All kWh @ 0.531 ¢/kWh	$ -	$ 13	$ 40	$ 66	$ 97	$ 27	$ 80	$ 133	$ 194	$ 40	$ 119	$ 199	$ 290	$ 53	$ 159	$ 265	$ 387			
All rkVA @ $0.22 /rkVA	$ 2	$ 2	$ 2	$ 2	$ 2	$ 4	$ 4	$ 4	$ 4	$ 5	$ 5	$ 5	$ 5	$ 7	$ 7	$ 7	$ 7			
Sub-Total	$ 112	$ 125	$ 151	$ 178	$ 208	$ 227	$ 280	$ 333	$ 394	$ 328	$ 408	$ 487	$ 579	$ 430	$ 536	$ 642	$ 764			
Riders																				
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 4	$ 13	$ 21	$ 30	$ 8	$ 25	$ 42	$ 61	$ 13	$ 38	$ 63	$ 91	$ 17	$ 50	$ 84	$ 122			
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Default Service Support Charge @ 0.177 ¢/kWh	$ -	$ 4	$ 13	$ 22	$ 32	$ 9	$ 27	$ 44	$ 65	$ 13	$ 40	$ 66	$ 97	$ 18	$ 53	$ 89	$ 129			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ -	$ 9	$ 26	$ 43	$ 63	$ 17	$ 52	$ 86	$ 126	$ 26	$ 77	$ 129	$ 188	$ 34	$ 103	$ 172	$ 251			
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
PTC/HPS Charge																				
All kWh @ $ 0.11023 /kWh	$ -	$ 276	$ 827	$ 1,378	$ 2,012	$ 551	$ 1,653	$ 2,756	$ 4,023	$ 827	$ 2,480	$ 4,134	$ 6,035	$ 1,102	$ 3,307	$ 5,512	$ 8,047			
Sub Total	$ 111.63	$ 409.07	$ 1,003.95	$ 1,598.83	$ 2,282.94	$ 794.85	$ 1,984.61	$ 3,174.36	$ 4,542.58	$ 1,180.63	$ 2,965.27	$ 4,749.90	$ 6,802.22	$ 1,566.41	$ 3,945.92	$ 6,325.43	$ 9,061.87			
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Total Bill	**$ 111.63**	**$ 409.07**	**$ 1,003.95**	**$ 1,598.83**	**$ 2,282.94**	**$ 794.85**	**$ 1,984.61**	**$ 3,174.36**	**$ 4,542.58**	**$ 1,180.63**	**$ 2,965.27**	**$ 4,749.90**	**$ 6,802.22**	**$ 1,566.41**	**$ 3,945.92**	**$ 6,325.43**	**$ 9,061.87**			
% Increase	**21.21%**	**5.84%**	**2.93%**	**2.22%**	**1.86%**	**5.44%**	**2.75%**	**2.10%**	**1.77%**	**5.30%**	**2.69%**	**2.06%**	**1.75%**	**5.24%**	**2.66%**	**2.04%**	**1.73%**			

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS MEDIUM - SINGLE PHASE
With Demands 10 - 20 KW
At Average Levels of kWh Use

KW Demand																				
Total kW	0	10	10	10	10	10	10	10	10	20	20	20	20	20	20	20	20			
Hrs Use	0	100	200	300	400	500	600	730	900	100	200	300	400	500	600	730	900			
REACTIVE DEMAND																				
rkVA	0	3	3	3	3	3	3	3	3	7	7	7	7	7	7	7	7			
ENERGY USAGE																				
Monthly Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,300	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000			
Total Energy Usage	0	1,000	2,000	3,000	4,000	5,000	6,000	7,300	9,000	2,000	4,000	6,000	8,000	10,000	12,000	14,600	18,000			
Total Proposed Bill	$ 23.29	$ 177.60	$ 296.58	$ 415.55	$ 534.53	$ 653.51	$ 772.48	$ 927.15	$ 1,129.41	$ 331.92	$ 569.87	$ 807.82	$ 1,045.77	$ 1,283.72	$ 1,521.67	$ 1,831.01	$ 2,235.52			
Total Current Bill	19.18	166.11	283.88	401.64	519.40	637.17	754.93	908.02	1,108.22	313.04	548.57	784.10	1,019.62	1,255.15	1,490.67	1,796.86	2,197.25			
Increase ($)	$ 4.11	$ 11.49	$ 12.70	$ 13.92	$ 15.13	$ 16.34	$ 17.55	$ 19.13	$ 21.19	$ 18.87	$ 21.30	$ 23.72	$ 26.15	$ 28.57	$ 31.00	$ 34.15	$ 38.27			
Increase (%)	21.42%	6.92%	4.47%	3.46%	2.91%	2.56%	2.33%	2.11%	1.91%	6.03%	3.88%	3.03%	2.56%	2.28%	2.08%	1.90%	1.74%			
Overall Increase (%)	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%	3.04%			
UNBUNDLED RATES - CURRENT																				
Distribution																				
Distribution Charge @ $18.91	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19	$ 19			
All kW @ $2.81/kW	$ -	$ 28	$ 28	$ 28	$ 28	$ 28	$ 28	$ 28	$ 28	$ 56	$ 56	$ 56	$ 56	$ 56	$ 56	$ 56	$ 56			
All kWh @ 0.400 ¢/kWh	$ -	$ 4	$ 8	$ 12	$ 16	$ 20	$ 24	$ 29	$ 36	$ 8	$ 16	$ 24	$ 32	$ 40	$ 48	$ 58	$ 72			
All rkVA @ $0.18 /rkVA	$ -	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1			
Sub-Total	$ 19	$ 52	$ 56	$ 60	$ 64	$ 68	$ 72	$ 77	$ 84	$ 84	$ 92	$ 100	$ 108	$ 116	$ 124	$ 135	$ 148			
Riders																				
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 7	$ 8	$ 10	$ 12	$ 15	$ 3	$ 7	$ 10	$ 13	$ 17	$ 20	$ 24	$ 30			
TCJA @ -3.130 %	$ (1)	$ (2)	$ (2)	$ (2)	$ (2)	$ (2)	$ (2)	$ (2)	$ (3)	$ (3)	$ (3)	$ (3)	$ (3)	$ (4)	$ (4)	$ (4)	$ (5)			
Smart Meter Charge @ $-0.04	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)			
Default Service Support Charge @ 0.177 ¢/kWh	$ -	$ 2	$ 4	$ 5	$ 7	$ 9	$ 11	$ 13	$ 16	$ 4	$ 7	$ 11	$ 14	$ 18	$ 21	$ 26	$ 32			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ (1)	$ 2	$ 5	$ 8	$ 12	$ 15	$ 18	$ 23	$ 28	$ 4	$ 11	$ 17	$ 24	$ 31	$ 37	$ 46	$ 57			
DSIC @ 5.000 %	$ 1	$ 3	$ 3	$ 3	$ 3	$ 4	$ 4	$ 4	$ 5	$ 4	$ 5	$ 5	$ 6	$ 6	$ 7	$ 8	$ 9			
PTC/HPS Charge																				
All kWh @ $ 0.11023 /kWh	$ -	$ 110	$ 220	$ 331	$ 441	$ 551	$ 661	$ 805	$ 992	$ 220	$ 441	$ 661	$ 882	$ 1,102	$ 1,323	$ 1,609	$ 1,984			
Sub Total	$ 19	$ 166	$ 284	$ 402	$ 520	$ 637	$ 755	$ 908	$ 1,109	$ 313	$ 549	$ 784	$ 1,020	$ 1,256	$ 1,491	$ 1,798	$ 2,198			
STAS @ -0.05 %	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (0)	$ (1)	$ (0)	$ (0)	$ (0)	$ (1)	$ (1)	$ (1)	$ (1)	$ (1)			
Total Bill	**$ 19**	**$ 166**	**$ 284**	**$ 402**	**$ 519**	**$ 637**	**$ 755**	**$ 908**	**$ 1,108**	**$ 313**	**$ 549**	**$ 784**	**$ 1,020**	**$ 1,255**	**$ 1,491**	**$ 1,797**	**$ 2,197**			
UNBUNDLED RATES - PROPOSED																				
Distribution																				
Distribution Charge @ $23.29	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23	$ 23			
All kW @ $3.46/kW	$ -	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 35	$ 69	$ 69	$ 69	$ 69	$ 69	$ 69	$ 69	$ 69			
All kWh @ 0.531 ¢/kWh	$ -	$ 5	$ 11	$ 16	$ 21	$ 27	$ 32	$ 39	$ 48	$ 11	$ 21	$ 32	$ 42	$ 53	$ 64	$ 77	$ 95			
All rkVA @ $0.22 /rkVA	$ -	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1			
Sub-Total	$ 23	$ 64	$ 69	$ 75	$ 80	$ 85	$ 90	$ 97	$ 106	$ 105	$ 115	$ 126	$ 136	$ 147	$ 158	$ 171	$ 189			
Riders																				
Phase IV Energy Efficiency Charge @ 0.167 ¢/kWh	$ -	$ 2	$ 3	$ 5	$ 7	$ 8	$ 10	$ 12	$ 15	$ 3	$ 7	$ 10	$ 13	$ 17	$ 20	$ 24	$ 30			
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Default Service Support Charge @ 0.177 ¢/kWh	$ -	$ 2	$ 4	$ 5	$ 7	$ 9	$ 11	$ 13	$ 16	$ 4	$ 7	$ 11	$ 14	$ 18	$ 21	$ 26	$ 32			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ -	$ 3	$ 7	$ 10	$ 14	$ 17	$ 21	$ 25	$ 31	$ 7	$ 14	$ 21	$ 28	$ 34	$ 41	$ 50	$ 62			
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
PTC/HPS Charge																				
All kWh @ $ 0.11023 /kWh	$ -	$ 110	$ 220	$ 331	$ 441	$ 551	$ 661	$ 805	$ 992	$ 220	$ 441	$ 661	$ 882	$ 1,102	$ 1,323	$ 1,609	$ 1,984			
Sub Total	$ 23	$ 178	$ 297	$ 416	$ 535	$ 654	$ 772	$ 927	$ 1,129	$ 332	$ 570	$ 808	$ 1,046	$ 1,284	$ 1,522	$ 1,831	$ 2,236			
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Total Bill	**$ 23**	**$ 178**	**$ 297**	**$ 416**	**$ 535**	**$ 654**	**$ 772**	**$ 927**	**$ 1,129**	**$ 332**	**$ 570**	**$ 808**	**$ 1,046**	**$ 1,284**	**$ 1,522**	**$ 1,831**	**$ 2,236**			
% Increase	**21.42%**	**6.92%**	**4.47%**	**3.46%**	**2.91%**	**2.56%**	**2.33%**	**2.11%**	**1.91%**	**6.03%**	**3.88%**	**3.03%**	**2.56%**	**2.28%**	**2.08%**	**1.90%**	**1.74%**			

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 500 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	500	500	500	500	500	500	750	750	750	750	750	750	1,000	1,000	1,000	1,000	1,000		
Hrs Use	0	200	300	400	500	730	200	300	400	500	730	900	200	300	400	500	730		
REACTIVE DEMAND																			
rkVA	248	248	248	248	248	248	372	372	372	372	372	372	495	495	495	495	495		
ENERGY USAGE																			
Monthly Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Energy Usage	0	100,000	150,000	200,000	250,000	365,000	150,000	225,000	300,000	375,000	547,500	675,000	200,000	300,000	400,000	500,000	730,000		
Total Proposed Bill	$ 3,434.75	$ 9,832.75	$ 13,031.75	$ 16,230.75	$ 19,429.75	$ 26,787.45	$ 14,660.74	$ 19,459.24	$ 24,257.74	$ 29,056.24	$ 40,092.79	$ 48,250.24	$ 19,488.72	$ 25,886.72	$ 32,284.72	$ 38,682.72	$ 53,398.12		
Total Current Bill	2,963.65	9,358.45	12,555.85	15,753.26	18,950.66	26,304.68	13,959.42	18,755.52	23,551.62	28,347.72	39,378.75	47,532.12	18,560.38	24,955.18	31,349.99	37,744.79	52,452.83		
Increase ($)	$ 471.10	$ 474.30	$ 475.90	$ 477.50	$ 479.10	$ 482.78	$ 701.32	$ 703.72	$ 706.12	$ 708.51	$ 714.03	$ 718.11	$ 928.33	$ 931.53	$ 934.73	$ 937.93	$ 945.29		
Increase (%)	15.90%	5.07%	3.79%	3.03%	2.53%	1.84%	5.02%	3.75%	3.00%	2.50%	1.81%	1.51%	5.00%	3.73%	2.98%	2.48%	1.80%		
Overall Increase (%)	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $145.82	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146		
All kW @ $3.99/kW	$ 1,995	$ 1,995	$ 1,995	$ 1,995	$ 1,995	$ 1,995	$ 2,993	$ 2,993	$ 2,993	$ 2,993	$ 2,993	$ 2,993	$ 3,990	$ 3,990	$ 3,990	$ 3,990	$ 3,990		
All rkVA @$ 0.18 /rkVA	$ 45	$ 45	$ 45	$ 45	$ 45	$ 45	$ 67	$ 67	$ 67	$ 67	$ 67	$ 67	$ 89	$ 89	$ 89	$ 89	$ 89		
Sub-Total	$ 2,185	$ 2,185	$ 2,185	$ 2,185	$ 2,185	$ 2,185	$ 3,205	$ 3,205	$ 3,205	$ 3,205	$ 3,205	$ 3,205	$ 4,225	$ 4,225	$ 4,225	$ 4,225	$ 4,225		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 110	$ 110	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220	$ 220		
TCJA @ -3.130 %	$ (68)	$ (68)	$ (68)	$ (68)	$ (68)	$ (68)	$ (100)	$ (100)	$ (100)	$ (100)	$ (100)	$ (100)	$ (132)	$ (132)	$ (132)	$ (132)	$ (132)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 619	$ 619	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 668	$ 668	$ 668	$ 668	$ 668	$ 668	$ 1,000	$ 1,000	$ 1,000	$ 1,000	$ 1,000	$ 1,000	$ 1,333	$ 1,333	$ 1,333	$ 1,333	$ 1,333		
DSIC @ 5.000 %	$ 112	$ 112	$ 112	$ 112	$ 112	$ 112	$ 164	$ 164	$ 164	$ 164	$ 164	$ 164	$ 216	$ 216	$ 216	$ 216	$ 216		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 6,398	$ 9,597	$ 12,796	$ 15,995	$ 23,353	$ 9,597	$ 14,396	$ 19,194	$ 23,993	$ 35,029	$ 43,187	$ 12,796	$ 19,194	$ 25,592	$ 31,990	$ 46,705		
Sub Total	$ 2,965.14	$ 9,363.14	$ 12,562.14	$ 15,761.14	$ 18,960.14	$ 26,317.84	$ 13,966.40	$ 18,764.90	$ 23,563.40	$ 28,361.90	$ 39,398.45	$ 47,555.90	$ 18,569.67	$ 24,967.67	$ 31,365.67	$ 37,763.67	$ 52,479.07		
STAS @ -0.05 %	$ (1.48)	$ (4.68)	$ (6.28)	$ (7.88)	$ (9.48)	$ (13.16)	$ (6.98)	$ (9.38)	$ (11.78)	$ (14.18)	$ (19.70)	$ (23.78)	$ (9.28)	$ (12.48)	$ (15.68)	$ (18.88)	$ (26.24)		
Total Bill	**$ 2,963.65**	**$ 9,358.45**	**$ 12,555.85**	**$ 15,753.26**	**$ 18,950.66**	**$ 26,304.68**	**$ 13,959.42**	**$ 18,755.52**	**$ 23,551.62**	**$ 28,347.72**	**$ 39,378.75**	**$ 47,532.12**	**$ 18,560.38**	**$ 24,955.18**	**$ 31,349.99**	**$ 37,744.79**	**$ 52,452.83**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $176.79	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177		
All kW @ $4.95/kW	$ 2,475	$ 2,475	$ 2,475	$ 2,475	$ 2,475	$ 2,475	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 3,713	$ 4,951	$ 4,951	$ 4,951	$ 4,951	$ 4,951		
All rkVA @$ 0.22 /rkVA	$ 54	$ 54	$ 54	$ 54	$ 54	$ 54	$ 81	$ 81	$ 81	$ 81	$ 81	$ 81	$ 108	$ 108	$ 108	$ 108	$ 108		
Sub-Total	$ 2,706	$ 2,706	$ 2,706	$ 2,706	$ 2,706	$ 2,706	$ 3,971	$ 3,971	$ 3,971	$ 3,971	$ 3,971	$ 3,971	$ 5,236	$ 5,236	$ 5,236	$ 5,236	$ 5,236		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 110	$ 110	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220	$ 220		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 619	$ 619	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 729	$ 729	$ 729	$ 729	$ 729	$ 729	$ 1,093	$ 1,093	$ 1,093	$ 1,093	$ 1,093	$ 1,093	$ 1,457	$ 1,457	$ 1,457	$ 1,457	$ 1,457		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 6,398	$ 9,597	$ 12,796	$ 15,995	$ 23,353	$ 9,597	$ 14,396	$ 19,194	$ 23,993	$ 35,029	$ 43,187	$ 12,796	$ 19,194	$ 25,592	$ 31,990	$ 46,705		
Sub Total	$ 3,434.75	$ 9,832.75	$ 13,031.75	$ 16,230.75	$ 19,429.75	$ 26,787.45	$ 14,660.74	$ 19,459.24	$ 24,257.74	$ 29,056.24	$ 40,092.79	$ 48,250.24	$ 19,488.72	$ 25,886.72	$ 32,284.72	$ 38,682.72	$ 53,398.12		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 3,434.75**	**$ 9,832.75**	**$ 13,031.75**	**$ 16,230.75**	**$ 19,429.75**	**$ 26,787.45**	**$ 14,660.74**	**$ 19,459.24**	**$ 24,257.74**	**$ 29,056.24**	**$ 40,092.79**	**$ 48,250.24**	**$ 19,488.72**	**$ 25,886.72**	**$ 32,284.72**	**$ 38,682.72**	**$ 53,398.12**		
% Increase	**15.90%**	**5.07%**	**3.79%**	**3.03%**	**2.53%**	**1.84%**	**5.02%**	**3.75%**	**3.00%**	**2.50%**	**1.81%**	**1.51%**	**5.00%**	**3.73%**	**2.98%**	**2.48%**	**1.80%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	743	743	743	743	743	991	991	991	991	1,238	1,238	1,238	1,238	1,486	1,486	1,486	1,486		
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Proposed Bill	$ 9,950.68	$ 19,547.68	$ 38,741.68	$ 57,935.68	$ 80,008.78	$ 26,004.65	$ 51,596.65	$ 77,188.65	$ 106,619.45	$ 32,461.62	$ 64,451.62	$ 96,441.62	$ 133,230.12	$ 38,918.58	$ 77,306.58	$ 115,694.58	$ 159,840.78		
Total Current Bill	8,577.91	18,170.11	37,354.51	56,538.92	78,600.98	24,174.64	49,753.84	75,333.05	104,749.13	30,179.17	62,153.17	94,127.18	130,897.29	36,183.70	74,552.50	112,921.31	157,045.44		
Increase ($)	$ 1,372.77	$ 1,377.57	$ 1,387.17	$ 1,396.77	$ 1,407.80	$ 1,830.01	$ 1,842.81	$ 1,855.60	$ 1,870.32	$ 2,282.45	$ 2,298.44	$ 2,314.44	$ 2,332.83	$ 2,734.88	$ 2,754.08	$ 2,773.27	$ 2,795.35		
Increase (%)	16.00%	7.58%	3.71%	2.47%	1.79%	7.57%	3.70%	2.46%	1.79%	7.56%	3.70%	2.46%	1.78%	7.56%	3.69%	2.46%	1.78%		
Overall Increase (%)	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $145.82	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146		
All kW @ $3.99/kW	$ 5,985	$ 5,985	$ 5,985	$ 5,985	$ 5,985	$ 7,980	$ 7,980	$ 7,980	$ 7,980	$ 9,975	$ 9,975	$ 9,975	$ 9,975	$ 11,970	$ 11,970	$ 11,970	$ 11,970		
All rkVA @$ 0.18 /rkVA	$ 134	$ 134	$ 134	$ 134	$ 134	$ 178	$ 178	$ 178	$ 178	$ 223	$ 223	$ 223	$ 223	$ 268	$ 268	$ 268	$ 268		
Sub-Total	$ 6,265	$ 6,265	$ 6,265	$ 6,265	$ 6,265	$ 8,304	$ 8,304	$ 8,304	$ 8,304	$ 10,344	$ 10,344	$ 10,344	$ 10,344	$ 12,383	$ 12,383	$ 12,383	$ 12,383		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ -3.130 %	$ (196)	$ (196)	$ (196)	$ (196)	$ (196)	$ (260)	$ (260)	$ (260)	$ (260)	$ (324)	$ (324)	$ (324)	$ (324)	$ (388)	$ (388)	$ (388)	$ (388)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 1,997	$ 1,997	$ 1,997	$ 1,997	$ 1,997	$ 2,662	$ 2,662	$ 2,662	$ 2,662	$ 3,327	$ 3,327	$ 3,327	$ 3,327	$ 3,991	$ 3,991	$ 3,991	$ 3,991		
DSIC @ 5.000 %	$ 320	$ 320	$ 320	$ 320	$ 320	$ 425	$ 425	$ 425	$ 425	$ 529	$ 529	$ 529	$ 529	$ 633	$ 633	$ 633	$ 633		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 8,582.20	$ 18,179.20	$ 37,373.20	$ 56,567.20	$ 78,640.30	$ 24,186.73	$ 49,778.73	$ 75,370.73	$ 104,801.53	$ 30,194.27	$ 62,184.27	$ 94,174.27	$ 130,962.77	$ 36,201.80	$ 74,589.80	$ 112,977.80	$ 157,124.00		
STAS @ -0.05 %	$ (4.29)	$ (9.09)	$ (18.69)	$ (28.28)	$ (39.32)	$ (12.09)	$ (24.89)	$ (37.69)	$ (52.40)	$ (15.10)	$ (31.09)	$ (47.09)	$ (65.48)	$ (18.10)	$ (37.29)	$ (56.49)	$ (78.56)		
Total Bill	**$ 8,577.91**	**$ 18,170.11**	**$ 37,354.51**	**$ 56,538.92**	**$ 78,600.98**	**$ 24,174.64**	**$ 49,753.84**	**$ 75,333.05**	**$ 104,749.13**	**$ 30,179.17**	**$ 62,153.17**	**$ 94,127.18**	**$ 130,897.29**	**$ 36,183.70**	**$ 74,552.50**	**$ 112,921.31**	**$ 157,045.44**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $176.79	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177		
All kW @ $4.95/kW	$ 7,426	$ 7,426	$ 7,426	$ 7,426	$ 7,426	$ 9,902	$ 9,902	$ 9,902	$ 9,902	$ 12,377	$ 12,377	$ 12,377	$ 12,377	$ 14,852	$ 14,852	$ 14,852	$ 14,852		
All rkVA @$ 0.22 /rkVA	$ 162	$ 162	$ 162	$ 162	$ 162	$ 216	$ 216	$ 216	$ 216	$ 270	$ 270	$ 270	$ 270	$ 324	$ 324	$ 324	$ 324		
Sub-Total	$ 7,765	$ 7,765	$ 7,765	$ 7,765	$ 7,765	$ 10,295	$ 10,295	$ 10,295	$ 10,295	$ 12,824	$ 12,824	$ 12,824	$ 12,824	$ 15,354	$ 15,354	$ 15,354	$ 15,354		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,914	$ 2,914	$ 2,914	$ 2,914	$ 3,643	$ 3,643	$ 3,643	$ 3,643	$ 4,371	$ 4,371	$ 4,371	$ 4,371		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 9,950.68	$ 19,547.68	$ 38,741.68	$ 57,935.68	$ 80,008.78	$ 26,004.65	$ 51,596.65	$ 77,188.65	$ 106,619.45	$ 32,461.62	$ 64,451.62	$ 96,441.62	$ 133,230.12	$ 38,918.58	$ 77,306.58	$ 115,694.58	$ 159,840.78		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 9,950.68**	**$ 19,547.68**	**$ 38,741.68**	**$ 57,935.68**	**$ 80,008.78**	**$ 26,004.65**	**$ 51,596.65**	**$ 77,188.65**	**$ 106,619.45**	**$ 32,461.62**	**$ 64,451.62**	**$ 96,441.62**	**$ 133,230.12**	**$ 38,918.58**	**$ 77,306.58**	**$ 115,694.58**	**$ 159,840.78**		
% Increase	**16.00%**	**7.58%**	**3.71%**	**2.47%**	**1.79%**	**7.57%**	**3.70%**	**2.46%**	**1.79%**	**7.56%**	**3.70%**	**2.46%**	**1.78%**	**7.56%**	**3.69%**	**2.46%**	**1.78%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GS - LARGE
With Demands of 1,500 - 3,000 KW w/ Voltage Discount
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	743	743	743	743	743	991	991	991	991	1,238	1,238	1,238	1,238	1,486	1,486	1,486	1,486		
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Proposed Bill	$ 7,713.88	$ 17,310.88	$ 36,504.88	$ 55,698.88	$ 77,771.98	$ 23,022.24	$ 48,614.24	$ 74,206.24	$ 103,637.04	$ 28,733.60	$ 60,723.60	$ 92,713.60	$ 129,502.10	$ 34,444.97	$ 72,832.97	$ 111,220.97	$ 155,367.17		
Total Current Bill	6,702.23	16,294.44	35,478.84	54,663.24	76,725.31	21,673.74	47,252.94	72,832.15	102,248.23	27,053.04	59,027.05	91,001.05	127,771.16	32,432.35	70,801.15	109,169.96	153,294.09		
Increase ($)	$ 1,011.64	$ 1,016.44	$ 1,026.04	$ 1,035.63	$ 1,046.67	$ 1,348.50	$ 1,361.30	$ 1,374.09	$ 1,388.81	$ 1,680.56	$ 1,696.56	$ 1,712.55	$ 1,730.94	$ 2,012.62	$ 2,031.81	$ 2,051.01	$ 2,073.08		
Increase (%)	15.09%	6.24%	2.89%	1.89%	1.36%	6.22%	2.88%	1.89%	1.36%	6.21%	2.87%	1.88%	1.35%	6.21%	2.87%	1.88%	1.35%		
Overall Increase (%)	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%	2.98%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $145.82	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146	$ 146		
All kW @ $2.76/kW	$ 4,140	$ 4,140	$ 4,140	$ 4,140	$ 4,140	$ 5,520	$ 5,520	$ 5,520	$ 5,520	$ 6,900	$ 6,900	$ 6,900	$ 6,900	$ 8,280	$ 8,280	$ 8,280	$ 8,280		
All rkVA @$ 0.18 /rkVA	$ 134	$ 134	$ 134	$ 134	$ 134	$ 178	$ 178	$ 178	$ 178	$ 223	$ 223	$ 223	$ 223	$ 268	$ 268	$ 268	$ 268		
Sub-Total	$ 4,420	$ 4,420	$ 4,420	$ 4,420	$ 4,420	$ 5,844	$ 5,844	$ 5,844	$ 5,844	$ 7,269	$ 7,269	$ 7,269	$ 7,269	$ 8,693	$ 8,693	$ 8,693	$ 8,693		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ -3.130 %	$ (138)	$ (138)	$ (138)	$ (138)	$ (138)	$ (183)	$ (183)	$ (183)	$ (183)	$ (228)	$ (228)	$ (228)	$ (228)	$ (272)	$ (272)	$ (272)	$ (272)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 2,055	$ 2,055	$ 2,055	$ 2,055	$ 2,055	$ 2,739	$ 2,739	$ 2,739	$ 2,739	$ 3,423	$ 3,423	$ 3,423	$ 3,423	$ 4,107	$ 4,107	$ 4,107	$ 4,107		
DSIC @ 5.000 %	$ 231	$ 231	$ 231	$ 231	$ 231	$ 305	$ 305	$ 305	$ 305	$ 380	$ 380	$ 380	$ 380	$ 454	$ 454	$ 454	$ 454		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 6,705.59	$ 16,302.59	$ 35,496.59	$ 54,690.59	$ 76,763.69	$ 21,684.58	$ 47,276.58	$ 72,868.58	$ 102,299.38	$ 27,066.58	$ 59,056.58	$ 91,046.58	$ 127,835.08	$ 32,448.57	$ 70,836.57	$ 109,224.57	$ 153,370.77		
STAS @ -0.05 %	$ (3.35)	$ (8.15)	$ (17.75)	$ (27.35)	$ (38.38)	$ (10.84)	$ (23.64)	$ (36.43)	$ (51.15)	$ (13.53)	$ (29.53)	$ (45.52)	$ (63.92)	$ (16.22)	$ (35.42)	$ (54.61)	$ (76.69)		
Total Bill	**$ 6,702.23**	**$ 16,294.44**	**$ 35,478.84**	**$ 54,663.24**	**$ 76,725.31**	**$ 21,673.74**	**$ 47,252.94**	**$ 72,832.15**	**$ 102,248.23**	**$ 27,053.04**	**$ 59,027.05**	**$ 91,001.05**	**$ 127,771.16**	**$ 32,432.35**	**$ 70,801.15**	**$ 109,169.96**	**$ 153,294.09**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $176.79	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177	$ 177		
All kW @ $3.46/kW	$ 5,189	$ 5,189	$ 5,189	$ 5,189	$ 5,189	$ 6,919	$ 6,919	$ 6,919	$ 6,919	$ 8,649	$ 8,649	$ 8,649	$ 8,649	$ 10,379	$ 10,379	$ 10,379	$ 10,379		
All rkVA @$ 0.22 /rkVA	$ 162	$ 162	$ 162	$ 162	$ 162	$ 216	$ 216	$ 216	$ 216	$ 270	$ 270	$ 270	$ 270	$ 324	$ 324	$ 324	$ 324		
Sub-Total	$ 5,528	$ 5,528	$ 5,528	$ 5,528	$ 5,528	$ 7,312	$ 7,312	$ 7,312	$ 7,312	$ 9,096	$ 9,096	$ 9,096	$ 9,096	$ 10,880	$ 10,880	$ 10,880	$ 10,880		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,914	$ 2,914	$ 2,914	$ 2,914	$ 3,643	$ 3,643	$ 3,643	$ 3,643	$ 4,371	$ 4,371	$ 4,371	$ 4,371		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 7,713.88	$ 17,310.88	$ 36,504.88	$ 55,698.88	$ 77,771.98	$ 23,022.24	$ 48,614.24	$ 74,206.24	$ 103,637.04	$ 28,733.60	$ 60,723.60	$ 92,713.60	$ 129,502.10	$ 34,444.97	$ 72,832.97	$ 111,220.97	$ 155,367.17		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 7,713.88**	**$ 17,310.88**	**$ 36,504.88**	**$ 55,698.88**	**$ 77,771.98**	**$ 23,022.24**	**$ 48,614.24**	**$ 74,206.24**	**$ 103,637.04**	**$ 28,733.60**	**$ 60,723.60**	**$ 92,713.60**	**$ 129,502.10**	**$ 34,444.97**	**$ 72,832.97**	**$ 111,220.97**	**$ 155,367.17**		
% Increase	**15.09%**	**6.24%**	**2.89%**	**1.89%**	**1.36%**	**6.22%**	**2.88%**	**1.89%**	**1.36%**	**6.21%**	**2.87%**	**1.88%**	**1.35%**	**6.21%**	**2.87%**	**1.88%**	**1.35%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 25 - 150 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	25	25	25	25	25	50	50	50	50	100	100	100	100	150	150	150	150		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	4	4	4	4	4	9	9	9	9	18	18	18	18	27	27	27	27		
ENERGY USAGE																			
Monthly Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500		
Total Energy Usage	0	2,500	7,500	12,500	18,250	5,000	15,000	25,000	36,500	10,000	30,000	50,000	73,000	15,000	45,000	75,000	109,500		
Total Proposed Bill	$ 1,292.14	$ 1,452.09	$ 1,771.99	$ 2,091.89	$ 2,459.78	$ 1,668.43	$ 2,308.23	$ 2,948.03	$ 3,683.80	$ 2,101.09	$ 3,380.69	$ 4,660.29	$ 6,131.83	$ 2,533.76	$ 4,453.16	$ 6,372.56	$ 8,579.87		
Total Current Bill	1,060.82	1,220.69	1,540.43	1,860.17	2,227.87	1,433.56	2,073.04	2,712.52	3,447.92	1,859.29	3,138.25	4,417.21	5,888.02	2,285.03	4,203.47	6,121.91	8,328.11		
Increase ($)	$ 231.32	$ 231.40	$ 231.56	$ 231.72	$ 231.90	$ 234.87	$ 235.19	$ 235.51	$ 235.87	$ 241.80	$ 242.44	$ 243.08	$ 243.82	$ 248.74	$ 249.70	$ 250.66	$ 251.76		
Increase (%)	21.81%	18.96%	15.03%	12.46%	10.41%	16.38%	11.34%	8.68%	6.84%	13.01%	7.73%	5.50%	4.14%	10.89%	5.94%	4.09%	3.02%		
Overall Increase (%)	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $983.20	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983		
All kW @ $0.61/kW	$ 15	$ 15	$ 15	$ 15	$ 15	$ 31	$ 31	$ 31	$ 31	$ 61	$ 61	$ 61	$ 61	$ 92	$ 92	$ 92	$ 92		
All rkVA @$ 0.18 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 2	$ 3	$ 3	$ 3	$ 3	$ 5	$ 5	$ 5	$ 5		
Sub-Total	$ 999	$ 999	$ 999	$ 999	$ 999	$ 1,015	$ 1,015	$ 1,015	$ 1,015	$ 1,047	$ 1,047	$ 1,047	$ 1,047	$ 1,079	$ 1,079	$ 1,079	$ 1,079		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 6	$ 6	$ 6	$ 6	$ 6	$ 11	$ 11	$ 11	$ 11	$ 22	$ 22	$ 22	$ 22	$ 33	$ 33	$ 33	$ 33		
TCJA @ -3.130 %	$ (31)	$ (31)	$ (31)	$ (31)	$ (31)	$ (32)	$ (32)	$ (32)	$ (32)	$ (33)	$ (33)	$ (33)	$ (33)	$ (34)	$ (34)	$ (34)	$ (34)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 31	$ 31	$ 31	$ 31	$ 31	$ 62	$ 62	$ 62	$ 62	$ 124	$ 124	$ 124	$ 124	$ 186	$ 186	$ 186	$ 186		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 13	$ 13	$ 13	$ 13	$ 13	$ 49	$ 49	$ 49	$ 49	$ 121	$ 121	$ 121	$ 121	$ 193	$ 193	$ 193	$ 193		
DSIC @ 5.000 %	$ 49	$ 49	$ 49	$ 49	$ 49	$ 50	$ 50	$ 50	$ 50	$ 52	$ 52	$ 52	$ 52	$ 54	$ 54	$ 54	$ 54		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 160	$ 480	$ 800	$ 1,168	$ 320	$ 960	$ 1,600	$ 2,335	$ 640	$ 1,919	$ 3,199	$ 4,671	$ 960	$ 2,879	$ 4,799	$ 7,006		
Sub Total	$ 1,061.35	$ 1,221.30	$ 1,541.20	$ 1,861.10	$ 2,228.99	$ 1,434.28	$ 2,074.08	$ 2,713.88	$ 3,449.65	$ 1,860.22	$ 3,139.82	$ 4,419.42	$ 5,890.96	$ 2,286.17	$ 4,205.57	$ 6,124.97	$ 8,332.28		
STAS @ -0.05 %	$ (0.53)	$ (0.61)	$ (0.77)	$ (0.93)	$ (1.11)	$ (0.72)	$ (1.04)	$ (1.36)	$ (1.72)	$ (0.93)	$ (1.57)	$ (2.21)	$ (2.95)	$ (1.14)	$ (2.10)	$ (3.06)	$ (4.17)		
Total Bill	**$ 1,060.82**	**$ 1,220.69**	**$ 1,540.43**	**$ 1,860.17**	**$ 2,227.87**	**$ 1,433.56**	**$ 2,073.04**	**$ 2,712.52**	**$ 3,447.92**	**$ 1,859.29**	**$ 3,138.25**	**$ 4,417.21**	**$ 5,888.02**	**$ 2,285.03**	**$ 4,203.47**	**$ 6,121.91**	**$ 8,328.11**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $1,235.76	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236		
All kW @ $0.76/kW	$ 19	$ 19	$ 19	$ 19	$ 19	$ 38	$ 38	$ 38	$ 38	$ 76	$ 76	$ 76	$ 76	$ 114	$ 114	$ 114	$ 114		
All rkVA @$ 0.23 /rkVA	$ 1	$ 1	$ 1	$ 1	$ 1	$ 2	$ 2	$ 2	$ 2	$ 4	$ 4	$ 4	$ 4	$ 6	$ 6	$ 6	$ 6		
Sub-Total	$ 1,256	$ 1,256	$ 1,256	$ 1,256	$ 1,256	$ 1,276	$ 1,276	$ 1,276	$ 1,276	$ 1,316	$ 1,316	$ 1,316	$ 1,316	$ 1,356	$ 1,356	$ 1,356	$ 1,356		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 6	$ 6	$ 6	$ 6	$ 6	$ 11	$ 11	$ 11	$ 11	$ 22	$ 22	$ 22	$ 22	$ 33	$ 33	$ 33	$ 33		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 31	$ 31	$ 31	$ 31	$ 31	$ 62	$ 62	$ 62	$ 62	$ 124	$ 124	$ 124	$ 124	$ 186	$ 186	$ 186	$ 186		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 36	$ 36	$ 36	$ 36	$ 36	$ 73	$ 73	$ 73	$ 73	$ 146	$ 146	$ 146	$ 146	$ 219	$ 219	$ 219	$ 219		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 160	$ 480	$ 800	$ 1,168	$ 320	$ 960	$ 1,600	$ 2,335	$ 640	$ 1,919	$ 3,199	$ 4,671	$ 960	$ 2,879	$ 4,799	$ 7,006		
Sub Total	$ 1,292.14	$ 1,452.09	$ 1,771.99	$ 2,091.89	$ 2,459.78	$ 1,668.43	$ 2,308.23	$ 2,948.03	$ 3,683.80	$ 2,101.09	$ 3,380.69	$ 4,660.29	$ 6,131.83	$ 2,533.76	$ 4,453.16	$ 6,372.56	$ 8,579.87		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 1,292.14**	**$ 1,452.09**	**$ 1,771.99**	**$ 2,091.89**	**$ 2,459.78**	**$ 1,668.43**	**$ 2,308.23**	**$ 2,948.03**	**$ 3,683.80**	**$ 2,101.09**	**$ 3,380.69**	**$ 4,660.29**	**$ 6,131.83**	**$ 2,533.76**	**$ 4,453.16**	**$ 6,372.56**	**$ 8,579.87**		
% Increase	**21.81%**	**18.96%**	**15.03%**	**12.46%**	**10.41%**	**16.38%**	**11.34%**	**8.68%**	**6.84%**	**13.01%**	**7.73%**	**5.50%**	**4.14%**	**10.89%**	**5.94%**	**4.09%**	**3.02%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 250 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	250	250	250	250	250	500	500	500	500	750	750	750	750	1,000	1,000	1,000	1,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	44	44	44	44	44	89	89	89	89	133	133	133	133	177	177	177	177		
ENERGY USAGE																			
Monthly Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Proposed Bill	$ 1,799.60	$ 3,399.10	$ 6,598.10	$ 9,797.10	$ 13,475.95	$ 5,562.44	$ 11,960.44	$ 18,358.44	$ 25,716.14	$ 7,725.78	$ 17,322.78	$ 26,919.78	$ 37,956.33	$ 9,889.12	$ 22,685.12	$ 35,481.12	$ 50,196.52		
Total Current Bill	1,537.79	3,136.49	6,333.89	9,531.29	13,208.30	5,265.15	11,659.95	18,054.76	25,408.78	7,393.82	16,986.02	26,578.22	37,609.25	9,522.48	22,312.08	35,101.68	49,809.73		
Increase ($)	$ 261.81	$ 262.61	$ 264.21	$ 265.81	$ 267.65	$ 297.28	$ 300.48	$ 303.68	$ 307.36	$ 331.96	$ 336.76	$ 341.56	$ 347.08	$ 366.64	$ 373.04	$ 379.43	$ 386.79		
Increase (%)	17.02%	8.37%	4.17%	2.79%	2.03%	5.65%	2.58%	1.68%	1.21%	4.49%	1.98%	1.29%	0.92%	3.85%	1.67%	1.08%	0.78%		
Overall Increase (%)	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $983.20	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983		
All kW @ $0.61/kW	$ 153	$ 153	$ 153	$ 153	$ 153	$ 305	$ 305	$ 305	$ 305	$ 458	$ 458	$ 458	$ 458	$ 610	$ 610	$ 610	$ 610		
All rkVA @$ 0.18 /rkVA	$ 8	$ 8	$ 8	$ 8	$ 8	$ 16	$ 16	$ 16	$ 16	$ 24	$ 24	$ 24	$ 24	$ 32	$ 32	$ 32	$ 32		
Sub-Total	$ 1,144	$ 1,144	$ 1,144	$ 1,144	$ 1,144	$ 1,304	$ 1,304	$ 1,304	$ 1,304	$ 1,465	$ 1,465	$ 1,465	$ 1,465	$ 1,625	$ 1,625	$ 1,625	$ 1,625		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 55	$ 55	$ 55	$ 55	$ 55	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220		
TCJA @ -3.130 %	$ (36)	$ (36)	$ (36)	$ (36)	$ (36)	$ (41)	$ (41)	$ (41)	$ (41)	$ (46)	$ (46)	$ (46)	$ (46)	$ (51)	$ (51)	$ (51)	$ (51)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 309	$ 309	$ 309	$ 309	$ 309	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 336	$ 336	$ 336	$ 336	$ 336	$ 696	$ 696	$ 696	$ 696	$ 1,055	$ 1,055	$ 1,055	$ 1,055	$ 1,414	$ 1,414	$ 1,414	$ 1,414		
DSIC @ 5.000 %	$ 59	$ 59	$ 59	$ 59	$ 59	$ 69	$ 69	$ 69	$ 69	$ 80	$ 80	$ 80	$ 80	$ 90	$ 90	$ 90	$ 90		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 1,600	$ 4,799	$ 7,998	$ 11,676	$ 3,199	$ 9,597	$ 15,995	$ 23,353	$ 4,799	$ 14,396	$ 23,993	$ 35,029	$ 6,398	$ 19,194	$ 31,990	$ 46,705		
Sub Total	$ 1,538.56	$ 3,138.06	$ 6,337.06	$ 9,536.06	$ 13,214.91	$ 5,267.79	$ 11,665.79	$ 18,063.79	$ 25,421.49	$ 7,397.52	$ 16,994.52	$ 26,591.52	$ 37,628.07	$ 9,527.24	$ 22,323.24	$ 35,119.24	$ 49,834.64		
STAS @ -0.05 %	$ (0.77)	$ (1.57)	$ (3.17)	$ (4.77)	$ (6.61)	$ (2.63)	$ (5.83)	$ (9.03)	$ (12.71)	$ (3.70)	$ (8.50)	$ (13.30)	$ (18.81)	$ (4.76)	$ (11.16)	$ (17.56)	$ (24.92)		
Total Bill	**$ 1,537.79**	**$ 3,136.49**	**$ 6,333.89**	**$ 9,531.29**	**$ 13,208.30**	**$ 5,265.15**	**$ 11,659.95**	**$ 18,054.76**	**$ 25,408.78**	**$ 7,393.82**	**$ 16,986.02**	**$ 26,578.22**	**$ 37,609.25**	**$ 9,522.48**	**$ 22,312.08**	**$ 35,101.68**	**$ 49,809.73**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $1,235.76	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236		
All kW @ $0.76/kW	$ 190	$ 190	$ 190	$ 190	$ 190	$ 379	$ 379	$ 379	$ 379	$ 569	$ 569	$ 569	$ 569	$ 758	$ 758	$ 758	$ 758		
All rkVA @$ 0.23 /rkVA	$ 10	$ 10	$ 10	$ 10	$ 10	$ 20	$ 20	$ 20	$ 20	$ 30	$ 30	$ 30	$ 30	$ 40	$ 40	$ 40	$ 40		
Sub-Total	$ 1,435	$ 1,435	$ 1,435	$ 1,435	$ 1,435	$ 1,635	$ 1,635	$ 1,635	$ 1,635	$ 1,835	$ 1,835	$ 1,835	$ 1,835	$ 2,034	$ 2,034	$ 2,034	$ 2,034		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 55	$ 55	$ 55	$ 55	$ 55	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 309	$ 309	$ 309	$ 309	$ 309	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 364	$ 364	$ 364	$ 364	$ 364	$ 729	$ 729	$ 729	$ 729	$ 1,093	$ 1,093	$ 1,093	$ 1,093	$ 1,457	$ 1,457	$ 1,457	$ 1,457		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 1,600	$ 4,799	$ 7,998	$ 11,676	$ 3,199	$ 9,597	$ 15,995	$ 23,353	$ 4,799	$ 14,396	$ 23,993	$ 35,029	$ 6,398	$ 19,194	$ 31,990	$ 46,705		
Sub Total	$ 1,799.60	$ 3,399.10	$ 6,598.10	$ 9,797.10	$ 13,475.95	$ 5,562.44	$ 11,960.44	$ 18,358.44	$ 25,716.14	$ 7,725.78	$ 17,322.78	$ 26,919.78	$ 37,956.33	$ 9,889.12	$ 22,685.12	$ 35,481.12	$ 50,196.52		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 1,799.60**	**$ 3,399.10**	**$ 6,598.10**	**$ 9,797.10**	**$ 13,475.95**	**$ 5,562.44**	**$ 11,960.44**	**$ 18,358.44**	**$ 25,716.14**	**$ 7,725.78**	**$ 17,322.78**	**$ 26,919.78**	**$ 37,956.33**	**$ 9,889.12**	**$ 22,685.12**	**$ 35,481.12**	**$ 50,196.52**		
% Increase	**17.02%**	**8.37%**	**4.17%**	**2.79%**	**2.03%**	**5.65%**	**2.58%**	**1.68%**	**1.21%**	**4.49%**	**1.98%**	**1.29%**	**0.92%**	**3.85%**	**1.67%**	**1.08%**	**0.78%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	266	266	266	266	266	355	355	355	355	443	443	443	443	532	532	532	532		
ENERGY USAGE																			
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000		
Total Proposed Bill	$ 4,618.80	$ 14,215.80	$ 33,409.80	$ 52,603.80	$ 74,676.90	$ 18,542.48	$ 44,134.48	$ 69,726.48	$ 99,157.28	$ 22,869.16	$ 54,859.16	$ 86,849.16	$ 123,637.66	$ 27,195.83	$ 65,583.83	$ 103,971.83	$ 148,118.03		
Total Current Bill	4,187.60	13,779.81	32,964.21	52,148.61	74,210.68	18,037.13	43,616.34	69,195.54	98,611.63	22,294.46	54,268.46	86,242.47	123,012.57	26,551.79	64,920.59	103,289.40	147,413.52		
Increase ($)	$ 431.19	$ 435.99	$ 445.59	$ 455.18	$ 466.22	$ 505.34	$ 518.14	$ 530.94	$ 545.65	$ 574.70	$ 590.69	$ 606.69	$ 625.08	$ 644.05	$ 663.24	$ 682.44	$ 704.51		
Increase (%)	10.30%	3.16%	1.35%	0.87%	0.63%	2.80%	1.19%	0.77%	0.55%	2.58%	1.09%	0.70%	0.51%	2.43%	1.02%	0.66%	0.48%		
Overall Increase (%)	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $983.20	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983		
All kW @ $0.61/kW	$ 915	$ 915	$ 915	$ 915	$ 915	$ 1,220	$ 1,220	$ 1,220	$ 1,220	$ 1,525	$ 1,525	$ 1,525	$ 1,525	$ 1,830	$ 1,830	$ 1,830	$ 1,830		
All rkVA @$ 0.18 /rkVA	$ 48	$ 48	$ 48	$ 48	$ 48	$ 64	$ 64	$ 64	$ 64	$ 80	$ 80	$ 80	$ 80	$ 96	$ 96	$ 96	$ 96		
Sub-Total	$ 1,946	$ 1,946	$ 1,946	$ 1,946	$ 1,946	$ 2,267	$ 2,267	$ 2,267	$ 2,267	$ 2,588	$ 2,588	$ 2,588	$ 2,588	$ 2,909	$ 2,909	$ 2,909	$ 2,909		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ -3.130 %	$ (61)	$ (61)	$ (61)	$ (61)	$ (61)	$ (71)	$ (71)	$ (71)	$ (71)	$ (81)	$ (81)	$ (81)	$ (81)	$ (91)	$ (91)	$ (91)	$ (91)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 2,132	$ 2,132	$ 2,132	$ 2,132	$ 2,132	$ 2,851	$ 2,851	$ 2,851	$ 2,851	$ 3,569	$ 3,569	$ 3,569	$ 3,569	$ 4,288	$ 4,288	$ 4,288	$ 4,288		
DSIC @ 5.000 %	$ 111	$ 111	$ 111	$ 111	$ 111	$ 132	$ 132	$ 132	$ 132	$ 153	$ 153	$ 153	$ 153	$ 174	$ 174	$ 174	$ 174		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 4,189.70	$ 13,786.70	$ 32,980.70	$ 52,174.70	$ 74,247.80	$ 18,046.16	$ 43,638.16	$ 69,230.16	$ 98,660.96	$ 22,305.61	$ 54,295.61	$ 86,285.61	$ 123,074.11	$ 26,565.07	$ 64,953.07	$ 103,341.07	$ 147,487.27		
STAS @ -0.05 %	$ (2.09)	$ (6.89)	$ (16.49)	$ (26.09)	$ (37.12)	$ (9.02)	$ (21.82)	$ (34.62)	$ (49.33)	$ (11.15)	$ (27.15)	$ (43.14)	$ (61.54)	$ (13.28)	$ (32.48)	$ (51.67)	$ (73.74)		
Total Bill	**$ 4,187.60**	**$ 13,779.81**	**$ 32,964.21**	**$ 52,148.61**	**$ 74,210.68**	**$ 18,037.13**	**$ 43,616.34**	**$ 69,195.54**	**$ 98,611.63**	**$ 22,294.46**	**$ 54,268.46**	**$ 86,242.47**	**$ 123,012.57**	**$ 26,551.79**	**$ 64,920.59**	**$ 103,289.40**	**$ 147,413.52**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $1,235.76	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236		
All kW @ $0.76/kW	$ 1,137	$ 1,137	$ 1,137	$ 1,137	$ 1,137	$ 1,516	$ 1,516	$ 1,516	$ 1,516	$ 1,896	$ 1,896	$ 1,896	$ 1,896	$ 2,275	$ 2,275	$ 2,275	$ 2,275		
All rkVA @$ 0.23 /rkVA	$ 60	$ 60	$ 60	$ 60	$ 60	$ 80	$ 80	$ 80	$ 80	$ 100	$ 100	$ 100	$ 100	$ 120	$ 120	$ 120	$ 120		
Sub-Total	$ 2,433	$ 2,433	$ 2,433	$ 2,433	$ 2,433	$ 2,832	$ 2,832	$ 2,832	$ 2,832	$ 3,232	$ 3,232	$ 3,232	$ 3,232	$ 3,631	$ 3,631	$ 3,631	$ 3,631		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,914	$ 2,914	$ 2,914	$ 2,914	$ 3,643	$ 3,643	$ 3,643	$ 3,643	$ 4,371	$ 4,371	$ 4,371	$ 4,371		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116		
Sub Total	$ 4,618.80	$ 14,215.80	$ 33,409.80	$ 52,603.80	$ 74,676.90	$ 18,542.48	$ 44,134.48	$ 69,726.48	$ 99,157.28	$ 22,869.16	$ 54,859.16	$ 86,849.16	$ 123,637.66	$ 27,195.83	$ 65,583.83	$ 103,971.83	$ 148,118.03		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 4,618.80**	**$ 14,215.80**	**$ 33,409.80**	**$ 52,603.80**	**$ 74,676.90**	**$ 18,542.48**	**$ 44,134.48**	**$ 69,726.48**	**$ 99,157.28**	**$ 22,869.16**	**$ 54,859.16**	**$ 86,849.16**	**$ 123,637.66**	**$ 27,195.83**	**$ 65,583.83**	**$ 103,971.83**	**$ 148,118.03**		
% Increase	**10.30%**	**3.16%**	**1.35%**	**0.87%**	**0.63%**	**2.80%**	**1.19%**	**0.77%**	**0.55%**	**2.58%**	**1.09%**	**0.70%**	**0.51%**	**2.43%**	**1.02%**	**0.66%**	**0.48%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 250 - 1,000 KW
At Average Levels of kWh Use

KW Demand																			
Total kW	250	250	250	250	250	500	500	500	500	750	750	750	750	1,000	1,000	1,000	1,000		
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730		
REACTIVE DEMAND																			
rkVA	44	44	44	44	44	89	89	89	89	133	133	133	133	177	177	177	177		
ENERGY USAGE																			
Monthly Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Energy Usage	0	25,000	75,000	125,000	182,500	50,000	150,000	250,000	365,000	75,000	225,000	375,000	547,500	100,000	300,000	500,000	730,000		
Total Proposed Bill	$ 1,801.09	$ 3,400.59	$ 6,599.59	$ 9,798.59	$ 13,477.44	$ 5,563.93	$ 11,961.93	$ 18,359.93	$ 25,717.63	$ 7,727.27	$ 17,324.27	$ 26,921.27	$ 37,957.82	$ 9,890.61	$ 22,686.61	$ 35,482.61	$ 50,198.01		
Total Current Bill	1,539.00	3,137.70	6,335.10	9,532.50	13,209.51	5,266.36	11,661.16	18,055.97	25,409.99	7,395.03	16,987.23	26,579.43	37,610.46	9,523.69	22,313.29	35,102.89	49,810.94		
Increase ($)	$ 262.09	$ 262.89	$ 264.49	$ 266.09	$ 267.93	$ 297.57	$ 300.77	$ 303.97	$ 307.65	$ 332.25	$ 337.05	$ 341.84	$ 347.36	$ 366.92	$ 373.32	$ 379.72	$ 387.08		
Increase (%)	17.03%	8.38%	4.18%	2.79%	2.03%	5.65%	2.58%	1.68%	1.21%	4.49%	1.98%	1.29%	0.92%	3.85%	1.67%	1.08%	0.78%		
Overall Increase (%)	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%		
UNBUNDLED RATES - CURRENT																			
Distribution																			
Distribution Charge @ $983.20	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983		
Transformer Charge @ $1.19	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1		
All kW @ $0.61/kW	$ 153	$ 153	$ 153	$ 153	$ 153	$ 305	$ 305	$ 305	$ 305	$ 458	$ 458	$ 458	$ 458	$ 610	$ 610	$ 610	$ 610		
All rkVA @$ 0.18 /rkVA	$ 8	$ 8	$ 8	$ 8	$ 8	$ 16	$ 16	$ 16	$ 16	$ 24	$ 24	$ 24	$ 24	$ 32	$ 32	$ 32	$ 32		
Sub-Total	$ 1,145	$ 1,145	$ 1,145	$ 1,145	$ 1,145	$ 1,305	$ 1,305	$ 1,305	$ 1,305	$ 1,466	$ 1,466	$ 1,466	$ 1,466	$ 1,626	$ 1,626	$ 1,626	$ 1,626		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 55	$ 55	$ 55	$ 55	$ 55	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220		
TCJA @ -3.130 %	$ (36)	$ (36)	$ (36)	$ (36)	$ (36)	$ (41)	$ (41)	$ (41)	$ (41)	$ (46)	$ (46)	$ (46)	$ (46)	$ (51)	$ (51)	$ (51)	$ (51)		
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 309	$ 309	$ 309	$ 309	$ 309	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 336	$ 336	$ 336	$ 336	$ 336	$ 696	$ 696	$ 696	$ 696	$ 1,055	$ 1,055	$ 1,055	$ 1,055	$ 1,414	$ 1,414	$ 1,414	$ 1,414		
DSIC @ 5.000 %	$ 59	$ 59	$ 59	$ 59	$ 59	$ 69	$ 69	$ 69	$ 69	$ 80	$ 80	$ 80	$ 80	$ 90	$ 90	$ 90	$ 90		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 1,600	$ 4,799	$ 7,998	$ 11,676	$ 3,199	$ 9,597	$ 15,995	$ 23,353	$ 4,799	$ 14,396	$ 23,993	$ 35,029	$ 6,398	$ 19,194	$ 31,990	$ 46,705		
Sub Total	$ 1,539.77	$ 3,139.27	$ 6,338.27	$ 9,537.27	$ 13,216.12	$ 5,269.00	$ 11,667.00	$ 18,065.00	$ 25,422.70	$ 7,398.73	$ 16,995.73	$ 26,592.73	$ 37,629.28	$ 9,528.45	$ 22,324.45	$ 35,120.45	$ 49,835.85		
STAS @ -0.05 %	$ (0.77)	$ (1.57)	$ (3.17)	$ (4.77)	$ (6.61)	$ (2.63)	$ (5.83)	$ (9.03)	$ (12.71)	$ (3.70)	$ (8.50)	$ (13.30)	$ (18.81)	$ (4.76)	$ (11.16)	$ (17.56)	$ (24.92)		
Total Bill	**$ 1,539.00**	**$ 3,137.70**	**$ 6,335.10**	**$ 9,532.50**	**$ 13,209.51**	**$ 5,266.36**	**$ 11,661.16**	**$ 18,055.97**	**$ 25,409.99**	**$ 7,395.03**	**$ 16,987.23**	**$ 26,579.43**	**$ 37,610.46**	**$ 9,523.69**	**$ 22,313.29**	**$ 35,102.89**	**$ 49,810.94**		
UNBUNDLED RATES - PROPOSED																			
Distribution																			
Distribution Charge @ $1,235.76	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236		
Transformer Charge @ $1.50	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1		
All kW @ $0.76/kW	$ 190	$ 190	$ 190	$ 190	$ 190	$ 379	$ 379	$ 379	$ 379	$ 569	$ 569	$ 569	$ 569	$ 758	$ 758	$ 758	$ 758		
All rkVA @$ 0.23 /rkVA	$ 10	$ 10	$ 10	$ 10	$ 10	$ 20	$ 20	$ 20	$ 20	$ 30	$ 30	$ 30	$ 30	$ 40	$ 40	$ 40	$ 40		
Sub-Total	$ 1,437	$ 1,437	$ 1,437	$ 1,437	$ 1,437	$ 1,636	$ 1,636	$ 1,636	$ 1,636	$ 1,836	$ 1,836	$ 1,836	$ 1,836	$ 2,036	$ 2,036	$ 2,036	$ 2,036		
Riders																			
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 55	$ 55	$ 55	$ 55	$ 55	$ 110	$ 110	$ 110	$ 110	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220		
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Default Service Support Charge @$ 1.237 /kW NSPL	$ 309	$ 309	$ 309	$ 309	$ 309	$ 619	$ 619	$ 619	$ 619	$ 928	$ 928	$ 928	$ 928	$ 1,237	$ 1,237	$ 1,237	$ 1,237		
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Sub-Total	$ 364	$ 364	$ 364	$ 364	$ 364	$ 729	$ 729	$ 729	$ 729	$ 1,093	$ 1,093	$ 1,093	$ 1,093	$ 1,457	$ 1,457	$ 1,457	$ 1,457		
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
PTC/HPS Charge																			
All kWh @ $ 0.06398 /kWh	$ -	$ 1,600	$ 4,799	$ 7,998	$ 11,676	$ 3,199	$ 9,597	$ 15,995	$ 23,353	$ 4,799	$ 14,396	$ 23,993	$ 35,029	$ 6,398	$ 19,194	$ 31,990	$ 46,705		
Sub Total	$ 1,801.09	$ 3,400.59	$ 6,599.59	$ 9,798.59	$ 13,477.44	$ 5,563.93	$ 11,961.93	$ 18,359.93	$ 25,717.63	$ 7,727.27	$ 17,324.27	$ 26,921.27	$ 37,957.82	$ 9,890.61	$ 22,686.61	$ 35,482.61	$ 50,198.01		
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		
Total Bill	**$ 1,801.09**	**$ 3,400.59**	**$ 6,599.59**	**$ 9,798.59**	**$ 13,477.44**	**$ 5,563.93**	**$ 11,961.93**	**$ 18,359.93**	**$ 25,717.63**	**$ 7,727.27**	**$ 17,324.27**	**$ 26,921.27**	**$ 37,957.82**	**$ 9,890.61**	**$ 22,686.61**	**$ 35,482.61**	**$ 50,198.01**		
% Increase	**17.03%**	**8.38%**	**4.18%**	**2.79%**	**2.03%**	**5.65%**	**2.58%**	**1.68%**	**1.21%**	**4.49%**	**1.98%**	**1.29%**	**0.92%**	**3.85%**	**1.67%**	**1.08%**	**0.78%**		

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE GP
With Demands of 1,500 - 3,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	1,500	1,500	1,500	1,500	1,500	2,000	2,000	2,000	2,000	2,500	2,500	2,500	2,500	3,000	3,000	3,000	3,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
REACTIVE DEMAND																		
rkVA	266	266	266	266	266	355	355	355	355	443	443	443	443	532	532	532	532	
ENERGY USAGE																		
Monthly Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Energy Usage	0	150,000	450,000	750,000	1,095,000	200,000	600,000	1,000,000	1,460,000	250,000	750,000	1,250,000	1,825,000	300,000	900,000	1,500,000	2,190,000	
Total Proposed Bill	$ 3,677.64	$ 13,274.64	$ 32,468.64	$ 51,662.64	$ 73,735.74	$ 17,287.10	$ 42,879.10	$ 68,471.10	$ 97,901.90	$ 21,299.56	$ 53,289.56	$ 85,279.56	$ 122,068.06	$ 25,312.02	$ 63,700.02	$ 102,088.02	$ 146,234.22	
Total Current Bill	3,426.34	13,018.55	32,202.95	51,387.35	73,449.42	17,021.72	42,600.92	68,180.12	97,596.21	21,024.89	52,998.89	84,972.90	121,743.00	25,028.06	63,396.86	101,765.67	145,889.79	
Increase ($)	$ 251.29	$ 256.09	$ 265.69	$ 275.28	$ 286.32	$ 265.38	$ 278.18	$ 290.97	$ 305.69	$ 274.67	$ 290.67	$ 306.66	$ 325.06	$ 283.96	$ 303.16	$ 322.35	$ 344.42	
Increase (%)	7.33%	1.97%	0.83%	0.54%	0.39%	1.56%	0.65%	0.43%	0.31%	1.31%	0.55%	0.36%	0.27%	1.13%	0.48%	0.32%	0.24%	
Overall Increase (%)	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	0.78%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $983.20	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	$ 983	
Transformer Charge @ $1.19	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
All kW @ $0.11/kW	$ 165	$ 165	$ 165	$ 165	$ 165	$ 220	$ 220	$ 220	$ 220	$ 275	$ 275	$ 275	$ 275	$ 330	$ 330	$ 330	$ 330	
All rkVA @$ 0.18 /rkVA	$ 48	$ 48	$ 48	$ 48	$ 48	$ 64	$ 64	$ 64	$ 64	$ 80	$ 80	$ 80	$ 80	$ 96	$ 96	$ 96	$ 96	
Sub-Total	$ 1,197	$ 1,197	$ 1,197	$ 1,197	$ 1,197	$ 1,268	$ 1,268	$ 1,268	$ 1,268	$ 1,339	$ 1,339	$ 1,339	$ 1,339	$ 1,410	$ 1,410	$ 1,410	$ 1,410	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660	
TCJA @ -3.130 %	$ (37)	$ (37)	$ (37)	$ (37)	$ (37)	$ (40)	$ (40)	$ (40)	$ (40)	$ (42)	$ (42)	$ (42)	$ (42)	$ (44)	$ (44)	$ (44)	$ (44)	
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 2,156	$ 2,156	$ 2,156	$ 2,156	$ 2,156	$ 2,882	$ 2,882	$ 2,882	$ 2,882	$ 3,608	$ 3,608	$ 3,608	$ 3,608	$ 4,335	$ 4,335	$ 4,335	$ 4,335	
DSIC @ 5.000 %	$ 75	$ 75	$ 75	$ 75	$ 75	$ 84	$ 84	$ 84	$ 84	$ 93	$ 93	$ 93	$ 93	$ 102	$ 102	$ 102	$ 102	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116	
Sub Total	$ 3,428.06	$ 13,025.06	$ 32,219.06	$ 51,413.06	$ 73,486.16	$ 17,030.23	$ 42,622.23	$ 68,214.23	$ 97,645.03	$ 21,035.40	$ 53,025.40	$ 85,015.40	$ 121,803.90	$ 25,040.58	$ 63,428.58	$ 101,816.58	$ 145,962.78	
STAS @ -0.05 %	$ (1.71)	$ (6.51)	$ (16.11)	$ (25.71)	$ (36.74)	$ (8.52)	$ (21.31)	$ (34.11)	$ (48.82)	$ (10.52)	$ (26.51)	$ (42.51)	$ (60.90)	$ (12.52)	$ (31.71)	$ (50.91)	$ (72.98)	
Total Bill	**$ 3,426.34**	**$ 13,018.55**	**$ 32,202.95**	**$ 51,387.35**	**$ 73,449.42**	**$ 17,021.72**	**$ 42,600.92**	**$ 68,180.12**	**$ 97,596.21**	**$ 21,024.89**	**$ 52,998.89**	**$ 84,972.90**	**$ 121,743.00**	**$ 25,028.06**	**$ 63,396.86**	**$ 101,765.67**	**$ 145,889.79**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $1,235.76	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	$ 1,236	
Transformer Charge @ $1.50	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	$ 1	
All kW @ $0.13/kW	$ 195	$ 195	$ 195	$ 195	$ 195	$ 260	$ 260	$ 260	$ 260	$ 325	$ 325	$ 325	$ 325	$ 389	$ 389	$ 389	$ 389	
All rkVA @$ 0.23 /rkVA	$ 60	$ 60	$ 60	$ 60	$ 60	$ 80	$ 80	$ 80	$ 80	$ 100	$ 100	$ 100	$ 100	$ 120	$ 120	$ 120	$ 120	
Sub-Total	$ 1,492	$ 1,492	$ 1,492	$ 1,492	$ 1,492	$ 1,577	$ 1,577	$ 1,577	$ 1,577	$ 1,662	$ 1,662	$ 1,662	$ 1,662	$ 1,747	$ 1,747	$ 1,747	$ 1,747	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 330	$ 330	$ 330	$ 330	$ 330	$ 440	$ 440	$ 440	$ 440	$ 550	$ 550	$ 550	$ 550	$ 660	$ 660	$ 660	$ 660	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 1.237 /kW NSPL	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 1,856	$ 2,474	$ 2,474	$ 2,474	$ 2,474	$ 3,093	$ 3,093	$ 3,093	$ 3,093	$ 3,711	$ 3,711	$ 3,711	$ 3,711	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,186	$ 2,914	$ 2,914	$ 2,914	$ 2,914	$ 3,643	$ 3,643	$ 3,643	$ 3,643	$ 4,371	$ 4,371	$ 4,371	$ 4,371	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 9,597	$ 28,791	$ 47,985	$ 70,058	$ 12,796	$ 38,388	$ 63,980	$ 93,411	$ 15,995	$ 47,985	$ 79,975	$ 116,764	$ 19,194	$ 57,582	$ 95,970	$ 140,116	
Sub Total	$ 3,677.64	$ 13,274.64	$ 32,468.64	$ 51,662.64	$ 73,735.74	$ 17,287.10	$ 42,879.10	$ 68,471.10	$ 97,901.90	$ 21,299.56	$ 53,289.56	$ 85,279.56	$ 122,068.06	$ 25,312.02	$ 63,700.02	$ 102,088.02	$ 146,234.22	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 3,677.64**	**$ 13,274.64**	**$ 32,468.64**	**$ 51,662.64**	**$ 73,735.74**	**$ 17,287.10**	**$ 42,879.10**	**$ 68,471.10**	**$ 97,901.90**	**$ 21,299.56**	**$ 53,289.56**	**$ 85,279.56**	**$ 122,068.06**	**$ 25,312.02**	**$ 63,700.02**	**$ 102,088.02**	**$ 146,234.22**	
% Increase	**7.33%**	**1.97%**	**0.83%**	**0.54%**	**0.39%**	**1.56%**	**0.65%**	**0.43%**	**0.31%**	**1.31%**	**0.55%**	**0.36%**	**0.27%**	**1.13%**	**0.48%**	**0.32%**	**0.24%**	

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE PP44
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000	
Total Proposed Bill	$ 7,757.94	$ 39,946.85	$ 104,324.69	$ 168,702.53	$ 242,737.04	$ 79,888.11	$ 208,643.78	$ 337,399.46	$ 485,468.48	$ 119,829.37	$ 312,962.88	$ 506,096.39	$ 728,199.92	$ 159,770.63	$ 417,281.97	$ 674,793.32	$ 970,931.37	
Total Current Bill	7,825.71	39,940.11	104,168.90	168,397.69	242,260.81	79,868.38	208,325.97	336,783.55	484,509.77	119,796.65	312,483.03	505,169.41	726,758.74	159,724.93	416,640.10	673,555.27	969,007.71	
Increase ($)	$ (67.78)	$ 6.75	$ 155.79	$ 304.83	$ 476.23	$ 19.73	$ 317.82	$ 615.91	$ 958.71	$ 32.72	$ 479.85	$ 926.98	$ 1,441.18	$ 45.70	$ 641.88	$ 1,238.05	$ 1,923.66	
Increase (%)	-0.87%	0.02%	0.15%	0.18%	0.20%	0.02%	0.15%	0.18%	0.20%	0.03%	0.15%	0.18%	0.20%	0.03%	0.15%	0.18%	0.20%	
Overall Increase (%)	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $4.08	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	
All kWh @ $ 0.00029 /kWh	$ -	$ 145	$ 435	$ 725	$ 1,059	$ 290	$ 870	$ 1,450	$ 2,117	$ 435	$ 1,305	$ 2,175	$ 3,176	$ 580	$ 1,740	$ 2,900	$ 4,234	
All kW @ $0.11/kW	$ 550	$ 550	$ 550	$ 550	$ 550	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,650	$ 1,650	$ 1,650	$ 1,650	$ 2,200	$ 2,200	$ 2,200	$ 2,200	
Sub-Total	$ 554	$ 699	$ 989	$ 1,279	$ 1,613	$ 1,394	$ 1,974	$ 2,554	$ 3,221	$ 2,089	$ 2,959	$ 3,829	$ 4,830	$ 2,784	$ 3,944	$ 5,104	$ 6,438	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 3,300	$ 3,300	$ 3,300	$ 3,300	$ 4,400	$ 4,400	$ 4,400	$ 4,400	
TCJA @ -3.130 %	$ (17)	$ (22)	$ (31)	$ (40)	$ (50)	$ (44)	$ (62)	$ (80)	$ (101)	$ (65)	$ (93)	$ (120)	$ (151)	$ (87)	$ (123)	$ (160)	$ (202)	
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	
Default Service Support Charge @ $ 1.237 /kW NSPL	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 12,370	$ 12,370	$ 12,370	$ 12,370	$ 18,555	$ 18,555	$ 18,555	$ 18,555	$ 24,740	$ 24,740	$ 24,740	$ 24,740	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 7,276	$ 7,271	$ 7,262	$ 7,253	$ 7,242	$ 14,534	$ 14,516	$ 14,498	$ 14,477	$ 21,798	$ 21,770	$ 21,743	$ 21,712	$ 29,061	$ 29,024	$ 28,988	$ 28,946	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 31,990	$ 95,970	$ 159,950	$ 233,527	$ 63,980	$ 191,940	$ 319,900	$ 467,054	$ 95,970	$ 287,910	$ 479,850	$ 700,581	$ 127,960	$ 383,880	$ 639,800	$ 934,108	
Sub Total	$ 7,830	$ 39,960	$ 104,221	$ 168,482	$ 242,382	$ 79,908	$ 208,430	$ 336,952	$ 484,752	$ 119,857	$ 312,639	$ 505,422	$ 727,122	$ 159,805	$ 416,849	$ 673,892	$ 969,492	
STAS @ -0.05 %	$ (4)	$ (20)	$ (52)	$ (84)	$ (121)	$ (40)	$ (104)	$ (168)	$ (242)	$ (60)	$ (156)	$ (253)	$ (364)	$ (80)	$ (208)	$ (337)	$ (485)	
Total Bill	**$ 7,826**	**$ 39,940**	**$ 104,169**	**$ 168,398**	**$ 242,261**	**$ 79,868**	**$ 208,326**	**$ 336,784**	**$ 484,510**	**$ 119,797**	**$ 312,483**	**$ 505,169**	**$ 726,759**	**$ 159,725**	**$ 416,640**	**$ 673,555**	**$ 969,008**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $5.60	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	
All kWh @ $ 0.00040 /kWh	$ -	$ 199	$ 597	$ 995	$ 1,452	$ 398	$ 1,194	$ 1,989	$ 2,904	$ 597	$ 1,790	$ 2,984	$ 4,356	$ 796	$ 2,387	$ 3,978	$ 5,808	
All kW @ $0.09/kW	$ 467	$ 467	$ 467	$ 467	$ 467	$ 935	$ 935	$ 935	$ 935	$ 1,402	$ 1,402	$ 1,402	$ 1,402	$ 1,869	$ 1,869	$ 1,869	$ 1,869	
Sub-Total	$ 473	$ 672	$ 1,070	$ 1,468	$ 1,925	$ 1,338	$ 2,134	$ 2,929	$ 3,844	$ 2,004	$ 3,198	$ 4,391	$ 5,764	$ 2,671	$ 4,262	$ 5,853	$ 7,683	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 3,300	$ 3,300	$ 3,300	$ 3,300	$ 4,400	$ 4,400	$ 4,400	$ 4,400	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 1.237 /kW NSPL	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 12,370	$ 12,370	$ 12,370	$ 12,370	$ 18,555	$ 18,555	$ 18,555	$ 18,555	$ 24,740	$ 24,740	$ 24,740	$ 24,740	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 7,285	$ 7,285	$ 7,285	$ 7,285	$ 7,285	$ 14,570	$ 14,570	$ 14,570	$ 14,570	$ 21,855	$ 21,855	$ 21,855	$ 21,855	$ 29,140	$ 29,140	$ 29,140	$ 29,140	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 31,990	$ 95,970	$ 159,950	$ 233,527	$ 63,980	$ 191,940	$ 319,900	$ 467,054	$ 95,970	$ 287,910	$ 479,850	$ 700,581	$ 127,960	$ 383,880	$ 639,800	$ 934,108	
Sub Total	$ 7,758	$ 39,947	$ 104,325	$ 168,703	$ 242,737	$ 79,888	$ 208,644	$ 337,399	$ 485,468	$ 119,829	$ 312,963	$ 506,096	$ 728,200	$ 159,771	$ 417,282	$ 674,793	$ 970,931	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 7,758**	**$ 39,947**	**$ 104,325**	**$ 168,703**	**$ 242,737**	**$ 79,888**	**$ 208,644**	**$ 337,399**	**$ 485,468**	**$ 119,829**	**$ 312,963**	**$ 506,096**	**$ 728,200**	**$ 159,771**	**$ 417,282**	**$ 674,793**	**$ 970,931**	
% Increase	**-0.87%**	**0.02%**	**0.15%**	**0.18%**	**0.20%**	**0.02%**	**0.15%**	**0.18%**	**0.20%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE PP44
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 38,767.29	$ 199,711.88	$ 521,601.07	$ 843,490.25	$ 1,213,662.81	$ 239,653.14	$ 625,920.16	$ 1,012,187.18	$ 1,456,394.25	$ 279,594.40	$ 730,239.25	$ 1,180,884.11	$ 1,699,125.69	$ 319,535.66	$ 834,558.35	$ 1,349,581.04	$ 1,941,857.14	
Total Current Bill	39,081.22	199,653.20	520,797.16	841,941.12	1,211,256.68	239,581.47	624,954.23	1,010,326.98	1,453,505.65	279,509.74	729,111.29	1,178,712.84	1,695,754.62	319,438.02	833,268.36	1,347,098.70	1,938,003.59	
Increase ($)	$ (313.92)	$ 58.69	$ 803.91	$ 1,549.13	$ 2,406.13	$ 71.67	$ 965.93	$ 1,860.20	$ 2,888.60	$ 84.66	$ 1,127.96	$ 2,171.27	$ 3,371.08	$ 97.64	$ 1,289.99	$ 2,482.34	$ 3,853.55	
Increase (%)	-0.80%	0.03%	0.15%	0.18%	0.20%	0.03%	0.15%	0.18%	0.20%	0.03%	0.15%	0.18%	0.20%	0.03%	0.15%	0.18%	0.20%	
Overall Increase (%)	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	0.19%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $4.08	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	$ 4	
All kWh @ $ 0.00029 /kWh	$ -	$ 725	$ 2,175	$ 3,625	$ 5,293	$ 870	$ 2,610	$ 4,350	$ 6,351	$ 1,015	$ 3,045	$ 5,075	$ 7,410	$ 1,160	$ 3,480	$ 5,800	$ 8,468	
All kW @ $0.11/kW	$ 2,750	$ 2,750	$ 2,750	$ 2,750	$ 2,750	$ 3,300	$ 3,300	$ 3,300	$ 3,300	$ 3,850	$ 3,850	$ 3,850	$ 3,850	$ 4,400	$ 4,400	$ 4,400	$ 4,400	
Sub-Total	$ 2,754	$ 3,479	$ 4,929	$ 6,379	$ 8,047	$ 4,174	$ 5,914	$ 7,654	$ 9,655	$ 4,869	$ 6,899	$ 8,929	$ 11,264	$ 5,564	$ 7,884	$ 10,204	$ 12,872	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 7,700	$ 7,700	$ 7,700	$ 7,700	$ 8,800	$ 8,800	$ 8,800	$ 8,800	
TCJA @ -3.130 %	$ (86)	$ (109)	$ (154)	$ (200)	$ (252)	$ (131)	$ (185)	$ (240)	$ (302)	$ (152)	$ (216)	$ (279)	$ (353)	$ (174)	$ (247)	$ (319)	$ (403)	
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	
Default Service Support Charge @ $ 1.237 /kW NSPL	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 37,110	$ 37,110	$ 37,110	$ 37,110	$ 43,295	$ 43,295	$ 43,295	$ 43,295	$ 49,480	$ 49,480	$ 49,480	$ 49,480	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 36,347	$ 36,324	$ 36,279	$ 36,233	$ 36,181	$ 43,587	$ 43,533	$ 43,478	$ 43,416	$ 50,850	$ 50,787	$ 50,723	$ 50,650	$ 58,114	$ 58,041	$ 57,969	$ 57,885	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 159,950	$ 479,850	$ 799,750	$ 1,167,635	$ 191,940	$ 575,820	$ 959,700	$ 1,401,162	$ 223,930	$ 671,790	$ 1,119,650	$ 1,634,689	$ 255,920	$ 767,760	$ 1,279,600	$ 1,868,216	
Sub Total	$ 39,101	$ 199,753	$ 521,058	$ 842,362	$ 1,211,863	$ 239,701	$ 625,267	$ 1,010,832	$ 1,454,233	$ 279,650	$ 729,476	$ 1,179,302	$ 1,696,603	$ 319,598	$ 833,685	$ 1,347,773	$ 1,938,973	
STAS @ -0.05 %	$ (20)	$ (100)	$ (261)	$ (421)	$ (606)	$ (120)	$ (313)	$ (505)	$ (727)	$ (140)	$ (365)	$ (590)	$ (848)	$ (160)	$ (417)	$ (674)	$ (969)	
Total Bill	**$ 39,081**	**$ 199,653**	**$ 520,797**	**$ 841,941**	**$ 1,211,257**	**$ 239,581**	**$ 624,954**	**$ 1,010,327**	**$ 1,453,506**	**$ 279,510**	**$ 729,111**	**$ 1,178,713**	**$ 1,695,755**	**$ 319,438**	**$ 833,268**	**$ 1,347,099**	**$ 1,938,004**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $5.60	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	$ 6	
All kWh @ $ 0.00040 /kWh	$ -	$ 995	$ 2,984	$ 4,973	$ 7,261	$ 1,194	$ 3,581	$ 5,968	$ 8,713	$ 1,392	$ 4,177	$ 6,962	$ 10,165	$ 1,591	$ 4,774	$ 7,957	$ 11,617	
All kW @ $0.09/kW	$ 2,337	$ 2,337	$ 2,337	$ 2,337	$ 2,337	$ 2,804	$ 2,804	$ 2,804	$ 2,804	$ 3,271	$ 3,271	$ 3,271	$ 3,271	$ 3,739	$ 3,739	$ 3,739	$ 3,739	
Sub-Total	$ 2,342	$ 3,337	$ 5,326	$ 7,315	$ 9,603	$ 4,003	$ 6,390	$ 8,777	$ 11,522	$ 4,669	$ 7,454	$ 10,239	$ 13,442	$ 5,336	$ 8,518	$ 11,701	$ 15,361	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 7,700	$ 7,700	$ 7,700	$ 7,700	$ 8,800	$ 8,800	$ 8,800	$ 8,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 1.237 /kW NSPL	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 37,110	$ 37,110	$ 37,110	$ 37,110	$ 43,295	$ 43,295	$ 43,295	$ 43,295	$ 49,480	$ 49,480	$ 49,480	$ 49,480	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 36,425	$ 36,425	$ 36,425	$ 36,425	$ 36,425	$ 43,710	$ 43,710	$ 43,710	$ 43,710	$ 50,995	$ 50,995	$ 50,995	$ 50,995	$ 58,280	$ 58,280	$ 58,280	$ 58,280	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 159,950	$ 479,850	$ 799,750	$ 1,167,635	$ 191,940	$ 575,820	$ 959,700	$ 1,401,162	$ 223,930	$ 671,790	$ 1,119,650	$ 1,634,689	$ 255,920	$ 767,760	$ 1,279,600	$ 1,868,216	
Sub Total	$ 38,767	$ 199,712	$ 521,601	$ 843,490	$ 1,213,663	$ 239,653	$ 625,920	$ 1,012,187	$ 1,456,394	$ 279,594	$ 730,239	$ 1,180,884	$ 1,699,126	$ 319,536	$ 834,558	$ 1,349,581	$ 1,941,857	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 38,767**	**$ 199,712**	**$ 521,601**	**$ 843,490**	**$ 1,213,663**	**$ 239,653**	**$ 625,920**	**$ 1,012,187**	**$ 1,456,394**	**$ 279,594**	**$ 730,239**	**$ 1,180,884**	**$ 1,699,126**	**$ 319,536**	**$ 834,558**	**$ 1,349,581**	**$ 1,941,857**	
% Increase	**-0.80%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	**0.03%**	**0.15%**	**0.18%**	**0.20%**	

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE PP46
With Demands Up to 20,000 KW
At Average Levels of kWh Use

KW Demand																				
Total kW	5,000	5,000	5,000	5,000	5,000	10,000	10,000	10,000	10,000	15,000	15,000	15,000	15,000	20,000	20,000	20,000	20,000			
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730			
ENERGY USAGE																				
Monthly Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000			
Total Energy Usage	0	500,000	1,500,000	2,500,000	3,650,000	1,000,000	3,000,000	5,000,000	7,300,000	1,500,000	4,500,000	7,500,000	10,950,000	2,000,000	6,000,000	10,000,000	14,600,000			
Total Proposed Bill	$ 8,783.09	$ 41,425.45	$ 106,710.16	$ 171,994.87	$ 247,072.29	$ 82,844.06	$ 213,413.48	$ 343,982.90	$ 494,137.73	$ 124,262.67	$ 320,116.80	$ 515,970.93	$ 741,203.18	$ 165,681.29	$ 426,820.13	$ 687,958.97	$ 988,268.63			
Total Current Bill	8,553.20	41,030.68	105,985.63	170,940.59	245,638.78	82,048.19	211,958.10	341,868.01	491,264.40	123,065.71	317,930.57	512,795.43	736,890.03	164,083.22	423,903.04	683,722.86	982,515.65			
Increase ($)	$ 229.89	$ 394.77	$ 724.53	$ 1,054.28	$ 1,433.50	$ 795.87	$ 1,455.38	$ 2,114.89	$ 2,873.33	$ 1,196.97	$ 2,186.23	$ 3,175.50	$ 4,313.16	$ 1,598.06	$ 2,917.09	$ 4,236.11	$ 5,752.99			
Increase (%)	2.69%	0.96%	0.68%	0.62%	0.58%	0.97%	0.69%	0.62%	0.58%	0.97%	0.69%	0.62%	0.59%	0.97%	0.69%	0.62%	0.59%			
Overall Increase (%)	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%			
UNBUNDLED RATES - CURRENT																				
Distribution																				
Distribution Charge @ $5.45	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5			
All kWh @ $ 0.00104 /kWh	$ -	$ 520	$ 1,560	$ 2,600	$ 3,796	$ 1,040	$ 3,120	$ 5,200	$ 7,592	$ 1,560	$ 4,680	$ 7,800	$ 11,388	$ 2,080	$ 6,240	$ 10,400	$ 15,184			
All kW @ $0.26/kW	$ 1,300	$ 1,300	$ 1,300	$ 1,300	$ 1,300	$ 2,600	$ 2,600	$ 2,600	$ 2,600	$ 3,900	$ 3,900	$ 3,900	$ 3,900	$ 5,200	$ 5,200	$ 5,200	$ 5,200			
Sub-Total	$ 1,305	$ 1,825	$ 2,865	$ 3,905	$ 5,101	$ 3,645	$ 5,725	$ 7,805	$ 10,197	$ 5,465	$ 8,585	$ 11,705	$ 15,293	$ 7,285	$ 11,445	$ 15,605	$ 20,389			
Riders																				
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 3,300	$ 3,300	$ 3,300	$ 3,300	$ 4,400	$ 4,400	$ 4,400	$ 4,400			
TCJA @ -3.130 %	$ (41)	$ (57)	$ (90)	$ (122)	$ (160)	$ (114)	$ (179)	$ (244)	$ (319)	$ (171)	$ (269)	$ (366)	$ (479)	$ (228)	$ (358)	$ (488)	$ (638)			
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8			
Default Service Support Charge @ $ 1.237 /kW NSPL	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 12,370	$ 12,370	$ 12,370	$ 12,370	$ 18,555	$ 18,555	$ 18,555	$ 18,555	$ 24,740	$ 24,740	$ 24,740	$ 24,740			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ 7,252	$ 7,236	$ 7,203	$ 7,171	$ 7,133	$ 14,464	$ 14,399	$ 14,334	$ 14,259	$ 21,692	$ 21,594	$ 21,497	$ 21,384	$ 28,920	$ 28,790	$ 28,659	$ 28,510			
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
PTC/HPS Charge																				
All kWh @ $ 0.06398 /kWh	$ -	$ 31,990	$ 95,970	$ 159,950	$ 233,527	$ 63,980	$ 191,940	$ 319,900	$ 467,054	$ 95,970	$ 287,910	$ 479,850	$ 700,581	$ 127,960	$ 383,880	$ 639,800	$ 934,108			
Sub Total	$ 8,557	$ 41,051	$ 106,039	$ 171,026	$ 245,762	$ 82,089	$ 212,064	$ 342,039	$ 491,510	$ 123,127	$ 318,090	$ 513,052	$ 737,259	$ 164,165	$ 424,115	$ 684,065	$ 983,007			
STAS @ -0.05 %	$ (4)	$ (21)	$ (53)	$ (86)	$ (123)	$ (41)	$ (106)	$ (171)	$ (246)	$ (62)	$ (159)	$ (257)	$ (369)	$ (82)	$ (212)	$ (342)	$ (492)			
Total Bill	**$ 8,553**	**$ 41,031**	**$ 105,986**	**$ 170,941**	**$ 245,639**	**$ 82,048**	**$ 211,958**	**$ 341,868**	**$ 491,264**	**$ 123,066**	**$ 317,931**	**$ 512,795**	**$ 736,890**	**$ 164,083**	**$ 423,903**	**$ 683,723**	**$ 982,516**			
UNBUNDLED RATES - PROPOSED																				
Distribution																				
Distribution Charge @ $6.84	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7			
All kWh @ $ 0.00130 /kWh	$ -	$ 652	$ 1,957	$ 3,262	$ 4,762	$ 1,305	$ 3,914	$ 6,524	$ 9,524	$ 1,957	$ 5,871	$ 9,785	$ 14,287	$ 2,609	$ 7,828	$ 13,047	$ 19,049			
All kW @ $0.30/kW	$ 1,491	$ 1,491	$ 1,491	$ 1,491	$ 1,491	$ 2,983	$ 2,983	$ 2,983	$ 2,983	$ 4,474	$ 4,474	$ 4,474	$ 4,474	$ 5,965	$ 5,965	$ 5,965	$ 5,965			
Sub-Total	$ 1,498	$ 2,150	$ 3,455	$ 4,760	$ 6,260	$ 4,294	$ 6,903	$ 9,513	$ 12,514	$ 6,438	$ 10,352	$ 14,266	$ 18,767	$ 8,581	$ 13,800	$ 19,019	$ 25,021			
Riders																				
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 1,100	$ 2,200	$ 2,200	$ 2,200	$ 2,200	$ 3,300	$ 3,300	$ 3,300	$ 3,300	$ 4,400	$ 4,400	$ 4,400	$ 4,400			
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Default Service Support Charge @$ 1.237 /kW NSPL	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 6,185	$ 12,370	$ 12,370	$ 12,370	$ 12,370	$ 18,555	$ 18,555	$ 18,555	$ 18,555	$ 24,740	$ 24,740	$ 24,740	$ 24,740			
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Sub-Total	$ 7,285	$ 7,285	$ 7,285	$ 7,285	$ 7,285	$ 14,570	$ 14,570	$ 14,570	$ 14,570	$ 21,855	$ 21,855	$ 21,855	$ 21,855	$ 29,140	$ 29,140	$ 29,140	$ 29,140			
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
PTC/HPS Charge																				
All kWh @ $ 0.06398 /kWh	$ -	$ 31,990	$ 95,970	$ 159,950	$ 233,527	$ 63,980	$ 191,940	$ 319,900	$ 467,054	$ 95,970	$ 287,910	$ 479,850	$ 700,581	$ 127,960	$ 383,880	$ 639,800	$ 934,108			
Sub Total	$ 8,783	$ 41,425	$ 106,710	$ 171,995	$ 247,072	$ 82,844	$ 213,413	$ 343,983	$ 494,138	$ 124,263	$ 320,117	$ 515,971	$ 741,203	$ 165,681	$ 426,820	$ 687,959	$ 988,269			
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
Total Bill	**$ 8,783**	**$ 41,425**	**$ 106,710**	**$ 171,995**	**$ 247,072**	**$ 82,844**	**$ 213,413**	**$ 343,983**	**$ 494,138**	**$ 124,263**	**$ 320,117**	**$ 515,971**	**$ 741,203**	**$ 165,681**	**$ 426,820**	**$ 687,959**	**$ 988,269**			
% Increase	**2.69%**	**0.96%**	**0.68%**	**0.62%**	**0.58%**	**0.97%**	**0.69%**	**0.62%**	**0.58%**	**0.97%**	**0.69%**	**0.62%**	**0.59%**	**0.97%**	**0.69%**	**0.62%**	**0.59%**			

West Penn Rate District
COMPARISON BETWEEN PRESENT AND PROPOSED RATES
RATE PP46
With Demands Over 20,000 KW
At Average Levels of kWh Use

KW Demand																		
Total kW	25,000	25,000	25,000	25,000	25,000	30,000	30,000	30,000	30,000	35,000	35,000	35,000	35,000	40,000	40,000	40,000	40,000	
Hrs Use	0	100	300	500	730	100	300	500	730	100	300	500	730	100	300	500	730	
ENERGY USAGE																		
Monthly Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Energy Usage	0	2,500,000	7,500,000	12,500,000	18,250,000	3,000,000	9,000,000	15,000,000	21,900,000	3,500,000	10,500,000	17,500,000	25,550,000	4,000,000	12,000,000	20,000,000	29,200,000	
Total Proposed Bill	$ 43,888.12	$ 207,099.90	$ 533,523.45	$ 859,947.00	$ 1,235,334.08	$ 248,518.51	$ 640,226.77	$ 1,031,935.03	$ 1,482,399.53	$ 289,937.12	$ 746,930.09	$ 1,203,923.06	$ 1,729,464.98	$ 331,355.73	$ 853,633.41	$ 1,375,911.10	$ 1,976,530.43	
Total Current Bill	42,713.35	205,100.74	529,875.51	854,650.28	1,228,141.27	246,118.25	635,847.98	1,025,577.70	1,473,766.89	287,135.77	741,820.45	1,196,505.13	1,719,392.51	328,153.28	847,792.92	1,367,432.55	1,965,018.13	
Increase ($)	$ 1,174.77	$ 1,999.16	$ 3,647.94	$ 5,296.72	$ 7,192.81	$ 2,400.26	$ 4,378.79	$ 6,357.33	$ 8,632.64	$ 2,801.35	$ 5,109.65	$ 7,417.94	$ 10,072.47	$ 3,202.45	$ 5,840.50	$ 8,478.54	$ 11,512.30	
Increase (%)	2.75%	0.97%	0.69%	0.62%	0.59%	0.98%	0.69%	0.62%	0.59%	0.98%	0.69%	0.62%	0.59%	0.98%	0.69%	0.62%	0.59%	
Overall Increase (%)	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	0.94%	
UNBUNDLED RATES - CURRENT																		
Distribution																		
Distribution Charge @ $5.45	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	$ 5	
All kWh @ $ 0.00104 /kWh	$ -	$ 2,600	$ 7,800	$ 13,000	$ 18,980	$ 3,120	$ 9,360	$ 15,600	$ 22,776	$ 3,640	$ 10,920	$ 18,200	$ 26,572	$ 4,160	$ 12,480	$ 20,800	$ 30,368	
All kW @ $0.26/kW	$ 6,500	$ 6,500	$ 6,500	$ 6,500	$ 6,500	$ 7,800	$ 7,800	$ 7,800	$ 7,800	$ 9,100	$ 9,100	$ 9,100	$ 9,100	$ 10,400	$ 10,400	$ 10,400	$ 10,400	
Sub-Total	$ 6,505	$ 9,105	$ 14,305	$ 19,505	$ 25,485	$ 10,925	$ 17,165	$ 23,405	$ 30,581	$ 12,745	$ 20,025	$ 27,305	$ 35,677	$ 14,565	$ 22,885	$ 31,205	$ 40,773	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 7,700	$ 7,700	$ 7,700	$ 7,700	$ 8,800	$ 8,800	$ 8,800	$ 8,800	
TCJA @ -3.130 %	$ (204)	$ (285)	$ (448)	$ (611)	$ (798)	$ (342)	$ (537)	$ (733)	$ (957)	$ (399)	$ (627)	$ (855)	$ (1,117)	$ (456)	$ (716)	$ (977)	$ (1,276)	
Smart Meter Charge @ $7.89	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	$ 8	
Default Service Support Charge @ $ 1.237 /kW NSPL	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 37,110	$ 37,110	$ 37,110	$ 37,110	$ 43,295	$ 43,295	$ 43,295	$ 43,295	$ 49,480	$ 49,480	$ 49,480	$ 49,480	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 36,229	$ 36,148	$ 35,985	$ 35,822	$ 35,635	$ 43,376	$ 43,181	$ 42,985	$ 42,761	$ 50,604	$ 50,376	$ 50,148	$ 49,886	$ 57,832	$ 57,572	$ 57,311	$ 57,012	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 159,950	$ 479,850	$ 799,750	$ 1,167,635	$ 191,940	$ 575,820	$ 959,700	$ 1,401,162	$ 223,930	$ 671,790	$ 1,119,650	$ 1,634,689	$ 255,920	$ 767,760	$ 1,279,600	$ 1,868,216	
Sub Total	$ 42,735	$ 205,203	$ 530,141	$ 855,078	$ 1,228,756	$ 246,241	$ 636,166	$ 1,026,091	$ 1,474,504	$ 287,279	$ 742,192	$ 1,197,104	$ 1,720,253	$ 328,317	$ 848,217	$ 1,368,117	$ 1,966,001	
STAS @ -0.05 %	$ (21)	$ (103)	$ (265)	$ (428)	$ (614)	$ (123)	$ (318)	$ (513)	$ (737)	$ (144)	$ (371)	$ (599)	$ (860)	$ (164)	$ (424)	$ (684)	$ (983)	
Total Bill	**$ 42,713**	**$ 205,101**	**$ 529,876**	**$ 854,650**	**$ 1,228,141**	**$ 246,118**	**$ 635,848**	**$ 1,025,578**	**$ 1,473,767**	**$ 287,136**	**$ 741,820**	**$ 1,196,505**	**$ 1,719,393**	**$ 328,153**	**$ 847,793**	**$ 1,367,433**	**$ 1,965,018**	
UNBUNDLED RATES - PROPOSED																		
Distribution																		
Distribution Charge @ $6.84	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	$ 7	
All kWh @ $ 0.00130 /kWh	$ -	$ 3,262	$ 9,785	$ 16,309	$ 23,811	$ 3,914	$ 11,742	$ 19,571	$ 28,573	$ 4,566	$ 13,699	$ 22,832	$ 33,335	$ 5,219	$ 15,657	$ 26,094	$ 38,098	
All kW @ $0.30/kW	$ 7,456	$ 7,456	$ 7,456	$ 7,456	$ 7,456	$ 8,948	$ 8,948	$ 8,948	$ 8,948	$ 10,439	$ 10,439	$ 10,439	$ 10,439	$ 11,930	$ 11,930	$ 11,930	$ 11,930	
Sub-Total	$ 7,463	$ 10,725	$ 17,248	$ 23,772	$ 31,274	$ 12,869	$ 20,697	$ 28,525	$ 37,528	$ 15,012	$ 24,145	$ 33,278	$ 43,781	$ 17,156	$ 27,593	$ 38,031	$ 50,034	
Riders																		
Phase IV Energy Efficiency Charge @ $ 0.22 /kW PLC	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 5,500	$ 6,600	$ 6,600	$ 6,600	$ 6,600	$ 7,700	$ 7,700	$ 7,700	$ 7,700	$ 8,800	$ 8,800	$ 8,800	$ 8,800	
TCJA @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Smart Meter Charge @ $0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Default Service Support Charge @$ 1.237 /kW NSPL	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 30,925	$ 37,110	$ 37,110	$ 37,110	$ 37,110	$ 43,295	$ 43,295	$ 43,295	$ 43,295	$ 49,480	$ 49,480	$ 49,480	$ 49,480	
Solar Photovoltaic Requirements Charge @ 0.000 ¢/kWh	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Sub-Total	$ 36,425	$ 36,425	$ 36,425	$ 36,425	$ 36,425	$ 43,710	$ 43,710	$ 43,710	$ 43,710	$ 50,995	$ 50,995	$ 50,995	$ 50,995	$ 58,280	$ 58,280	$ 58,280	$ 58,280	
DSIC @ 0.000 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
PTC/HPS Charge																		
All kWh @ $ 0.06398 /kWh	$ -	$ 159,950	$ 479,850	$ 799,750	$ 1,167,635	$ 191,940	$ 575,820	$ 959,700	$ 1,401,162	$ 223,930	$ 671,790	$ 1,119,650	$ 1,634,689	$ 255,920	$ 767,760	$ 1,279,600	$ 1,868,216	
Sub Total	$ 43,888	$ 207,100	$ 533,523	$ 859,947	$ 1,235,334	$ 248,519	$ 640,227	$ 1,031,935	$ 1,482,400	$ 289,937	$ 746,930	$ 1,203,923	$ 1,729,465	$ 331,356	$ 853,633	$ 1,375,911	$ 1,976,530	
STAS @ 0.00 %	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	
Total Bill	**$ 43,888**	**$ 207,100**	**$ 533,523**	**$ 859,947**	**$ 1,235,334**	**$ 248,519**	**$ 640,227**	**$ 1,031,935**	**$ 1,482,400**	**$ 289,937**	**$ 746,930**	**$ 1,203,923**	**$ 1,729,465**	**$ 331,356**	**$ 853,633**	**$ 1,375,911**	**$ 1,976,530**	
% Increase	**2.75%**	**0.97%**	**0.69%**	**0.62%**	**0.59%**	**0.98%**	**0.69%**	**0.62%**	**0.59%**	**0.98%**	**0.69%**	**0.62%**	**0.59%**	**0.98%**	**0.69%**	**0.62%**	**0.59%**	

Appendix D

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE RS (Residential Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
				20.2%					
1	Distribution			$71,173,484					
2	Customer Charge	6,306,100	$ 11.25	$ 70,943,623	6,306,100	$ 11.25	$ 70,943,623	$ (0)	0.0%
3	Demand Charge (kW)	84,508	$ 2.72	229,861	84,508	$ 2.95	249,404	19,543	8.5%
4	Energy Charge (kWh)								
5	All kWh	5,857,567,027	$ 0.04800	281,163,217	5,857,567,027	$ 0.05138	300,941,982	19,778,765	7.0%
6	**Total Base Normalized Distribution Revenues**			**$ 352,336,701**			**$ 372,135,009**	**$ 19,798,308**	5.6%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	6,306,100	$ (1.00)	$ (6,306,100)	6,306,100	$ -	$ -	$ 6,306,100	-100.0%
9	TCJA Voluntary Surcharge		-3.91%	(13,776,365)		0.00%	-	13,776,365	-100.0%
10	STAS		0.02%	220,811		0.00%	-	(220,811)	-100.0%
11	Distribution System Improvement Charge		4.70%	$ 18,751,680		0.00%	$ -	(18,751,680)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 351,226,728**			**$ 372,135,009**	**$ 20,908,281**	6.0%
13	Rider Charges								
14	Default Service Support Charge	5,857,567,027	$ 0.00405	23,723,146	5,857,567,027	$ 0.00405	23,723,146	-	0.0%
15	Universal Service Charge	5,857,567,027	$ 0.00947	55,471,160	5,857,567,027	$ 0.00947	55,471,160	-	0.0%
16	Solar Photovoltaic Requirements Charge	5,857,567,027	$ 0.00006	351,454	5,857,567,027	$ 0.00006	351,454	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	5,857,567,027	$ 0.00192	11,246,529	5,857,567,027	$ 0.00192	11,246,529	-	0.0%
18	PTC/HPS Charge	5,857,567,027	$ 0.11306	662,256,528	5,857,567,027	$ 0.11306	662,256,528	-	0.0%
19	**Total Energy and Revenue**	5,857,567,027		**$ 1,104,275,545**	5,857,567,027		**$ 1,125,183,826**	**$ 20,908,281**	1.9%
20	Avg rate per kWh			$ 0.18852			$ 0.19209		
21	Proposed Increase						$ 20,908,281		
22	Percent Increase						1.89%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.	SCHEDULE GSV (Volunteer Service)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Customer Charge	3,020	$ 11.25	$ 33,977	3,020	$ 11.25	$ 33,977	$ 0	0.0%
3	Demand Charge (kW)	18,358	$ 2.72	49,934	18,358	$ 2.95	54,180	4,246	8.5%
4	Energy Charge (kWh)								
5	All kWh	10,064,727	$ 0.04800	483,107	10,064,727	$ 0.05138	517,092	33,985	7.0%
6	**Total Base Normalized Distribution Revenues**			**$ 567,018**			**$ 605,249**	**$ 38,231**	6.7%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	3,020	$ (1.00)	$ (3,020)	3,020	$ -	$ -	$ 3,020	-100.0%
9	TCJA Voluntary Surcharge		-3.91%	(22,170)		0.00%	-	22,170	-100.0%
10	STAS		0.02%	372		0.00%	-	(372)	-100.0%
11	Distribution System Improvement Charge		4.70%	$ 30,556		0.00%	$ -	(30,556)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 572,755**			**$ 605,249**	**$ 32,494**	5.7%
13	Rider Charges								
14	Default Service Support Charge	10,064,727	$ 0.00405	40,762	10,064,727	$ 0.00405	40,762	-	0.0%
15	Universal Service Charge	10,064,727	$ 0.00947	95,313	10,064,727	$ 0.00947	95,313	-	0.0%
16	Solar Photovoltaic Requirements Charge	10,064,727	$ 0.00006	604	10,064,727	$ 0.00006	604	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	10,064,727	$ 0.00129	12,983	10,064,727	$ 0.00129	12,983	-	0.0%
18	PTC/HPS Charge	10,064,727	$ 0.11306	1,137,918	10,064,727	$ 0.11306	1,137,918	-	0.0%
19	**Total Energy and Revenue**	10,064,727		**$ 1,860,336**	10,064,727		**$ 1,892,830**	**$ 32,494**	1.7%
20	Avg rate per kWh			$ 0.18484			$ 0.18807		
21	Proposed Increase						$ 32,494		
22	Percent Increase						1.75%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Small (General Service Small)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	494,420	$ 21.88	$ 10,817,903	494,420	$ 23.78	$ 11,756,851	$ 938,948	8.7%
3	Demand Charge (kW)								
4	Energy Charge (kWh)								
5	All kWh	151,865,272	$ 0.04069	6,179,398	151,865,272	$ 0.05092	7,733,275	1,553,877	25.1%
6	**Total Base Normalized Distribution Revenues**			**$ 16,997,301**			**$ 19,490,126**	**$ 2,492,825**	14.7%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	494,420	$ 1.92	$ 949,286	494,420	$ -	$ -	$ (949,286)	-100.0%
9	TCJA Voluntary Surcharge		-3.91%	(664,594)		0.00%	-	664,594	-100.0%
10	STAS		0.02%	7,301		0.00%	-	(7,301)	-100.0%
11	Distribution System Improvement Charge		4.70%	$ 821,461		0.00%	$ -	(821,461)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 18,110,754**			**$ 19,490,126**	**$ 1,379,372**	7.6%
13	Rider Charges								
14	Default Service Support Charge	151,865,272	$ 0.00110	167,052	151,865,272	$ 0.00110	167,052	-	0.0%
15	Universal Service Charge			-			-	-	0.0%
16	Solar Photovoltaic Requirements Charge	151,865,272	$ 0.00006	9,112	151,865,272	$ 0.00006	9,112	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	151,865,272	$ 0.00129	195,906	151,865,272	$ 0.00129	195,906	-	0.0%
18	PTC/HPS Charge	151,865,272	$ 0.11872	18,029,445	151,865,272	$ 0.11872	18,029,445	-	0.0%
19	**Total Energy and Revenue**	151,865,272		**$ 36,512,269**	151,865,272		**$ 37,891,641**	**$ 1,379,372**	3.8%
20	Avg rate per kWh			$ 0.24043			$ 0.24951		
21	Proposed Increase						$ 1,379,372		
22	Percent Increase						3.78%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Medium (General Service Medium)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge								
3	Single Phase	153,354	$ 24.07	$ 3,691,239	153,354	$ 26.01	$ 3,988,978	$ 297,739	8.1%
4	Three Phase	174,210	$ 43.03	7,496,242	174,210	$ 46.50	8,100,897	604,655	8.1%
	Demand Charge								
5	All kW	8,863,323	$ 5.11	45,291,582	8,863,323	$ 5.51	48,865,303		
6	All rkVa	2,741,526	$ 0.20	548,305	2,741,526	$ 0.22	592,532	44,227	8.1%
7	Energy Charge (kWh)	2,610,563,574	$ -	-	2,610,563,574				
8	**Total Base Normalized Distribution Revenues**			**$ 57,027,367**			**$ 61,547,710**	**$ 4,520,343**	7.9%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	327,564	$ 1.92	$ 628,923	327,564	$ -	$ -	$ (628,923)	
11	TCJA Voluntary Surcharge		-3.91%	(2,229,770)		0.00%	-	2,229,770	-100.0%
12	STAS		0.02%	74,908		0.00%	-	(74,908)	-100.0%
13	Distribution System Improvement Charge		4.70%	$ 2,763,325		0.00%	$ -	(2,763,325)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 58,264,752**			**$ 61,547,710**	**$ 3,282,958**	5.6%
15	Rider Charges								
16	Default Service Support Charge	2,610,563,574	$ 0.00111	2,897,726	2,610,563,574	$ 0.00111	2,897,726	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	2,610,563,574	$ 0.00006	156,634	2,610,563,574	$ 0.00006	156,634	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	2,610,563,574	$ 0.00129	3,367,627	2,610,563,574	$ 0.00129	3,367,627	-	0.0%
20	PTC/HPS Charge	2,610,563,574	$ 0.11872	309,926,108	2,610,563,574	$ 0.11872	309,926,108	-	0.0%
21	**Total Energy and Revenue**	2,610,563,574		**$ 374,612,846**	2,610,563,574	-	**$ 377,895,804**	**$ 3,282,958**	0.9%
22	Avg rate per kWh			$ 0.14350			$ 0.14476		
23	Proposed Increase						$ 3,282,958		
24	Percent Increase						0.88%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.	SCHEDULE GS-Large (General Service Large)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Customer Charge	4,790	$ 270.09	$ 1,293,622	4,790	$ 295.31	$ 1,414,432	$ 120,810	9.3%
3	Demand Charge (kW)								
4	All kW	2,196,516	$ 4.16	9,137,508	2,196,516	$ 4.44	9,759,941	622,433	6.8%
5	All rkVa	1,061,690	$ 0.20	212,338	1,061,690	$ 0.22	232,168	19,830	9.3%
6	Energy Charge (kWh)								
7	All kWh	862,656,896	$ -	-	862,656,896	$ -	-	-	0.0%
8	**Total Base Normalized Distribution Revenues**			**$ 10,643,468**			**$ 11,406,541**	**$ 763,073**	7.2%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	4,790	$ 6.69	$ 32,042	4,790	$ -	$ -	$ (32,042)	
11	TCJA Voluntary Surcharge		-3.91%	(416,160)		0.00%	-	416,160	-100.0%
12	STAS		0.02%	18,393		0.00%	-	(18,393)	-100.0%
13	Distribution System Improvement Charge		4.70%	$ 509,423		0.00%	$ -	(509,423)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 10,787,167**			**$ 11,406,541**	**$ 619,374**	5.7%
15	Rider Charges								
16	Default Service Support Charge	1,810,755	$ 0.62100	1,124,479	1,810,755	$ 0.62100	1,124,479	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	862,656,896	$ 0.00006	51,759	862,656,896	$ 0.00006	51,759	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	1,810,755	$ 0.32000	579,442	1,810,755	$ 0.32000	579,442	-	0.0%
20	PTC/HPS Charge	862,656,896	$ 0.09209	79,442,074	862,656,896	$ 0.09209	79,442,074	-	0.0%
21	**Total Energy and Revenue**	862,656,896		**$ 91,984,921**	862,656,896		**$ 92,604,295**	**$ 619,374**	0.7%
22	Avg rate per kWh			$ 0.10663			$ 0.10735		
23	Proposed Increase						$ 619,374		
24	Percent Increase						0.67%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current				Pro Forma				Revenue Change	Percent Change
		Billing Determinants		Rate	Revenue	Billing Determinants		Rate	Revenue		
	SCHEDULE GP (General Primary Service)	*[a]*		*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution										
2	Customer Charge	6,981	$	951.53	$ 6,642,388	6,981	$	1,029.09	$ 7,183,797	$541,409	8.2%
3	Demand Charge (kW)										
4	All kW	6,554,863	$	2.98	19,533,492	6,554,863	$	3.11	20,392,038	$858,546	4.4%
5	All rkVa	944,343	$	0.20	188,869	944,343	$	0.22	204,263	$15,394	8.2%
6	Backup Demand kW								-	$0	0.0%
7	Energy Charge (kWh)										
8	All kWh	2,723,839,928	$	-	-	2,723,839,928	$	-	-	$0	0.0%
9	**Total Base Normalized Distribution Revenues**				**$ 26,364,749**				**$ 27,780,098**	$1,415,349	5.4%
10	Rider Charges										
11	Smart Meter Technologies Charge (Per Bill)	6,981	$	6.69	$ 46,701	6,981	$	-	$ -	($46,701)	
12	TCJA Voluntary Surcharge			-3.91%	(1,030,862)			0.00%	-	1,030,862	-100.0%
13	STAS			0.02%	56,470			0.00%	-	(56,470)	-100.0%
14	Distribution System Improvement Charge			4.70%	$ 1,268,020			0.00%	$ -	($1,268,020)	-100.0%
15	**Total Distribution Including Rider Charges**				**$ 26,705,079**				**$ 27,780,098**	$1,075,019	4.0%
16	Rider Charges										
17	Default Service Support Charge	4,995,504	$	0.62100	3,102,208	4,995,504	$	0.62100	3,102,208	-	0.0%
18	Universal Service Charge				-				-	-	0.0%
19	Solar Photovoltaic Requirements Charge	2,723,839,928	$	0.00006	163,430	2,723,839,928	$	0.00006	163,430	-	0.0%
20	Phase IV Energy Efficiency and Conservation Charge	4,995,504	$	0.32000	1,598,561	4,995,504	$	0.32000	1,598,561	-	0.0%
21	PTC/HPS Charge	2,723,839,928	$	0.09209	250,838,419	2,723,839,928	$	0.09209	250,838,419	-	0.0%
22	**Total Energy and Revenue**	2,723,839,928			**$ 282,407,698**	2,723,839,928			**$ 283,482,717**	**$ 1,075,019**	0.4%
23	Avg rate per kWh				$ 0.10368				$ 0.10407		
24	Proposed Increase								$ 1,075,019		
25	Percent Increase								0.38%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE TP (Transmission Power Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	392	$ 5,290.68	$ 2,073,314	392	$ 5,731.69	$ 2,246,137	$172,823	8.3%
3	Demand Charge (kW)								
4	All kW	5,693,641	$ 0.96	5,465,896	5,693,641	$ 0.89	5,071,836	($394,060)	-7.2%
5	115 kV Discount (Per kW)		$ (0.75)	-	-	$ (0.70)	-	$0	0.0%
6	Energy Charge (kWh)								
7	All kWh	1,848,231,542	$ -	-	1,848,231,542	$ -	-	$0	0.0%
8	**Total Base Normalized Distribution Revenues**			**$ 7,539,210**			**$ 7,317,973**	($221,237)	-2.9%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	392	$ 6.69	$ 2,622	392	$ -	$ -	($2,622)	
11	TCJA Voluntary Surcharge		-3.91%	(294,783)		0.00%	-	294,783	-100.0%
12	STAS		0.02%	36,101		0.00%	-	(36,101)	-100.0%
13	Distribution System Improvement Charge			$ -		0.00%	$ -	-	0.0%
14	**Total Distribution Including Rider Charges**			**$ 7,283,150**			**$ 7,317,973**	$34,823	0.5%
15	Rider Charges								
16	Default Service Support Charge	3,126,645	$ 0.62100	1,941,647	3,126,645	$ 0.62100	1,941,647	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	1,848,231,542	$ 0.00006	110,894	1,848,231,542	$ 0.00006	110,894	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	3,126,645	$ 0.32000	1,000,526	3,126,645	$ 0.32000	1,000,526	-	0.0%
20	PTC/HPS Charge	1,848,231,542	$ 0.09209	170,203,643	1,848,231,542	$ 0.09209	170,203,643	-	0.0%
21	**Total Energy and Revenue**	1,848,231,542		**$ 180,539,859**	1,848,231,542		**$ 180,574,683**	**$ 34,823**	0.0%
22	Avg rate per kWh			$ 0.09768			$ 0.09770		
23	Proposed Increase						$ 34,823		
24	Percent Increase						0.02%		

Met-Ed Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE MS (Municipal Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	663	$ 32.23	$ 21,364	663	$ 32.23	$ 21,364	$ -	0.0%
3	Energy Charge (kWh)								
4	All kWh	4,347,594	$ 0.03159	137,341	4,347,594	$ 0.03430	149,141	11,800	8.6%
5	**Total Base Normalized Distribution Revenues**			**$ 158,705**			**$ 170,505**	**$ 11,800**	7.4%
6	Rider Charges								
7	Smart Meter Technologies Charge (Per Bill)	663	$ 1.92	$ 1,273	663	$ -	$ -	$ (1,273)	-100.0%
8	TCJA Voluntary Surcharge		-3.91%	(6,205)		0.00%	-	6,205	-100.0%
9	STAS		0.02%	138		0.00%	-	(138)	-100.0%
10	Distribution System Improvement Charge		4.70%	$ 7,491		0.00%	$ -	(7,491)	-100.0%
11	**Total Distribution Including Rider Charges**			**$ 161,401**			**$ 170,505**	**$ 9,104**	5.6%
12	Rider Charges								
13	Default Service Support Charge	4,347,594	$ 0.00111	4,826	4,347,594	$ 0.00111	4,826	-	0.0%
14	Universal Service Charge			-			-	-	0.0%
15	Solar Photovoltaic Requirements Charge	4,347,594	$ 0.00006	261	4,347,594	$ 0.00006	261	-	0.0%
16	Phase IV Energy Efficiency and Conservation Charge	4,347,594	$ 0.00129	5,608	4,347,594	$ 0.00129	5,608	-	0.0%
17	PTC/HPS Charge	4,347,594	$ 0.11872	516,146	4,347,594	$ 0.11872	516,146	-	0.0%
18	**Total Energy and Revenue**	4,347,594		**$ 688,242**	4,347,594		**$ 697,346**	**$ 9,104**	1.3%
19	Avg rate per kWh			$ 0.15830			$ 0.16040		
20	Proposed Increase						$ 9,104		
21	Percent Increase						1.32%		

Met-Ed Rate District
Proposed Distribution Rates
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Line No.		Current			Pro Forma			Revenue Change	Percent Change
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue		
	SCHEDULE OL (Outdoor Area Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Lamps								
2	175 W Mercury Vapor	24,804	$ 8.31	$ 206,119	24,804	$ 8.98	$ 222,685	$ 16,566	8.0%
3	100 W Sodium Vapor	11,611	$ 24.32	282,368	11,611	$ 26.27	305,061	22,693	8.0%
4	250 W Sodium Vapor	4,697	$ 13.17	61,862	4,697	$ 14.23	66,833	4,971	8.0%
5	400 W Sodium Vapor	7,980	$ 8.48	67,670	7,980	$ 9.16	73,109	5,439	8.0%
6	Poles								
7	Pole Charge	3,326	$ 9.19	30,566	3,326	$ 9.93	33,022	2,456	8.0%
8	**Total Base Normalized Distribution Revenues**			**$ 648,585**			**$ 700,710**	**$ 52,125**	8.0%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
11	TCJA Voluntary Surcharge		-3.91%	(25,360)		0.00%	-	25,360	-100.0%
12	STAS		0.02%	316		0.00%	-	(316)	-100.0%
13	Distribution System Improvement Charge		4.70%	$ 29,535		0.00%	$ -	(29,535)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 653,076**			**$ 700,710**	**$ 47,634**	7.3%
15	Rider Charges								
16	Default Service Support Charge	4,007,790	$ 0.11100	444,865	4,007,790	$ 0.11100	444,865	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	4,007,790	$ 0.00006	240	4,007,790	$ 0.00006	240	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	4,007,790	$ 0.00129	5,170	4,007,790	$ 0.00129	5,170	-	0.0%
20	PTC/HPS Charge	4,007,790	$ 0.11872	475,805	4,007,790	$ 0.11872	475,805	-	0.0%
21	**Total Energy and Revenue**	4,007,790		**$ 1,579,156**	4,007,790		**$ 1,626,790**	**$ 47,634**	3.0%
22	Avg rate per kWh			$ 0.39402			$ 0.40591		
23	Proposed Increase						$ 47,634		
24	Percent Increase						3.02%		

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Line No.	SCHEDULE SL (Street Lighting Service)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	SODIUM VAPOR								
2	70 WATTS	37,115	$ 8.05	$ 298,779	37,115	$ 8.64	$ 320,634	$ 21,856	7.3%
3	100 WATTS	181,970	$ 7.88	$ 1,433,925	181,970	$ 8.46	$ 1,538,816	$ 104,891	7.3%
4	150 WATTS	104,174	$ 7.76	$ 808,388	104,174	$ 8.33	$ 867,521	$ 59,133	7.3%
5	200 WATTS	252	$ 7.30	$ 1,840	252	$ 7.83	$ 1,975	$ 135	7.3%
6	250 WATTS	43,194	$ 8.25	$ 356,347	43,194	$ 8.85	$ 382,414	$ 26,067	7.3%
7	400 WATTS	7,550	$ 8.09	$ 61,075	7,550	$ 8.68	$ 65,543	$ 4,468	7.3%
8	800 WATTS	-	$ 7.74	$ -	-	$ 8.31	$ -	$ -	0.0%
9	MERCURY VAPOR								
10	100 WATTS	60	$ 8.15	$ 489	60	$ 8.75	$ 525	$ 36	7.3%
11	175 WATTS	7,513	$ 7.89	$ 59,281	7,513	$ 8.47	$ 63,618	$ 4,336	7.3%
12	250 WATTS	1,232	$ 7.52	$ 9,266	1,232	$ 8.07	$ 9,944	$ 678	7.3%
13	400 WATTS	2,350	$ 6.75	$ 15,866	2,350	$ 7.24	$ 17,026	$ 1,161	7.3%
14	1000 WATTS	18	$ 5.16	$ 93	18	$ 5.54	$ 100	$ 7	7.3%
15	INCANDESCENT								
16	105 WATTS	612	$ 8.03	$ 4,915	612	$ 8.62	$ 5,275	$ 360	7.3%
17	205 WATTS	48	$ 7.64	$ 367	48	$ 8.20	$ 394	$ 27	7.3%
18	327 WATTS								
19	860 WATTS								
20	METAL HALIDE								
21	175 WATTS	1,068	$ 8.16	$ 8,717	1,068	$ 8.76	$ 9,354	$ 638	7.3%
22	250 WATTS	1,056	$ 8.16	$ 8,619	1,056	$ 8.76	$ 9,249	$ 630	7.3%
23	400 WATTS	1,896	$ 7.99	$ 15,152	1,896	$ 8.57	$ 16,260	$ 1,108	7.3%
24	OVERHEAD ALT. TECHNOLOGY LIGHTING	21,174	$ 7.88	$ 166,853	21,174	$ 8.46	$ 179,058	$ 12,205	7.3%
25	POST TOP INCANDESENT								
26	2,500 LUMENS								
27	6,000 LUMENS								
28	COMPANY O&M OF CONVENTIONAL LUMIN.								
29	SODIUM VAPOR LAMPS	274,916	$ 2.84	$ 780,760	274,916	$ 3.05	$ 837,873	$ 57,113	7.3%
30	MERCURY VAPOR LAMPS	5,069	$ 1.17	$ 5,931	5,069	$ 1.26	$ 6,365	$ 434	7.3%
31	INCANDESCENT LAMPS	612	$ 3.19	$ 1,953	612	$ 3.42	$ 2,096	$ 143	7.3%

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Line No.	SCHEDULE SL (Street Lighting Service)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
32	COMPANY OWNERSHIP OF CONVENTIONAL LUM. FACILITIES								
33	CHARGES PER MONTH PER LIGHT	275,630	$ 2.72	$ 749,714	275,630	$ 2.92	$ 804,556	$ 54,842	7.3%
34	CHARGES PER MONTH PER POLE	1,027	$ 11.35	$ 11,656	1,027	$ 12.18	$ 12,508	$ 853	7.3%
35	**Underground Feed to St Lights**								
36	SODIUM VAPOR								
37	70 WATTS	5,390	$ 0.10	$ 539	5,390	$ 0.11	$ 578	$ 39	7.3%
38	100 WATTS	42,179	$ 0.15	$ 6,327	42,179	$ 0.16	$ 6,790	$ 463	7.3%
39	150 WATTS	32,184	$ 0.23	$ 7,402	32,184	$ 0.25	$ 7,944	$ 541	7.3%
40	250 WATTS	13,659	$ 0.38	$ 5,190	13,659	$ 0.41	$ 5,570	$ 380	7.3%
41	400 WATTS	4,340	$ 0.60	$ 2,604	4,340	$ 0.64	$ 2,794	$ 190	7.3%
42	800 WATTS	-	$ 1.19	$ -	-	$ 1.28	$ -	$ -	0.0%
43	MERCURY VAPOR								
44	100 WATTS								
45	175 WATTS	3,626	$ 0.28	$ 1,015	3,626	$ 0.30	$ 1,089	$ 74	7.3%
46	250 WATTS	681	$ 0.40	$ 272	681	$ 0.43	$ 292	$ 20	7.3%
47	400 WATTS	1,745	$ 0.60	$ 1,047	1,745	$ 0.64	$ 1,124	$ 77	7.3%
48	700 WATTS								
49	800 WATTS								
50	1000 WATTS	18	$ 1.56	$ 28	18	$ 1.67	$ 30	$ 2	7.3%
51	INCANDESCENT								
52	105 WATTS								
53	205 WATTS								
54	327 WATTS								
55	448 WATTS								
56	690 WATTS								
57	860 WATTS								
58	1720 WATTS								
59	METAL HALIDE								
60	175 WATTS	1,068	$ 0.27	$ 288	1,068	$ 0.29	$ 310	$ 21	7.3%
61	250 WATTS	1,056	$ 0.38	$ 401	1,056	$ 0.41	$ 431	$ 29	7.3%
62	400 WATTS	1,896	$ 0.60	$ 1,138	1,896	$ 0.64	$ 1,221	$ 83	7.3%
63	PROVISION C MONTHLY MINUMUM CHARGE								
64	ALL FIXTURES	107,843	$ 0.15	$ 16,177	107,843	$ 0.16	$ 17,360	$ 1,183	7.3%

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE SL (Street Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
65	COMPANY O&M OF CONVENTIONAL LUMIN.								
66	SODIUM VAPOR LAMPS	84,216	$ 3.38	$ 284,649	84,216	$ 3.63	$ 305,471	$ 20,822	7.3%
67	MERCURY VAPOR LAMPS	5,961	$ 1.92	$ 11,445	5,961	$ 2.06	$ 12,283	$ 837	7.3%
68	INCANDESCENT LAMPS								
69	COMPANY OWNERSHIP OF ORNAMENTAL LUMINAIRE								
70	CHARGES PER LIGHT	22,968	$ 6.46	$ 148,376	22,968	$ 6.93	$ 159,229	$ 10,854	7.3%
71	COMPANY OWNERSHIP OF ORNAMENTAL STANDARDS								
72	STANDARD MONTHLY CHARGE	17,877	$ 12.17	$ 217,565	17,877	$ 13.06	$ 233,480	$ 15,915	7.3%
73	CONVERSIONS	-	$ 4.10	$ -	-	$ 4.40	$ -	$ -	0.0%
74	UNDERGROUND ALT. TECHNOLOGY LIGHTING								
75	MINIMUM FIXUTURE CHARGE	20,334	$ 0.17	$ 3,457	20,334	$ 0.18	$ 3,710	$ 253	7.3%
76	KWH CHARGE	530,613	$ 0.0028	$ 1,486	530,613	$ 0.00300	$ 1,594	$ 109	7.3%
77	**LED Streetlights**								
78	COBRA HEAD								
79	50 WATTS	33,633	$ 9.80	$ 329,600	33,633	$ 10.52	$ 353,711	$ 24,110	7.3%
80	90 WATTS	23,129	$ 12.11	$ 280,087	23,129	$ 13.00	$ 300,576	$ 20,488	7.3%
81	130 WATTS	9,901	$ 12.87	$ 127,425	9,901	$ 13.81	$ 136,747	$ 9,321	7.3%
82	260 WATTS	5,310	$ 19.89	$ 105,617	5,310	$ 21.34	$ 113,343	$ 7,726	7.3%
83	Colonial								
84	50 WATTS	6,271	$ 15.42	$ 96,703	6,271	$ 16.55	$ 103,776	$ 7,074	7.3%
85	90 WATTS	875	$ 16.95	$ 14,834	875	$ 18.19	$ 15,919	$ 1,085	7.3%
86	Acorn								
87	50 WATTS	1,275	$ 25.59	$ 32,634	1,275	$ 27.46	$ 35,021	$ 2,387	7.3%
88	90 WATTS	493	$ 27.04	$ 13,333	493	$ 29.02	$ 14,309	$ 975	7.3%
89	**Total Base Normalized Distribution Revenues**			**$ 6,509,628**			**$ 6,985,806**	**$ 476,178**	7.3%

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Line No.		Current Billing Determinants	Current Rate	Current Revenue	Pro Forma Billing Determinants	Pro Forma Rate	Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE SL (Street Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
90	Rider Charges								
91	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
92	TCJA Voluntary Surcharge		-3.91%	(254,526)		0.00%	-	254,526	-100.0%
93	STAS		0.02%	2,505		0.00%	-	(2,505)	-100.0%
94	Distribution System Improvement Charge		4.70%	$ 294,697		0.00%	$ -	(294,697)	-100.0%
95	**Total Distribution Including Rider Charges**			**$ 6,552,303**			**$ 6,985,806**	**$ 433,503**	6.6%
96	Rider Charges								
97	Default Service Support Charge	25,935,220	$ 0.11100	2,878,809	25,935,220	$ 0.11100	2,878,809	-	0.0%
98	Universal Service Charge			-			-	-	0.0%
99	Solar Photovoltaic Requirements Charge	25,935,220	$ 0.00006	1,556	25,935,220	$ 0.00006	1,556	-	0.0%
100	Phase IV Energy Efficiency and Conservation Charg	25,935,220	$ 0.00058	15,042	25,935,220	$ 0.00058	15,042	-	0.0%
101	PTC/HPS Charge	25,935,220	$ 0.11872	3,079,029	25,935,220	$ 0.11872	3,079,029	-	0.0%
102	**Total Energy and Revenue**	25,935,220		**$ 12,526,740**	25,935,220		**$ 12,960,243**	**$ 433,503**	3.5%
103	Avg rate per kWh			$0.48300			$0.49972		
104	Proposed Increase						$433,503		
105	Percent Increase						3.46%		

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Line No.	SCHEDULE Borderline Service	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Energy Charge (kWh)								
3	All kWh	1,092,299	$ 0.04133	45,145	1,092,299	$ 0.04490	49,049	3,904	8.6%
4	**Total Base Normalized Distribution Revenues**			**$ 45,145**			**$ 49,049**	**$ 3,904**	8.6%
5	Rider Charges								
6	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
7	TCJA Voluntary Surcharge		-3.91%	(1,765)		0.00%	-	1,765	-100.0%
8	STAS		0.02%	59		0.00%	-	(59)	-100.0%
9	Distribution System Improvement Charge		4.70%	$ 2,039		0.00%	$ -	(2,039)	-100.0%
10	**Total Distribution Including Rider Charges**			**$ 45,478**			**$ 49,049**	**$ 3,571**	7.9%
11	Rider Charges								
12	Default Service Support Charge	1,092,299	$ 0.11100	121,245	1,092,299	$ 0.11100	121,245	-	0.0%
13	Universal Service Charge			-			-	-	0.0%
14	Solar Photovoltaic Requirements Charge	1,092,299	$ 0.00006	66	1,092,299	$ 0.00006	66	-	0.0%
15	Phase IV Energy Efficiency and Conservation Charge			-			-	-	0.0%
16	PTC/HPS Charge	1,092,299	$ 0.11872	129,678	1,092,299	$ 0.11872	129,678	-	0.0%
17	**Total Energy and Revenue**	1,092,299		**$ 296,466**	1,092,299		**$ 300,037**	**$ 3,571**	1.2%
18	Avg rate per kWh			$ 0.27141			$ 0.27468		
19	Proposed Increase						$ 3,571		
20	Percent Increase						1.20%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma			Revenue Change	Percent Change
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue		
	SCHEDULE RS (Residential Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	5,957,018	$ 11.25	$ 67,016,450	5,957,018	$ 11.25	$ 67,016,450	$ 0	0.0%
3	Demand Charge (kW)	53,581	$ 2.91	155,921	53,581	$ 3.26	174,880	18,959	12.2%
4	Energy Charge (kWh)								
5	All kWh	4,312,760,298	$ 0.06074	261,957,061	4,312,760,298	$ 0.06815	293,921,630	31,964,569	12.2%
6	**Total Base Normalized Distribution Revenues**			**$ 329,129,432**			**$ 361,112,960**	**$ 31,983,528**	9.7%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	5,957,018	$ (0.84)	$ (5,003,895)	5,957,018	$ -	$ -	$ 5,003,895	-100.0%
9	TCJA Voluntary Surcharge		-6.01%	(19,780,679)		0.00%	-	19,780,679	-100.0%
10	STAS		0.07%	618,135		0.00%	-	(618,135)	-100.0%
11	Distribution System Improvement Charge		5.00%	$ 18,520,817		0.00%	$ -	(18,520,817)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 323,483,810**			**$ 361,112,960**	**$ 37,629,150**	11.6%
13	Rider Charges								
14	Default Service Support Charge	4,312,760,298	$ 0.00842	36,313,442	4,312,760,298	$ 0.00842	36,313,442	-	0.0%
15	Universal Service Charge	4,312,760,298	$ 0.01306	56,324,649	4,312,760,298	$ 0.01306	56,324,649	-	0.0%
16	Solar Photovoltaic Requirements Charge	4,312,760,298	$ 0.00008	345,021	4,312,760,298	$ 0.00008	345,021	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	4,312,760,298	$ 0.00226	9,746,838	4,312,760,298	$ 0.00226	9,746,838	-	0.0%
18	PTC/HPS Charge	4,312,760,298	$ 0.10607	457,454,485	4,312,760,298	$ 0.10607	457,454,485	-	0.0%
19	**Total Energy and Revenue**	4,312,760,298		**$ 883,668,245**	4,312,760,298		**$ 921,297,395**	**$ 37,629,150**	4.3%
20	Avg rate per kWh			$ 0.20490			$ 0.21362		
21	Proposed Increase						$ 37,629,150		
22	Percent Increase						4.26%		

Penelec Rate District
Proposed Distribution Rates
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Line No.	SCHEDULE GSV (Volunteer Service)	Current Billing Determinants	Current Rate	Current Revenue	Pro Forma Billing Determinants	Pro Forma Rate	Pro Forma Revenue	Revenue Change	Percent Change
		[a]	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	7,467	$ 11.25	$ 84,003	7,467	$ 11.25	$ 84,003	$ (0)	0.0%
3	Demand Charge (kW)	24,373	$ 2.91	70,926	24,373	$ 3.26	79,551	8,625	12.2%
4	Energy Charge (kWh)								
5	All kWh	13,948,372	$ 0.06074	847,224	13,948,372	$ 0.06815	950,604	103,380	12.2%
6	**Total Base Normalized Distribution Revenues**			**$ 1,002,154**			**$ 1,114,158**	**$ 112,004**	11.2%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	7,467	$ (0.84)	$ (6,272)	7,467	$ -	$ -	$ 6,272	-100.0%
9	TCJA Voluntary Surcharge		-6.01%	(60,229)		0.00%	-	60,229	-100.0%
10	STAS		0.07%	1,958		0.00%	-	(1,958)	-100.0%
11	Distribution System Improvement Charge		5.00%	$ 57,111		0.00%	$ -	(57,111)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 994,722**			**$ 1,114,158**	**$ 119,436**	12.0%
13	Rider Charges								
14	Default Service Support Charge	13,948,372	$ 0.00842	117,445	13,948,372	$ 0.00842	117,445	-	0.0%
15	Universal Service Charge	13,948,372	$ 0.01306	182,166	13,948,372	$ 0.01306	182,166	-	0.0%
16	Solar Photovoltaic Requirements Charge	13,948,372	$ 0.00008	1,116	13,948,372	$ 0.00008	1,116	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	13,948,372	$ 0.00175	24,410	13,948,372	$ 0.00175	24,410	-	0.0%
18	PTC/HPS Charge	13,948,372	$ 0.10607	1,479,504	13,948,372	$ 0.10607	1,479,504	-	0.0%
19	**Total Energy and Revenue**	13,948,372		**$ 2,799,362**	13,948,372		**$ 2,918,798**	**$ 119,436**	4.3%
20	Avg rate per kWh			$ 0.20069			$ 0.20926		
21	Proposed Increase						$ 119,436		
22	Percent Increase						4.27%		

Penelec Rate District
Proposed Distribution Rates
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Line No.	SCHEDULE GS-Small (General Service Small)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Customer Charge	635,218	$ 18.33	$ 11,643,547	635,218	$ 20.87	$ 13,254,944	$ 1,611,397	13.8%
3	Demand Charge (kW)								
4	Energy Charge (kWh)								
5	All kWh	202,620,628	$ 0.03624	7,342,972	202,620,628	$ 0.04262	8,635,216	1,292,244	17.6%
6	**Total Base Normalized Distribution Revenues**			**$ 18,986,518**			**$ 21,890,160**	**$ 2,903,642**	15.3%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	635,218	$ 0.52	$ 330,313	635,218	$ -	$ -	$ (330,313)	-100.0%
9	TCJA Voluntary Surcharge		-6.01%	(1,141,090)		0.00%	-	1,141,090	-100.0%
10	STAS		0.07%	30,639		0.00%	-	(30,639)	-100.0%
11	Distribution System Improvement Charge		5.00%	$ 926,516		0.00%	$ -	(926,516)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 19,132,897**			**$ 21,890,160**	**$ 2,757,263**	14.4%
13	Rider Charges								
14	Default Service Support Charge	202,620,628	$ 0.00388	786,168	202,620,628	$ 0.00388	786,168	-	0.0%
15	Universal Service Charge			-			-	-	0.0%
16	Solar Photovoltaic Requirements Charge	202,620,628	$ 0.00008	16,210	202,620,628	$ 0.00008	16,210	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	202,620,628	$ 0.00175	354,586	202,620,628	$ 0.00175	354,586	-	0.0%
18	PTC/HPS Charge	202,620,628	$ 0.11603	23,510,071	202,620,628	$ 0.11603	23,510,071	-	0.0%
19	**Total Energy and Revenue**	202,620,628		**$ 43,799,932**	202,620,628		**$ 46,557,195**	**$ 2,757,263**	6.3%
20	Avg rate per kWh			$ 0.21617			$ 0.22978		
21	Proposed Increase						$ 2,757,263		
22	Percent Increase						6.30%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Medium (General Service Medium)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge								
3	Single Phase	177,944	$19.58	$ 3,484,137	177,944	$ 21.91	$ 3,899,218	$ 415,081	11.9%
4	Three Phase	190,231	$39.38	7,491,313	190,231	$ 44.07	8,383,788	892,475	11.9%
	Demand Charge								
5	All kW	9,747,035	$6.30	61,406,320	9,747,035	$ 6.99	68,144,336		
6	All rkVa	3,129,545	$0.20	625,909	3,129,545	$ 0.22	700,476	74,567	11.9%
7	Energy Charge (kWh)	2,897,970,802	$ -	-	2,897,970,802				
8	**Total Base Normalized Distribution Revenues**			**$ 73,007,678**			**$ 81,127,818**	**$ 8,120,140**	11.1%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	368,175	$ 0.52	$ 191,451	368,175	$ -	$ -	$ (191,451)	
11	TCJA Voluntary Surcharge		-6.01%	(4,387,761)		0.00%	-	4,387,761	-100.0%
12	STAS		0.07%	297,713		0.00%	-	(297,713)	-100.0%
13	Distribution System Improvement Charge		5.00%	$ 3,694,141		0.00%	$ -	(3,694,141)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 72,803,222**			**$ 81,127,818**	**$ 8,324,596**	11.4%
15	Rider Charges								
16	Default Service Support Charge	2,897,970,802	$ 0.00388	11,244,127	2,897,970,802	$ 0.00388	11,244,127	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	2,897,970,802	$ 0.00008	231,838	2,897,970,802	$ 0.00008	231,838	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	2,897,970,802	$ 0.00175	5,071,449	2,897,970,802	$ 0.00175	5,071,449	-	0.0%
20	PTC/HPS Charge	2,897,970,802	$ 0.11603	336,251,552	2,897,970,802	$ 0.11603	336,251,552	-	0.0%
21	**Total Energy and Revenue**	2,897,970,802		**$ 425,602,187**	2,897,970,802	-	**$ 433,926,783**	**$ 8,324,596**	2.0%
22	Avg rate per kWh			$ 0.14686			$ 0.14973		
23	Proposed Increase						$ 8,324,596		
24	Percent Increase						1.96%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Large (General Service Large)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	5,091	$204.79	$ 1,042,486	5,091	$ 229.30	$ 1,167,257	$ 124,771	12.0%
3	Demand Charge (kW)								
4	All kW	2,403,985	$6.68	16,058,617	2,403,985	$ 7.43	17,850,268	1,791,651	11.2%
5	All rkVa	1,315,141	$0.19	249,877	1,315,141	$ 0.21	279,784	29,907	12.0%
6	Energy Charge (kWh)								
7	All kWh	919,325,959	$ -	-	919,325,959	$ -	-	-	0.0%
8	**Total Base Normalized Distribution Revenues**			**$ 17,350,980**			**$ 19,297,309**	**$ 1,946,329**	11.2%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	5,091	$ 9.87	$ 50,243	5,091	$ -	$ -	$ (50,243)	
11	TCJA Voluntary Surcharge		-6.01%	(1,042,794)		0.00%	-	1,042,794	-100.0%
12	STAS		0.07%	46,619		0.00%	-	(46,619)	-100.0%
13	Distribution System Improvement Charge		5.00%	$ 841,895		0.00%	$ -	(841,895)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 17,246,943**			**$ 19,297,309**	**$ 2,050,366**	11.9%
15	Rider Charges								
16	Default Service Support Charge	1,997,812	$ 2.81200	5,617,847	1,997,812	$ 2.81200	5,617,847	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	919,325,959	$ 0.00008	73,546	919,325,959	$ 0.00008	73,546	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	1,997,812	$ 0.24000	479,475	1,997,812	$ 0.24000	479,475	-	0.0%
20	PTC/HPS Charge	919,325,959	$ 0.04702	43,226,707	919,325,959	$ 0.04702	43,226,707	-	0.0%
21	**Total Energy and Revenue**	919,325,959		**$ 66,644,517**	919,325,959		**$ 68,694,884**	**$ 2,050,366**	3.1%
22	Avg rate per kWh			$ 0.07249			$ 0.07472		
23	Proposed Increase						$ 2,050,366		
24	Percent Increase						3.08%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma			Revenue Change	Percent Change
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue		
	SCHEDULE GP (General Primary Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	5,406	$996.52	$ 5,387,152	5,406	$ 1,115.91	$ 6,032,582	$645,430	12.0%
3	Demand Charge (kW)								
4	All kW	3,975,322	$3.46	13,754,615	3,975,322	$ 3.81	15,137,306	$1,382,691	10.1%
5	All rkVa	1,048,311	$0.19	199,179	1,048,311	$ 0.21	223,043	$23,864	12.0%
6	Backup Demand kW						-	$0	0.0%
7	Energy Charge (kWh)								
8	All kWh	1,495,018,951	$ -	-	1,495,018,951	$ -	-	$0	0.0%
9	**Total Base Normalized Distribution Revenues**			**$ 19,340,946**			**$ 21,392,931**	$2,051,985	10.6%
10	Rider Charges								
11	Smart Meter Technologies Charge (Per Bill)	5,406	$ 9.87	$ 53,357	5,406	$ -	$ -	($53,357)	
12	TCJA Voluntary Surcharge		-6.01%	(1,162,391)		0.00%	-	1,162,391	-100.0%
13	STAS		0.07%	68,930		0.00%	-	(68,930)	-100.0%
14	Distribution System Improvement Charge		5.00%	$ 946,503		0.00%	$ -	($946,503)	-100.0%
15	**Total Distribution Including Rider Charges**			**$ 19,247,346**			**$ 21,392,931**	$2,145,585	11.1%
16	Rider Charges								
17	Default Service Support Charge	2,908,964	$ 2.81200	8,180,006	2,908,964	$ 2.81200	8,180,006	-	0.0%
18	Universal Service Charge			-			-	-	0.0%
19	Solar Photovoltaic Requirements Charge	1,495,018,951	$ 0.00008	119,602	1,495,018,951	$ 0.00008	119,602	-	0.0%
20	Phase IV Energy Efficiency and Conservation Charge	2,908,964	$ 0.24000	698,151	2,908,964	$ 0.24000	698,151	-	0.0%
21	PTC/HPS Charge	1,495,018,951	$ 0.04702	70,295,791	1,495,018,951	$ 0.04702	70,295,791	-	0.0%
22	**Total Energy and Revenue**	1,495,018,951		**$ 98,540,896**	1,495,018,951		**$ 100,686,481**	**$ 2,145,585**	2.2%
23	Avg rate per kWh			$ 0.06591			$ 0.06735		
24	Proposed Increase						$ 2,145,585		
25	Percent Increase						2.18%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma			Revenue Change	Percent Change
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue		
	SCHEDULE TP (Transmission Power Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	729	$ 3,413.98	$ 2,489,651	729	$ 3,829.99	$ 2,793,024	$303,373	12.2%
3	Demand Charge (kW)								
4	All kW	4,764,628	$ 1.86	8,862,209	4,764,628	$ 2.01	9,566,611	$704,402	7.9%
5	115 kV Discount (Per kW)	1,474,050	$ (1.49)	(2,196,334)	1,474,050	$ (1.61)	(2,370,907)	($174,573)	7.9%
6	Energy Charge (kWh)								
7	All kWh	2,608,661,409	$ -	-	2,608,661,409	$ -	-	$0	0.0%
8	**Total Base Normalized Distribution Revenues**			**$ 9,155,526**			**$ 9,988,728**	$833,202	9.1%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	729	$ 9.87	$ 7,198	729	$ -	$ -	($7,198)	
11	TCJA Voluntary Surcharge		-6.01%	(550,247)		0.00%	-	550,247	-100.0%
12	STAS		0.07%	101,395		0.00%	-	(101,395)	-100.0%
13	Distribution System Improvement Charge		5.00%	$ 481,299		0.00%	$ -	(481,299)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 9,195,171**			**$ 9,988,728**	$793,557	8.6%
15	Rider Charges								
16	Default Service Support Charge	4,222,938	$ 2.81200	11,874,901	4,222,938	$ 2.81200	11,874,901	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	2,608,661,409	$ 0.00008	208,693	2,608,661,409	$ 0.00008	208,693	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	4,222,938	$ 0.24000	1,013,505	4,222,938	$ 0.24000	1,013,505	-	0.0%
20	PTC/HPS Charge	2,608,661,409	$ 0.04702	122,659,259	2,608,661,409	$ 0.04702	122,659,259	-	0.0%
21	**Total Energy and Revenue**	2,608,661,409		**$ 144,951,530**	2,608,661,409		**$ 145,745,086**	**$ 793,557**	0.5%
22	Avg rate per kWh			$ 0.05557			$ 0.05587		
23	Proposed Increase						$ 793,557		
24	Percent Increase						0.55%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.	SCHEDULE H (All Electric School, Church and Hospital Rate)	Current Billing Determinants	Current Rate	Current Revenue	Pro Forma Billing Determinants	Pro Forma Rate	Pro Forma Revenue	Revenue Change	Percent Change
		[a]	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	1,679	$ 35.13	$ 58,977	1,679	$ 35.13	$ 58,977	$ -	0.0%
3	Energy Charge (kWh)								
4	All kWh	23,931,981	$ 0.03312	792,627	23,931,981	$ 0.03677	879,865	87,238	11.0%
5	**Total Base Normalized Distribution Revenues**			**$ 851,604**			**$ 938,842**	**$ 87,238**	10.2%
6	Rider Charges								
7	Smart Meter Technologies Charge (Per Bill)	1,679	$ 0.52	$ 873	1,679	$ -	$ -	$ (873)	-100.0%
8	TCJA Voluntary Surcharge		-6.01%	(51,181)		0.00%	-	51,181	-100.0%
9	STAS		0.07%	2,630		0.00%	-	(2,630)	-100.0%
10	Distribution System Improvement Charge		5.00%	$ 42,159		0.00%	$ -	(42,159)	-100.0%
11	**Total Distribution Including Rider Charges**			**$ 846,084**			**$ 938,842**	**$ 92,758**	11.0%
12	Rider Charges								
13	Default Service Support Charge	23,931,981	$ 0.00388	92,856	23,931,981	$ 0.00388	92,856	-	0.0%
14	Universal Service Charge			-			-	-	0.0%
15	Solar Photovoltaic Requirements Charge	23,931,981	$ 0.00008	1,915	23,931,981	$ 0.00008	1,915	-	0.0%
16	Phase IV Energy Efficiency and Conservation Charge	23,931,981	$ 0.00175	41,881	23,931,981	$ 0.00175	41,881	-	0.0%
17	PTC/HPS Charge	23,931,981	$ 0.11603	2,776,828	23,931,981	$ 0.11603	2,776,828	-	0.0%
18	**Total Energy and Revenue**	23,931,981		**$ 3,759,564**	23,931,981		**$ 3,852,321**	**$ 92,758**	2.5%
19	Avg rate per kWh			$ 0.15709			$ 0.16097		
20	Proposed Increase						$ 92,758		
21	Percent Increase						2.47%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE OL (Outdoor Area Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	HIGH PRESSURE SODIUM VAPOR								
2	70 WATTS	12,703	$ 19.38	$ 246,177	12,703	$ 21.48	$ 272,802	$ 26,625	10.8%
3	100 WATTS	69,157	$ 19.46	1,345,790	69,157	$ 21.56	1,491,345	145,555	10.8%
4	New 150 WATTS	122	$ 23.96	2,921	122	$ 26.55	3,236	315	10.8%
5	200 WATTS	29,312	$ 28.45	833,915	29,312	$ 31.53	924,107	90,192	10.8%
6	250 WATTS	75	$ 29.67	2,214	75	$ 32.88	2,454	240	10.8%
7	400 WATTS	3,463	$ 28.75	99,574	3,463	$ 31.86	110,343	10,769	10.8%
8	200 WATTS Floodlights	296	$ 34.56	10,214	296	$ 38.30	11,318	1,104	10.8%
9	400 WATTS Floodlight	712	$ 33.98	24,206	712	$ 37.66	26,824	2,618	10.8%
10	MERCURY VAPOR								
11	100 WATTS	30,941	$ 8.28	256,191	30,941	$ 9.18	283,899	27,708	10.8%
12	175 WATTS	31,176	$ 8.79	274,037	31,176	$ 9.74	303,676	29,639	10.8%
13	250 WATTS	3,638	$ 12.48	45,405	3,638	$ 13.83	50,316	4,911	10.8%
14	400 WATTS	1,522	$ 14.28	21,737	1,522	$ 15.82	24,088	2,351	10.8%
15	700 WATTS	57	$ 20.00	1,136	57	$ 22.16	1,259	123	10.8%
16	1,000 WATTS	177	$ 20.62	3,646	177	$ 22.85	4,040	394	10.8%
17	400 WATT Floodlight	403	$ 16.17	6,513	403	$ 17.92	7,218	705	10.8%
18	1,000 WATT Floodlight	134	$ 26.62	3,566	134	$ 29.50	3,952	386	10.8%
19	ADDITIONAL FACILITIES								
20	WOOD POLE - Per Pole Per Lamp	35,702	$ 1.61	57,480	35,702	$ 1.78	63,697	6,217	10.8%
21	WOOD POLE - In Excess of One Per Lamp	1,140	$ 3.94	4,492	1,140	$ 4.37	4,977	485	10.8%
22	FABRICATED POLE - Per Pole Per Lamp	2,300	$ 8.06	18,538	2,300	$ 8.93	20,544	2,006	10.8%
23	FABRICATED POLE - In Excess of One Per Lamp	229	$ 10.62	2,428	229	$ 11.77	2,690	262	10.8%
24	**Total Base Normalized Distribution Revenues**			**$ 3,260,181**			**$ 3,612,785**	**$ 352,604**	10.8%
25	Rider Charges								
26	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
27	TCJA Voluntary Surcharge		-6.01%	(195,937)		0.00%	-	195,937	-100.0%
28	STAS		0.07%	3,193		0.00%	-	(3,193)	-100.0%
29	Distribution System Improvement Charge		5.00%	$ 154,177		0.00%	$ -	(154,177)	-100.0%
30	**Total Distribution Including Rider Charges**			**$ 3,221,613**			**$ 3,612,785**	**$ 391,172**	12.1%
31	Rider Charges								
32	Default Service Support Charge	11,026,505	$ 0.00388	42,783	11,026,505	$ 0.00388	42,783	-	0.0%
33	Universal Service Charge			-			-	-	0.0%
34	Solar Photovoltaic Requirements Charge	11,026,505	$ 0.00008	882	11,026,505	$ 0.00008	882	-	0.0%
35	Phase IV Energy Efficiency and Conservation Charge	11,026,505	$ 0.00175	19,296	11,026,505	$ 0.00175	19,296	-	0.0%
36	PTC/HPS Charge	11,026,505	$ 0.11603	1,279,405	11,026,505	$ 0.11603	1,279,405	-	0.0%
37	**Total Energy and Revenue**	11,026,505		**$ 4,563,980**	11,026,505		**$ 4,955,152**	**$ 391,172**	8.6%
38	Avg rate per kWh			$ 0.41391			$ 0.44939		
39	Proposed Increase						$ 391,172		
40	Percent Increase						8.57%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE SL (Street Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
	High Pressure Sodium Vapor Street Lighting Service								
1	WOOD POLE								
2	70 WATTS	160,522	$ 10.48	$ 1,682,270	160,522	$ 11.84	$ 1,900,988	$ 218,718	13.0%
3	100 WATTS	263,199	$ 9.28	2,442,490	263,199	$ 10.49	2,760,047	317,557	13.0%
4	150 WATTS	37,786	$ 8.82	333,276	37,786	$ 9.97	376,606	43,330	13.0%
5	200 WATTS	30,914	$ 13.47	416,417	30,914	$ 15.22	470,557	54,140	13.0%
6	200 WATTS Prov E	48	$ 12.71	610	48	$ 14.36	689	79	13.0%
7	250 WATTS	303	$ 14.15	4,282	303	$ 15.99	4,839	557	13.0%
8	400 WATTS	7,085	$ 9.26	65,606	7,085	$ 10.46	74,136	8,530	13.0%
9	400 WATTS Prov E	12	$ 10.63	128	12	$ 12.01	144	17	13.0%
10	FIBERGLASS POLE NOT OVER 16 FEET								
11	70 WATTS	2,045	$ 16.75	34,249	2,045	$ 18.93	38,702	4,453	13.0%
12	100 WATTS	40,991	$ 15.56	637,822	40,991	$ 17.58	720,747	82,925	13.0%
13	150 WATTS	3,644	$ 15.10	55,032	3,644	$ 17.06	62,186	7,155	13.0%
14	200 WATTS	2,434	$ 19.71	47,969	2,434	$ 22.27	54,206	6,237	13.0%
15	250 WATTS	194	$ 20.36	3,957	194	$ 23.01	4,472	514	13.0%
16	400 WATTS	2,198	$ 15.52	34,108	2,198	$ 17.54	38,543	4,435	13.0%
17	UNDERPASS LIGHTING								
18	70 WATTS	12	$ 9.95	117	12	$ 11.24	132	15	13.0%
19	100 WATTS	457	$ 6.98	3,187	457	$ 7.89	3,601	414	13.0%
20	150 WATTS	193	$ 6.42	1,239	193	$ 7.25	1,400	161	13.0%
21	200 WATTS	49	$ 9.99	485	49	$ 11.29	549	63	13.0%
22	400 WATTS	-	$ 5.13	-	-	$ 5.80	-	-	0.0%
23	**Rate Schedule LED - Light Emitting Diode**								
24	COBRA HEAD								
25	50 WATTS	94,724	$ 8.29	785,259	94,724	$ 9.37	887,354	102,094	13.0%
26	90 WATTS	56,289	$ 9.88	556,131	56,289	$ 11.16	628,436	72,305	13.0%
27	130 WATTS	12,190	$ 11.14	135,796	12,190	$ 12.59	153,451	17,655	13.0%
28	260 WATTS	1,626	$ 17.30	28,131	1,626	$ 19.55	31,788	3,657	13.0%
29	Colonial								
30	50 WATTS	4,166	$ 13.37	55,704	4,166	$ 15.11	62,946	7,242	13.0%
31	90 WATTS	768	$ 14.71	11,297	768	$ 16.62	12,766	1,469	13.0%
	Acorn								
	50 WATTS	1,416	$ 22.30	31,577	1,416	$ 25.20	35,682	4,105	13.0%
	90 WATTS	-	$ 23.58	-	-	$ 26.65	-	-	0.0%

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current Billing Determinants		Current Rate	Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate	Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE SL (Street Lighting Service)	*[a]*		*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
	SCHEDULE MSL (Municipal Street Lighting Service)										
	WOOD POLE										
	100 WATTS	-	$	7.94	-	-	$	8.97	-	-	0.0%
	175 WATTS	-	$	7.93	-	-	$	8.96	-	-	0.0%
	250 WATTS	-	$	11.09	-	-	$	12.53	-	-	0.0%
	FARBRICATED POLE										
	250 WATTS	-	$	17.30	-	-	$	19.55	-	-	0.0%
	STANDARD HIGH PRESSURE SODIUM VAPOR UNITS										
	WOOD POLE										
	250 WATTS	-	$	14.60	-	-	$	16.50	-	-	0.0%
	FABRICATED POLE										
	250 WATTS	-	$	20.98	-	-	$	23.71	-	-	0.0%
	MERCURY VAPOR FLOODLIGHT UNITS										
	WOOD POLE										
	400 WATTS	301	$	13.28	4,000	301	$	15.01	4,520	520	13.0%
	1,000 WATTS	768	$	15.95	12,250	768	$	18.02	13,842	1,593	13.0%
	FABRICATED POLE										
	400 WATTS	-	$	33.07	-	-	$	37.37	-	-	0.0%
	UNDERGROUND SYSTEM										
	Earth Construction/Ft	2,312,747	$	0.04	92,510	2,312,747	$	0.05	104,537	12,028	13.0%
	Sidewalk Construction/Ft	2,496	$	0.40	998	2,496	$	0.45	1,128	130	13.0%
	LIMITED ACCESS HIGHWAY LIGHTING										
	MERCURY VAPOR LAMP										
	250 WATTS	24	$	6.91	166	24	$	7.81	187	22	13.0%
	400 WATTS	60	$	5.91	355	60	$	6.68	401	46	13.0%
	HIGH PRESSURE SODIUM VAPOR LAMP										
	200 WATTS	-	$	9.07	-	-	$	10.25	-	-	0.0%
	400 WATTS	-	$	4.43	-	-	$	5.01	-	-	0.0%
	OVERHEAD OR BOULEVARD STREET LIGHTING										
	Overhead Self-Controlled (Per Unit)	22,239	$	1.86	41,365	22,239	$	2.10	46,743	5,378	13.0%
	First 100,000 kWh	1,144,871	$	0.00726	8,312	1,144,871	$	0.008204	9,392	1,081	13.0%
	Excess kWh	-	$	0.00191	-	-	$	0.002158	-		
32	**Total Base Normalized Distribution Revenues**				**$ 7,527,096**				**$ 8,505,720**	**$ 978,624**	13.0%

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE SL (Street Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
33	Rider Charges								
34	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
35	TCJA Voluntary Surcharge		-6.01%	(452,378)		0.00%	-	452,378	-100.0%
36	STAS		0.07%	7,888		0.00%	-	(7,888)	-100.0%
37	Distribution System Improvement Charge		5.00%	$ 353,912		0.00%	$ -	(353,912)	-100.0%
38	**Total Distribution Including Rider Charges**			**$ 7,436,518**			**$ 8,505,720**	**$ 1,069,203**	14.4%
39	Rider Charges								
40	Default Service Support Charge	31,975,577	$ 0.00388	124,065	31,975,577	$ 0.00388	124,065	-	0.0%
41	Universal Service Charge			-			-	-	0.0%
42	Solar Photovoltaic Requirements Charge	31,975,577	$ 0.00008	2,558	31,975,577	$ 0.00008	2,558	-	0.0%
43	Phase IV Energy Efficiency and Conservation Charge	31,975,577	$ 0.00011	3,517	31,975,577	$ 0.00011	3,517	-	0.0%
44	PTC/HPS Charge	31,975,577	$ 0.11603	3,710,126	31,975,577	$ 0.11603	3,710,126	-	0.0%
45	**Total Energy and Revenue**			**$ 11,276,784**	-		**$ 12,345,987**	**$ 1,069,203**	9.5%
46	Avg rate per kWh			$0.00000			$0.00000		
47	Proposed Increase						$1,069,203		
48	Percent Increase						9.48%		

Penelec Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE Borderline Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Energy Charge (kWh)								
3	All kWh	313,377	$ 0.05038	15,788	313,377	$ 0.06084	19,067	3,279	20.8%
4	**Total Base Normalized Distribution Revenues**			**$ 15,788**			**$ 19,067**	**$ 3,279**	20.8%
5	Rider Charges								
6	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
7	TCJA Voluntary Surcharge		-6.01%	(949)		0.00%	-	949	-100.0%
8	STAS		0.07%	37		0.00%	-	(37)	-100.0%
9	Distribution System Improvement Charge		5.00%	$ 742		0.00%	$ -	(742)	-100.0%
10	**Total Distribution Including Rider Charges**			**$ 15,618**			**$ 19,067**	**$ 3,449**	22.1%
11	Rider Charges								
12	Default Service Support Charge	313,377	$ 0.00388	1,216	313,377	$ 0.00388	1,216	-	0.0%
13	Universal Service Charge			-			-	-	0.0%
14	Solar Photovoltaic Requirements Charge	313,377	$ 0.00008	25	313,377	$ 0.00008	25	-	0.0%
15	Phase IV Energy Efficiency and Conservation Charge			-	-	$ -	-	-	0.0%
16	PTC/HPS Charge	313,377	$ 0.11603	36,361	313,377	$ 0.11603	36,361	-	0.0%
17	**Total Energy and Revenue**	313,377		**$ 53,220**	313,377		**$ 56,669**	**$ 3,449**	6.5%
18	Avg rate per kWh			$ 0.16983			$ 0.18083		
19	Proposed Increase						$ 3,449		
20	Percent Increase						6.48%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE RS (Residential Service)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	1,824,115		$11.00	$	20,065,266	1,824,115		$11.00	$	20,065,266	$ (0)	0.0%
3	Demand Charge (kW)	67,873	$	1.88		127,601	67,873	$	2.25		152,908	25,307	19.8%
4	Energy Charge (kWh)												
5	All kWh	1,713,034,249	$	0.04437		76,007,330	1,713,034,249	$	0.05480		93,880,710	17,873,380	23.5%
6	**Total Base Normalized Distribution Revenues**				**$**	**96,200,197**				**$**	**114,098,884**	**$ 17,898,687**	18.6%
7	Rider Charges												
8	Smart Meter Technologies Charge (Per Bill)	1,824,115	$	(0.60)	$	(1,094,469)	1,824,115	$	-	$	-	$ 1,094,469	-100.0%
9	TCJA Voluntary Surcharge			-3.39%		(3,261,187)			0.00%		-	3,261,187	-100.0%
10	STAS			-0.02%		(62,149)			0.00%		-	62,149	-100.0%
11	Distribution System Improvement Charge			7.50%	$	8,336,283			0.00%	$	-	(8,336,283)	-100.0%
12	**Total Distribution Including Rider Charges**				**$**	**100,118,675**				**$**	**114,098,884**	**$ 13,980,209**	14.0%
13	Rider Charges												
14	Default Service Support Charge	1,713,034,249	$	(0.00072)		(1,233,385)	1,713,034,249	$	(0.00072)		(1,233,385)	-	0.0%
15	Universal Service Charge	1,713,034,249	$	0.00927		15,879,827	1,713,034,249	$	0.00927		15,879,827	-	0.0%
16	Solar Photovoltaic Requirements Charge	1,713,034,249	$	0.00006		102,782	1,713,034,249	$	0.00006		102,782	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	1,713,034,249	$	0.00200		3,426,068	1,713,034,249	$	0.00200		3,426,068	-	0.0%
18	PTC/HPS Charge	1,713,034,249	$	0.11231		192,390,877	1,713,034,249	$	0.11231		192,390,877	-	0.0%
19	**Total Energy and Revenue**	1,713,034,249			**$**	**310,684,845**	1,713,034,249			**$**	**324,665,054**	**$ 13,980,209**	4.5%
20	Avg rate per kWh				$	0.18137				$	0.18953		
21	Proposed Increase									$	13,980,209		
22	Percent Increase										4.50%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GSV (Volunteer Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	930	$ 11.00	$ 10,233	930	$ 11.00	$ 10,233	$ 0	0.0%
3	Demand Charge (kW)	1,738	$ 1.88	3,267	1,738	$ 2.25	3,915	648	19.8%
4	Energy Charge (kWh)								
5	All kWh	1,995,206	$ 0.04437	88,527	1,995,206	$ 0.05480	109,345	20,818	23.5%
6	**Total Base Normalized Distribution Revenues**			**$ 102,027**			**$ 123,493**	**$ 21,466**	21.0%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	930	$ (0.60)	$ (558)	930	$ -	$ -	$ 558	-100.0%
9	TCJA Voluntary Surcharge		-3.39%	(3,459)		0.00%	-	3,459	-100.0%
10	STAS		-0.02%	(70)		0.00%	-	70	-100.0%
11	Distribution System Improvement Charge		7.50%	$ 9,046		0.00%	$ -	(9,046)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 106,986**			**$ 123,493**	**$ 16,507**	15.4%
13	Rider Charges								
14	Default Service Support Charge	1,995,206	$ (0.00072)	(1,437)	1,995,206	$ (0.00072)	(1,437)	-	0.0%
15	Universal Service Charge	1,995,206	$ 0.00927	18,496	1,995,206	$ 0.00927	18,496	-	0.0%
16	Solar Photovoltaic Requirements Charge	1,995,206	$ 0.00006	120	1,995,206	$ 0.00006	120	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	1,995,206	$ 0.00206	4,110	1,995,206	$ 0.00206	4,110	-	0.0%
18	PTC/HPS Charge	1,995,206	$ 0.11231	224,082	1,995,206	$ 0.11231	224,082	-	0.0%
19	**Total Energy and Revenue**	1,995,206		**$ 352,357**	1,995,206		**$ 368,863**	**$ 16,507**	4.7%
20	Avg rate per kWh			$ 0.17660			$ 0.18487		
21	Proposed Increase						$ 16,507		
22	Percent Increase						4.68%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Small (General Service Small)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	138,417	$ 24.89	$ 3,445,187	138,417	$ 30.04	$ 4,158,037	$ 712,850	20.7%
3	Demand Charge (kW)								
4	Energy Charge (kWh)								
5	All kWh	49,281,744	$ 0.03623	1,785,478	49,281,744	$ 0.04817	2,374,032	588,554	33.0%
6	**Total Base Normalized Distribution Revenues**			**$ 5,230,664**			**$ 6,532,069**	**$ 1,301,405**	24.9%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	138,417	$ 1.04	$ 143,953	138,417	$ -	$ -	$ (143,953)	-100.0%
9	TCJA Voluntary Surcharge		-3.39%	(177,320)		0.00%	-	177,320	-100.0%
10	STAS		-0.02%	(2,415)		0.00%	-	2,415	-100.0%
11	Distribution System Improvement Charge		7.50%	$ 397,411		0.00%	$ -	(397,411)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 5,592,295**			**$ 6,532,069**	**$ 939,774**	16.8%
13	Rider Charges								
14	Default Service Support Charge	49,281,744	$ (0.00176)	(86,736)	49,281,744	$ (0.00176)	(86,736)	-	0.0%
15	Universal Service Charge			-			-	-	0.0%
16	Solar Photovoltaic Requirements Charge	49,281,744	$ 0.00006	2,957	49,281,744	$ 0.00006	2,957	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	49,281,744	$ 0.00206	101,520	49,281,744	$ 0.00206	101,520	-	0.0%
18	PTC/HPS Charge	49,281,744	$ 0.13109	6,460,344	49,281,744	$ 0.13109	6,460,344	-	0.0%
19	**Total Energy and Revenue**	49,281,744		**$ 12,070,380**	49,281,744		**$ 13,010,154**	**$ 939,774**	7.8%
20	Avg rate per kWh			$ 0.24493			$ 0.26400		
21	Proposed Increase						$ 939,774		
22	Percent Increase						7.79%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Medium (General Service Medium)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	106,074	$ 26.87	2,850,207	106,074	$ 32.02	3,396,782	546,575	19.2%
3	Demand Charge								
4	All kW	3,039,157	$ 3.40	10,333,134	3,039,157	$ 4.13	12,544,839		
5	All rkVa	924,290	$ 0.20	184,858	924,290	$ 0.24	220,308	35,450	19.2%
6	Energy Charge (kWh)	839,944,113	$ -	-	839,944,113				
7	**Total Base Normalized Distribution Revenues**			**$ 13,368,199**			**$ 16,161,929**	**$ 2,793,730**	20.9%
8	Rider Charges								
9	Smart Meter Technologies Charge (Per Bill)	106,074	$ 1.04	$ 110,317	106,074	$ -	$ -	$ (110,317)	
10	TCJA Voluntary Surcharge		-3.39%	(453,182)		0.00%	-	453,182	-100.0%
11	STAS		-0.02%	(24,900)		0.00%	-	24,900	-100.0%
12	Distribution System Improvement Charge		7.50%	$ 1,106,671		0.00%	$ -	(1,106,671)	-100.0%
13	**Total Distribution Including Rider Charges**			**$ 14,107,106**			**$ 16,161,929**	**$ 2,054,823**	14.6%
14	Rider Charges								
15	Default Service Support Charge	839,944,113	$ (0.00181)	(1,520,299)	839,944,113	$ (0.00181)	(1,520,299)	-	0.0%
16	Universal Service Charge			-			-	-	0.0%
17	Solar Photovoltaic Requirements Charge	839,944,113	$ 0.00006	50,397	839,944,113	$ 0.00006	50,397	-	0.0%
18	Phase IV Energy Efficiency and Conservation Charge	839,944,113	$ 0.00206	1,730,285	839,944,113	$ 0.00206	1,730,285	-	0.0%
19	PTC/HPS Charge	839,944,113	$ 0.13109	110,108,274	839,944,113	$ 0.13109	110,108,274	-	0.0%
20	**Total Energy and Revenue**	839,944,113		**$ 124,475,762**	839,944,113	-	**$ 126,530,585**	**$ 2,054,823**	1.7%
21	Avg rate per kWh			$ 0.14820			$ 0.15064		
22	Proposed Increase						$ 2,054,823		
23	Percent Increase						1.65%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Large (General Service Large)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	1,733		$130.07	$	225,440	1,733	$	152.83	$	264,894	$ 39,454	17.5%
3	Demand Charge (kW)												
4	All kW	855,254		$4.36		3,728,905	855,254	$	5.12		4,376,817	647,912	17.4%
5	All rkVa	361,930	$	0.20		72,386	361,930	$	0.24		85,054	12,668	17.5%
6	Energy Charge (kWh)												
7	All kWh	322,711,741	$	-		-	322,711,741	$	-		-	-	0.0%
8	**Total Base Normalized Distribution Revenues**				**$**	**4,026,731**				**$**	**4,726,765**	**$ 700,034**	17.4%
9	Rider Charges												
10	Smart Meter Technologies Charge (Per Bill)	1,733	$	4.85	$	8,406	1,733	$	-	$	-	$ (8,406)	
11	TCJA Voluntary Surcharge			-3.39%		(136,506)			0.00%		-	136,506	-100.0%
12	STAS			-0.02%		(3,268)			0.00%		-	3,268	-100.0%
13	Distribution System Improvement Charge			7.50%	$	315,417			0.00%	$	-	(315,417)	-100.0%
14	**Total Distribution Including Rider Charges**				**$**	**4,210,779**				**$**	**4,726,765**	**$ 515,986**	12.3%
15	Rider Charges												
16	Default Service Support Charge	697,558	$	(0.84200)		(587,343)	697,558	$	(0.84200)		(587,343)	-	0.0%
17	Universal Service Charge					-					-	-	0.0%
18	Solar Photovoltaic Requirements Charge	322,711,741	$	0.00006		19,363	322,711,741	$	0.00006		19,363	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	697,558	$	0.44000		306,925	697,558	$	0.44000		306,925	-	0.0%
20	PTC/HPS Charge	322,711,741	$	0.03839		12,388,904	322,711,741	$	0.03839		12,388,904	-	0.0%
21	**Total Energy and Revenue**	322,711,741			**$**	**16,338,627**	322,711,741			**$**	**16,854,613**	**$ 515,986**	3.2%
22	Avg rate per kWh				$	0.05063				$	0.05223		
23	Proposed Increase									$	515,986		
24	Percent Increase										3.16%		

Penn Power Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE GP (General Primary Service)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	1,508		$114.35	$	172,416	1,508	$	138.43	$	208,719	$36,303	21.1%
3	Demand Charge (kW)												
4	All kW	920,483		$4.34		3,994,896	920,483	$	5.23		4,812,550	$817,654	20.5%
5	All rkVa	407,787	$	0.20		81,557	407,787	$	0.24		98,730	$17,173	21.1%
6	Backup Demand kW										-	$0	0.0%
7	Energy Charge (kWh)												
8	All kWh	393,669,651	$	-		-	393,669,651	$	-		-	$0	0.0%
9	**Total Base Normalized Distribution Revenues**				**$**	**4,248,869**				**$**	**5,119,999**	$871,130	20.5%
10	Rider Charges												
11	Smart Meter Technologies Charge (Per Bill)	1,508	$	4.85	$	7,313	1,508	$	-	$	-	($7,313)	
12	TCJA Voluntary Surcharge			-3.39%		(144,037)			0.00%		-	144,037	-100.0%
13	STAS			-0.02%		(3,855)			0.00%		-	3,855	-100.0%
14	Distribution System Improvement Charge			7.50%	$	333,459			0.00%	$	-	($333,459)	-100.0%
15	**Total Distribution Including Rider Charges**				**$**	**4,441,749**				**$**	**5,119,999**	$678,250	15.3%
16	Rider Charges												
17	Default Service Support Charge	759,047	$	(0.84200)		(639,118)	759,047	$	(0.84200)		(639,118)	-	0.0%
18	Universal Service Charge					-					-	-	0.0%
19	Solar Photovoltaic Requirements Charge	393,669,651	$	0.00006		23,620	393,669,651	$	0.00006		23,620	-	0.0%
20	Phase IV Energy Efficiency and Conservation Charge	759,047	$	0.44000		333,981	759,047	$	0.44000		333,981	-	0.0%
21	PTC/HPS Charge	393,669,651	$	0.03839		15,112,978	393,669,651	$	0.03839		15,112,978	-	0.0%
22	**Total Energy and Revenue**	393,669,651			**$**	**19,273,210**	393,669,651			**$**	**19,951,460**	**$ 678,250**	3.5%
23	Avg rate per kWh				$	0.04896				$	0.05068		
24	Proposed Increase									$	678,250		
25	Percent Increase										3.52%		

Penn Power Rate District
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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE TP (Transmission Power Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	546	$ 324.29	$ 176,950	546	$ 372.87	$ 203,459	$26,509	15.0%
3	Demand Charge (kW)								
4	All kW	4,095,558	$ 0.54	2,211,601	4,095,558	$ 0.60	2,453,611	$242,010	10.9%
5	All kVA	2,071,035	$ 0.20	414,207	2,071,035	$ 0.22	459,532	$45,325	10.9%
6	Energy Charge (kWh)								
7	All kWh	1,309,300,930	$ -	-	1,309,300,930	$ -	-	$0	0.0%
8	**Total Base Normalized Distribution Revenues**			**$ 2,802,758**			**$ 3,116,602**	$313,844	11.2%
9	Rider Charges								
10	Smart Meter Technologies Charge (Per Bill)	546	$ 4.85	$ 2,646		$ -	$ -	($2,646)	-100.0%
11	TCJA Voluntary Surcharge		-3.39%	(95,013)		0.00%	-	95,013	-100.0%
12	STAS		-0.02%	(10,527)		0.00%	-	10,527	-100.0%
13	Distribution System Improvement Charge		7.50%	$ 258,837		0.00%	$ -	(258,837)	-100.0%
14	**Total Distribution Including Rider Charges**			**$ 2,958,701**			**$ 3,116,602**	$157,901	5.3%
15	Rider Charges								
16	Default Service Support Charge	1,683,579	$ (0.84200)	(1,417,574)	1,683,579	$ (0.84200)	(1,417,574)	-	0.0%
17	Universal Service Charge			-			-	-	0.0%
18	Solar Photovoltaic Requirements Charge	1,309,300,930	$ 0.00006	78,558	1,309,300,930	$ 0.00006	78,558	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	1,683,579	$ 0.44000	740,775	1,683,579	$ 0.44000	740,775	-	0.0%
20	PTC/HPS Charge	1,309,300,930	$ 0.03839	50,264,063	1,309,300,930	$ 0.03839	50,264,063	-	0.0%
21	**Total Energy and Revenue**	1,309,300,930		**$ 52,624,523**	1,309,300,930		**$ 52,782,424**	**$ 157,901**	0.3%
22	Avg rate per kWh			$ 0.04019			$ 0.04031		
23	Proposed Increase						$ 157,901		
24	Percent Increase						0.30%		

Penn Power Rate District
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Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE PNP (Public or Non-Profit Organization Rate)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	1,053	$	15.56	$	16,379	1,053	$	15.56	$	16,379	$ -	0.0%
3	Energy Charge (kWh)												
4	All kWh	1,862,519	$	0.03440		64,071	1,862,519	$	0.04370		81,387	17,316	27.0%
5	**Total Base Normalized Distribution Revenues**				**$**	**80,450**				**$**	**97,766**	**$ 17,316**	21.5%
6	Rider Charges												
7	Smart Meter Technologies Charge (Per Bill)	1,053	$	1.04	$	1,095	1,053	$	-	$	-	$ (1,095)	-100.0%
8	TCJA Voluntary Surcharge			-3.39%		(2,727)			0.00%		-	2,727	-100.0%
9	STAS			-0.02%		(66)			0.00%		-	66	-100.0%
10	Distribution System Improvement Charge			7.50%	$	6,199			0.00%	$	-	(6,199)	-100.0%
11	**Total Distribution Including Rider Charges**				**$**	**84,951**				**$**	**97,766**	**$ 12,815**	15.1%
12	Rider Charges												
13	Default Service Support Charge	1,862,519	$	(0.00181)		(3,371)	1,862,519	$	(0.00181)		(3,371)	-	0.0%
14	Universal Service Charge					-					-	-	0.0%
15	Solar Photovoltaic Requirements Charge	1,862,519	$	0.00006		112	1,862,519	$	0.00006		112	-	0.0%
16	Phase IV Energy Efficiency and Conservation Charge	1,862,519	$	0.00206		3,837	1,862,519	$	0.00206		3,837	-	0.0%
17	PTC/HPS Charge	1,862,519	$	0.13109		244,158	1,862,519	$	0.13109		244,158	-	0.0%
18	**Total Energy and Revenue**	1,862,519			**$**	**329,685**	1,862,519			**$**	**342,501**	**$ 12,815**	3.9%
19	Avg rate per kWh				$	0.17701				$	0.18389		
20	Proposed Increase									$	12,815		
21	Percent Increase										3.89%		

Penn Power Rate District
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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE OL (Outdoor Area Lighting Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Lamps								
2	175 W MERCURY VAPOR	173	$ 14.58	$ 2,525	173	$ 17.42	$ 3,017	$ 492	19.5%
3	175 W MERCURY VAPOR - PT	60	$ 26.52	1,579	60	$ 31.69	1,887	308	19.5%
4	400 W MERCURY VAPOR	80	$ 12.54	1,000	80	$ 14.98	1,195	195	19.5%
5	70 W SODIUM VAPOR	169	$ 18.19	3,069	169	$ 21.73	3,667	598	19.5%
6	100 W SODIUM VAPOR - PT	6,896	$ 27.88	192,263	6,896	$ 33.31	229,727	37,464	19.5%
7	100 W SODIUM VAPOR	2,697	$ 18.30	49,361	2,697	$ 21.87	58,979	9,618	19.5%
8	150 W SODIUM VAPOR	1,107	$ 17.63	19,517	1,107	$ 21.07	23,320	3,803	19.5%
9	250 W SODIUM VAPOR	4,774	$ 18.49	88,278	4,774	$ 22.09	105,480	17,202	19.5%
10	400 W SODIUM VAPOR	4,698	$ 18.32	86,075	4,698	$ 21.89	102,848	16,773	19.5%
11	250 Metal Halide	577	$ 22.82	13,172	577	$ 27.27	15,738	2,566	19.5%
12	400 Metal Halide	3,677	$ 19.48	71,636	3,677	$ 23.28	85,595	13,959	19.5%
13	1,000 Metal Halide	925	$ 8.32	7,695	925	$ 9.94	9,194	1,499	19.5%
14	Poles								
15	30' or 35' Pole Charge	1,843	$ 11.07	20,401	1,843	$ 13.23	24,377	3,976	19.5%
16	40' Pole Charge	880	$ 12.88	11,338	880	$ 15.39	13,548	2,210	19.5%
17	**Total Base Normalized Distribution Revenues**			**$ 567,910**			**$ 678,572**	**$ 110,662**	19.5%
18	Rider Charges								
19	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
20	TCJA Voluntary Surcharge		-3.39%	(19,252)		0.00%	-	19,252	-100.0%
21	STAS		-0.02%	(189)		0.00%	-	189	-100.0%
22	Distribution System Improvement Charge		7.50%	$ 41,564		0.00%	$ -	(41,564)	-100.0%
23	**Total Distribution Including Rider Charges**			**$ 590,034**			**$ 678,572**	**$ 88,538**	15.0%
24	Rider Charges								
25	Default Service Support Charge	2,685,529	$ (0.00181)	(4,861)	2,685,529	$ (0.00181)	(4,861)	-	0.0%
26	Universal Service Charge			-			-	-	0.0%
27	Solar Photovoltaic Requirements Charge	2,685,529	$ 0.00006	161	2,685,529	$ 0.00006	161	-	0.0%
28	Phase IV Energy Efficiency and Conservation Charge	2,685,529	$ 0.00206	5,532	2,685,529	$ 0.00206	5,532	-	0.0%
29	PTC/HPS Charge	2,685,529	$ 0.13109	352,046	2,685,529	$ 0.13109	352,046	-	0.0%
30	**Total Energy and Revenue**	2,685,529		**$ 942,912**	2,685,529		**$ 1,031,450**	**$ 88,538**	9.4%
31	Avg rate per kWh			$ 0.35111			$ 0.38408		
32	Proposed Increase						$ 88,538		
33	Percent Increase						9.39%		

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Line No.	SCHEDULE SL (Street Lighting Service)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	SODIUM VAPOR								
2	70 WATTS	816	$ 9.87	$ 8,054	816	$ 12.06	$ 9,841	$ 1,787	22.2%
3	100 WATTS	1,916	$ 8.59	$ 16,461	1,916	$ 10.50	$ 20,115	$ 3,653	22.2%
4	150 WATTS	1,032	$ 8.72	$ 8,999	1,032	$ 10.66	$ 10,996	$ 1,997	22.2%
5	250 WATTS	276	$ 10.19	$ 2,808	276	$ 12.45	$ 3,431	$ 623	22.2%
6	400 WATTS	256	$ 10.49	$ 2,685	256	$ 12.82	$ 3,281	$ 596	22.2%
7	Cobra Head								
8	50 WATTS	90,387	$ 7.32	$ 661,634	90,387	$ 8.94	$ 808,472	$ 146,838	22.2%
9	90 WATTS	13,284	$ 8.78	$ 116,630	13,284	$ 10.73	$ 142,514	$ 25,884	22.2%
10	130 WATTS	11,555	$ 9.78	$ 113,006	11,555	$ 11.95	$ 138,086	$ 25,080	22.2%
11	260 WATTS	4,754	$ 15.12	$ 71,884	4,754	$ 18.48	$ 87,838	$ 15,953	22.2%
12	Colonial								
13	50 WATTS	49	$ 11.72	$ 578	49	$ 14.32	$ 706	$ 128	22.2%
14	90 WATTS	-	$ 12.87	$ -	-	$ 15.73	$ -	$ -	0.0%
15	Acorn								
16	50 WATTS	36	$ 19.46	$ 701	36	$ 23.78	$ 856	$ 155	22.2%
17	90 WATTS	-	$ 20.57	$ -	-	$ 25.14	$ -	$ -	0.0%
18	**Total Base Normalized Distribution Revenues**			**$ 1,003,440**			**$ 1,226,136**	**$ 222,696**	22.2%
19	Rider Charges								
20	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	0.0%
21	TCJA Voluntary Surcharge		-3.39%	(34,017)		0.00%	-	34,017	-100.0%
22	STAS		-0.02%	(294)		0.00%	-	294	-100.0%
23	Distribution System Improvement Charge		7.50%	$ 73,160		0.00%	$ -	(73,160)	-100.0%
24	**Total Distribution Including Rider Charges**			**$ 1,042,289**			**$ 1,226,136**	**$ 183,847**	17.6%
25	Rider Charges								
26	Default Service Support Charge	3,267,043	$ (0.00181)	(5,913)	3,267,043	$ (0.00181)	(5,913)	-	0.0%
27	Universal Service Charge			-			-	-	0.0%
28	Solar Photovoltaic Requirements Charge	3,267,043	$ 0.00006	196	3,267,043	$ 0.00006	196	-	0.0%
29	Phase IV Energy Efficiency and Conservation Charge	3,267,043	$ 0.00185	6,044	3,267,043	$ 0.00185	6,044	-	0.0%
30	PTC/HPS Charge	3,267,043	$ 0.13109	428,277	3,267,043	$ 0.13109	428,277	-	0.0%
31	**Total Energy and Revenue**			**$ 1,470,893**	-		**$ 1,654,740**	**$ 183,847**	12.5%
32	Avg rate per kWh			$0.00000			$0.00000		
33	Proposed Increase						$183,847		
34	Percent Increase						12.50%		

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Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE RS (Residential Service)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	7,634,145	$	7.44	$	56,798,039	7,634,145	$	9.00	$	68,707,306	$ 11,909,267	21.0%
3	Demand Charge (kW)	110,822	$	2.46		272,623	110,822	$	3.05		337,545	64,922	23.8%
4	Energy Charge (kWh)												
5	All kWh	7,237,022,340	$	0.03487		252,354,969	7,237,022,340	$	0.04306		311,610,006	59,255,037	23.5%
6	**Total Base Normalized Distribution Revenues**				**$**	**309,425,631**				**$**	**380,654,857**	**$ 71,229,226**	23.0%
7	Rider Charges												
8	Smart Meter Technologies Charge (Per Bill)	7,237,022,340	$	(0.00103)	$	(7,454,133)	7,237,022,340	$	-	$	-	$ 7,454,133	-100.0%
9	TCJA Voluntary Surcharge			-3.13%		(9,685,022)			0.00%		-	9,685,022	-100.0%
10	STAS			-0.05%		(567,728)			0.00%		-	567,728	-100.0%
11	Distribution System Improvement Charge			5.00%	$	18,077,239			0.00%	$	-	(18,077,239)	-100.0%
12	**Total Distribution Including Rider Charges**				**$**	**309,795,986**				**$**	**380,654,857**	**$ 70,858,871**	22.9%
13	Rider Charges												
14	Default Service Support Charge	7,237,022,340	$	0.00443		32,060,009	7,237,022,340	$	0.00443		32,060,009	-	0.0%
15	Universal Service Charge	7,237,022,340	$	0.00795		57,534,328	7,237,022,340	$	0.00795		57,534,328	-	0.0%
16	Solar Photovoltaic Requirements Charge	7,237,022,340	$	-		-	7,237,022,340	$	-		-	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	7,237,022,340	$	0.00162		11,723,976	7,237,022,340	$	0.00162		11,723,976	-	0.0%
18	PTC/HPS Charge	7,237,022,340	$	0.10001		723,774,604	7,237,022,340	$	0.10001		723,774,604	-	0.0%
19	**Total Energy and Revenue**	7,237,022,340			**$**	**1,134,888,903**	7,237,022,340			**$**	**1,205,747,774**	**$ 70,858,871**	6.2%
20	Avg rate per kWh				$	0.15682				$	0.16661		
21	Proposed Increase									$	70,858,871		
22	Percent Increase										6.24%		

West Penn Rate District
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Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GSV (Volunteer Service)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	7,563	$ 7.44	$ 56,268	7,563	$ 9.00	$ 68,066	$ 11,798	21.0%
3	Demand Charge (kW)	37,987	$ 2.46	93,448	37,987	$ 3.05	115,701	22,253	23.8%
4	Energy Charge (kWh)								
5	All kWh	18,944,346	$ 0.03487	660,589	18,944,346	$ 0.04306	815,701	155,112	23.5%
6	**Total Base Normalized Distribution Revenues**			**$ 810,305**			**$ 999,468**	**$ 189,163**	23.3%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	18,944,346	$ (0.00103)	$ (19,513)	18,944,346	$ -	$ -	$ 19,513	-100.0%
9	TCJA Voluntary Surcharge		-3.13%	(25,363)		0.00%	-	25,363	-100.0%
10	STAS		-0.05%	(1,487)		0.00%	-	1,487	-100.0%
11	Distribution System Improvement Charge		5.00%	$ 47,384		0.00%	$ -	(47,384)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 811,327**			**$ 999,468**	**$ 188,141**	23.2%
13	Rider Charges								
14	Default Service Support Charge	18,944,346	$ 0.00443	83,923	18,944,346	$ 0.00443	83,923	-	0.0%
15	Universal Service Charge	18,944,346	$ 0.00795	150,608	18,944,346	$ 0.00795	150,608	-	0.0%
16	Solar Photovoltaic Requirements Charge	18,944,346	$ -	-	18,944,346	$ -	-	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	18,944,346	$ 0.00167	31,637	18,944,346	$ 0.00167	31,637	-	0.0%
18	PTC/HPS Charge	18,944,346	$ 0.10001	1,894,624	18,944,346	$ 0.10001	1,894,624	-	0.0%
19	**Total Energy and Revenue**	18,944,346		**$ 2,972,119**	18,944,346		**$ 3,160,260**	**$ 188,141**	6.3%
20	Avg rate per kWh			$ 0.15689			$ 0.16682		
21	Proposed Increase						$ 188,141		
22	Percent Increase						6.33%		

West Penn Rate District
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Line No.	SCHEDULE GS-Small (General Service Small)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Customer Charge	750,476	$ 9.52	$ 7,144,536	750,476	$ 12.35	$ 9,265,171	$ 2,120,635	29.7%
3	Demand Charge (kW)				-	$ -	-	-	0.0%
4	Energy Charge (kWh)								
5	All kWh	210,898,870	$ 0.03529	7,442,621	210,898,870	$ 0.04722	9,958,027	2,515,406	33.8%
6	**Total Base Normalized Distribution Revenues**			**$ 14,587,157**			**$ 19,223,198**	**$ 4,636,041**	31.8%
7	Rider Charges								
8	Smart Meter Technologies Charge (Per Bill)	750,476	($0.04)	$ (30,019)	750,476	$ -	$ -	$ 30,019	-100.0%
9	TCJA Voluntary Surcharge		-3.13%	(456,578)		0.00%	-	456,578	-100.0%
10	STAS		-0.05%	(19,403)		0.00%	-	19,403	-100.0%
11	Distribution System Improvement Charge		5.00%	$ 722,638		0.00%	$ -	(722,638)	-100.0%
12	**Total Distribution Including Rider Charges**			**$ 14,803,795**			**$ 19,223,198**	**$ 4,419,403**	29.9%
13	Rider Charges								
14	Default Service Support Charge	210,898,870	$ 0.00182	383,836	210,898,870	$ 0.00182	383,836	-	0.0%
15	Universal Service Charge			-			-	-	0.0%
16	Solar Photovoltaic Requirements Charge	210,898,870	$ -	-	210,898,870	$ -	-	-	0.0%
17	Phase IV Energy Efficiency and Conservation Charge	210,898,870	$ 0.00167	352,201	210,898,870	$ 0.00167	352,201	-	0.0%
18	PTC/HPS Charge	210,898,870	$ 0.11023	23,247,382	210,898,870	$ 0.11023	23,247,382	-	0.0%
19	**Total Energy and Revenue**	210,898,870		**$ 38,787,214**	210,898,870		**$ 43,206,618**	**$ 4,419,403**	11.4%
20	Avg rate per kWh			$ 0.18391			$ 0.20487		
21	Proposed Increase						$ 4,419,403		
22	Percent Increase						11.39%		

West Penn Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE GS-Medium (General Service Medium)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	448,265	$ 18.91	$ 8,476,682	448,265	$ 23.29	$ 10,440,551	$ 1,963,869	23.2%
3	Demand Charge								
4	All kW	11,942,335	$ 2.81	33,557,960	11,942,335	$ 3.46	41,332,636		
5	All rkVa	3,914,355	$ 0.18	704,584	3,914,355	$ 0.22	867,821	163,237	23.2%
6	Energy Charge (kWh)	3,335,030,667	$ 0.00400	13,340,123	3,335,030,667	$ 0.00531	17,693,829		
7	**Total Base Normalized Distribution Revenues**			**$ 56,079,349**			**$ 70,334,837**	**$ 14,255,488**	25.4%
8	Rider Charges								
9	Smart Meter Technologies Charge (Per Bill)	448,265	$ (0.04)	$ (17,931)	448,265	$ -	$ -	$ 17,931	
10	TCJA Voluntary Surcharge		-3.13%	(1,755,284)		0.00%	-	1,755,284	-100.0%
11	STAS		-0.05%	(218,196)		0.00%	-	218,196	-100.0%
12	Distribution System Improvement Charge		5.00%	$ 2,993,782		0.00%	$ -	(2,993,782)	-100.0%
13	**Total Distribution Including Rider Charges**			**$ 57,081,720**			**$ 70,334,837**	**$ 13,253,117**	23.2%
14	Rider Charges								
15	Default Service Support Charge	3,335,030,667	$ 0.00177	5,903,004	3,335,030,667	$ 0.00177	5,903,004	-	0.0%
16	Universal Service Charge			-			-	-	0.0%
17	Solar Photovoltaic Requirements Charge	3,335,030,667	$ -	-	3,335,030,667	$ -	-	-	0.0%
18	Phase IV Energy Efficiency and Conservation Charge	3,335,030,667	$ 0.00167	5,569,501	3,335,030,667	$ 0.00167	5,569,501	-	0.0%
19	PTC/HPS Charge	3,335,030,667	$ 0.11023	367,620,430	3,335,030,667	$ 0.11023	367,620,430	-	0.0%
20	**Total Energy and Revenue**	3,335,030,667		**$ 436,174,656**	3,335,030,667	-	**$ 449,427,773**	**$ 13,253,117**	3.0%
21	Avg rate per kWh			$ 0.13079			$ 0.13476		
22	Proposed Increase						$ 13,253,117		
23	Percent Increase						3.04%		

West Penn Rate District
Proposed Distribution Rates
Test Period 12 Months Ended December 2025

Line No.	SCHEDULE GS-Large (General Service Large)	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
1	Distribution								
2	Customer Charge	10,831	$ 145.82	$ 1,579,417	10,831	$ 176.79	$ 1,914,825	$ 335,408	21.2%
3	Demand Charge (kW)								
4	All kW	5,471,093	$ 3.99	21,829,663	5,471,093	$ 4.95	27,086,437	5,256,774	24.1%
5	All rkVa	2,710,286	$ 0.18	487,851	2,710,286	$ 0.22	591,453	103,602	21.2%
6	Voltage Discount	1,905,603	$ (1.23)	(2,343,892)	1,905,603	$ (1.49)	(2,841,646)	(497,754)	21.2%
7	Energy Charge (kWh)								
8	All kWh	2,072,266,580	$ -	-	2,072,266,580	$ -	-	-	0.0%
9	**Total Base Normalized Distribution Revenues**			**$ 21,553,039**			**$ 26,751,069**	**$ 5,198,030**	24.1%
10	Rider Charges								
11	Smart Meter Technologies Charge (Per Bill)	10,831	$ 7.89	$ 85,459	10,831	$ -	$ -	$ (85,459)	
12	TCJA Voluntary Surcharge		-3.13%	(674,610)		0.00%	-	674,610	-100.0%
13	STAS		-0.05%	(80,189)		0.00%	-	80,189	-100.0%
14	Distribution System Improvement Charge		5.00%	$ 1,091,515		0.00%	$ -	(1,091,515)	-100.0%
15	**Total Distribution Including Rider Charges**			**$ 21,975,215**			**$ 26,751,069**	**$ 4,775,854**	21.7%
16	Rider Charges								
17	Default Service Support Charge	3,938,267	$ 1.23700	4,871,636	3,938,267	$ 1.23700	4,871,636	-	0.0%
18	Universal Service Charge			-			-	-	0.0%
19	Solar Photovoltaic Requirements Charge	2,072,266,580	$ -	-	2,072,266,580	$ -	-	-	0.0%
20	Phase IV Energy Efficiency and Conservation Charge	3,938,267	$ 0.22000	866,419	3,938,267	$ 0.22000	866,419	-	0.0%
21	PTC/HPS Charge	2,072,266,580	$ 0.06398	132,583,616	2,072,266,580	$ 0.06398	132,583,616	-	0.0%
22	**Total Energy and Revenue**	2,072,266,580		**$ 160,296,885**	2,072,266,580		**$ 165,072,740**	**$ 4,775,854**	3.0%
23	Avg rate per kWh			$ 0.07735			$ 0.07966		
24	Proposed Increase						$ 4,775,854		
25	Percent Increase						2.98%		

West Penn Rate District
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Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE GP/TP (General Primary Service / Transmission Power)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	2,284	$	983.20	$	2,245,219	2,284	$	1,235.76	$	2,821,958	$576,739	25.7%
3	Demand Charge (kW)												
4	All kW	11,871,733	$	0.61		7,241,757	11,871,733	$	0.76		9,001,719	$1,759,962	24.3%
5	All rkVa	2,104,787	$	0.18		378,862	2,104,787	$	0.23		476,181	$97,319	25.7%
6	Voltage Discount	1,810,610	$	(0.50)		(905,305)	1,810,610	$	(0.63)		(1,137,854)	($232,549)	25.7%
7	Transformer Charge	2,315,895	$	1.19		2,755,916	2,315,895	$	1.50		3,463,839	$707,923	25.7%
8	Energy Charge (kWh)												
9	All kWh	5,177,946,964	$	-		-	5,177,946,964	$	-		-	$0	0.0%
10	**Total Base Normalized Distribution Revenues**				**$**	**11,716,449**				**$**	**14,625,843**	$2,909,394	24.8%
11	Rider Charges												
12	Smart Meter Technologies Charge (Per Bill)	2,284		$7.89	$	18,017	2,284	$	-	$	-	($18,017)	
13	TCJA Voluntary Surcharge			-3.13%		(366,725)			0.00%		-	366,725	-100.0%
14	STAS			-0.05%		(177,682)			0.00%		-	177,682	-100.0%
15	Distribution System Improvement Charge			5.00%	$	659,381			0.00%	$	-	($659,381)	-100.0%
16	**Total Distribution Including Rider Charges**				**$**	**11,849,440**				**$**	**14,625,843**	$2,776,403	23.4%
17	Rider Charges												
18	Default Service Support Charge	8,272,150	$	1.23700		10,232,649	8,272,150	$	1.23700		10,232,649	-	0.0%
19	Universal Service Charge					-					-	-	0.0%
20	Solar Photovoltaic Requirements Charge	5,177,946,964	$	-		-	5,177,946,964	$	-		-	-	0.0%
21	Phase IV Energy Efficiency and Conservation Charge	8,272,150	$	0.22000		1,819,873	8,272,150	$	0.22000		1,819,873	-	0.0%
22	PTC/HPS Charge	5,177,946,964	$	0.06398		331,285,047	5,177,946,964	$	0.06398		331,285,047	-	0.0%
23	**Total Energy and Revenue**	5,177,946,964			**$**	**355,187,009**	5,177,946,964			**$**	**357,963,412**	**$ 2,776,403**	0.8%
24	Avg rate per kWh				$	0.06860				$	0.06913		
25	Proposed Increase									$	2,776,403		
26	Percent Increase										0.78%		

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE PP44 (Primary Power Service Sch. 44)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	16	$ 4.08	$ 67	16	$ 5.60	$ 91	$24	35.8%
3	Demand Charge								
4	All kVA	115,790	$ 0.11	12,737	115,790	$ 0.09	10,823	($1,914)	-15.0%
5	Energy Charge (kWh)								
6	All kWh	71,779,158	$ 0.00029	20,816	71,779,158	$ 0.00040	28,556	$7,740	37.2%
7	**Total Base Normalized Distribution Revenues**			**$ 33,620**			**$ 39,470**	$5,850	17.4%
8	Rider Charges								
9	Smart Meter Technologies Charge (Per Bill)	16	$ 7.89	$ 129	16	$ -	$ -	($129)	
10	TCJA Voluntary Surcharge		-3.13%	(1,052)		0.00%	-	1,052	-100.0%
11	STAS		-0.05%	(2,374)		0.00%	-	2,374	-100.0%
12	Distribution System Improvement Charge			$ -		0.00%	$ -	-	0.0%
13	**Total Distribution Including Rider Charges**			**$ 30,323**			**$ 39,470**	$9,147	30.2%
14	Rider Charges								
15	Default Service Support Charge	84,185	$ 1.23700	104,137	84,185	$ 1.23700	104,137	-	0.0%
16	Universal Service Charge			-			-	-	0.0%
17	Solar Photovoltaic Requirements Charge	71,779,158	$ -	-	71,779,158	$ -	-	-	0.0%
18	Phase IV Energy Efficiency and Conservation Charge	84,185	$ 0.22000	18,521	84,185	$ 0.22000	18,521	-	0.0%
19	PTC/HPS Charge	71,779,158	$ 0.06398	4,592,431	71,779,158	$ 0.06398	4,592,431	-	0.0%
20	**Total Energy and Revenue**	71,779,158		**$ 4,745,411**	71,779,158		**$ 4,754,558**	**$ 9,147**	0.2%
21	Avg rate per kWh			$ 0.06611			$ 0.06624		
22	Proposed Increase						$ 9,147		
23	Percent Increase						0.19%		

West Penn Rate District
Proposed Distribution Rates
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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	SCHEDULE PP46 (Primary Power Service Sch. 46)	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution								
2	Customer Charge	33	$ 5.45	$ 178	33	$ 6.84	$ 223	$45	25.3%
3	Demand Charge								
4	All kVA @50% Demand	7,014,915	$ 0.52	1,823,878	7,014,915	$ 0.60	2,092,209	$268,331	14.7%
5	Energy Charge (kWh)								
6	All kWh	1,012,139,446	$ 0.00104	1,052,625	1,012,139,446	$ 0.00130	1,320,548	$267,923	25.5%
7	**Total Base Normalized Distribution Revenues**			**$ 2,876,681**			**$ 3,412,980**	$536,299	18.6%
8	Rider Charges								
9	Smart Meter Technologies Charge (Per Bill)	33	$ 7.89	$ 257	33	$ -	$ -	($257)	
10	TCJA Voluntary Surcharge		-3.13%	(90,040)		0.00%	-	90,040	-100.0%
11	STAS		-0.05%	(35,234)		0.00%	-	35,234	-100.0%
12	Distribution System Improvement Charge			$ -		0.00%	$ -	-	0.0%
13	**Total Distribution Including Rider Charges**			**$ 2,751,664**			**$ 3,412,980**	$661,315	24.0%
14	Rider Charges								
15	Default Service Support Charge	2,006,501	$ 1.23700	2,482,041	2,006,501	$ 1.23700	2,482,041	-	0.0%
16	Universal Service Charge			-			-	-	0.0%
17	Solar Photovoltaic Requirements Charge	1,012,139,446	$ -	-	1,012,139,446	$ -	-	-	0.0%
18	Phase IV Energy Efficiency and Conservation Charge	2,006,501	$ 0.22000	441,430	2,006,501	$ 0.22000	441,430	-	0.0%
19	PTC/HPS Charge	1,012,139,446	$ 0.06398	64,756,682	1,012,139,446	$ 0.06398	64,756,682	-	0.0%
20	**Total Energy and Revenue**	1,012,139,446		**$ 70,431,818**	1,012,139,446		**$ 71,093,133**	**$ 661,315**	0.9%
21	Avg rate per kWh			$ 0.06959			$ 0.07024		
22	Proposed Increase						$ 661,315		
23	Percent Increase						0.94%		

West Penn Rate District
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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
	SCHEDULE 51 (Street Lighting Service)								
1	MERCURY VAPOR								
2	175 WATTS	19,051	$ 10.17	$ 193,746	19,051	$ 13.29	$ 253,173	$ 59,427	30.7%
3	250 WATTS	3,569	$ 14.07	$ 50,215	3,569	$ 18.39	$ 65,618	$ 15,402	30.7%
4	400 WATTS	5,855	$ 17.29	$ 101,232	5,855	$ 22.59	$ 132,282	$ 31,050	30.7%
5	1000 WATTS	676	$ 26.81	$ 18,116	676	$ 35.03	$ 23,673	$ 5,557	30.7%
	SCHEDULE 52 (Outdoor Lighting Service)								
6	HIGH PRESSURE SODIUM VAPOR								
7	100 WATTS	65,580	$ 11.72	$ 768,598	65,580	$ 15.31	$ 1,004,346	$ 235,747	30.7%
8	MERCURY VAPOR								
9	100 WATTS	7,378	$ 8.75	$ 64,555	7,378	$ 11.43	$ 84,355	$ 19,800	30.7%
10	175 WATTS	106,193	$ 9.86	$ 1,047,059	106,193	$ 12.88	$ 1,368,217	$ 321,158	30.7%
11	400 WATTS	144	$ 16.04	$ 2,302	144	$ 20.96	$ 3,008	$ 706	30.7%
	SCHEDULE 53 (Street and Area Lighting Service)								
12	OVERHEAD SERVICE								
13	100 WATTS	1,627	$ 13.12	$ 21,346	1,627	$ 17.14	$ 27,893	$ 6,547	30.7%
14	100 WATTS - Long Term	707	$ 12.62	$ 8,923	707	$ 16.64	$ 11,768	$ 2,845	31.9%
15	200 WATTS	2,587	$ 17.47	$ 45,189	2,587	$ 22.83	$ 59,050	$ 13,861	30.7%
16	200 WATTS - Long Term	1,228	$ 16.97	$ 20,838	1,228	$ 22.33	$ 27,418	$ 6,580	31.6%
17	400 WATTS	899	$ 25.27	$ 22,713	899	$ 33.02	$ 29,679	$ 6,967	30.7%
18	400 WATTS - Long Term	284	$ 24.77	$ 7,026	284	$ 32.52	$ 9,225	$ 2,199	31.3%
19	400 WATTS - FL	3,956	$ 25.29	$ 100,052	3,956	$ 33.05	$ 130,740	$ 30,688	30.7%
20	400 WATTS - FL - Long Term	1,341	$ 24.79	$ 33,241	1,341	$ 32.55	$ 43,643	$ 10,401	31.3%
21	**UNDERGROUND SERVICE**								
22	LOW MOUNT								
23	100 WATTS	961	$ 22.83	$ 21,934	961	$ 29.83	$ 28,662	$ 6,728	30.7%
24	100 WATTS - Long Term	288	$ 22.33	$ 6,431	288	$ 29.33	$ 8,448	$ 2,017	31.4%
25	HIGH MOUNT - SINGLE LUMINAIRE PER POLE								
26	100 WATTS	-	$ 44.79	$ -	-	$ 58.53	$ -	$ -	0.0%

West Penn Rate District
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Test Period 12 Months Ended December 2025

Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
27	100 WATTS - Long Term	84	$ 44.29	$ 3,720	84	$ 58.03	$ 4,874	$ 1,154	31.0%
28	200 WATTS	36	$ 44.44	$ 1,600	36	$ 58.07	$ 2,091	$ 491	30.7%
29	200 WATTS - Long Term	370	$ 43.94	$ 16,260	370	$ 57.57	$ 21,304	$ 5,044	31.0%
30	400 WATTS	116	$ 48.23	$ 5,599	116	$ 63.02	$ 7,316	$ 1,717	30.7%
31	400 WATTS - Long Term	192	$ 47.73	$ 9,164	192	$ 62.52	$ 12,004	$ 2,840	31.0%
32	HIGH MOUNT - EACH ADDITIONAL LUMINAIRE PER POLE								
33	100 WATTS	-	$ 21.46	$ -	-	$ 28.04	$ -	$ -	0.0%
34	100 WATTS- Long Term	24	$ 20.96	$ 503	24	$ 27.54	$ 661	$ 158	31.4%
35	200 WATTS	12	$ 22.88	$ 275	12	$ 29.90	$ 359	$ 84	30.7%
36	200 WATTS- Long Term	24	$ 22.38	$ 537	24	$ 29.40	$ 706	$ 168	31.4%
37	400 WATTS	81	$ 26.66	$ 2,166	81	$ 34.84	$ 2,831	$ 665	30.7%
38	400 WATTS- Long Term	-	$ 26.16	$ -	-	$ 34.34	$ -	$ -	0.0%
	SCHEDULE 54 (Street Lighting Service)								
39	HIGH PRESSURE SODIUM VAPOR								
40	100 WATTS	5,356	$ 12.39	$ 66,355	5,356	$ 16.19	$ 86,708	$ 20,353	30.7%
41	200 WATTS	1,682	$ 16.78	$ 28,229	1,682	$ 21.93	$ 36,888	$ 8,659	30.7%
42	400 WATTS	368	$ 24.56	$ 9,026	368	$ 32.09	$ 11,795	$ 2,769	30.7%
	SCHEDULE 55 (Area Lighting Service Underground Distribution Service)								
1	SODIUM VAPOR								
2	LOW MOUNT								
3	100 WATTS	334	$ 22.12	$ 7,393	334	$ 28.90	$ 9,661	$ 2,268	30.7%
4	HIGH MOUNT - SINGLE LUMINAIRE PER POLE								
5	100 WATTS	106	$ 40.75	$ 4,320	106	$ 53.25	$ 5,645	$ 1,325	30.7%
6	200 WATTS	24	$ 43.69	$ 1,029	24	$ 57.09	$ 1,345	$ 316	30.7%
7	HIGH MOUNT - EACH ADDITIONAL LUMINAIRE PER POLE								
8	200 WATTS	24	$ 22.07	$ 520	24	$ 28.84	$ 679	$ 159	30.7%
9	MERCURY VAPOR								
10	175 WATTS	72	$ 18.97	$ 1,366	72	$ 24.79	$ 1,785	$ 419	30.7%
	SCHEDULE 56 (Street Lighting Service Customer Owned Equipment)								

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
43	HIGH PRESSURE SODIUM VAPOR								
44	100 WATTS - CUSTOMER POLE	513	$ 5.05	$ 2,591	513	$ 6.60	$ 3,386	$ 795	30.7%
45	100 WATTS - COMPANY POLE	62	$ 6.71	$ 415	62	$ 8.77	$ 542	$ 127	30.7%
46	200 WATTS - CUSTOMER POLE	1,786	$ 8.36	$ 14,933	1,786	$ 10.92	$ 19,513	$ 4,580	30.7%
47	200 WATTS - COMPANY POLE	-	$ 10.85	$ -	-	$ 14.18	$ -	$ -	0.0%
48	400 WATTS - CUSTOMER POLE	322	$ 13.63	$ 4,392	322	$ 17.81	$ 5,739	$ 1,347	30.7%
49	400 WATTS - COMPANY POLE	-	$ 16.53	$ -	-	$ 21.60	$ -	$ -	0.0%
	SCHEDULE 57 (Outdoor Lighting Equipment, Maintenance and Unmetered Service)								
	OVERHEAD SERVICE								
1	HIGH PRESSURE SODIUM VAPOR - VERTICAL OPEN LENS								
2	100 WATTS - NEW POLE	2,892	$ 21.41	$ 61,915	2,892	$ 27.98	$ 80,906	$ 18,991	30.7%
3	100 WATTS - NEW POLE- Long Term	275	$ 20.91	$ 5,748	275	$ 27.48	$ 7,553	$ 1,805	31.4%
4	100 WATTS - EXISITING POLE	78,025	$ 11.92	$ 930,054	78,025	$ 15.58	$ 1,215,324	$ 285,270	30.7%
5	100 WATTS - EXISITING POLE- Long Term	1,742	$ 11.42	$ 19,898	1,742	$ 15.08	$ 26,268	$ 6,370	32.0%
6	MERCURY VAPOR - COBRA HEAD								
7	175 WATTS - CUSTOMER POLE	1,358	$ 9.68	$ 13,143	1,358	$ 12.65	$ 17,174	$ 4,031	30.7%
8	175 WATTS - CUSTOMER POLE- Long Term	150	$ 9.18	$ 1,378	150	$ 12.15	$ 1,824	$ 446	32.3%
9	HIGH PRESSURE SODIUM VAPOR - COBRA HEAD								
10	100 WATTS	10,559	$ 11.72	$ 123,751	10,559	$ 15.31	$ 161,708	$ 37,957	30.7%
11	100 WATTS- Long Term	45,354	$ 11.22	$ 508,868	45,354	$ 14.81	$ 671,905	$ 163,037	32.0%
12	200 WATTS	5,417	$ 15.65	$ 84,768	5,417	$ 20.45	$ 110,769	$ 26,000	30.7%
13	200 WATTS- Long Term	11,934	$ 15.15	$ 180,802	11,934	$ 19.95	$ 238,088	$ 57,286	31.7%
14	400 WATTS	1,678	$ 22.61	$ 37,944	1,678	$ 29.55	$ 49,583	$ 11,638	30.7%
15	400 WATTS- Long Term	1,366	$ 22.11	$ 30,209	1,366	$ 29.05	$ 39,684	$ 9,475	31.4%
16	METAL HALIDE - COBRA HEAD								
17	100 WATTS	478	$ 16.70	$ 7,976	478	$ 21.82	$ 10,423	$ 2,447	30.7%
18	100 WATTS- Long Term	-	$ 16.20	$ -	-	$ 21.32	$ -	$ -	0.0%
19	175 WATTS	429	$ 16.70	$ 7,171	429	$ 21.82	$ 9,371	$ 2,200	30.7%
20	175 WATTS- Long Term	396	$ 16.20	$ 6,415	396	$ 21.32	$ 8,444	$ 2,028	31.6%
21	400 WATTS	974	$ 24.38	$ 23,748	974	$ 31.86	$ 31,032	$ 7,284	30.7%
22	400 WATTS- Long Term	-	$ 23.88	$ -	-	$ 31.36	$ -	$ -	0.0%
23	1,000 WATTS	138	$ 35.24	$ 4,875	138	$ 46.05	$ 6,370	$ 1,495	30.7%

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Line No.	Street Lighting Service	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
24	1,000 WATTS- Long Term	106	$ 34.74	$ 3,666	106	$ 45.55	$ 4,806	$ 1,141	31.1%
25	HIGH PRESSURE SODIUM VAPOR - FLOODLIGHT								
26	200 WATTS	5,540	$ 17.72	$ 98,162	5,540	$ 23.16	$ 128,270	$ 30,109	30.7%
27	200 WATTS- Long Term	376	$ 17.22	$ 6,469	376	$ 22.66	$ 8,511	$ 2,042	31.6%
28	400 WATTS	6,139	$ 24.56	$ 150,770	6,139	$ 32.09	$ 197,015	$ 46,245	30.7%
29	400 WATTS- Long Term	572	$ 24.06	$ 13,761	572	$ 31.59	$ 18,069	$ 4,308	31.3%
30	METAL HALIDE - FLOODLIGHT								
31	400 WATTS	3,339	$ 24.79	$ 82,769	3,339	$ 32.39	$ 108,157	$ 25,387	30.7%
32	400 WATTS- Long Term	156	$ 24.29	$ 3,778	156	$ 31.89	$ 4,960	$ 1,183	31.3%
33	1,000 WATTS	2,083	$ 35.24	$ 73,403	2,083	$ 46.05	$ 95,917	$ 22,514	30.7%
34	1,000 WATTS- Long Term	192	$ 34.74	$ 6,665	192	$ 45.55	$ 8,739	$ 2,074	31.1%
35	**UNDERGROUND SERVICE**								
36	HIGH PRESSURE SODIUM VAPOR - COLONIAL POST TOP								
37	100 WATTS	10,823	$ 20.45	$ 221,339	10,823	$ 26.72	$ 289,229	$ 67,890	30.7%
38	100 WATTS- Long Term	5,972	$ 19.95	$ 119,142	5,972	$ 26.22	$ 156,601	$ 37,459	31.4%
39	METAL HALIDE - COLONIAL POST TOP								
40	100 WATTS	1,094	$ 25.08	$ 27,446	1,094	$ 32.77	$ 35,864	$ 8,418	30.7%
41	100 WATTS- Long Term	1,297	$ 24.58	$ 31,871	1,297	$ 32.27	$ 41,845	$ 9,974	31.3%
42	HIGH PRESSURE SODIUM VAPOR - COBRA HEAD								
43	100 WATTS	168	$ 38.15	$ 6,415	168	$ 49.85	$ 8,382	$ 1,968	30.7%
44	100 WATTS- Long Term	24	$ 37.65	$ 904	24	$ 49.35	$ 1,184	$ 281	31.1%
45	200 WATTS	49	$ 39.95	$ 1,964	49	$ 52.20	$ 2,567	$ 602	30.7%
46	200 WATTS- Long Term	60	$ 39.45	$ 2,367	60	$ 51.70	$ 3,102	$ 735	31.1%
47	400 WATTS	12	$ 42.62	$ 511	12	$ 55.69	$ 668	$ 157	30.7%
48	400 WATTS- Long Term	-	$ 42.12	$ -	-	$ 55.19	$ -	$ -	0.0%
49	HIGH PRESSURE SODIUM VAPOR - COBRA HEAD ADDITIONAL FIXTURE								
50	100 WATTS	-	$ 14.18	$ -	-	$ 18.53	$ -	$ -	0.0%
51	100 WATTS- Long Term	-	$ 13.68	$ -	-	$ 18.03	$ -	$ -	0.0%
52	200 WATTS	-	$ 18.88	$ -	-	$ 24.67	$ -	$ -	0.0%
53	200 WATTS- Long Term	-	$ 18.38	$ -	-	$ 24.17	$ -	$ -	0.0%
54	400 WATTS	-	$ 27.30	$ -	-	$ 35.67	$ -	$ -	0.0%
55	400 WATTS- Long Term	-	$ 26.80	$ -	-	$ 35.17	$ -	$ -	0.0%

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Line No.	Street Lighting Service	Current Billing Determinants [a]	Current Rate [b]	Current Revenue [c]=[a]x[b]	Pro Forma Billing Determinants [e]=[a]+[d]	Pro Forma Rate [f]	Pro Forma Revenue [g]=[e]x[f]	Revenue Change [h]=[g]-[c]	Percent Change [i]=[h]/[c]
56	METAL HALIDE - COBRA HEAD								
57	400 WATT	108	$ 51.57	$ 5,562	108	$ 67.39	$ 7,267	$ 1,706	30.7%
58	400 WATT- Long Term	-	$ 51.07	$ -	-	$ 66.89	$ -	$ -	0.0%
59	HIGH PRESSURE SODIUM VAPOR - SHOE BOX W/ BASE								
60	100 WATT	-	$ 60.48	$ -	-	$ 79.03	$ -	$ -	0.0%
61	100 WATT- Long Term	-	$ 59.98	$ -	-	$ 78.53	$ -	$ -	0.0%
62	200 WATT	132	$ 54.05	$ 7,135	132	$ 70.63	$ 9,323	$ 2,188	30.7%
63	200 WATT- Long Term	-	$ 53.55	$ -	-	$ 70.13	$ -	$ -	0.0%
64	400 WATT	471	$ 56.14	$ 26,435	471	$ 73.36	$ 34,543	$ 8,108	30.7%
65	400 WATT- Long Term	-	$ 55.64	$ -	-	$ 72.86	$ -	$ -	0.0%
66	HIGH PRESSURE SODIUM VAPOR - SHOE BOX W/O BASE								
67	100 WATT	-	$ 44.79	$ -	-	$ 58.53	$ -	$ -	0.0%
68	100 WATT- Long Term	12	$ 44.29	$ 522	12	$ 58.03	$ 684	$ 162	31.0%
69	200 WATT	109	$ 41.64	$ 4,542	109	$ 54.41	$ 5,935	$ 1,393	30.7%
70	200 WATT- Long Term	-	$ 41.14	$ -	-	$ 53.91	$ -		
71	400 WATT	121	$ 52.09	$ 6,289	121	$ 68.07	$ 8,219	$ 1,929	30.7%
72	400 WATT- Long Term	115	$ 51.59	$ 5,943	115	$ 67.57	$ 7,783	$ 1,840	31.0%
73	HIGH PRESSURE SODIUM VAPOR - SHOE BOX ADDITIONAL FIXTURE								
74	100 WATT	-	$ 21.46	$ -	-	$ 28.05	$ -	$ -	0.0%
75	100 WATT- Long Term	-	$ 20.96	$ -	-	$ 27.55	$ -	$ -	0.0%
76	200 WATT	-	$ 24.64	$ -	-	$ 32.20	$ -	$ -	0.0%
77	200 WATT- Long Term	-	$ 24.14	$ -	-	$ 31.70	$ -		
78	400 WATT	85	$ 28.81	$ 2,435	85	$ 37.65	$ 3,182	$ 747	30.7%
79	400 WATT- Long Term	-	$ 28.31	$ -	-	$ 37.15	$ -	$ -	0.0%
80	METAL HALIDE - SHOE BOX W/O BASE								
81	400 WATTS	-	$ 53.56	$ -	-	$ 69.99	$ -	$ -	0.0%
82	400 WATTS- Long Term	-	$ 53.06	$ -	-	$ 69.49	$ -	$ -	0.0%
83	METAL HALIDE - SHOE BOX ADDITIONAL FIXTURE								
84	400 WATTS	-	$ 31.68	$ -	-	$ 41.40	$ -	$ -	0.0%
85	400 WATTS- Long Term	-	$ 31.18	$ -	-	$ 40.90	$ -	$ -	0.0%

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
86	**CUSTOMER OWNED POLE**								
87	HIGH PRESSURE SODIUM VAPOR								
88	100 WATTS	706	$ 4.52	$ 3,189	706	$ 5.91	$ 4,168	$ 978	30.7%
89	200 WATTS	2,186	$ 7.77	$ 16,989	2,186	$ 10.15	$ 22,200	$ 5,211	30.7%
90	400 WATTS	60	$ 12.67	$ 760	60	$ 16.56	$ 993	$ 233	30.7%
91	MERCURY VAPOR								
92	400 WATTS	24	$ 9.01	$ 216	24	$ 11.77	$ 283	$ 66	30.7%
93	METAL HALIDE								
94	250 WATTS	24	$ 8.08	$ 198	24	$ 10.56	$ 258	$ 61	30.7%
95	400 WATTS	144	$ 8.60	$ 1,238	144	$ 11.24	$ 1,618	$ 380	30.7%
96	1,000 WATTS	168	$ 15.79	$ 2,653	168	$ 20.63	$ 3,466	$ 814	30.7%
97	**COMPANY OWNED POLE**								
98	HIGH PRESSURE SODIUM VAPOR								
99	100 WATTS	35	$ 6.24	$ 217	35	$ 8.15	$ 284	$ 67	30.7%
100	200 WATTS	510	$ 9.33	$ 4,754	510	$ 12.19	$ 6,212	$ 1,458	30.7%
101	400 WATTS	72	$ 14.23	$ 1,025	72	$ 18.59	$ 1,339	$ 314	30.7%
102	METAL HALIDE								
103	175 WATTS	12	$ 8.60	$ 103	12	$ 11.24	$ 135	$ 32	30.7%
104	250 WATTS	804	$ 9.58	$ 7,702	804	$ 12.52	$ 10,065	$ 2,362	30.7%
105	400 WATTS	24	$ 10.16	$ 244	24	$ 13.28	$ 319	$ 75	30.7%
106	1,000 WATTS	72	$ 17.33	$ 1,248	72	$ 22.65	$ 1,630	$ 383	30.7%
	SCHEDULE 59 (Outdoor Lighting Equipment and Maintenance Service)								
107	**OVERHEAD SERVICE**								
108	MERCURY VAPOR - COBRA HEAD								
109	175 WATTS	47	$ 10.35	$ 489	47	$ 13.52	$ 639	$ 150	30.7%
110	175 WATTS- Long Term	-	$ 9.85	$ -	-	$ 13.02	$ -	$ -	0.0%
111	HIGH PRESSURE SODIUM VAPOR - COBRA HEAD								

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
112	100 WATTS	24	$ 11.41	$ 272	24	$ 14.91	$ 356	$ 83	30.7%
113	100 WATTS- Long Term	-	$ 10.91	$ -	-	$ 14.41	$ -	$ -	0.0%
114	200 WATTS	-	$ 14.89	$ -	-	$ 19.46	$ -	$ -	0.0%
115	200 WATTS- Long Term	90	$ 14.39	$ 1,295	90	$ 18.96	$ 1,706	$ 411	31.7%
116	400 WATTS	60	$ 17.64	$ 1,053	60	$ 23.05	$ 1,376	$ 323	30.7%
117	400 WATTS- Long Term	-	$ 17.14	$ -	-	$ 22.55	$ -	$ -	0.0%
118	METAL HALIDE - COBRA HEAD								
119	400 WATTS	40	$ 16.98	$ 674	40	$ 22.19	$ 881	$ 207	30.7%
120	400 WATTS- Long Term	-	$ 16.48	$ -	-	$ 21.69	$ -	$ -	0.0%
121	HIGH PRESSURE SODIUM VAPOR - FLOODLIGHT								
122	200 WATTS	24	$ 15.55	$ 373	24	$ 20.32	$ 488	$ 114	30.7%
123	200 WATTS- Long Term	12	$ 15.05	$ 181	12	$ 19.82	$ 238	$ 57	31.7%
124	400 WATTS	88	$ 17.83	$ 1,572	88	$ 23.30	$ 2,054	$ 482	30.7%
125	400 WATTS- Long Term	13	$ 17.33	$ 228	13	$ 22.80	$ 300	$ 72	31.6%
126	METAL HALIDE - FLOODLIGHT								
127	400 WATTS	125	$ 16.99	$ 2,116	125	$ 22.20	$ 2,765	$ 649	30.7%
128	400 WATTS- Long Term	-	$ 16.49	$ -	-	$ 21.70	$ -	$ -	0.0%
129	1,000 WATTS	228	$ 26.69	$ 6,085	228	$ 34.88	$ 7,952	$ 1,867	30.7%
130	1,000 WATTS- Long Term	-	$ 26.19	$ -	-	$ 34.38	$ -	$ -	0.0%
131	**UNDERGROUND SERVICE**								
132	HIGH PRESSURE SODIUM VAPOR - COLONIAL POST TOP								
133	100 WATTS	60	$ 20.70	$ 1,242	60	$ 27.05	$ 1,623	$ 381	30.7%
134	100 WATTS- Long Term	-	$ 20.20	$ -	-	$ 26.55	$ -	$ -	0.0%
135	METAL HALIDE - COLONIAL POST TOP								
136	175 WATTS	96	$ 23.87	$ 2,292	96	$ 31.19	$ 2,994	$ 703	30.7%
137	175 WATTS- Long Term	36	$ 23.37	$ 841	36	$ 30.69	$ 1,105	$ 264	31.3%
138	METAL HALIDE - COBRA HEAD								
139	1,000 WATT	-	$ 50.57	$ -	-	$ 66.08	$ -	$ -	0.0%
140	1,000 WATT- Long Term	-	$ 50.07	$ -	-	$ 65.58	$ -	$ -	0.0%
141	HIGH PRESSURE SODIUM VAPOR - SHOE BOX W/O BASE								
142	100 WATT	-	$ 42.74	$ -	-	$ 55.85	$ -	$ -	0.0%

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
143	100 WATT- Long Term	-	$ 42.24	$ -	-	$ 55.35	$ -	$ -	0.0%
144	METAL HALIDE - SHOE BOX W/O BASE								
145	400 WATTS	338	$ 40.02	$ 13,541	338	$ 52.30	$ 17,695	$ 4,153	30.7%
146	400 WATTS- Long Term	-	$ 39.52	$ -	-	$ 51.80	$ -	$ -	0.0%
	SCHEDULE 71 (Mercury Vapor Street and Highway Lighting Service)								
147	LOW MOUNT								
148	100 WATTS	-	$ 13.79	$ -	-	$ 18.02	$ -	$ -	0.0%
149	175 WATTS	161	$ 16.56	$ 2,662	161	$ 21.64	$ 3,478	$ 816	30.7%
	SCHEDULE 72 (LED Street Lighting Service)								
150	COBRA HEAD								
151	50 WATTS	433,300	$ 6.94	$ 3,007,102	433,300	$ 9.07	$ 3,929,451	$ 922,349	30.7%
152	90 WATTS	80,382	$ 8.73	$ 701,739	80,382	$ 11.41	$ 916,979	$ 215,240	30.7%
153	130 WATTS	50,267	$ 9.28	$ 466,476	50,267	$ 12.13	$ 609,555	$ 143,079	30.7%
154	260 WATTS	11,365	$ 14.38	$ 163,434	11,365	$ 18.79	$ 213,563	$ 50,129	30.7%
155	Colonial								
156	50 WATTS	21,867	$ 11.12	$ 243,162	21,867	$ 14.53	$ 317,745	$ 74,583	30.7%
157	90 WATTS	1,378	$ 12.24	$ 16,867	1,378	$ 15.99	$ 22,040	$ 5,173	30.7%
158	Acorn								
159	50 WATTS	1,526	$ 18.51	$ 28,247	1,526	$ 24.19	$ 36,911	$ 8,664	30.7%
160	90 WATTS	81	$ 19.57	$ 1,579	81	$ 25.57	$ 2,063	$ 484	30.7%
161	**Total Base Normalized Distribution Revenues**			**$ 10,376,893**			**$ 13,571,202**	**$ 3,194,309**	30.8%
162	Rider Charges								
163	Smart Meter Technologies Charge (Per Bill)			$ -	-	$ -	$ -	$ -	
164	TCJA Voluntary Surcharge		-3.13%	(324,797)		0.00%	-	324,797	-100.0%
165	STAS		-0.05%	(7,786)		0.00%	-	7,786	-100.0%
166	Distribution System Improvement Charge		5.00%	$ 500,207		0.00%	$ -	$ (500,207)	-100.0%
167	**Total Distribution Including Rider Charges**			**$ 10,544,517**			**$ 13,571,202**	$ 3,026,685	28.7%
168	Rider Charges								
169	Default Service Support Charge	45,250,100	$ 0.00177	80,093	45,250,100	$ 0.00177	80,093	-	0.0%

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Line No.		Current			Pro Forma				
		Billing Determinants	Rate	Revenue	Billing Determinants	Rate	Revenue	Revenue Change	Percent Change
	Street Lighting Service	*[a]*	*[b]*	*[c]=[a]x[b]*	*[e]=[a]+[d]*	*[f]*	*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
170	Universal Service Charge			-			-	-	0.0%
171	Solar Photovoltaic Requirements Charge		$ -	-	-	$ -	-	-	0.0%
172	Phase IV Energy Efficiency and Conservation Charge	45,250,100	$ (0.00106)	(47,965)	45,250,100	$ (0.00106)	(47,965)	-	0.0%
173	PTC/HPS Charge	45,250,100	$ 0.11023	4,987,918	45,250,100	$ 0.11023	4,987,918	-	0.0%
174	**Total Energy and Revenue**	45,250,100		**$ 15,564,563**	45,250,100		**$ 18,591,248**	**$ 3,026,685**	19.4%
175	Avg rate per kWh			$ 0.34397			$ 0.41086		
176	Proposed Increase						$ 3,026,685		
177	Percent Increase						19.45%		

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Line No.		Current Billing Determinants		Current Rate		Current Revenue	Pro Forma Billing Determinants		Pro Forma Rate		Pro Forma Revenue	Revenue Change	Percent Change
	SCHEDULE GP (Penn State University)	*[a]*		*[b]*		*[c]=[a]x[b]*	*[e]=[a]+[d]*		*[f]*		*[g]=[e]x[f]*	*[h]=[g]-[c]*	*[i]=[h]/[c]*
1	Distribution												
2	Customer Charge	12	$	793.00	$	9,516	12	$	994.35	$	11,932	$2,416	25.4%
3	Demand Charge (kW)												
4	First 10,000 kVA @50% Demand	120,000	$	2.52		302,400	120,000	$	2.66		319,204	$16,804	5.6%
5	Additional kVA @50% Demand	251,861	$	2.42		609,503	251,861	$	3.03		764,261	$154,758	25.4%
6	Energy Charge (kWh)												
7	All kWh	198,529,807	$	-		-	198,529,807	$	-		-	$0	0.0%
8	**Total Base Normalized Distribution Revenues**				**$**	**921,419**				**$**	**1,095,397**	$173,978	18.9%
9	Rider Charges												
10	Smart Meter Technologies Charge (Per Bill)	12			$	-	12	$	-	$	-	$ -	
11	TCJA Voluntary Surcharge			-3.13%		(28,840)			0.00%		-	28,840	-100.0%
12	STAS			-0.05%		(7,053)			0.00%		-	7,053	-100.0%
13	Distribution System Improvement Charge				$	-			0.00%	$	-	$ -	0.0%
14	**Total Distribution Including Rider Charges**				**$**	**885,526**				**$**	**1,095,397**	$ 209,871	23.7%
15	Rider Charges												
16	Default Service Support Charge	412,978	$	1.23700		510,854	412,978	$	1.23700		510,854	-	0.0%
17	Universal Service Charge					-					-	-	0.0%
18	Solar Photovoltaic Requirements Charge	198,529,807	$	-		-	198,529,807	$	-		-	-	0.0%
19	Phase IV Energy Efficiency and Conservation Charge	0	$	0.22000		0	0	$	0.22000		0	-	0.0%
20	PTC/HPS Charge	198,529,807	$	0.06398		12,701,937	198,529,807	$	0.06398		12,701,937	-	0.0%
21	**Total Energy and Revenue**	198,529,807			**$**	**14,098,316**	198,529,807			**$**	**14,308,188**	**$ 209,871**	1.5%
22	Avg rate per kWh				$	0.07101				$	0.07207		
23	Proposed Increase									$	209,871		
24	Percent Increase										1.49%		

Appendix E

Met-Ed

Rate Schedule	Revised Rev. Allocation	Net Increase
RS	372,141,019	29,160,940
GSV	599,238	39,459
GSS	19,490,126	1,556,557
GSM	61,547,710	4,593,956
GSL	11,406,541	974,259
GP	27,781,129	2,093,735
TP	7,383,683	568,115
BORD	49,049	4,559
MS	170,505	11,908
OL	700,710	58,383
SL	6,985,806	538,140
TOTAL	**508,255,516**	**39,600,011**

Penelec

Rate Schedule	Revised Rev. Allocation	Net Increase
RS	361,131,794	39,150,908
GSV	1,095,324	104,988
GSS	21,890,160	2,661,176
GSM	81,127,818	8,636,262
GSL	19,297,309	2,062,743
GP	21,639,280	2,315,204
TP	10,023,785	1,088,763
BORD	19,067	3,561
H	938,842	99,205
OL	3,612,786	380,984
SL	8,505,720	1,186,186
TOTAL	**529,281,886**	**57,689,980**

Penn Power

Rate Schedule	Revised Rev. Allocation	Net Increase
RS	114,100,193	18,883,887
GSV	122,184	20,225
GSS	6,532,069	1,119,852
GSM	16,161,929	2,600,612
GSL	4,726,765	704,008
GP	5,119,999	890,535
TP	3,116,602	406,064
PNP	97,766	15,582
OL	678,571	112,562
SL	1,226,136	226,673
TOTAL	**151,882,215**	**24,980,000**

West Penn

Rate Schedule	Revised Rev. Allocation	Net Increase
RS	380,664,525	73,215,979
GSV	989,799	182,285
GSS	19,223,198	4,399,853
GSM	70,371,021	13,236,844
GSL	26,751,069	4,685,820
GP / TP	14,665,914	2,997,322
44	39,470	10,699
46	3,412,979	692,453
OL	5,427,257	1,062,832
SL	8,143,945	2,024,104
PSU	1,095,397	221,811
TOTAL	**530,784,576**	**102,730,000**

FE PA	**1,720,204,193**	**224,999,991**

Appendix F

FE Pennsylvania Electric Company
LED Conversion Charge ("LEDC") Rider Rates
For the Twelve Months Ending March 31, 2026

		Met-Ed	Res	Com	Ind
Line No.	**Description**	**Amount**	**Amount**	**Amount**	**Amount**
1	Total $LEDC_{C\ Costs}$ to be recovered over 12 months	$ 1,611,478			
2	kW Network System Peak Load ("NSPL") by Customer Class	33,246,375	17,141,270	5,120,403	10,984,701
3	Customer Class Allocator based on NSPL	100%	52%	15%	33%
4	Total Expenses to be Recovered in LEDC by Rate Class (Line 1 X Line 3)	$ 1,611,478	$ 830,851	$ 248,190	$ 532,437
5	S = Projected kWh Sales to Delivery Service Residential and Commercial Customers	8,714,025,049	5,890,809,097	2,823,215,952	
6	S= kW NSPL for Industrial Customers				10,984,701
7	LEDC Rider Rate in cents/kWh ((Line 4 / Line 5) x100) or $/kW NSPL (Line 4/Line 6)		0.0141	0.0088	$ 0.048
8	Gross up for Gross Receipts Tax (GRT = 5.90%)		1.062699	1.062699	1.062699
9	**LEDC Rider Rate in cents/kWh or $/kW NSPL** (Line 7 X Line 8)		**0.0150**	**0.0090**	**$ 0.052**

FE Pennsylvania Electric Company
LED Conversion Charge ("LEDC") Rider Rates
For the Twelve Months Ending March 31, 2026

Line No.	Description	Penelec Amount	Res Amount	Com Amount	Ind Amount
1	Total $LEDC_{C\ Costs}$ to be recovered over 12 months	$ 4,666,954			
2	kW Network System Peak Load ("NSPL") by Customer Class	28,028,613	10,904,545	5,829,423	11,294,646
3	Customer Class Allocator based on NSPL	100%	39%	21%	40%
4	Total Expenses to be Recovered in LEDC by Rate Class (Line 1 X Line 3)	$ 4,666,954	$ 1,815,680	$ 970,638	$ 1,880,635
5	S = Projected kWh Sales to Delivery Service Residential and Commercial Customers	7,600,545,491	4,357,634,511	3,242,910,979	
6	S= kW NSPL for Industrial Customers				11,294,646
7	LEDC Rider Rate in cents/kWh ((Line 4 / Line 5) x100) or $/kW NSPL (Line 4/Line 6)		0.0417	0.0299	$ 0.167
8	Gross up for Gross Receipts Tax (GRT = 5.90%)		1.062699	1.062699	1.062699
9	**LEDC Rider Rate in cents/kWh or $/kW NSPL** (Line 7 X Line 8)		**0.0440**	**0.0320**	**$ 0.177**

FE Pennsylvania Electric Company
LED Conversion Charge ("LEDC") Rider Rates
For the Twelve Months Ending March 31, 2026

Line No.	Description	Penn Power Amount	Res Amount	Com Amount	Ind Amount
1	Total $LEDC_{C\ Costs}$ to be recovered over 12 months	$ 266,542			
2	kW Network System Peak Load ("NSPL") by Customer Class	9,776,674	4,508,376	2,283,857	2,984,441
3	Customer Class Allocator based on NSPL	100%	46%	23%	31%
4	Total Expenses to be Recovered in LEDC by Rate Class (Line 1 X Line 3)	$ 266,542	$ 122,912	$ 62,265	$ 81,365
5	S = Projected kWh Sales to Delivery Service Residential and Commercial Customers	2,627,679,310	1,719,547,434	908,131,875	
6	S= kW NSPL for Industrial Customers				2,984,441
7	LEDC Rider Rate in cents/kWh ((Line 4 / Line 5) x100) or $/kW NSPL (Line 4/Line 6)		0.0071	0.0069	$ 0.027
8	Gross up for Gross Receipts Tax (GRT = 5.90%)		1.062699	1.062699	1.062699
9	**LEDC Rider Rate in cents/kWh or $/kW NSPL** (Line 7 X Line 8)		**0.0080**	**0.0070**	**$ 0.029**

FE Pennsylvania Electric Company
LED Conversion Charge ("LEDC") Rider Rates
For the Twelve Months Ending March 31, 2026

Line No.	Description	West Penn Amount	Res Amount	Com Amount	Ind Amount
1	Total $LEDC_{C\ Costs}$ to be recovered over 12 months	$ 2,355,979			
2	kW Network System Peak Load ("NSPL") by Customer Class	43,963,176	20,547,857	7,438,290	15,977,028
3	Customer Class Allocator based on NSPL	100%	47%	17%	36%
4	Total Expenses to be Recovered in LEDC by Rate Class (Line 1 X Line 3)	$ 2,355,979	$ 1,101,156	$ 398,617	$ 856,206
5	S = Projected kWh Sales to Delivery Service Residential and Commercial Customers	10,898,516,700	7,259,821,193	3,638,695,507	
6	S= kW NSPL for Industrial Customers				15,977,028
7	LEDC Rider Rate in cents/kWh ((Line 4 / Line 5) x100) or $/kW NSPL (Line 4/Line 6)		0.0152	0.0110	$ 0.054
8	Gross up for Gross Receipts Tax (GRT = 5.90%)		1.062699	1.062699	1.062699
9	**LEDC Rider Rate in cents/kWh or $/kW NSPL** (Line 7 X Line 8)		**0.01600**	**0.01200**	**$ 0.057**

Appendix G

APPENDIX G

LIST OF ABBREVIATIONS

Abbreviation	Abbreviated Word(s)
ADIT	Accumulated Deferred Income Tax
AFSI	Adjusted Financial Statement Income
AGA	American Gas Association
AGIF	American Gas Index Fund
ASC	Accounting Standards Codification
ASL	Average Service Life
ASU	Accounting Standards Update
BCS	Bureau of Consumer Services
C&I	Commercial and Industrial
CAIDI	Customer Average Interruption Duration Index
CAMT	Corporate Alternative Minimum Tax
CAP	Customer Assistance Program
CAPM	Capital Asset Pricing Model
CCOSS or COSS	Class Cost of Service Study
CI	Customers Interrupted
CLI	Confirmed Low-Income
CMI	Customer Minutes Interrupted
CTA	Consolidated Tax Adjustment
CWC	Cash Working Capital
CWIP	Construction Work in Progress

DAA	Division of Audits and Accounting
DCF	Discounted Cash Flow
DCFC	Direct Current Fast Charging
DEF	Dollar Energy Fund
DEI	Diversity, Equity and Inclusion
DHS	Department of Human Services
DOE	Department of Energy
DPS	Dividends per Share
DSDP	Diverse Supplier Developer Program
DSIC	Distribution System Improvement Charge
EAOT	Energy Assistance Outreach team
EDC	Electric Distribution Company
ELG	Equal Life Group
EPS	Earnings per Share
EV	Electric Vehicle
FASB	Financial Accounting Standards Board
FE PA	FirstEnergy Pennsylvania Electric Company
FENOC	FirstEnergy Nuclear Operating Company
FERC	Federal Energy Regulatory Commission
FES	FirstEnergy Solutions and Subsidiaries
FESC	FirstEnergy Service Company
FET	FirstEnergy Transmission, LLC
FPFTY	Fully Projected Future Test Year

FPL	Federal Poverty Level
FTY	Future Test Year
GAAP	Generally Accepted Accounting Principles
GS	General Service
GSS	General Service Small
HTY	Historic Test Year
I&M	Inspection and Maintenance
IC	Investment Committee
ICE	Interrupted Cost Estimator
IMD	Investment Management Department
IRS	Internal Revenue Service
kV	Kilovolt
LED	Light-Emitting Diode
LEP	Limited English Proficiency
LI	Low-Income
LIHEAP	Low Income Home Energy Assistance Program
LIURP	Low Income Usage Reduction Program
LTIIP	Long Term Infrastructure Improvement Plan
LWS	Leading With Safety
MW	Megawatt
MWh	Megawatt-hours
NACVA	National Association of Certified Valuation Analysts
NYPSC	New York Public Service Commission

O&M	Operations and Maintenance
OAL	Outdoor Area Lighting
OLS	Ordinary Least Squares
OMS	Outage Management System
OPEB	Other Post-Employment Benefits
OTA	Over The Air Termination
PCAP	Pennsylvania Customer Assistance Program
PJM	PJM Interconnection, LLC
PUHCA	Public Utility Holding Company Act
PURTA	Public Utility Realty Tax
PV	Present Value
RCA	Root Cause Analysis
rKVA	Reactive Demand
ROE	Return on Equity
ROR	Rate of Return
RPM	Risk Premium Model
RS	Residential Service
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SAP	SAP Enterprise Resource Planning System
SEC	Securities and Exchange Commission
SML	Security Market Line
SMT-C	Smart Meter Technologies Charge

STAS	State Tax Adjustment Surcharge
SURFA	Society of Utility and Regulatory Financial Analysts
SV	Sodium Vapor
TCJA	Tax Cuts and Jobs Act
UA	Uncollectibles Accounts
USAC	Universal Services Advisory Committee
USECP	Universal Service and Energy Conservation Plan
USofA	Uniform System of Accounts
VEBA	Voluntary employee Benefits Association
WBS	Work Breakdown Structures

Appendix H

APPENDIX H

PROPOSED FINDINGS OF FACT

1. FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company") is a "public utility" and "electric distribution company" ("EDC") as those terms are defined in Sections 102 and 2803 of the Public Utility Code, 66 Pa. C.S. §§ 102, 2803, subject to the regulatory jurisdiction of the Pennsylvania Public Utility Commission ("Commission"), and provides electric distribution, and default electric supply services to customers located in its certificated service territory.

2. FE PA consists of the Met-Ed, Penelec, Penn Power, West Penn and Pennsylvania State University ("PSU") rate districts (individually a "Rate District" and in any combination the "Rate Districts").

3. On January 1, 2024, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the "Predecessor Companies") merged into FE PA pursuant to the Commission's Order at Docket Nos. A-2023-3038771, *et al* ("PA Consolidation").

4. As part of the approvals received in the PA Consolidation, FE PA was certificated as a public utility and authorized to provide public utility service in the territories of the Predecessor Companies.

5. As a part of this approval, the tariffs of the Predecessor Companies were combined into a single tariff for FE PA.

6. FE PA currently provides electric distribution service under the same rates, terms, and conditions for service as the Predecessor Companies.

7. The single, combined tariff approved as part of the PA Consolidation established the Rate Districts, including one for each of the Predecessor Companies.

8. On April 2, 2024, FE PA filed Supplement No. 3 to FE PA's Tariff Electric – Pa. P.U.C. No. 1 ("Supplement No. 3"), responses to filing requirements and standard data requests, and supporting direct testimony and exhibits with the Commission (the "2024 Base Rate Case").

9. In Supplement No. 3, FE PA sought a base rate increase, pursuant to 66 Pa.C.S. § 1308 of the Public Utility Code ("Code"), of approximately $502 million annually across all "Rate Districts" based on data for a fully projected future test year ending December 31, 2025 ("FPFTY"). On a Rate District basis, FE PA proposed rates designed to increase annual distribution revenues as follows: Met-Ed Rate District - $146 million, Penelec Rate District - $132 million, Penn Power Rate District - $55 million, and West Penn Rate District - $169 million. Supplement No. 3 also contained non-substantive revisions to the language of certain Rules and Regulations, rate schedules and riders in the Company's currently effective tariff, as summarized in FE PA Exhibit MSK-2. The filing was made in compliance with the Commission's regulations and contained all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

10. On August 15, 2024, a telephonic evidentiary hearing was held. After discussing preliminary and procedural matters, providing an update on the status of ongoing settlement discussions, and receiving certain questions from the ALJs that FE PA was directed to answer, the hearing was recessed until 2:30 p.m. At the 2:30 p.m. hearing session, a further update regarding settlement discussions was provided. In addition, the procedure for the remainder of the scheduled hearings was established. The ALJs directed that the August 16, 2024 hearing date would be cancelled, and that hearings would reconvene on August 19, 2024, so that any cross-examination

of witnesses could be conducted and so that FE PA could provide any testimony and/or exhibits responding to the ALJs' directed questions. In addition, it was agreed that all pre-served testimony would be admitted into the record via written stipulation and verification.

11. On August 19, 2024, a Joint Stipulation for the admission of all pre-served testimony and exhibits was submitted.

12. Also on August 19, 2024, the parties reconvened for a further telephonic evidentiary hearing. Cross examination of two FE PA witnesses, one OCA witness, and IBEW Local 777's witness was conducted. In addition, FE PA witnesses Joanne Savage and Tracy Ashton provided supplemental testimony and exhibits responding to the ALJs' directed questions. FE PA Exhibits JMS-6, and Exhibits TMA-6 through TMA-10 were admitted into the record.

13. On August 21, 2024, the First Post-Hearing Order admitting evidence into the record was issued. The First Post-Hearing Order admitted all pre-served testimony and exhibits that were set forth in the Joint Stipulation into the record.

14. On August 22, 2024, the Second Post-Hearing Order was issued. The Second Post-Hearing Order clarified the First Post-Hearing Order.

15. Also on August 22, 2024, counsel for FE PA notified the ALJs via e-mail that a unanimous settlement of all issues had been reached.

16. The Settlement is supported by all active parties in this case: FE PA, the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the "Large User Groups"[1], the International Brotherhood of

[1] The Large User Groups are comprised of the Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), and West Penn Power Industrial Interveners ("WPPII").

Electric Workers Local 459 ("IBEW 459"), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"), the UWUA System Local 102 ("UWUA 102"), Walmart, Inc. ("Walmart") and the Pennsylvania State University ("PSU"), collectively the "Joint Petitioners" or the "Parties").

17. Several customers filed *pro se* formal complaints opposing the proposed rate increase, specifically: (1) Annette Martin, Docket No. C-2024-3048409; (2) Donald Ellenberger, Docket No. C-2024-3048783; (3) Connie Dunmyer, Docket No. C-2024-3049013; (4) Mark Bowers, Docket No. C-2024-3049014; (5) Amy Stutzman, Docket Nos. C-2024-3049016 and C-2024-3049017; (6) Hattie Coates, Docket No. C-2024-3049021; (7) John J. Dolan, Docket No. C-2024-3049128, (8) David R. VanNorman, Jr., Docket No. C-2024-3049599; (9) Roland Hoffman, Docket No. C-2024-3049608; (10) David Hoffman, Docket No. C-2024-3049661; (11) Judith A. Garofolo, Docket No. C-2024-3049665; (12) Elaine Kitts, Docket No. C-2024-3049679; (13) Ryan Gandelman, Docket No. C-2024-3049683; (14) Beth Gandelman, Docket No. C-2024-3049774; (15) Charles E. Schwering, Docket No. C-2024-3049805, (16) John Piccinic, Docket No. C-2024-3049957; (17) Henry Barzilay, Docket No. C-2024-3049999; (18) Stanley and Lois LaFuria, Docket No. C-2024-3050000; (19) Albert Dilworth, Docket No. C-2024-3050001; (20) Jackie Stoner, Docket No. C-2024-3050413; and (21) Carol Ann Eroh, Docket No. C-2024-3050849.

18. None of the *pro se* complainants have been active parties.

19. The Settlement reflects a carefully balanced compromise of the interests of all of the Joint Petitioners, who represent a broad array of residential, commercial, and low-income customer interests. It also considers the statutorily recognized interests of the union-represented "employees" of FE PA. 66 Pa.C.S. § 1501.

20. The Settlement was achieved only after a comprehensive investigation of FE PA's proposals set forth in its 2024 Base Rate Case. In addition to formal and informal discovery, the active parties submitted several rounds of testimony, including the Company's direct testimony, other parties' direct testimony, rebuttal testimony, and surrebuttal testimony. In addition, FE PA presented supplemental testimony and exhibits in response to specific questions from the ALJs assigned to this matter. Further, the parties engaged in numerous settlement discussions and formal negotiations, which ultimately led to the Settlement.

21. The Joint Petitions agree that the Settlement is in the public interest. (Settlement ¶¶ 39, 73-76.)

22. Under the Settlement, FE PA will be permitted to increase annual distribution rate revenue by $225.0 million, to become effective on January 1, 2025, for service rendered thereafter. (Settlement ¶ 41.)

23. The agreed upon revenue requirement is a "black box" settlement, under which the parties do not specifically identify or resolve all of the individual rate base, revenue, expenses, and rate of return issues. (Settlement ¶ 41.)

24. The overall electric distribution revenue increase provided for by the Settlement is broken down by each of FE PA's Rate Districts as follows: Met-Ed Rate District - $39,600,000; Penelec Rate District - $57,690,000; Penn Power Rate District - $24,980,000; and West Penn Rate District - $102,730,000. (Settlement ¶ 42.)

25. The overall distribution rate revenue increase of $225.0 million is 44.8% of the proposed overall distribution revenue increase of approximately $502 million requested in FE PA's 2024 Base Rate Case filing. (Settlement ¶ 41; FE PA St. No. 1, at p. 6.)

26. The Company claimed that its current rates do not provide it with a reasonable opportunity to earn a fair rate of return on its investments made to serve the public in the provision of safe and reliable electric distribution service. (FE PA St. No. 1, at p. 13-14.)

27. Absent rate relief, FE PA projected that, for the 12 months ending December 31, 2025, its operations would produce an overall return on rate base of just 3.45%, which equates to a return on common equity of only 2.49%. (FE PA St. No. 1, at p. 13-14.)

28. FE PA claimed that without its requested rate relief, the Company's returns would continue to decline, deny the Company an opportunity to earn a fair and reasonable rate of return, and jeopardize the Company's ability to attract the capital needed to make the system investments necessary to support and ensure continued system reliability, safety, and customer service performance. (FE PA St. No. 1, at p. 13-14.)

29. During the course of the proceeding, the differences between the parties' litigation positions regarding revenue requirement changed. In its rebuttal testimony, FE PA explained that its most recent data and updates supported an annual revenue increase of $502.490 million. (FE PA St. No. 3-R, at pp. 3-6; FE PA Exhibit PML-7).) In surrebuttal testimony, I&E updated its recommended overall revenue requirement increase to $182.325 million, and the OCA updated its recommended revenue requirement increase of $71.170 million. (I&E St. No. 1-SR at 3; OCA St. No. 1-SR at 3 and Exhibit DM-SR-1.)

30. Through negotiations, the Joint Petitioners were able to compromise their competing litigation positions and arrive at the Settlement increase. The Settlement revenue increase is less than FE PA's overall requested increase, and more than I&E's final litigation position.

31. The increase under the Settlement, on both an overall and Rate District-specific basis, is within the range proposed by the parties, is in the public interest, and should be adopted without modification.

32. FE PA relied upon a class cost of service study ("CCOSS") to allocate its proposed total revenue and costs to each of the retail customer classes. (FE PA St. No. 7, at pp. 4-19; FE PA Exhibit TSL-1.)

33. FE PA, I&E, OCA, OSBA, LUG, and PSU took differing positions on revenue allocation. (*See, e.g.*, FE PA St. No. 7, at pp. 9-19 and FE PA Exhibit TSL-1; I&E St. No. 3, at pp. 24-25; OCA St. No. 3, at pp. 24-37; OSBA St. No. 1, at pp. 7-14; LUG St. No. 1, at pp. 15-28; PSU St. No. 1, at pp. 4-8.)

34. Appendix B to the Settlement sets forth the proof of revenues, which reflects (a) the agreed-upon revenue allocation, (b) the maintenance without modification of existing monthly customer charges for residential customers in the Met-Ed, Penelec and Penn Power Rate Districts, and (c) the increase of the monthly customer charge in the West Penn Rate District to $9.000 per month. (Settlement ¶¶ 43-44.)

35. Paragraph 45 of the Settlement resolves issues related to FE PA's rate design proposal with respect to FE PA's proposed streetlight conversion program.

36. FE PA had originally proposed to recover the costs of its streetlight conversion program through a regulatory asset, subject to true up. (FE PA St No. 6, at pp. 11-12.)

37. OCA recommended that the costs of the program be recovered instead through a separate tariff surcharge. (OCA St. No. 4, at pp. 42-43.)

38. The Settlement permits FE PA to establish a Rider to recover the costs of this program, allocate the costs among the customer classes, and ensure that the expenses associated

with the program are removed from the overall annual electric base distribution revenue increase contemplated by the Settlement. (Settlement ¶ 44.)

39. The Settlement in this proceeding states that FE PA agrees it will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027. (Settlement ¶ 46.)

40. The Settlement addresses when the Company will be permitted to charge the Distribution System Improvement Charge ("DSIC"). (Settlement ¶ 47.) Specifically, the Company will be eligible to include plant additions in the DSIC at the later of, (a) the end of the FPFTY, and (b) once the total FPFTY plant account balances exceed $3,696,815,000 for the Met-Ed Rate District; $4,029,557,000 for the Penelec Rate District; $1,052,092,000 for the Penn Power Rate District; and $3,760,467,000 for the West Penn Rate District.

41. The Settlement specifies, as required by the Commission, a mechanism for determining the return on equity to be used in future DSIC calculations. (Settlement ¶ 48.)

42. The Settlement also provides that the Company will submit an update to FE PA, Volume I, Ex. V-A-3, pp. 2-5 no later than May 1, 2025, which will include actual capital expenditures, plant additions, and retirements by month from January 1, 2024, through December 31, 2024. (Settlement ¶ 49.) An additional update for actuals from January 1, 2025, through December 31, 2025, shall be filed no later than May 1, 2026. (Settlement ¶ 49.)

43. The reporting requirements contemplated by Paragraph 49 of the Settlement were proposed by I&E. (I&E St. No. 3, at pp. 4-5.)

44. FE PA did not oppose these reporting requirements. (FE PA St. No. 4, at pp. 8-9.)

45. FE PA presented detailed depreciation studies on the Company's electric plant for the Historic Test Year ("HTY"), Future Test Year ("FTY"), and FPFTY. (*See* FE PA Exhibit Nos.

JJS-1, JJS-4, JJS-7, and JJS-10 (HTY depreciation studies for each Rate District), FE PA Exhibit Nos. JJS-2, JJS-5, JJS-8, and JJS-11 (FTY depreciation studies for each Rate District), and FE PA Exhibit Nos. JJS-3, JJS-6, JJS-9, and JJS-12 (FPFTY depreciation studies for each Rate District).) The depreciation studies were sponsored by, and supported by the direct testimony of, FE PA witness Mr. John J. Spanos. (*See* FE PA St. No. 9.)

46. OCA presented testimony in opposition to FE PA's proposed depreciation rates and, in particular, FE PA's proposal to utilize the Equal Life Group ("ELG") method to calculate its depreciation rates instead of the Average Service Life ("ASL") method. (OCA St. No. 3, at pp. 2-5, 24-25.)

47. Under the Settlement, FE PA's proposal to change its depreciation methodology from the Average Service Life ("ASL") method to the Equal Life Group ("ELG") method is withdrawn. (Settlement ¶ 50.)

48. In its initial filing, FE PA proposed to implement a mechanism to normalize pension/other post-employment benefits ("OPEB") expense (the "PON Mechanism"). (FE PA St. No. 4, at pp. 21-25.)

49. I&E and OCA opposed the implementation of the PON Mechanism. (I&E St. No. 4, at pp. 28-33; OCA St. No. 1SR, at pp. 19-20.)

50. Paragraph 51 of the Settlement provides that FE PA agrees to withdraw its proposal for implementation the PON Mechanism. (Settlement ¶ 51.)

51. In the initial filing FE PA proposed to continue to utilize its storm reserve accounts for storm costs and extraordinary storm costs that provide for regulatory treatment of ongoing storm damage costs, as established in the Rate Districts' Joint Petition for Partial Settlement of Rate Investigation at Docket Nos. R-2014-24228745, et al. (FE PA St. No. 3, at pp. 24-25.)

52. I&E opposed the continued use of the storm reserve account (I&E St. No. 4, at pp. 37-40) and the Company's claim for extraordinary storm deferrals (I&E St. No. 4, at pp. 42-44).

53. OCA recommended that any unamortized balance associated with the storm reserve and extraordinary storm deferrals be disallowed from rate base, and recommended several adjustments to FE PA's storm reserve balance and extraordinary storm deferrals expense. (OCA St. No. 1, at pp. 15-20.)

54. Paragraph 52 of the Settlement permits FE PA to amortize all known and measurable amounts for both extraordinary and non-extraordinary storm expense recorded through December 31, 2023, with no rate base or debt cost treatment for unamortized balances. (Settlement ¶ 52.) In addition, Paragraphs 53-54 of the Settlement establish the annual funding amounts for the storm reserve and cap the balance of the storm reserve between base rate cases at a specific amount. (Settlement ¶¶ 53-54.)

55. Due to the COVID-19 pandemic, FE PA incurred certain incremental expenses in excess of those embedded in rates since the issuance of the Commission's Emergency Order in *Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19*, Docket No. M-2020-3019244, ratified on March 26, 2020. FE PA incurred incremental uncollectibles accounts expenses and other extraordinary, non-recurring incremental COVID-19 related costs. (FE PA St. No. 3, at pp. 26-27.)

56. FE PA proposed to amortize the uncollectibles accounts expenses and other extraordinary, non-recurring incremental COVID-19 related costs over a three-year period. (FE PA St. No. 3, at p. 26; FE PA Exhibit No. PML-1, Adjustment IS-10.)

57. I&E proposed to disallow recovery of any unamortized balance of amortized COVID-19 costs from rate base, disallow recovery of costs related to late payment charge waivers

and reconnection fee waivers, and to amortize COVID-19 expenses over a 5-year period. (I&E St. No. 4, at pp. 46-48.)

58. OCA proposed to disallow recovery of any unamortized balance of amortized COVID-19 costs from rate base, and to amortize COVID-19 expenses over a 5.3-year period. (OCA St. No. 1, at pp. 21-23, 75.)

59. Paragraph 55 of the Settlement states that FE PA's revenue increase provided in this Settlement is reflective of the removal of COVID-19 deferral amounts incurred with respect to waived late payment charges and reconnection fees. (Settlement ¶ 55.) It also sets forth the amount of deferred COVID-19 costs that will be permitted to be amortized over five years, and provides that no unamortized balance related to these costs will be included in rate base. (Settlement ¶ 55.)

60. FE PA's initial filing also reflected the expected impact of the Commission's disposition of the complaint filed by Verizon against FE PA at Docket No. C-2020-3019345 into its FPFTY. (FE PA St. No. 1, at pp. 21-22.)

61. I&E and OCA opposed FE PA's proposal to amortize the costs incurred due to the Verizon complaint litigation, and to include any unamortized balance of those costs in rate base. (I&E St. No. 3, at pp. 6-11; OCA St. No. 1, at pp. 24-25, 77.)

62. Paragraph 56 of the Settlement reflects FE PA's withdrawal of its claim for rate base and expense treatment associated with its litigation against Verizon, but reserves FE PA's right to file a future petition for deferral treatment of these costs depending on the outcome of the pending appeals at 42 MAP 2024 and 43 MAP 2024, and any subsequent litigation. (Settlement ¶ 56.)

63. Prior to the 2024 Base Rate Case filing, FE PA performed reviews of certain non-operating or non-recoverable costs and identified certain costs that were recorded to utility operating accounts. (FE PA St. No. 1, at p. 19; FE PA St. No. 4, at pp. 37-39.)

64. As a result of these reviews, FE PA determined that approximately $13.6 million (including interest) had been included in base rates and collected from customers. (FE PA St. No. 1, at p. 19-20; FE PA St. No. 4, at pp. 37-39.)

65. FE PA proposed to issue a one-time fixed bill credit to customers to refund these amounts, allocated to rate schedules on the basis of 2023 distribution revenue. (FE PA St. No. 1, at pp. 20-21.)

66. Paragraph 57 of the Settlement reflects FE PA's commitment to refund these amounts to customers, and provide an informational filing to the Commission and the Parties in this proceeding regarding these refunds.

67. Paragraphs 58-70 of the Settlement resolve all issues related to the Company's universal service programs and customer service issues that were raised in this proceeding.

68. Paragraph 58 address issues related to the Company's customer service and call center performance. This provision requires the Company to take certain actions related to customer service, including maintaining customer service performance across several business functions at levels consistent with its 5-year historical average and conducting routine audits of its call center performance. (Settlement ¶ 58.) This provision was important to OCA, CAUSE-PA and IBEW Local 777 in this proceeding in order to ensure customer service performance, and call center performance does not deteriorate in the future. (OCA St. No. 6, at pp. 18-21; CAUSE-PA St. No. 1, at pp. 26-28.)

69. Paragraph 59 addresses issues related to the Pennsylvania Customer Assistance Program ("PCAP"). It requires that FE PA will review and adjust its PCAP rates based upon the new, applicable residential electric distribution base rates established in this proceeding to ensure all PCAP customers are receiving the most advantageous customer assistance program ("CAP") rate available, and that the implementation of all changes in FE PA's PCAP approved as part of FE PA's Universal Service and Energy Conservation Plan ("USECP") for 2024-2028 approved at Docket Nos. M-2022-3036532, et al. (Settlement ¶ 59.) This provision addresses certain issues raised by CAUSE-PA with respect to PCAP in this proceeding. (CAUSE-PA St. No. 1, at pp. 34-35.)

70. Paragraph 60 addresses issues related to FE PA's Hardship Fund. It requires that FE PA: (a) will consult with its Universal Services Advisory Committee ("USAC") to develop a plan to increase voluntary contributions to its Hardship Fund grant within nine months of the Commission's entry of a final order in this proceeding; (b) will amend its seasonal parameters for the Hardship Fund so that, at a minimum, customers who qualify for a Hardship Fund grant may do so in any month of the year, provided funding is available; (c) will initiate the issuances of plain language notices to low-income customers alerting them of past due bill(s), and of the availability of assistance to help pay their bill; (d) will increase its annual shareholder hardship matching contribution for grant assistance to $500,00 annually; (e) will make annual shareholder hardship contribution for grant assistance over routine funding levels in the amount of $2,000,000 annually for a three-year period beginning in 2025; (f) will roll over unspent funds and added to the proceeding year's budget; (g) will increase its maximum Hardship Fund grant to $600.00; (h) will eliminate any prohibitions against PCAP customers receiving a Hardship Fund grant within ninety days of a final Commission Order in this proceeding; (i) will implement certain data tracking for

its outreach efforts to the Company's most vulnerable customers; (j) will use best efforts to measure geographic reach of all outreach efforts to ensure equitable distribution of efforts across all rate districts; and (k) will provide annual updates to its USAC regarding the aforementioned datapoints until the Company's next base rate case filing. (Settlement ¶ 60.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's Hardship Fund in this proceeding. (CAUSE-PA St. No 1, at pp. 36-44.)

71. Paragraph 61 addresses issues related to FE PA's Low Income Usage Reduction Program ("LIURP"). It requires that FE PA: (a) increase its annual LIURP budget by a percentage equal to any approved increase in residential base distribution rates in this proceeding allocated proportionally among FE PA's rate districts; (b) will continue to carryover any unspent LIURP funds from the previous program year and add them to the budget for the following year by rate district; and (c) will continue to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FE PA's health and safety budget alone. (Settlement ¶ 61.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's LIURP in this proceeding. (CAUSE-PA St. No 1, at pp. 45-51.)

72. Paragraph 62 addresses issues related to FE PA's Administration of its Universal Service Programs. Specifically, it requires that FE PA: (a) implement a process whereby it will leverage Low Income Home Energy Assistance Program ("LIHEAP") data from the Pennsylvania Department of Human Service ("DHS") to meaningfully improve enrollment and retention in the PCAP, simplify burdensome paperwork requirements, and reduce unnecessarily duplicative administrative costs; (b) will, within six months of the Commission's entry of a final order in this

proceeding, petition the Commission for approval to implement automatic enrollment for LIHEAP recipients that have never previously been enrolled in either PCAP or CAP; and (c) implement a biennial audit process for monitoring and oversight of the Dollar Energy Fund's ("DEF") administration of programs within six months of the Commission's entry of a final order in this proceeding. (Settlement ¶ 62.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's Universal Service screening, enrollment, retention, and administration in this proceeding. (CAUSE-PA St. No 1, at pp. 51-60.)

73. Paragraph 63 addresses issues related to FE PA's definition of Confirmed Low-Income Customers. Specifically, it requires that FE PA will, within six months of a final Commission order in this proceeding, convene a collaborative of its USAC to discuss its current definition of "confirmed low-income" customers with commitment to, within twelve months of a final Commission order in this proceeding, revise its definition of the same to clearly outline those criteria which would qualify for CLI definitions and the timeframe for which a CLI designation will be retained under the Company's practices and procedures and consistent with 52 Pa. Code § 54.72. (Settlement ¶ 63.) This provision addresses certain issues raised by CAUSE-PA with respect to FE PA's definition of "confirmed low-income" in this proceeding. (CAUSE-PA St. No 1, at pp. 8-12.)

74. Paragraph 64 addresses FE PA's handling and analysis of customer complaints. Specifically, it requires that, within ninety days of the Commission's final order in this proceeding, FE PA will develop internal protocols for a regular and proper root cause analysis ("RCA") of its complaint trends, both for internal disputes and Commission Bureau of Consumer Services ("BCS") informal complaints that document infractions. (Settlement ¶ 64.) This provision was adopted in response to issues raised by the OCA. (OCA St. No. 6, at pp. 31-33.)

75. Paragraph 65 addresses FE PA's practices, procedures, and notices with respect to interacting with customers. Specifically, Paragraph 65 requires that FE PA ensure that: (a) all language reflects accurate requirements as required by statute or regulation and consistent with Commission orders and formal policies, as well as FE PA's tariffs; (b) FE PA's field representatives and customer service center representatives are provided with clear and robust directions for how to communicate with limited English proficiency ("LEP") customers; (c) all customers with income at or below 250% Federal Poverty Level ("FPL") receive protection from termination for nonpayment during the Winter Moratorium as required by statute or regulation and consistent with Commission orders and formal policies; (d) all guidance regarding the identification of "confirmed low-income" customers to conform with the Commission's regulations for electric distribution utilities, including as related to the waiver and/or refund of security deposits in such instances; (e) all guidance related to security deposits and the refund thereof; and (f) all customer notices and communications containing references related to medical certificate requirements to ensure they are compliant with all legal requirements. (Settlement ¶ 65.) These provisions address various issues raised by CAUSE-PA with respect to FE PA's practices, procedures, and notices for residential customers. (CAUSE-PA St. No 1, at pp. 60-64.)

76. Paragraph 66 addresses the Company's policies and procedures with respect to cash security deposits. Specifically, Paragraph 65 requires FE PA to amend its tariff to advise that: (a) the Company will not require an applicant or customer to provide a cash deposit when the customer provides information which demonstrates that he or she qualifies as CLI; (b) that any customer who has previously posted a cash security deposit, and who is subsequently newly found to be exempt from a deposit demand will be refunded that deposit within thirty (30) days of identifying that customer as CLI; and (c) security deposit refunds issued for confirmed low income customers

will be made directly to the customer, unless FE PA obtains informed consent to apply the security deposit to the customer's account balance; (Settlement ¶ 66.) These provisions address several issues raised by CAUSE-PA with respect to FE PA's current cash security deposit practices, policies and procedures. (CAUSE-PA St. No. 1, at pp. 67-68.)

77. Paragraph 68 addresses the Company's language access procedures when dealing with limited English proficiency ("LEP") customers. Specifically, this provisions requires FA PA to provide its field representatives with a card in English and Spanish that field representatives can share with customers to facilitate a response to questions to confirm whether there is a medical condition in the service location, whether a protection from abuse order or other court order with evidence of domestic violence is in effect, or, in winter months (December 1 to March 31), whether the household's income is at or below 250% FPL, thus triggering additional protections at the service location. (Settlement ¶ 68.) This provision was agreed to in order to addresses several issues raised by concerns expressed by CAUSE-PA with respect to FE's policies and procedures related to LEP customers. (CAUSE-PA St. No. 1, at pp. 63-64.)

78. Paragraph 69 addresses the Company's use or future use of speech analytics software, artificial intelligence, and similar technologies to assist with monitoring, or involving, universal service programs and other low-income customers. Specifically, Paragraph 69 requires FE PA to include a standing topic on its USAC meeting agenda through the filing of its next base rate case regarding the same, which IBEW Local 777 will receive. (Settlement ¶ 69.) This provision was adopted to address certain concerns voiced by the OCA. (OCA St. No. 5, at pp. 56-61.)

79. Paragraph 70 addresses the Company's practice and procedure with respect to reconnection fees for confirmed low income and PCAP customers. Specifically, it requires FE PA to allow Hardship Funds to be used for the purposes of payment of reconnection fees for all confirmed low-income customers, and that reconnection fees will not be required to be paid upfront by CAP participants in order for reconnection of services. (Settlement ¶ 70.) This provision was agreed to in order to address issues raised by CAUSE-PA and OCA. (CAUSE-PA St. No. 1, at pp. 68-71; OCA St. No. 5, at pp. 53-55.) Any associated tariff revisions pursuant to this paragraph will be completed within twelve months of the Commission's entry of a final order in this proceeding. (Settlement ¶ 70.)

80. FE PA's initial filing discussed the Company's capital investments and operations and maintenance ("O&M") expenses related to improving the Company's service reliability, including an enhanced vegetation management program. (FE PA St. No. 2, at pp. 10-13, 15, 18-21.)

81. I&E and OCA opposed the Company's proposed enhanced vegetation management program. (I&E St. No. 4, at pp. 50-51; *see also* OCA St. No. 7, at pp. 41-42.)

82. OCA also proposed that the Company's implement a number of initiatives and reporting requirements related to improving the Company's service reliability. (*See* OCA St. No. 7, at pp. 56-59.)

83. IBEW Local 777 supported the enhanced vegetation management program, but also made several recommendations regarding the FE PA's (and specifically the Met-Ed Rate District's) internal field hiring practices and attrition rates. (*See* IBEW-7, at pp. 7, 13-14.)

84. Paragraph 71 of the Settlement sets forth a number of commitments addressing FE PA's service reliability performance and operations. (Settlement ¶ 71.) Specifically, Paragraph

71 sets forth commitments by FE PA to increase internal field hires, complete a review of its distribution system for opportunities to introduce projects to selectively underground facilities, and improve its reliability performance with respect to System Average Interruption Duration Index ("SAIDI") and System Average Interruption Frequency Index ("SAIFI") in three years. (Settlement ¶ 71.)

85. Paragraph 72 of the Settlement resolves all issues related to FE PA's marketing and inclusion of non-basic service charges on residential customer bills. (Settlement ¶ 72.) OCA requested the terms contained in this Settlement provision in order to resolve the concerns it raised regarding FE PA's marketing and inclusion of non-basic service charges on residential customer bills. (OCA St. No. 4, at pp. 37-41.)

86. FE PA proposed to implement an Electric Vehicle ("EV") Pilot Program as a part of its initial filing. (FE PA St. No. 8, at pp. 13-17.)

87. I&E disagreed with the proposed EV Pilot Program expense claim, and recommended disallowance of the recovery of costs for the proposed EV dealership toolkit and EV residential rebates. (I&E St. No. 4, at pp. 53-55.)

88. OCA proposed to disallow EV Pilot Program costs for ratemaking purposes except for costs related to the EV education program. (OCA St. No. 1 at p. 58; OCA St. No. 6, at pp. 5-17.)

89. CAUSE-PA also raised several concerns with the EV Pilot Program, and recommended specific modifications to the program if it was approved. (CAUSE-PA St. No. 1, at pp. 74-77.)

90. Walmart also advanced specific recommendations related to the EV Pilot Program and the development of a rate structure for distribution customers interested in owning/operating

direct current fasting charging ("DCFC") EV charging equipment. (Walmart St. No. 1, at pp. 16-20.)

91. Settlement Paragraph 73 states that for purposes of the Settlement, FE PA withdraws all elements of its EV Pilot. (Settlement ¶ 73.) However, it also provides that FE PA will initiate work with interested stakeholders, including Intervenor IBEW Local 777, to (i) develop a new EV distribution rate specifically for public-facing EV chargers, similar to PECO Energy Company's EV-FC Rider, and (ii) seek Commission approval for such a rate in its next general base rate case. (Settlement ¶ 73.)

92. The Company and the Parties carefully considered the EV Pilot Program, and Paragraph 73 of the Settlement addresses the parties' concerns regarding the EV Pilot Program proposed by FE PA.

Appendix I

APPENDIX I

PROPOSED CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the subject matter and the parties to this proceeding. 66 Pa. C.S. §§ 1301, 1308(d).

2. Under Section 1301 of the Public Utility Code, a public utility's rates must be just and reasonable. 66 Pa. C.S. § 1301.

3. The Commission possesses a great deal of flexibility in its ratemaking function. *See Popowsky v. Pa. PUC*, 665 A.2d 808, 812 (Pa. 1995). "In determining just and reasonable rates, the [Commission] has discretion to determine the proper balance between the interests of ratepayers and utilities." *Id.*

4. The term "just and reasonable" is not intended to confine the ambit of regulatory discretion to an absolute or mathematical formulate; rather, the Commission is granted the power to balance the prices charged to utility customers and returns on capital to utility investors. *Pa. PUC v. Pa. Gas & Water Co.*, 424 A.2d 1213, 1219 (Pa. 1980), *cert. denied*, 454 U.S. 824, 102 S. Ct. 112, 70 L. Ed. 2d 97 (1981).

5. Commission policy promotes settlements. 52 Pa. Code § 5.231. Settlements lessen the time and expense the parties must expend litigating a case and at the same time conserve administrative resources.

6. Settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. 52 Pa. Code § 69.401.

7. The Commission encourages black box settlements. *Pa. PUC v. Aqua Pa., Inc.*, Docket No. R-2011-2267958, pp. 26-27 (Order entered June 7, 2012); *Pa. PUC v. Peoples TWP LLC*, Docket No. R-2013-2355886, p. 27 (Order entered Dec. 19, 2013); Statement of Chairman

Robert F. Powelson, *Implementation of Act 11 of 2012*, Docket No. M-2012-2293611, Public Meeting, August 2, 2012.

8. To accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. PUC v. UGI Utilities, Inc. – Gas Division*, Docket Nos. R-2015-2518438, *et al.* (Order entered Oct. 14, 2016); *Pa. PUC v. Philadelphia Gas Works*, Docket No. M-00031768 (Order entered Jan. 7, 2004).

9. The Joint Petitioners have the burden to prove that the Settlement is in the public interest. *Pa. PUC v. Pike Cnty. Light & Power (Electric)*, Docket Nos. R-2013-2397237, C-2014-2405317, *et al.* (Order entered Sept. 11, 2014).

10. The decision of the Commission must be supported by substantial evidence. 2 Pa. C.S. § 704.

11. "Substantial evidence" is such relevant evidence that a reasonable mind might accept as adequate to support a conclusion. More is required than a mere trace of evidence or a suspicion of the existence of a fact sought to be established. *Norfolk & Western Ry. Co. v. Pa. PUC*, 413 A.2d 1037 (Pa. 1980); *Erie Resistor Corp. v. Unemployment Comp. Bd. of Review*, 166 A.2d 96 (Pa. Super. 1961); *Murphy v. Comm., Dept. of Public Welfare, White Haven Center*, 480 A.2d 382 (Pa. Cmwlth. 1984).

12. The rates and terms of service set forth in the Settlement are supported by substantial evidence and are in the public interest. Therefore, consistent with the terms and conditions set forth in the Settlement, FE PA's proposed rate increase should be granted.

Appendix J

APPENDIX J

PROPOSED ORDERING PARAGRAPHS

1. That the Pennsylvania Public Utility Commission approve this Settlement, including all the terms and modifications thereof, without modification;

2. That the investigation into this matter be terminated and the matter marked closed; and

3. That the Commission issue an Opinion and Order terminating the proceeding, and authorizing FE PA to file the *pro forma* tariff supplement attached to the Settlement as **Appendix A** to become effective on January 1, 2025, for service rendered thereafter.

Appendix K

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2024-3047068
Office of Consumer Advocate	:	C-2024-3048327
Office of Small Business Advocate	:	C-2024-3048411
Annette Martin	:	C-2024-3048409
Met-Ed Industrial Users Group, et al.	:	C-2024-3048673
Donald Ellenberger	:	C-2024-3048783
Pennsylvania State University	:	C-2024-3048958
Connie Dunmyer	:	C-2024-3049013
Mark Bowers	:	C-2024-3049014
Amy Stutzman	:	C-2024-3049016
Amy Stutzman	:	C-2024-3049017
Hattie Coates	:	C-2024-3049021
John J. Dolan	:	C-2024-3049128
Utility Workers Union of America Local 102	:	C-2024-3049235
David R. VanNorman, Jr.	:	C-2024-3049599
Roland Hoffman	:	C-2024-3049608
David Hoffman	:	C-2024-3049661
Judith A. Garofolo	:	C-2024-3049665
Elaine Kitts	:	C-2024-3049679
Ryan Gandelman	:	C-2024-3049683
Beth Gandelman	:	C-2024-3049774
Charles E. Schwering	:	C-2024-3049805
John Piccinic	:	C-2024-3049957
Henry Barzilay	:	C-2024-3049999
Stanley and Lois LaFuria	:	C-2024-3050000
Albert Dilworth	:	C-2024-3050001
Jackie Stoner	:	C-2024-3050413
Carol Ann Eroh	:	C-2024-3050849
	:	
v.	:	
	:	
FirstEnergy Pennsylvania Electric Company	:	

FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

STATEMENT IN SUPPORT OF
JOINT PETITION FOR APPROVAL OF
SETTLEMENT OF ALL ISSUES

Date: September 13, 2024

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I. INTRODUCTION

FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company") hereby submits this Statement in Support of the Joint Petition for Approval of Settlement of All Issues ("Settlement") entered into by FE PA, the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the "Large User Groups"[1], the International Brotherhood of Electric Workers Local 459 ("IBEW 459"), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"), the UWUA System Local 102 ("UWUA 102"), Walmart, Inc. ("Walmart") and the Pennsylvania State University ("PSU"), parties in the above-captioned proceeding (hereinafter collectively referred to as the "Joint Petitioners" or "Parties"), all active parties in the above-captioned base rate proceeding.[2] The Settlement represents a full resolution of all issues raised in the instant base rate proceeding.

The Joint Petitioners unanimously agree that FE PA's April 2, 2024 distribution base rate increase filing ("2024 Base Rate Case") should be approved, subject to the terms and conditions of the Settlement. The Settlement provides for increases in rates, as set forth in the *pro forma* tariff supplement attached hereto as **Appendix A** and the proof of revenues attached hereto as **Appendix B**, designed to produce a net increase in overall annual distribution operating revenues of $225.0

[1] The Large User Groups are comprised of the Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), and West Penn Power Industrial Interveners ("WPPII").

[2] A number of individuals filed *pro se* formal complaints opposing the proposed rate increase. None of these complainants were active parties in this proceeding. A complete copy of this Settlement is being served on all formal complainants.

million for FE PA,[3] based upon a Fully Projected Future Test Year ("FPFTY") ending December 31, 2025.

The Settlement reflects a carefully balanced compromise of the interests of the Joint Petitioners, who represent a broad array of residential, commercial, and other important customer interests. FE PA submits that the Settlement is in the public interest, just and reasonable, and supported by substantial evidence.

For these reasons, and as explained in further detail below, FE PA respectfully requests that Administrative Law Judge Katrina L. Dunderdale ("ALJ Dunderdale") and Administrative Law Judge Emily I. DeVoe ("ALJ DeVoe") (collectively, "ALJs") and the Commission approve the Settlement without modification.

II. STANDARD FOR APPROVAL OF SETTLEMENT

Commission policy promotes settlements. *See* 52 Pa. Code § 5.231. Settlements reduce the time and expense that parties must expend litigating a case and, at the same time, conserve administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See* 52 Pa. Code § 69.401.

The Commission has explained that parties to settled cases are afforded flexibility in reaching amicable resolutions, so long as the settlement is in the public interest. *Pa. PUC v. MXenergy Electric Inc.*, Docket No. M-2012-2201861, 2013 Pa. PUC LEXIS 789, 310 P.U.R.4th 58 (Order entered Dec. 5, 2013). To approve a settlement, the Commission must first determine

[3] As explained in Paragraph 42 of the Settlement, the overall revenue requirement increase is broken down by Rate District as follows: Met-Ed Rate District - $39.60 million; Penelec Rate District - $57.69 million; Penn Power Rate District - $24.98 million; West Penn Rate District - $102.73 million.

that the proposed terms and conditions are in the public interest. *Pa. PUC v. Windstream Pa., LLC*, Docket No. M-2012-2227108, 2012 Pa. PUC LEXIS 1535 (Opinion and Order entered Sept. 27, 2012); *Pa. PUC v. C.S. Water & Sewer Assocs.*, Docket No. R-881147, 74 Pa. PUC 767 (Order entered July 22, 1991).

As explained in the next section of this Statement in Support, the Settlement is just and reasonable and in the public interest and, therefore, should be approved without modification.

III. THE SETTLEMENT IS IN THE PUBLIC INTEREST

A. GENERAL

The Joint Petitioners agree that the Settlement is in the public interest. (Settlement ¶¶ 39, 74-77.) The Settlement was achieved only after a comprehensive investigation of FE PA's proposals set forth in its 2024 Base Rate Case. In addition to informal discovery, FE PA responded to over 746 formal discovery requests, many of which included multiple subparts. The active parties submitted several rounds of written testimony, including FE PA's direct testimony, other parties' direct testimony, rebuttal testimony, surrebuttal testimony, and FE PA's supplemental testimony to respond to specific inquiries raised by the ALJs during the evidentiary hearings. Further, the parties engaged in numerous settlement discussions and formal negotiations, which ultimately led to the Settlement.

The Joint Petitioners undertook a significant effort to reach a full settlement of all issues. The Joint Petitioners each had to compromise on many different and competing issues and proposals raised in this case. In some instances, and in exchange for reaching an agreement on other issues, the Joint Petitioners collectively agreed to accept or reject a certain party's litigation position or to meet somewhere in between competing litigation positions. As such, when

determining whether the Settlement is reasonable and in the public interest, the Commission should view the Settlement as a whole instead of focusing on individual terms and conditions.

As noted previously, the Settlement reflects a carefully balanced compromise of the competing and broad array of interests of the Joint Petitioners in this proceeding. (Settlement ¶ 39.) The Joint Petitioners, their counsel, and their expert consultants have considerable experience in base rate proceedings. Their knowledge, experience, and ability to evaluate the strengths and weaknesses of their litigation positions provided a strong foundation upon which to build a consensus in this proceeding. The fact that the Settlement is supported by parties representing a diversity of constituents and interests, in and of itself, provides substantial evidence that the Settlement is reasonable and in the public interest, particularly given the active role of the parties in this proceeding as well as the many negotiations required to achieve the Settlement.

The Joint Petitioners have agreed that FE PA's distribution base rate increase filing should be approved, including those tariff changes included in and specifically identified in **Appendix A** attached thereto, subject to the terms and conditions of the Settlement. (Settlement ¶ 40.) Thus, the terms and conditions of the Settlement, as detailed and supported in the following sections, should be approved without modification.

B. REVENUE REQUIREMENT

FE PA will submit a revised tariff supplement that is designed to produce an overall, annual electric distribution revenue increase of $225.0 million, to become effective on January 1, 2025, for service rendered thereafter, in lieu of the as-filed, overall increase of approximately $502 million. (Settlement ¶ 41.) More specifically, the overall electric distribution revenue increase is broken down by each of FE PA's rate districts as follows: (a) Met-Ed Rate District - $39,600,000; (b) Penelec Rate District - $57,690,000; (c) Penn Power Rate District - $24,980,000; and (d) West

Penn Rate District - $102,730,000. (Settlement ¶ 42.) The agreed upon revenue requirement is a "black box" settlement, with certain exceptions discussed below. (Settlement ¶ 41.)

Under a "black box" settlement, parties do not specifically identify or resolve individual rate base, revenue, expenses, and rate of return issues. This "black box" concept often facilitates settlement agreements because it permits parties to retain their positions on important ratemaking issues for the proceeding at hand as well as for future proceedings. The Commission encourages black box settlements. *See, e.g.*, *Pa. PUC v. Aqua Pa., Inc.*, Docket No. R-2011-2267958, pp. 26-27 (Order entered June 7, 2012); *Pa. PUC v. Peoples TWP LLC*, Docket No. R-2013-2355886, pp. 27-28 (Order entered Dec. 19, 2013); Statement of Chairman Robert F. Powelson, *Implementation of Act 11 of 2012*, Docket No. M-2012-2293611 (Public Meeting, Aug. 2, 2012). In addition, FE PA has found that the "black box" settlement concept often assists with achieving settlement agreements because parties are not required to identify a specific return on equity or specifically identify, rate base, revenue, expense and return amounts that are allowed or disallowed. As such, parties are not required to abandon or reverse their position on certain issues—unless specified outside of the black box—which could impact their positions in later cases. Under a "black box" settlement, it is not necessary for the ALJs to decide individual rate base or revenue and expense adjustments proposed by the parties or determine the return on equity under the Settlement in order to ascertain the reasonableness of the proposed revenue increase under the Settlement.

FE PA's current electric distribution base rates for each of the FE PA Rate Districts were established in 2017. (FE PA St. No. 1, at p. 6.) Since the last base rate case filed by FE PA's Predecessor Companies (i.e., Metropolitan Edison Company, Pennsylvania Electric Company,

Pennsylvania Power Company, and West Penn Power Company),[4] FE PA prudently and effectively managed costs despite significant shifts in the economy, such as significant increases in inflation, rising interest rates and growth in operating and capital costs. (FE PA St. No. 1, at p. 7, 8-11.) FE PA also utilized the Distribution System Improvement Charge ("DSIC") to enable timely recovery of capital investments put into service pursuant through each of the Predecessor Companies' Commission-approved Long Term Infrastructure Improvement Plans ("LTIIPs"). Furthermore, FirstEnergy Corp. ("FirstEnergy"), FE PA's parent company, has taken several steps to improve its balance sheet, which has benefitted distribution operations in Pennsylvania since the Predecessor Companies' last base rate case. (FE PA St. No. 1, at p. 7; FE PA St. No. 11, at p. 3.) Moreover, FE PA has invested more than $900 million in electric distribution infrastructure since the last base rate case, which has hardened FE PA's system and resulted in decreased line and equipment failure. (FE PA St. No. 1, at p. 7; FE PA St. No. 2, at pp. 11-14.)

However, many factors are contributing to the Company's request for a distribution rate increase in this matter. (FE PA St. No. 1, at pp. 8-11.) The settled revenue increase is essential to FE PA's continued ability to attract capital on reasonable terms, and continued extensive efforts to repair, replace, improve and modernize its distribution system. (FE PA St. No. 1, at p. 13.) The Company's current rates—which were established in 2017—do not provide it with a reasonable opportunity to earn a fair rate of return on its investments made to serve the public in the provision of safe and reliable electric distribution service. (FE PA St. No. 1, at p. 13.) Absent rate relief, FE PA projected that its operations at current rates would produce an overall return on rate base of just 3.45%, which equates to a return on equity ("ROE") of only 2.49%, for the twelve months

[4] On January 1, 2024, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company merged into FE PA pursuant to the Commission's Order at Docket Nos. A-2023-3038771, et al ("PA Consolidation").

ending December 31, 2025. (FE PA St. No. 1, at p. 13.) Those returns are not adequate based upon the applicable financial analyses and the risks confronted by the Company, as detailed by FE PA witness Dylan D'Ascendis. (FE PA St. No. 1, at p. 13; *see also* FE PA St. No. 10.) Unless FE PA receives the requested rate relief, those returns will continue to decline, denying the Company an opportunity to earn a fair and reasonable rate of return, and risk undermining Company's ability to attract the capital needed to make the system investments necessary to support and ensure continued system reliability, safety, and customer service performance. (FE PA St. No. 1, at p. 13.)

In this proceeding, FE PA, I&E, and OCA presented testimony on the overall revenue requirement. In its initial filing, FE PA proposed an overall, annual revenue increase of approximately $502 million (FE PA St. No. 1, at p. at 6), which was broken down by Rate District as follows: Met-Ed Rate District - $146.332 million; Penelec Rate District - $132.963 million; Penn Power Rate District - $54.764 million; and West Penn Rate District - $169.789 million. (FE PA St. No. 1, at p. 6; *see also* FE PA Exhibit PML-1, at pp. 1-2.) FE PA's initial filing included a proposed ROE of 11.30% (FE PA St. No. 10, at pp. 3-4). In its rebuttal testimony, FE PA explained that its originally proposed revenue increase was justified, even though its most recent data and updates supported an overall, annual revenue increase of $511.805 million. (FE PA St. No. 1, at pp. 5-6; FE PA Exhibit PML-7.)

By comparison, I&E initially recommended an overall, annual revenue requirement increase of approximately $165.225 million, which was broken down by Rate District as follows: Met-Ed Rate District - $16.815 million; Penelec Rate District - $38.455 million; Penn Power Rate District - $18.934 million; and West Penn Rate District - $91.021 million. (I&E St. No. 1, at pp. 5-10.) I&E also proposed an ROE of 9.91% in its direct testimony. (I&E St. No. 3, at p. 6, 27.) Subsequently, in I&E's surrebuttal testimony, I&E updated its recommended overall, annual

revenue requirement to an increase of $185.325 million, which was broken down by Rate District as follows: Met-Ed Rate District - $21.844 million; Penelec Rate District - $45.020 million; Penn Power Rate District - $20.179 million; and West Penn Rate District - $95.282 million. (I&E St. No. 1-SR, at pp. 5-11.)

The OCA, on the other hand, initially recommended a revenue requirement increase of $16.910 million, which was broken down by Rate District as follows: Met-Ed Rate District - $4.91; Penelec Rate District - $4.46 million; Penn Power Rate District - $1.84 million; and West Penn Rate District - $5.570 million. (OCA St. No. 1, at p. at 5; OCA Exhibit DM-1.) OCA utilized a hypothetical capital structure of 50% debt and 50% equity and an ROE of 9.38%. (OCA St. No. 2, at p. 8.) In its surrebuttal testimony, the OCA updated its recommended overall, annual revenue requirement increase to $71.170 million, which was broken down by Rate District as follows: Met-Ed Rate District - $20.673; Penelec Rate District - $18.775 million; Penn Power Rate District - $7.735 million; and West Penn Rate District - $23.985 million. (OCA St. No. 1-SR at 2.)

The Commission has previously outlined the principles it uses to assess whether a settlement meets the public interest standard:

> The purpose of this investigation is to establish rates for Aqua customers which are "just and reasonable" pursuant to Section 1301 of the Public Utility Code (Code), 66 Pa. C.S. § 1301. A public utility seeking a general rate increase is entitled to an opportunity to earn a fair rate of return on the value of the property dedicated to public service. *Pennsylvania Gas and Water Co. v. Pennsylvania Pub. Util. Comm'n*, 341 A.2d 239 (Pa. Cmwlth. 1975). In determining what constitutes a fair rate of return, the Commission is guided by the criteria set forth in *Bluefield Water Works and Improvement Co. v. Public Service Comm'n of West Virginia*, 262 U.S. 679 (1923) and *Federal Power Comm'n v. Hope Natural Gas Co.*, 320 U.S. 591 (1944). In *Bluefield* the United States Supreme Court stated:
>
> > A public utility is entitled to such rates as will permit it to earn a return on the value of the property which it employs for the convenience of the public equal to that generally

> being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties; but it has no constitutional right to profits such as are realized or anticipated in highly profitable enterprises or speculative ventures. The return should be reasonably sufficient to assure confidence in the financial soundness of the utility and should be adequate, under efficient and economical management, to maintain and support its credit and enable it to raise the money necessary for the proper discharge of its public duties. A rate of return may be too high or too low by changes affecting opportunities for investment, the money market and business conditions generally.
>
> *Bluefield*, 262 U.S. at 692-3.

Pa. PUC, et al. v. Aqua Pennsylvania, Inc., Docket Nos. R-209-2132019, et al., 2010 Pa. PUC LEXIS 1808, at *22-24 (Opinion and Order entered June 16, 2010).

The Supreme Court of Pennsylvania has further held:

> the power to fix "just and reasonable" rates imports a flexibility in the exercise of a complicated regulatory function by a specialized decision-making body and that the term "just and reasonable" was not intended to confine the ambit of regulatory discretion to an absolute or mathematical formulation but rather to confer upon the regulatory body the power to make and apply policy concerning the appropriate balance between prices charged to utility customers and returns on capital to utility investors consonant with constitutional protections applicable to both.

Pa. PUC v. Pa. Gas and Water Co., 424 A.2d 1213, 1219 (Pa. 1980). Indeed, neither the Public Utility Code nor principles of due process require the Commission to adhere to a defined formula or methodology to determine "just and reasonable" utility rates. *See Duquesne Light Co v. Barasch*, 488 U.S. 299, 315-16 (1989) (quoting *FPC v. Hope Natural Gas*, and stating "the Commission was not bound to the use of any single formula or combination of formulae in determining rates").

One of the long-standing ways to identify that a base rate outcome is within an acceptable range of reasonableness for rates is through the settlement process. During this process, parties with differing interests engage in an adversarial process to evaluate and scrutinize the evidence supporting a rate request, and based upon robust discussions and negotiations, agree to a reasonable overall result.

Applying the overarching ratemaking principles discussed above and the standards used by the Commission to assess settlements, the revenue requirement provided for in this Settlement is reasonable, in the public interest and should be approved. As previously explained, FE PA provided substantial evidence to justify its proposed revenue requirement increase in this proceeding. (*See generally* FE PA St. Nos. 1, 2, 3, 10, 11, 1-R, 3-R, and 10-R.) Through extensive negotiations, the Joint Petitioners were able to reach a compromise within a range of their competing litigation positions. In addition to stating the overall, annual revenue requirement increase that the Settlement will produce, the Settlement also contains other provisions that must be considered in assessing its reasonableness and the public interest. Indeed, there are a number of provisions addressing specific accounting measures that impacted how the overall, annual revenue requirement increase was achieved, as a well as a base rate case stay-out provision that will provide at least two years of base rate stability, among other provisions impacting the Company's service and operations. Furthermore, the overall, annual $225.0 million settlement increase falls within the range of the parties' overall revenue requirement proposals.

The Settlement increase is just and reasonable, is in the public interest, and is supported by substantial evidence. Thus, the Commission should approve the overall, annual "black box" $225.0 million revenue requirement increase and the Rate District-specific breakdowns provided for in the Settlement without modification.

C. REVENUE ALLOCATION AND RATE DESIGN

1. Revenue Allocation

FE PA relied upon a class cost of service study ("CCOSS") to allocate its proposed total revenue and costs to each of the retail customer classes. (FE PA St. No. 7, at pp. 4-19; FE PA Exhibit TSL-1.) FE PA, I&E, OCA, OSBA, LUG, and PSU took differing positions on revenue allocation. (*See, e.g.*, FE PA St. No. 7, at pp. 9-19 and FE PA Exhibit TSL-1; I&E St. No. 3, at pp. 24-25; OCA St. No. 3, at pp. 24-37; OSBA St. No. 1, at pp. 7-14; LUG St. No. 1, at pp. 15-28; PSU St. No. 1, at pp. 4-8.)

Ultimately, the Joint Petitioners were able to reach a full settlement that allocated the revenue in a manner that will move all classes closer to the cost of service. (Settlement ¶ 43; Appendix E.) The rate impact of the settled revenue allocation can be derived Appendices B and C to the Settlement.

FE PA believes that the revenue allocation under the Settlement is fully consistent with the Commonwealth Court's decision in *Lloyd*[5] and prior Appellate Court precedent regarding revenue allocation. In addition, in considering the *Lloyd* decision, it is important to recognize that *Lloyd* did not overturn prior judicial precedent regarding revenue allocation and the applicability of cost of service studies. When allocating revenues to the rate classes, the Commission is not required to adopt a single cost of service study or strictly allocate revenues according to the study's results. In *Executone of Philadelphia, Inc. v. Pa. PUC*, 415 A.2d 445, 448 (Pa. Cmwlth. 1980), the Court stated as follows:

> [T]here is no single correct cost study or methodology that can be used to answer all questions pertaining to costs; there are only appropriate and inappropriate cost analyses depending upon the type

[5] *See Lloyd v. Pa. PUC*, 904 A.2d 1010 (Pa. Cmwlth. 2006) ("*Lloyd*"), *allocatur denied*, 916 A.2d 1104 (Pa. 2007).

> of service under study and the management and regulatory decision in question.

Likewise, in *Peoples Natural Gas Co. v. Pa. PUC*, 409 A.2d 446, 456 (Pa. Cmwlth. 1979), the Court stated as follows with respect to rate design:

> . . . there is no set formula for determining proper ratios among the rates of different customer classes. *Natona Mills v. Pennsylvania Public Utility Commission*, 179 Pa. Super. 263, 116 A.2d 876 (1955). What is reasonable under the circumstances, the proper difference among rate classes, is an administrative question for the commission to decide. This court's scope of review is limited.

As *Lloyd* and the other cases cited above demonstrate, the Commission retains considerable discretion in designing rates, is not required to follow any particular cost of service study, and can consider other factors, including gradualism and extenuating economic circumstances, in designing just and reasonable rates, as long as cost of service is the primary guiding factor. The agreed-upon revenue allocation under the Settlement provides movement towards cost of service for all rate classes. As such, FE PA submits that the Settlement's proposed revenue allocation is fully consistent with the *Lloyd* decision and other relevant precedent regarding revenue allocation.

2. Rate Design

The primary objective of the Company's proposed rate design was to develop rate schedules that would recover the overall cost of service, but also design rates that were fair and equitable, and would moderate rate changes to address rate continuity concerns. (FE PA St. No. 7, at pp. 19-20.) Under the comprehensive Settlement, the parties have agreed that FE PA's existing monthly residential customer charges for the Met-Ed, Penelec and Penn Power Rate Districts will be maintained at their current amounts without modification, and that the West Penn Rate District monthly residential customer charge will be increased to $9.00 per month. (Settlement ¶ 44.) In addition, the Settlement reflects the parties' agreement as to how the proposed revenue requirement will be recovered through the fixed and volumetric charges

applicable to each Rate District and each customer class as set forth in Appendix D. (Settlement ¶ 44.)

The Company's proposed increase for the monthly residential customer charge was opposed by I&E, OCA and CAUSE-PA. (*See, e.g.*, I&E St. No. 3, at pp. 20-24; OCA St. No. 4, at p. 39; OCA St. No. 4, at pp. 70-80; CAUSE-PA St. No. 1, at pp. 28-30.) I&E proposed that monthly residential customer charges should for each Rate District should not be increased because they were above the corresponding customer costs in a customer cost analysis. (I&E St. No. 3, at pp. 20-24.) OCA and CAUSE-PA also proposed that monthly residential customer charges for each Rate District should be increased because it would reduce the incentive to conserve and limit the ability of customers (including low-income customers) to exercise control over a larger portion of their bills. (OCA St. No. 4, at p. 39; OCA St. No. 4, at pp. 70-80; CAUSE-PA St. No. 1, at pp. 28-30.) OSBA made certain observations regarding the GS Small Class rate design, and recommendations regarding scale back proposals to this class. (OSBA St. No. 1, at pp. 14-16.) OSBA also noted its general agreement with GS Medium Class rate design. (OSBA St. No. 1, at pp. 16-17.)

Under the Settlement, the parties have reached a reasonable compromise of their respective positions on the proposed increases to the monthly customer charges. Specifically, the parties have agreed to the following customer charges proposed by the Company in settlement: (1) the Rate RS and GSV customer charges for every Rate District except West Penn Rate District will be maintained at current levels (i.e., $11.25 for the Met-Ed and Penelec Rate Districts, and $11.00 for the Penn Power Rate District) rather than the Company's proposal of $14.50, and that the Rate RS and GSV customer charges in the West Penn Rate District will be increased to $9.00, as opposed to the Company's proposal of $11.50; (2) the monthly customer charges for each of the

remaining classes would be increased over their present levels, but would ultimately be set at an amount that was lower than the Company's initial proposal. (*See* Settlement, Appendix D.) In addition, the parties agreed to modest increases to the demand and volumetric charges applicable to each class in each Rate District, which were ultimately lower than the Company's initially proposed increases to these charges. (*See* Settlement, Appendix D.)

In addition, the Settlement provides for the implementation of a Rider for the Company's Streetlighting Conversion Program. (Settlement ¶ 45; Appendix F.) FE PA had originally proposed to recover the costs of its streetlight conversion program through a regulatory asset, subject to true up. (FE PA St No. 6, at pp. 11-12.) OCA recommended that the costs of the program be recovered instead through a separate tariff surcharge. (OCA St. No. 4, at pp. 42-43.) The Settlement represents the parties' agreement to adopt OCA's recommendation, with specific methods of calculation for Residential and Commercial customer classes, and Industrial customer classes. (Settlement ¶ 45; Appendix F.)

Thus, the overall rate design reflects a gradual increase in rates over the course of the FPFTY, moves all customer classes toward the overall cost of service, and strikes a reasonable balance between the interests of customers and the Company. For these reasons, the revenue allocation and rate design are just, reasonable, and in the public interest and, therefore, should be approved without modification.

D. RATE CASE STAYOUT

FE PA has agreed that it will not file another general base rate increase under 66 Pa.C.S. § 1308(d) for any of its Rate Districts for new rates to be effective prior to January 1, 2027. (Settlement ¶ 46.) The distribution base rate stay-out provision will help assure the stability of base rates, for a period of at least two years.

E. DSIC REPORTING

The Settlement provides that, as of the effective date of rates in this proceeding, FE PA will be eligible to include plant additions in the DSIC at the later of, (a) the end of the FPFTY, and (b) once the total FPFTY plant account balances exceed $3,696,815,000 for the Met-Ed Rate District; $4,029,557,000 for the Penelec Rate District; $1,052,092,000 for the Penn Power Rate District; and $3,760,467,000 for the West Penn Rate District. (Settlement ¶ 47.) The Joint Petitioners agree that this provision is included solely for purposes of calculating the DSIC and is not determinative for future ratemaking purposes of the projected additions to be included in rate base in a FPFTY filing. (Settlement ¶ 47.) This provision fully complies with the requirements of 66 Pa.C.S. § 1358 and the Commission's Model Tariff that the DSIC be set to zero as of the effective date of new base rates that include the DSIC-eligible plant.

This threshold provides FE PA a reasonable opportunity to recover its capital costs incurred to repair, improve, or replace its aging distribution infrastructure that is placed in service between base rate cases, which, in turn, provides customers with enhanced electric service safety and reliability benefits. FE PA also notes that this settlement provision is similar to other settlement provisions the Commission has adopted in recent proceedings. *See, e.g.*, *Pa. PUC, et al v. UGI Utilities, Inc. – Electric Division*, Docket No. R-2022-3037368, et al. (Order entered Sept. 9, 2023); *Pa. PUC, et al v. National Fuel Gas Distribution Corporation*, Docket No. R-2022-3035730, et al. (Order entered June 15, 2023) (approving a similar rate case settlement provision) *Pa. PUC, et al. v. Pennsylvania-American Water Co.*, 2021 Pa. PUC LEXIS 55, Docket Nos. R-2020-3019369, *et al.* (Order entered Feb. 25, 2021) (approving a similar rate case settlement provision); *Pa. PUC, et al. v. PECO Energy Co. – Electric Division*, 2018 Pa. PUC LEXIS 459, Docket Nos. R-2018-3000164*, et al.* (Order entered Dec. 20, 2018) (approving similar rate case

settlement provision). For these reasons, FE PA submits that this settlement provision should be approved without modification.

The Settlement further provides that for purposes of calculating its DSIC, FE PA shall use the equity return rate for electric utilities contained in the Commission's most recent Quarterly Report on the Earnings of Jurisdictional Utilities and shall update the equity return rate each quarter consistent with any changes to the equity return rate for electric utilities contained in the most recent Quarterly Earnings Report, consistent with 66 Pa. C.S. § 1357(b)(3), until such time as the DSIC is reset pursuant to the provisions of 66 Pa. C.S. § 1358(b)(1). (Settlement ¶ 48.) This Settlement provision is in the public interest because it satisfies the Commission's request that parties to a rate case settlement identify a return on equity for DSIC computation purposes. *See, e.g.*, *Pa. PUC v. UGI Utilities, Inc. – Gas Division*, Docket No. R-2015-2518438, p. 27 (Order entered Oct. 14, 2016).

In addition, the Settlement provides that the Company will submit an update to FE PA, Volume I, Ex. V-A-3, pp. 2-5 no later than May 1, 2025, which will include actual capital expenditures, plant additions, and retirements by month from January 1, 2024, through December 31, 2024. (Settlement ¶ 49.) An additional update for actuals from January 1, 2025, through December 31, 2025, shall be filed no later than May 1, 2026. (Settlement ¶ 49.) FE PA will further provide comparisons of its actual capital expenditures, plant additions, and retirements to its projections for these periods as a part of its next base rate case filing. (Settlement ¶ 49.) This will enable the parties and interested stakeholders to track the Company's actual capital expenditures, plant additions, and retirements for the FPFTY and evaluate to what extent the actual figures match the Company's projections in this case. These reporting requirements are also consistent with

prior settlement agreements that have been approved by the Commission. Accordingly, the Commission should approve this Settlement provision without modification.

F. ACCOUNTING

1. Depreciation Rates

FE PA presented detailed depreciation studies on the Company's electric plant for the Historic Test Year ("HTY"), Future Test Year ("FTY"), and FPFTY. (See FE PA Exhibit Nos. JJS-1, JJS-4, JJS-7, and JJS-10 (HTY depreciation studies for each Rate District), FE PA Exhibit Nos. JJS-2, JJS-5, JJS-8, and JJS-11 (FTY depreciation studies for each Rate District), and FE PA Exhibit Nos. JJS-3, JJS-6, JJS-9, and JJS-12 (FPFTY depreciation studies for each Rate District).) The depreciation studies were sponsored by, and supported by the direct testimony of, FE PA witness Mr. John J. Spanos. (See FE PA St. No. 9.) OCA presented testimony in opposition to FE PA's proposed depreciation rates and, in particular, FE PA's proposal to utilize the Equal Life Group ("ELG") method to calculate its depreciation rates instead of the Average Service Life ("ASL") method. (OCA St. No. 3, at pp. 2-5, 24-25.)

Under the Settlement, FE PA's proposal to change its depreciation methodology from the ASL method to the ELG method is withdrawn. (Settlement ¶ 50.) FE PA and OCA continued to disagree about the appropriate depreciation method and as such the Settlement should not be construed as an agreement to the methodology. Rather, FE PA's agreement to withdraw its proposal to change its depreciation methodology from the ASL to the ELG method for purposes of the Settlement, is a reasonable compromise of competing litigation positions and interests related to how FE PA calculates depreciation.

2. Pension/OPEB

FE PA originally proposed to implement a mechanism to normalize pension/other post-employment benefits ("OPEB") expense (the "PON Mechanism"). (FE PA St. No. 4, at pp. 21-

25.) FE PA explained that annual fluctuations in investment performance have become significant in the context of FE PA's income statement and overall financial performance. (FE PA St. No. 4, at p. 21.) The volatility inherent in the pension/OPEB expense results in a risk that rates may not be representative of future costs or credits. (FE PA St. No. 4, at p. 21.) The category of pension/OPEB is unique since it is driven by rates, asset returns, and employee mortality. (FE PA St. No. 4, at p. 22.) This presents a risk for customers that the level of expense embedded in rates may be too high, and a risk for the Company that the level of expense embedded in rates may be too low. (FE PA St. No. 4, at p. 22.) To address this risk, the Company proposed a PON Mechanism to moderate the impacts to its income statement from the impacts of the investment performance of pension/OPEB assets due to market fluctuations, which are outside of the Company's control. (FE PA St. No. 4, at p. 22.) FE PA further explained that the PON Mechanism also may moderate the impacts on customers' rates from market fluctuations as well. (FE PA St. No. 4, at p. 22.)

Paragraph 51 of the Settlement provides that FE PA agrees to withdraw proposal for implementation the PON Mechanism. (Settlement ¶ 51.) This provision addresses concerns and opposition raised by I&E and OCA with respect to the implementation of the proposed PON Mechanism in this proceeding. (I&E St. No. 4, at pp. 28-33; OCA St. No. 1SR, at pp. 19-20.) However, it leaves open the ability for FE PA to propose other changes to its pension/OPEB claims and other recovery mechanisms in the future. FE PA believes that this Settlement provision constitutes a reasonable compromise of the parties' competing litigation positions.

3. Storm Expense

In the initial filing, FE PA proposed to continue to utilize its storm reserve accounts for storm costs and extraordinary storm costs that provide for regulatory treatment of ongoing storm damage costs, as established in the Rate Districts' Joint Petition for Partial Settlement of Rate

Investigation at Docket Nos. R-2014-24228742, et al. (FE PA St. No. 3, at pp. 24-25.) As it did in the Predecessor Companies' last base rate case at Docket No. R-2016-2537349, et al., FE PA proposed to continue the recovery of storm damage costs, excluding expenses related to damage from extraordinary storm events, through the reserve accounts. However, FE PA proposed "to adjust the storm reserve revenue included in base rates to reflect: (1) the updated historical five-year average of actual storm expenses, as described in Adjustment IS-5; and (2) the additional amortization expense to recover the balance of the storm reserve." (FE PA St. No. 3, at p. 25; FE PA Exhibit No. PML-1, Adjustment IS-10.)

I&E opposed the continued use of the storm reserve account (I&E St. No. 4, at pp. 37-40) and the Company's claim for extraordinary storm deferrals (I&E St. No. 4, at pp. 42-44). OCA recommended that any unamortized balance associated with the storm reserve and extraordinary storm deferrals be disallowed from rate base, and recommended several adjustments to FE PA's storm reserve balance and extraordinary storm deferrals expense. (OCA St. No. 1, at pp. 15-20.) However, FE PA explained that due to the volatility of storms, the storm reserve account provides a mean to recover storm expenses while allowing the utility to earn an allowable rate of return. (FE PA St. No. 12-R, at p. 42.) FE PA further posited that, if it was not permitted to continue the use of the storm reserve accounts, it should be permitted to implement a rider mechanism that permits it to automatically recover the storm costs it incurs which are not otherwise recovered in base rates. (FE PA St. No. 12-R, at p. 42.) I&E and OCA both opposed this alternative proposal in their surrebuttal testimony. (I&E St. No. 4, at pp. 23-24; OCA St. No. 1SR, at p. 10 (explaining the "current recovery mechanism established by the Commission provides sufficient and reasonable recovery of storm costs.").)

Paragraph 52 of the Settlement permits FE PA to amortize all known and measurable amounts for both extraordinary and non-extraordinary storm expense recorded through December 31, 2023, with no rate base or debt cost treatment for unamortized balances. (Settlement ¶ 52.) This provision of the Settlement continues to permit FE PA to utilize the storm reserve accounts established in prior base rate case. In addition, Paragraphs 53-54 of the Settlement establish the annual funding amounts for the storm reserve and cap the balance of the storm reserve between base rate cases at a specific amount. (Settlement ¶¶ 53-54.) The funding amounts and caps on the balances of the storm reserve between base rate cases balances the interests of FE PA in ensuring timely recovery of storm damage costs, with I&E's and OCA's concerns regarding utilization of the storm reserve accounts to recover such costs. For these reasons, FE PA submits that these Settlement provisions are just and reasonable, in the public interest, and should be approved without modification.

4. COVID-19 Cost Deferral

Due to the COVID-19 pandemic, FE PA incurred certain incremental expenses in excess of those embedded in rates since the issuance of the Commission's Emergency Order in Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19, Docket No. M-2020-3019244, ratified on March 26, 2020. FE PA specifically incurred incremental uncollectibles accounts expenses and other extraordinary, non-recurring incremental COVID-19 related costs. (FE PA St. No. 3, at pp. 26-27.) FE PA proposed to amortize the uncollectibles accounts expenses and other extraordinary, non-recurring incremental COVID-19 related costs over a three-year period. (FE PA St. No. 3, at p. 26; FE PA Exhibit No. PML-1, Adjustment IS-10.)

None of the parties challenged FE PA's adjustments to its uncollectibles accounts expense due to the COVID-19 pandemic. However, I&E proposed to disallow recovery of any unamortized

balance of amortized COVID-19 costs from rate base, disallow recovery of costs related to late payment charge waivers and reconnection fee waivers, and to amortize COVID-19 expenses over a 5-year period. (I&E St. No. 4, at pp. 46-48.) OCA proposed to disallow recovery of any unamortized balance of amortized COVID-19 costs from rate base, and to amortize COVID-19 expenses over a 5.3-year period. (OCA St. No. 1, at pp. 21-23, 75.)

Importantly, the Commission has allowed public utilities to defer costs for accounting and financial reporting purposes on numerous occasions. More specifically, the Commission has repeatedly authorized public utilities to defer incremental uncollectibles expenses incurred due to the COVID-19 pandemic.[6] *See, e.g.*, *Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket Nos. R-2022-3037368, et al. (Order entered Sept. 9, 2023); *Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket Nos. R-2021-3023618, *et al.*, pp. 44-45 (Order entered Oct. 28, 2021); *Pa. PUC v. Duquesne Light Company*, Docket Nos. R-2021-3024750 (Order entered Dec. 16, 2021).

Under the Settlement, the Joint Petitioners agree that Company's revenue increase provided in this Settlement is reflective of deferred COVID-19 costs—except for deferred costs related to waived late payment charges and reconnection fees—totaling $21,453,000, which will

[6] Recovery of these costs is also consistent with prior Commission orders wherein the Commission has granted deferred accounting for expenses that are extraordinary, not reasonably foreseeable, and non-recurring. *See, e.g., Petition of PPL Electric Utilities Corporation for Authority to Defer, for Accounting Purposes, Certain Unanticipated Expenses Relating to Storm Damage*, Docket No. P-2012-2338996 (Feb. 14. 2013) (authorizing the deferral and amortization of certain expenses related to extraordinary and non-recurring storm damage); *Petition of PPL Electric Utilities Corporation for Authority to Defer for Accounting and Financial Reporting Purposes Certain Losses from Extraordinary Winter Storm Damage and to Amortize Such Losses,* Docket No. P-00052148 (August 25, 2005) (authorizing deferral and amortization of extraordinary winter storm damage); *Petition of PPL Electric Utilities Corporation for Authority to Defer for Accounting and Financial Reporting Purposes Certain Losses from Extraordinary Storm Damage and to Amortize Such Losses*, 231 P.U.R.4th 521 (2004) (Commission approved deferral of expenses associated with storm related damages); *Petition of Mechanicsburg Water Co.*, Docket No. P-910500 (September 25, 1991) (Approved deferral for accounting purposes of capital and other costs associated with water treatment plant expansion.); *Petition of Pennsylvania Gas & Water Co.,* Docket No. P-900454 (September 5, 1990) (Approved deferral of costs of four water treatment plants that were nearing completion.); and *Petition of Pennsylvania Gas & Water Co*., Docket No. P-920586 (October 21, 1992) (Approved deferral for accounting purposes of water treatment plant costs.).

be amortized over five years starting on January 1, 2025 (*i.e.*, $4,290,000 per year for five years) with no rate base treatment for the unamortized balance. (Settlement ¶ 55.) This provision is reasonable because it: (1) reflects incremental uncollectibles expenses incurred due to the pandemic; and (2) balances the Company's interest in recovering these costs with customers' interests in having these extraordinary and unforeseeable costs be recovered over a reasonable period of time. Thus, this Settlement provision is just, reasonable, and in the public interest and should be approved without modification.

5. Verizon Complaint

FE PA's initial filing also reflected the expected impact of the Commission's disposition of the complaint filed by Verizon against FE PA at Docket No. C-2020-3019345 into its FPFTY. (FE PA St. No. 1, at pp. 21-22.) Specifically, FE PA proposed to record as a regulatory asset the difference in revenues produced from the negotiated contract rates and the new, reduced rates ordered by the Commission. (FE PA St. No. 1, at p. 22.) Further, FE PA proposed to recover the difference—calculated to cover the period in which the new rates were effective through the effective date of new rates in this case, November 20, 2019, to December 31, 2024—in this case. (FE PA St. No. 1, at p. 22.)

I&E and OCA opposed FE PA's proposal to amortize the costs incurred due to the Verizon complaint litigation, and to include any unamortized balance of those costs in rate base. (I&E St. No. 3, at pp. 6-11; OCA St. No. 1, at pp. 24-25, 77.) In addition, both of these parties noted that appeals of the Commission's Order at Docket No. C-2020-3019345 remained pending before the courts. (I&E St. No. 3, at pp. 6, 11; OCA St. No. 1, at p. 25.)

Paragraph 56 of the Settlement resolves this issue, and provides that FE PA withdraws its claim for rate base and expense treatment of costs associated with its litigation against Verizon. (Settlement ¶ 56.) However, this provision also reserves FE PA's right to file a future petition for

deferral treatment of such costs depending on the outcome of the pending appeals at 42 MAP 2024 and 43 MAP 2024, and any subsequent litigation. This provision is reasonable because it preserves FE PA's rights to seek deferred accounting treatment for these costs. In the Commission's Order at Docket No. C-2020-3019345, the Commission rejected FE PA's proposal to defer the costs associated with this litigation and found "that FirstEnergy's base rate arguments can be deferred to the Companies' next base rate proceedings where the issues can be fully vetted." (FE PA St. No. 1-R, at p. 19 (quoting *Verizon Pa. LLC & Verizon North LLC v. Metro. Edison Co., Pa. Elec. Co., & Pa. Power Co.*, Docket No. C-2020-3019347, p. at 75 (Order entered Dec. 18, 2020).) The Commonwealth Court of Pennsylvania further noted on appeal that "the PUC specifically preserved FirstEnergy's right to seek base rate increases to offset its pole attachment reductions in its next base rate proceeding." (FE PA St. No. 1-R, at p. 20 (*Verizon Pa. LLC v. Pa. PUC*, 303 A.3d 219 (Pa. Cmwlth. 2023).) This Settlement provision is designed to ensure FE PA is not precluded from seeking to defer and recover any extraordinary, non-recurring costs associated with the Commission's Order at Docket No. C-2020-3019345 in a subsequent proceeding, due to an argument that it did not seek to do so at the first available opportunity. The provision also recognizes that the costs that would result from the Commission's Order at Docket No. C-2020-3019345 remains subject to appeal. Therefore, this provision is just and reasonable, in the public interest, and should be approved without modification.

6. Refunds

Prior to the 2024 Base Rate Case filing, FE PA performed reviews of certain non-operating or non-recoverable costs and identified certain costs that were recorded to utility operating accounts. (FE PA St. No. 1, at p. 19; FE PA St. No. 4, at pp. 37-39.) As a result of these reviews, FE PA determined that approximately $13.6 million (including interest) associated with these costs had been included in base rates and collected from customers. (FE PA St. No. 1, at p. 19-20; FE

PA St. No. 4, at pp. 37-39.) FE PA proposed to issue a one-time fixed bill credit to customers to refund these amounts, allocated to rate schedules on the basis of 2023 distribution revenue. (FE PA St. No. 1, at pp. 20-21.)

While no parties opposed FE PA's proposal to provide refunds related to the costs identified by these reviews, I&E recommended a total refund amount of $14.6 million reflecting the use of an 8% interest rate. (I&E St. No. 4, at pp. 58-59). I&E also recommended that the PUC "require the Company to supply such informational filing" on the actual refunds distributed to customers "to all parties in this proceeding within that 30-day period." (I&E St. No. 4, at pp. 59-60.) FE PA maintained that a 6% interest rate was appropriate, but agreed to provide the informational filing recommended by I&E. (FE PA St. No. 1-R, at pp. 17-18.)

Moreover, FE PA provided further information regarding its calculation of the refund amounts, in direct response to questions from the ALJs at hearing. Specifically, FE PA Exhibit TMA-10, and the testimony at hearing of FE PA witness Ms. Ashton, detailed the nature of the reviews conducted by FE PA to determine what costs should be refunded and confirm that FE PA's ratepayers were protected from paying for any penalties or payments related to the H.B. 6 investigation in Ohio. (FE PA Exhibit TMA-10.) FE PA also provided several additional exhibits to support its review and calculation of these refunds. (*See* FE PA Exhibit Nos. 6, 7 (CONFIDENITAL), 8 and 9.)

Paragraph 57 of the Settlement reflects FE PA's commitment to refund applicable amounts to customers, and provide an informational filing to the Commission and the Parties in this proceeding regarding these refunds. (Settlement ¶ 57.) FE PA is committed to ensuring that its customers are protected from paying for any portion of any penalties or payments related to the

H.B. 6 investigation in Ohio. Therefore, this Settlement provision is just and reasonable, in the public interest, and should be approved without modification.

G. CUSTOMER SERVICE AND UNIVERSAL SERVICE ISSUES

Paragraphs 58-70 of the Settlement resolve all issues related to the Company's universal service programs and customer service issues that were raised in this proceeding. FE PA explained in its initial filing that FirstEnergy recently recognized its Customer Experience business, to allow for a more direct focus on the customers' needs from the customers' perspective gained from real-time insights and surveys. (FE PA St. No. 8, at pp. 2-6.) As a result of the reorganization, and the feedback obtained from customers as a result of the reorganization, FE PA explained it was modernizing its technology, including the interactive voice response ("IVR") system, and optimizing its systems to aid in bill payment, move in and move out, and outage reporting. (FE PA St. No. 8, at pp. 6-7.) FE PA also proposed to create an Energy Assistance Outreach Team ("EAOT"), whose purpose would be to increase awareness of, and participation in, energy assistance programs available to low-income customers in FE PA's service territory. (FE PA St. No. 8, at pp. 9-12.)

Paragraph 58 address issues related to the Company's customer service and call center performance. This provision requires the Company to take certain actions related to customer service, including maintaining customer service performance across several business functions at levels consistent with its 5-year historical average and conducting routine audits of its call center performance. (Settlement ¶ 58.) This provision was important to OCA and CAUSE-PA in this proceeding in order to ensure customer service performance, and call center performance does not deteriorate in the future. (OCA St. No. 6, at pp. 18-21; CAUSE-PA St. No. 1, at pp. 26-28.) FE PA believes this provision is reasonable because it reaffirms FE PA's commitment to improve its

customers' experiences when interacting with the Company under above-described Customer Experience reorganization.

Paragraph 59 addresses issues related to the Pennsylvania Customer Assistance Program ("PCAP"). It requires that FE PA will review and adjust its PCAP rates based upon the new, applicable residential electric distribution base rates established in this proceeding to ensure all PCAP customers are receiving the most advantageous customer assistance program ("CAP") rate available, and that the implementation of all changes in FE PA's PCAP approved as part of FE PA's Universal Service and Energy Conservation Plan ("USECP") for 2024-2028 approved at Docket Nos. M-2022-3036532, et al. (Settlement ¶ 59.) This provision addresses certain issues raised by CAUSE-PA with respect to PCAP in this proceeding. (CAUSE-PA St. No. 1, at pp. 34-35.) FE PA submits that this provision is reasonable because it will ensure that customers participating in PCAP continue to obtain the most advantage CAP rate available in light of the base rates approved in this proceeding. In addition, this provision is reasonable because it commits FE PA to implementing all recently-approved changes to its PCACP by the effective date of the rates established in this proceeding.

Paragraph 60 addresses issues related to FE PA's Hardship Fund. It requires that FE PA: (a) will consult with its Universal Services Advisory Committee ("USAC") to develop a plan to increase voluntary contributions to its Hardship Fund grant within nine months of the Commission's entry of a final order in this proceeding; (b) will amend its seasonal parameters for the Hardship Fund so that, at a minimum, customers who qualify for a Hardship Fund grant may do so in any month of the year, provided funding is available; (c) will initiate the issuances of plain language notices to low-income customers alerting them of past due bill(s), and of the availability of assistance to help pay their bill; (d) will increase its annual shareholder hardship matching

contribution for grant assistance to $500,000 annually; (e) will make annual shareholder hardship contribution for grant assistance over routine funding levels in the amount of $2,000,000 annually for a three-year period beginning in 2025; (f) will roll over unspent funds and added to the proceeding year's budget; (g) will increase its maximum Hardship Fund grant to $600.00; (h) will eliminate any prohibitions against PCAP customers receiving a Hardship Fund grant within ninety days of a final Commission Order in this proceeding; (i) will implement certain data tracking for its outreach efforts to the Company's most vulnerable customers; (j) will use best efforts to measure geographic reach of all outreach efforts to ensure equitable distribution of efforts across all rate districts; and (k) will provide annual updates to its USAC regarding the aforementioned datapoints until the Company's next base rate case filing. (Settlement ¶ 60.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's Hardship Fund in this proceeding. (CAUSE-PA St. No 1, at pp. 36-45.) FE PA believes that this provision is reasonable because it is consistent with the Company's efforts to assist low-income customers and proposed additional efforts contemplated by the proposed EAOT, which in addition to contributions to the Hardship Fund included, continuing to meet with the USAC to discuss program outreach and feedback, and reviewing and improving eligibility and application requirements during the USECP proceeding. (FE PA St. No. 8-R, at pp. 16-20.)

Paragraph 61 addresses issues related to FE PA's Low Income Usage Reduction Program ("LIURP"). It requires that FE PA: (a) increase its annual LIURP budget by a percentage equal to any approved increase in residential base distribution rates in this proceeding allocated proportionally among FE PA's rate districts; (b) will continue to carryover any unspent LIURP funds from the previous program year and add them to the budget for the following year by rate district; and (c) will continue to proactively coordinate delivery of services with other local, state,

and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FE PA's health and safety budget alone. (Settlement ¶ 61.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's LIURP in this proceeding. (CAUSE-PA St. No 1, at pp. 45-51.) FE PA believes that these LIURP Settlement terms constitute a reasonable compromise of the parties' competing litigation positions.

Paragraph 62 addresses issues related to FE PA's Administration of its Universal Service Programs. Specifically, it requires that FE PA: (a) implement a process whereby it will leverage Low Income Home Energy Assistance Program ("LIHEAP") data from the Pennsylvania Department of Human Service ("DHS") to meaningfully improve enrollment and retention in the PCAP, simplify burdensome paperwork requirements, and reduce unnecessarily duplicative administrative costs; (b) will, within six months of the Commission's entry of a final order in this proceeding, petition the Commission for approval to implement automatic enrollment for LIHEAP recipients that have never previously been enrolled in either PCAP or CAP; and (c) implement a biennial audit process for monitoring and oversight of the Dollar Energy Fund's ("DEF") administration of programs within six months of the Commission's entry of a final order in this proceeding. (Settlement ¶ 62.) These provisions address certain issues raised by CAUSE-PA with respect to FE PA's Universal Service screening, enrollment, retention, and admiration in this proceeding. (CAUSE-PA St. No 1, at pp. 51-60.) FE PA believes that this Settlement provision is reasonable because it is consistent with FE PA's tentative implementation plans for the LIHEAP data share, and builds upon FE PA's in process work with its information technology department to use the data receive through this process to complete an automatic recertification and conduct outreach to non-participants to encourage enrollment. (FE PA St. No. 8-R, at p. 16.)

Paragraph 63 addresses issues related to FE PA's definition of Confirmed Low-Income Customers. Specifically, it requires that FE PA will, within six months of a final Commission order in this proceeding, convene a collaborative of its USAC to discuss its current definition of "confirmed low-income" customers with commitment to, within twelve months of a final Commission order in this proceeding, revise its definition of the same consistent with 52 Pa. Code § 54.72. (Settlement ¶ 63.) This provision addresses certain issues raised by CAUSE-PA with respect to FE PA's definition of "confirmed low-income" in this proceeding. (CAUSE-PA St. No 1, at pp. 8-12.) FE PA believes that this term represents a reasonable compromise of the parties' competing litigation positions.

Paragraph 64 addresses FE PA's handling and analysis of customer complaints. Specifically, it requires that, within ninety days of the Commission's final order in this proceeding, FE PA will develop internal protocols for a regular and proper root cause analysis ("RCA") of its complaint trends, both for internal disputes and Commission Bureau of Consumer Services ("BCS") informal complaints that document infractions. (Settlement ¶ 64.) This provision was adopted in response to issues raised by the OCA. (OCA St. No. 6, at pp. 31-33.) FE PA believes that this Settlement provision is reasonable because it is a continuation of FE PA's compliance with commitments made in the PA Consolidation to perform individual complaint investigations as well as a monthly review of root cause trends and addresses any internal issues related to the investigation findings. (FE PA St. No. 8-R, at pp. 33-34.)

Paragraphs 65-67 address FE PA's practices, procedures, and notices with respect to interacting with customers. Specifically, Paragraph 65 requires that FE PA ensure that: (a) all language reflects accurate requirements as required by statute or regulation and consistent with Commission orders and formal policies, as well as the FE PA's tariffs; (b) FE PA's field

representatives and customer service center representatives are provided with clear and robust directions for how to communicate with limited English proficiency ("LEP") customers; (c) all customers with income at or below 250% Federal Poverty Level ("FPL") receive protection from termination for nonpayment during the Winter Moratorium as required by statute or regulation and consistent with Commission orders and formal policies; (d) all guidance regarding the identification of "confirmed low-income" customers to conform with the Commission's regulations for electric distribution utilities, including as related to the waiver and/or refund of security deposits in such instances; (e) all guidance related to security deposits and the refund thereof; and (f) all customer notices and communications containing references related to medical certificate requirements to ensure they are compliant with all legal requirements. (Settlement ¶ 65.) FE PA believes these provisions are reasonable because they address various issues raised by CAUSE-PA with respect to FE PA's administration of Universal Service Programs. (CAUSE-PA St. No 1, at pp. 60-64.)

Paragraph 66 specifically requires FE PA to amend its tariff to advise that: (a) the Company will not require an applicant or customer to provide a cash deposit when the customer provides information which demonstrates that he or she qualifies as CLI; (b) that any customer who has previously posted a cash security deposit, and who is subsequently newly found to be exempt from a deposit demand will be refunded that deposit within thirty (30) days of identifying that customer as CLI; (c) security deposit refunds issued for confirmed low income customers will be made directly to the customer, unless FE PA obtains informed consent to apply the security deposit to the customer's account balance; and (d) these reviews and any associated revisions will be completed within twelve (12) months of the Commission's entry of a final order in this proceeding and will be conducted in consultation with the BCS and FE PA's USAC. (Settlement ¶ 66.) These

provisions address several issues raised by CAUSE-PA with respect to FE PA's current cash security deposit practices, policies and procedures. (CAUSE-PA St. No. 1, at pp. 67-68.) FE PA submits that this provision constitutes a reasonable compromise of the parties' competing litigation positions.

Paragraph 68 addresses the Company's language access procedures when dealing with limited English proficiency ("LEP") customers. Specifically, this provisions requires FA PA to provide its field representatives with a card in English and Spanish that field representatives can share with customers to facilitate a response to questions to confirm whether there is a medical condition in the service location, whether a protection from abuse order or other court order with evidence of domestic violence is in effect, or, in winter months (December 1 to March 31), whether the household's income is at or below 250% FPL, thus triggering additional protections at the service location. (Settlement ¶ 68.) This provision was agreed to in order to address concerns expressed by CAUSE-PA. (CAUSE-PA St. No. 1, at pp. 63-64.) FE PA submits that this provision constitutes a reasonable compromise of the parties' competing litigation positions.

Paragraph 69 addresses the Company's use or future use of speech analytics software, artificial intelligence, and similar technologies to assist with monitoring, or involving, universal service programs and other low-income customers. Specifically, Paragraph 69 requires FE PA to include a standing topic on its USAC meeting agenda through the filing of its next base rate case regarding the same, which IBEW Local 777 will receive. (Settlement ¶ 69.) This provision was adopted to address certain concerns voiced by the OCA. (OCA St. No. 5, at pp. 56-61.) FE PA does utilize speech analytics, but recognizes that the technology is still a work in progress that should be reviewed carefully for expanded or new uses. FE PA submits that this provision constitutes a reasonable compromise of the parties' competing litigation positions.

Paragraph 70 addresses the Company's practice and procedure with respect to applying Hardship Funds to reconnection fees. Specifically, it requires FE PA to allow Hardship Funds to be used for the purposes of payment of reconnection fees for all confirmed low-income customers, and that reconnection fees will not be required to be paid upfront by CAP participants in order for reconnection of services. (Settlement ¶ 70.) This provision was agreed to in order to address issues raised by CAUSE-PA and OCA. (CAUSE-PA St. No. 1, at pp. 68-71; OCA St. No. 5, at pp. 53-55.) FE PA submits that this provision constitutes a reasonable compromise of the parties' competing litigation positions.

H. ADDITIONAL PROVISIONS

1. Reliability and Operations

FE PA's initial filing discussed the Company's capital investments and operations and maintenance ("O&M") expenses related to improving the Company's service reliability, including an enhanced vegetation management program. (FE PA St. No. 2, at pp. 10-13, 15, 18-21.) I&E and OCA opposed the Company's proposed enhanced vegetation management program. (I&E St. No. 4, at pp. 50-51; *see also* OCA St. No. 7, at pp. 41-42.) OCA also proposed that the Company's implement a number of initiatives and reporting requirements related to improving the Company's service reliability. (*See* OCA St. No. 7, at pp. 56-59.) IBEW Local 777 supported the enhanced vegetation management program, but also made several recommendations regarding the FE PA's (and specifically the Met-Ed Rate District's) internal field hiring practices and attrition rates. (*See* IBEW-7, at pp. 7, 13-14.)

As explained in the rebuttal testimony of FE PA witness Mr. Hawkins, FE PA acknowledges that there is room to improve its reliability performance. (FE PA St. No. 12-R, at p. 6.) In addition, FE PA has recognized that outages caused by vegetation are a primary driver of

outages and a primary driver of the reliability performance concerns identified by the parties. (FE PA St. No. 1, at p. 9; FE PA St. No. 2 at, pp. 9-10.)

Paragraph 71 of the Settlement sets forth a number of commitments addressing FE PA's service reliability performance and operations. (Settlement ¶ 71.) Specifically, Paragraph 71 sets forth commitments by FE PA to increase internal field hires, complete a review of its distribution system for opportunities to introduce projects to selectively underground facilities, and improve its reliability performance with respect to System Average Interruption Duration Index ("SAIDI") and System Average Interruption Frequency Index ("SAIFI") in three years. (Settlement ¶ 71.) This Settlement provision evidences FE PA's commitment to ensure that it maintains a workforce sufficient to maintain and improve the reliability of its system, continue to make capital investments to improve the reliability of its distribution system, and to report upon and achieve measurable improvements to the reliability of its service. Therefore, this provision is in the public interest and should be approved without modification.

2. Non-Basic Services

OCA raised concerns regarding FE PA's marketing and inclusion of non-basic service charges on residential customer bills. (OCA St. No. 4, at pp. 37-41.) FE PA witness Mr. Jones testified that FE PA complies with all applicable regulations and requirements regarding the provision of non-basic services to customers, including the presentation of the charges on customers' bills and termination notices and in how the programs are marketed to customers. (FE PA St. No. 8-R, at pp. 54-58.) Mr. Jones responded to each of the concerns raised by OCA witness Ms. Alexander regarding non-basic services provide by FE PA. (FE PA St. No. 8-R, at pp. 54-60.)

Paragraph 72 of the Settlement resolves all issues related to FE PA's marketing and inclusion of non-basic service charges on residential customer bills. (Settlement ¶ 72.) While the

terms of this provision go beyond what is required under the Commission's regulations regarding the marketing and inclusion of non-basic service charges on residential customer bills, FE PA submits that this resolves OCA's concerns regarding FE PA's marketing and inclusion of non-basic service charges on residential customer bills. As such, this provision represents a reasonable compromise of the parties' competing litigation positions regarding non-basic services.

3. Electric Vehicle ("EV") Pilot

FE PA proposed to implement an Electric Vehicle ("EV") Pilot Program as a part of its initial filing. (FE PA St. No. 8, at pp. 13-17.) The EV Pilot proposed by FE PA contained two programs: (1) an education and awareness program; and (2) an incentive / rebate program. (FE PA St. No. 8, at p. 14.) The education and awareness program had several components, including: an online EV education platform, a grant assistance component, a fleet advisory program, and a dealership toolkit program. (FE PA St. No. 8, at pp. 14-15.) The incentive / rebate program included three components: a residential rebate component, a non-residential component that offered two sets of rebates (a customer-side make-ready rebate and a utility-side make-ready rebate), and a direct current fast charger ("DCFC") rebate component. (FE PA St. No. 8, at pp. 15-16.)

Several of the parties addressed the proposed EV Pilot Program. I&E disagreed with the proposed EV Pilot Program expense claim, and recommended disallowance of the recovery of costs for the proposed EV dealership toolkit and EV residential rebates. (I&E St. No. 4, at pp. 53-55.) OCA proposed to disallow EV Pilot Program costs for ratemaking purposes except for costs related to the EV education program. (OCA St. No. 1, at p. 58; OCA St. No. 6, at pp. 5-17.) CAUSE-PA also raised several concerns with the EV Pilot Program, and recommended specific modifications to the program if it was approved. (CAUSE-PA St. No. 1, at pp. 74-77.) Walmart also advanced specific recommendations related to the EV Pilot Program and the development of

a rate structure for distribution customers interested in owning/operating DCFC EV charging equipment. (Walmart St. No. 1, at pp. 16-20.)

Settlement Paragraph 73 states that for purposes of the Settlement, FE PA withdraws all elements of its EV Pilot. (Settlement ¶ 73.) However, it also provides that FE PA will initiate work with interested stakeholders, including Intervenor IBEW Local 777, to (i) develop a new EV distribution rate specifically for public-facing EV chargers, similar to PECO Energy Company's EV-FC Rider, and (ii) seek Commission approval for such a rate in its next general base rate case. (Settlement ¶ 73.) The provision addresses the concerns raised by various of the parties regarding the EV Pilot Program initially proposed, but also provides for the development of a specific distribution rate for public-facing EV chargers, which FE PA believes will benefit the public by helping to expand public charging infrastructure or assist public serving entities. Therefore, FE PA submits that this Settlement provision is in the public interest and should be approved without modification.

IV. CONCLUSION

The Settlement is the result of a detailed examination of FE PA's proposals, substantial discovery requests, multiple rounds of testimony, numerous settlement discussions, and compromises by the active parties. FE PA believes that fair and reasonable compromises have been achieved on all issues in this case, particularly given the fact that the settling parties have such diverse and competing interests in this proceeding and have reached a Settlement on all issues. FE PA fully supports this Settlement and respectfully requests that the Administrative Law Judges Katrina L. Dunderdale and Emily I. DeVoe and the Pennsylvania Public Utility Commission:

(i) Approve the Joint Petition for Approval of Settlement of All Issues without modification;

(ii) Approve the proposals set forth in FE PA's above-captioned distribution base rate increase filing subject to the terms and conditions of the Joint Petition for Approval of Settlement of All Issues;

(iii) Approve the *pro forma* tariff attached to the Joint Petition for Approval of Settlement of All Issues as Appendix A;

(iv) Approve the proof of revenues attached to the Joint Petition for Approval of Settlement of All Issues as Appendix B;

(v) Mark the Formal Complaints filed by OCA, OSBA, the Large User Groups, PSU, and UWUA Local 102, and the individual customer complainants as satisfied and closed; and

(vi) Mark the investigation at Docket No. R-2024-3047068 closed.

Respectfully submitted,



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Dated: September 13, 2024

Attorneys for FirstEnergy Pennsylvania Electric Company

Appendix L

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3047068
	:	
FirstEnergy Pennsylvania Electric Company Base Rates	:	

BUREAU OF INVESTIGATION AND ENFORCEMENT
STATEMENT IN SUPPORT OF
JOINT PETITION FOR APPROVAL OF SETTLEMENT
OF ALL ISSUES

TO: ADMINISTRATIVE LAW JUDGES KATRINA L. DUNDERDALE AND EMILY I. DEVOE:

I. INTRODUCTION

The Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission ("Commission"), by and through its Prosecutor, Scott B. Granger, hereby respectfully submits that the terms and conditions of the foregoing *Joint Petition for Approval of Settlement of All Issues* ("Joint Petition" or "Settlement") are in the public interest and represent a fair, just, and reasonable balance of the interests of the FirstEnergy Pennsylvania Electric Company ("FirstEnergy" or the "Company"); I&E; the Office of Consumer Advocate ("OCA"); the Office of Small Business Advocate ("OSBA"); the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"); Met-Ed Industrial Users Group ("MEIUG"); the Penelec

Industrial Customer Alliance ("PICA"); West Penn Power Industrial Interveners (WPPII); the International Brotherhood of Electric Workers Local 459 ("IBEW 459"); Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"); Walmart Inc. ("Walmart"); The Pennsylvania State University ("PSU"); and the Utility Workers Union of America, Local 102 ("UWUA 102") (parties in the above-captioned proceeding and hereinafter collectively referred to as "Joint Petitioners" or the "Parties"), as well as the FirstEnergy ratepayers in all four rate districts.

II. BACKGROUND

1. I&E is charged with representing the public interest in Commission proceedings related to rates, rate-related services, and applications affecting the public interest. In negotiated settlements, it is incumbent upon I&E to identify how amicable resolution of any such proceeding may benefit the public interest and to ensure that the public interest is served. Based upon I&E's analysis of the FirstEnergy base rate filing, acceptance of this proposed Settlement is in the public interest and I&E recommends that the Administrative Law Judges and the Commission approve the Settlement in its entirety.

2. FirstEnergy states that it is a "public utility" and "electric distribution company," as those terms are defined under Sections 102 and 2803 of the Pennsylvania Public Utility Code, that provides electric distribution service to customers throughout

Pennsylvania.[1] First Energy's roots are those of several predecessor Pennsylvania electric utilities.[2] On January 1, 2024, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the "Predecessor Companies") merged into FirstEnergy pursuant to the Commission's Order at Docket Nos. A-2023-3038771, *et al* ("PA Consolidation").[3] As part of the approvals received in the PA Consolidation, FirstEnergy was certificated as a public utility and authorized to provide public utility service in the territories of the Predecessor Companies.[4] As a part of this approval, the tariffs of the Predecessor Companies were combined into a single tariff for FirstEnergy.[5] FirstEnergy currently provides electric distribution service under the same rates, terms, and conditions for service as the Predecessor Companies.[6] The single, combined tariff approved as part of the PA Consolidation established the Rate Districts, including one for each of the Predecessor Companies.[7]

3. On April 2, 2024, FirstEnergy filed Supplement No. 3[8] to Tariff Electric Pa. P.U.C. No. 1 to become effective June 1, 2024, containing proposed changes in rates, rules, and regulations calculated to produce $502 million (or 34%) in additional annual base rate electric operating revenues.[9]

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1 FE PA St. No. 1, p. 3.
2 *Id.*
3 *Id.*
4 *Id.*
5 *Id.*, pp. 3-4. *See* FirstEnergy Tariff Electric Pa. P.U.C. No. 1.
6 *Id.*, p. 4.
7 *Id. See also* FE PA St. No. 2.
8 *See* FirstEnergy 2024 Base Rate Case Filing, Vol. I, Exh. No. 1, Proposed Tariff (Clean).
9 FE PA St. No. 1, p. 6. *See also* I&E St. No. 1, pp. 2-3.

4. On a Rate District basis, the proposed changes in rates, rules, and regulations were designed to produce revenue increases as follows: Met-Ed $146 million or 31%, Penelec $132 million or 28%, Penn Power $55 million or 43%, and West Penn $169 million or 40%. The proposed base rate increase requested in this filing is based on the use of a Fully Projected Future Test Year ("FPFTY") ending December 31, 2025.[10]

5. In addition, FirstEnergy proposed to roll into distribution base rates its Distribution System Improvement Charge ("DSIC") Rider, Smart Meter Technologies Charge ("SMT-C") Rider, State Tax Adjustment Surcharge ("STAS") Rider, and Tax Cuts and Jobs Act ("TCJA") Voluntary Surcharge Rider.[11] The Company also proposed recovery of its storm related deferrals and COVID-19 related deferral.[12]

6. I&E filed its Notice of Appearance on April 9, 2024.

7. On April 10, 2024, the OCA filed a Formal Complaint and Public Statement.

8. The OSBA filed a Notice of Appearance on April 15, 2024.

9. CAUSE-PA filed a Petition to Intervene on April 16, 2024.

10. On April 24, 2024, MEIUG, PICA, and WPPII filed a Joint Complaint.

11. On April 25, 2024, the IBEW 459 filed a Petition to Intervene.

12. On April 25, 2024, State Senator Wayne Langerholc, Jr., Pennsylvania's 35th District, filed a letter with the Commission formally opposing FirstEnergy's requested rate increase.

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[10] *Id.*
[11] *Id.*
[12] *Id.*

13. By Order entered April 25, 2024, the Commission suspended the implementation of Supplement No. 3 to Tariff Electric Pa. P.U.C. No. 1 by operation of law, pursuant to 66 Pa.C.S. § 1308(d), until January 1, 2025, unless permitted by Commission Order to become effective at an earlier date, and instituted an investigation into the lawfulness, justness, and reasonableness of the rates, rules, and regulations proposed in Supplement No. 3.

14. The case was assigned to the Office of Administrative Law Judge for the prompt scheduling of such hearings as may be necessary, culminating in the issuance of a Recommended Decision.

15. Also, on April 25, 2024, the Office of Administrative Law Judge (OALJ) scheduled a prehearing conference to be conducted telephonically on May 2, 2024.

16. On April 30, 2024, IBEW Local 777 filed a Petition to Intervene.

17. On May 2, 2024, Walmart filed a Petition to Intervene.

18. Also, on May 2, 2024, Administrative Law Judge Katrina L. Dunderdale (the "ALJ" or "ALJ Dunderdale") conducted a call-in telephonic prehearing conference with the parties in which various procedural matters were discussed and a litigation schedule was established.

19. On May 10, 2024, PSU filed a Formal Complaint.

20. On May 24, 2024, UWUA 102 filed a Formal Complaint.

21. In accordance with the procedural schedule established at the prehearing conference, I&E served to all active parties the following ten (10) pieces of testimony

and accompanying seven (7) exhibits from four (4) I&E witnesses:

Vanessa Okum
- I&E Statement No. 1 (PROPRIETARY/Non-Proprietary)
- I&E Exhibit No. 1 (PROPRIETARY/Non-Proprietary)
- I&E Statement No. 1-R (PROPRIETARY/Non-Proprietary)
- I&E Exhibit No. 1-R
- I&E Statement No. 1-SR (PROPRIETARY/Non-Proprietary)
- I&E Exhibit No. 1-SR

D. C. Patel
- I&E Statement No. 2
- I&E Exhibit No. 2
- I&E Statement No. 2-SR

Joseph Kubas
- I&E Statement No. 3 (PROPRIETARY/Non-Proprietary)
- I&E Exhibit No. 3
- I&E Statement No. 3-SR (PROPRIETARY/Non-Proprietary)
- I&E Exhibit No. 3-SR

Christine Wilson
- I&E Statement No. 4
- I&E Exhibit No. 4 (PROPRIETARY/Non-Proprietary)
- I&E Statement No. 4-R
- I&E Statement No. 4-SR

22. In-person Public Input Hearings were scheduled and held throughout the Commonwealth at the following locations on the following dates:

June 25, 2024, East Stroudsburg, PA at 1:00 and 6:00 pm.

June 26, 2024, Reading, PA at 1:00 and 6:00 pm.

June 27, 2024, State College, PA at 1:00 and 6:00 pm.

July 9, 2024, Erie, PA at 1:00 and 6:00 pm.

July 10, 2024, Butler, PA at 1:00 and 6:00 pm.

July 11, 2024, Greensburg, PA at 1:00 and 6:00 pm.

July 12, 2024, Washington, PA at 1:00 and 6:00 pm.

23. Additionally, telephonic Public Input Hearings were held on July 16, 2024, at 1:00 and 6:00 pm; and, on July 17, 2024, at 1:00 and 6:00 pm.

24. All parties undertook comprehensive discovery in this proceeding after the filing was made and continued to conduct discovery throughout the litigation and settlement negotiation process.

25. The telephonic evidentiary hearings were held as scheduled on Thursday, August 15, and Monday, August 19, 2024. The Friday, August 16th evidentiary hearing date was cancelled to allow the parties to continue settlement negotiations. During the hearing, several witnesses testified and were presented for cross examination. The remaining witnesses were excused from appearing at the hearing since all parties agreed to mutual waivers of cross examination and it was agreed that their testimony and exhibits would be submitted into the record by joint stipulation and verification.

26. In accordance with Commission policy encouraging settlements at 52 Pa. Code § 5.231 and § 69.401 as they often achieve results preferable to a fully litigated proceeding, I&E participated in numerous settlement discussions with FirstEnergy and the Parties. On August 22, 2024, following extensive settlement negotiations, the Joint Petitioners reached a full settlement of all issues as set forth in the Joint Petition.

III. SETTLEMENT TERMS AND CONDITIONS

A. GENERAL *(Joint Petition ¶¶ 39-40)*.

27. As stated *supra*, I&E is charged with representing the public interest in Commission proceedings related to rates, rate-related services, and applications affecting the public interest. In negotiated settlements, it is incumbent upon I&E to identify how amicable resolution of any such proceeding may benefit the public interest and to ensure that the public interest is served.

28. "The prime determinant in the consideration of a proposed Settlement is whether the settlement is in the public interest."[13] The Commission has recognized that a settlement "reflects a compromise of the positions held by the parties of interest, which, arguably fosters and promotes the public interest."[14]

29. Settlements conserve precious administrative resources and provide regulatory certainty with respect to the disposition of issues with results that are often preferable to those achieved at the conclusion of a fully-litigated proceeding; and, provide a final resolution of adversarial proceedings which, in the Commission's judgement, is preferable.[15] The very nature of a settlement requires a review and discussion of all issues raised by the parties' and a negotiated compromise on the part of all parties.

30. Any issues not specifically addressed in these settlement terms are not deemed as accepted or rejected as part of this black box settlement. The Settlement shall

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[13] *Pennsylvania Public Utility Commission v. Philadelphia Electric Company*, 60 PA PUC 1, 22 (1985).
[14] *Pennsylvania Public Utility Commission v. C S Water and Sewer Associates*, 74 PA PUC 767, 771 (1991).
[15] *See generally* 52 Pa. Code § 5.231 and § 69.401.

not be construed as approval of any Joint Petitioner's position on any issue, except to the extent required to effectuate the terms and agreements of the Settlement. Further, each term and condition set forth in the Joint Petition, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.

31. I&E submits that this Settlement balances the interests of the Company, its customers, and the Joint Petitioners in a fair and equitable manner and presents a resolution for the Commission's adoption that best serves the public interest. Furthermore, the negotiated Settlement demonstrates that compromises are evident throughout the Joint Petition. Accordingly, for the specific reasons articulated below to achieve the full scope of benefits addressed in the Settlement; I&E requests that the Settlement be recommended by ALJs Dunderdale and DeVoe, and approved by the Commission, without modification.

B. REVENUE REQUIREMENT ("Black Box" Settlement) *(Joint Petition ¶¶ 41-42)*.

In the Settlement, the Joint Petitioners agree that the terms of this Settlement, including the terms regarding the overall base rate revenue increase, reflect a carefully balanced "black box" compromise of the interests of all the active Parties in this proceeding. As such, the Settlement as to all terms shall be a "black box" settlement, except for the items specifically set forth in the Joint Petition.

The Joint Petitioners agree to an overall revenue requirement increase of $225,000,000, broken down by rate district as follows: Met-Ed $39,600,000; Penelec $57,690,000; Penn Power $24,980,000; and West Penn $102,730,000. This overall revenue requirement increase was arrived at after extensive negotiations among the parties.

I&E submitted extensive testimony regarding I&E's review of the overall revenue requirement for each of the FirstEnergy rate districts.[16] I&E applied the traditional revenue requirement formula used in base rate cases to complete its analysis.[17] I&E reviewed and accepted the Company's existing claimed capital structure.[18] I&E's calculated cost of common equity in this proceeding is 9.91%[19] and its overall rate of return recommendation is 7.44%.[20]

Further, I&E reviewed the Company's claim for total amount of plant in service through the FPFTY.[21] I&E performed an analysis of the customer cost analyses provided by the Company to support its proposed customer charges.[22] Also, I&E proposed its own recommendations regarding customer charges.[23]

I&E's final recommended overall revenue requirement increase was $182,325,000 total for all four rate districts combined.[24] Broken down by rate district, I&E's revenue

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16 *See* I&E St. No. 1, pp. 3-10. *See also* Paragraph 21, *supra*, for the complete list of I&E testimony and exhibits admitted into the record in this proceeding.
17 *See* I&E St. No. 2, pp. 2-5.
18 *Id.*, pp. 12-14.
19 *Id.*, pp. 27-30. *See also* I&E Exh. No. 2, Sch. 1.
20 I&E St. No. 2-SR, pp. 36-37.
21 I&E St. No. 3, pp. 2-6; I&E St. No. 3-SR, pp. 2-3.
22 *Id.*, pp. 12-20; *Id.*, 12-19.
23 *Id.*, pp. 20-24. *See also* I&E Exh. No. 3.
24 I&E St. No. 1-SR, pp. 10-11.

requirement increase recommendation was distributed as follows: Met-Ed $21,844,000; Penelec $45,020,000; Penn Power $20,179,000; and West Penn $95,282,000.[25]

In consideration of all of the above, I&E fully supports the negotiated level of overall base rate revenue increase as compared to FirstEnergy's original request. While the overall revenue requirement is a "black box" compromise, the overall Settlement revenue levels are reasonably within the levels advanced on the evidentiary record by I&E and reflect a full compromise of all revenue-related issues raised by the Parties. And, as a "black box" settlement, unless specifically addressed below, the Settlement does not reflect agreement upon individual issues. Therefore, in consideration of the extensive testimony presented by I&E and all of the Parties to this proceeding, I&E fully supports the negotiated level of overall base rate revenue increase as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, affected ratepayers, and the Commission with an amicable resolution of the overall revenue increase, all of which is in the public interest.

C. REVENUE ALLOCATION AND RATE DESIGN *(Joint Petition ¶¶ 43-45)*.

In the Settlement the Joint Petitioners agree, for purposes of this Settlement, that class revenue allocation will be based on the information provided in Appendix E attached to the Joint Petition.

The Joint Petitioners also agree FirstEnergy's existing monthly customer charges for residential customers in the Met-Ed, Penelec and Penn Power Rate Districts will be

[25] *Id.*, pp. 6-10.

maintained at the current amounts without modification. FirstEnergy's monthly customer charge for residential customers in the West Penn Rate District will be increased to $9.00 per month.

Additionally, the Joint Petitioners agree FirstEnergy will create a Rider for its LED Streetlighting Conversion Program ("LEDC"). The costs of the program will be allocated among the customer classes by Network System Peak Load ("NSPL") and charged on a cents/kWh basis for Residential and Commercial classes and on a $/kw NSPL basis for the Industrial class. Finally, the Company has removed the expense of this program from the overall annual electric distribution revenue increase contemplated by this Settlement. *See* Appendix F attached to the Joint Petition for a rate design example of the new LEDC Rider.

I&E submitted extensive testimony regarding cost of service, relative rate of return, revenue allocation, rate design and scale back of rates.[26] I&E evaluated the allocated cost of service studies provided by the Company.[27] I&E then recommended customer charges for the various customer classes and rate districts.[28] Finally, I&E recommended a revenue allocation for the Company's customer classes at I&E's proposed overall revenue increase that included a scale back of rates component.[29]

Additionally, while considering all of the customer cost analyses and revenue allocations presented by the Parties, the Joint Petitioners engaged in extensive

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[26] I&E St. No. 3, pp. 12-31; I&E St. No. 3-SR, pp. 12-32.
[27] *Id.*, pp. 12-20; *Id.*, pp. 12-19.
[28] *Id.*, pp. 20-24; *Id.*, pp. 20-21. *See also* I&E Exh. No. 3, Sch. 1, 2, 3, and 4.
[29] *Id.*, pp. 24-31; *Id.*, pp. 22-32. *See also* I&E Exh. No. 3, Sch. 7; I&E Exh. No. 3-SR, Sch. 1 and 2.

negotiations regarding the ultimate revenue allocation among rate classes and the applicable customer charge for each rate class. All due consideration was given to the application of relative rate of return concepts as well as scale backs. After extensive negotiations among the Joint Petitioners and in consideration of all of the record evidence presented, I&E fully supports the revenue allocation and rate design settlement terms as set forth in Appendices C, D and E attached to the Joint Petition as a full and fair compromise that is within a reasonable range (as compared to I&E's final recommendations) that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with regulatory certainty and an amicable resolution of the revenue allocation and rate design, all of which is in the public interest.

D. RATE CASE STAY OUT *(Joint Petition ¶ 46).*

In the Settlement, the Joint Petitioners agree that, as a condition of the Settlement, FirstEnergy agrees that it will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027, provided, however, that the foregoing shall not prevent FirstEnergy from filing a tariff or tariff supplement proposing a general increase in rates in compliance with Commission Orders or in response to fundamental changes in regulatory policies or federal tax policies significantly affecting FirstEnergy's rates. In such a filing, all parties would reserve their rights to challenge the basis for such a filing.

I&E did not submit testimony regarding a rate case stay out. The rate case stay out was offered as a settlement term by another party as part of the complex settlement negotiations. Other parties expressed concerns as to when FirstEnergy would file its next

base rate case and how that might affect and counteract other provisions in the Settlement. FirstEnergy expressed their concerns regarding stay outs in general and FirstEnergy's stated concerns regarding its proposed plans to reduce outages. I&E shares the concerns raised by all of the parties including FirstEnergy.

Ultimately, I&E fully supports the settled upon terms regarding a base rate case stay out as a full and fair compromise that was woven into the consideration of other terms within the Settlement. This compromise provides FirstEnergy, the Joint Petitioners, affected ratepayers, and the Commission with an amicable resolution and regulatory certainty, all of which is in the public interest.

E. DISTRIBUTION SYSTEM IMPROVEMENT CHARGE AND DSIC REPORTING *(Joint Petition ¶¶ 47-49).*

In the Settlement the Joint Petitioners agree, as of the effective date of rates in this proceeding, FirstEnergy will be eligible to include plant additions in the Distribution System Improvement Charge ("DSIC") at the later of, (1) the end of the FPFTY, and (2) once the total FPFTY plant account balances exceed $3,696,815,000 for the Met-Ed Rate District; $4,029,557,000 for the Penelec Rate District; $1,052,092,000 for the Penn Power Rate District; and $3,760,467,000 for the West Penn Rate District. The foregoing provision is included solely for purposes of calculating the DSIC and is not determinative for future ratemaking purposes of the projected additions to be included in rate base in a FPFTY filing.

Additionally, the Joint Petitioners agree, for purposes of calculating its DSIC, FirstEnergy shall use the equity return rate for electric utilities contained in the

Commission's most recent Quarterly Report on the Earnings of Jurisdictional Utilities and shall update the equity return rate each quarter consistent with any changes to the equity return rate for electric utilities contained in the most recent Quarterly Earnings Report, consistent with 66 Pa. C.S. § 1357(b)(3), until such time as the DSIC is reset pursuant to the provisions of 66 Pa. C.S. § 1358(b)(1).

And the Joint Petitioners agree that FirstEnergy shall submit an update to FE PA, Volume I, Ex. V-A-3, pp. 2-5 no later than May 1, 2025, which will include actual capital expenditures, plant additions, and retirements by month from January 1, 2024, through December 31, 2024. An additional update for actuals from January 1, 2025, through December 31, 2025, shall be filed no later than May 1, 2026. FirstEnergy will further provide comparisons of its actual capital expenditures, plant additions, and retirements to its projections for these periods as a part of its next base rate case filing.

I&E's analysis of FirstEnergy's filing included a full review of FirstEnergy's claimed rate base and distribution plant by I&E witness Joseph Kubas who reviewed the Company's claimed FTY and FPFTY rate base and submitted testimony regarding claimed rate base and its DSIC in the context of providing updated reporting on plant additions, retirement, and transfers.[30] I&E made a recommendation regarding rate base reporting.[31] I&E offered that there is value in determining how closely FirstEnergy's projected investments in future plant compare to the actual investments that are made by the end of the FTY and FPFTY.[32] I&E reasoned, determining the correlation between

[30] I&E St. No. 3, pp. 2-6; I&E St. No. 3-SR, pp. 2-3.
[31] I&E St. No. 3, pp. 2-6.
[32] *Id.*, p. 5.

FirstEnergy's projected and actual results will help inform the Commission and the parties in FirstEnergy's future rate cases.[33] The Company accepted I&E's recommendation.[34] Therefore, I&E fully supports the settled upon terms regarding rate base, DSIC, and the capital expenditure reporting as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory certainty which is in the public interest.

F. ACCOUNTING *(Joint Petition ¶¶ 50-57)*.

Depreciation *(Joint Petition ¶ 50)* – In the Settlement, the Joint Petitioners agree, the Company will withdraw its proposal to change its depreciation methodology from the Average Service Life ("ASL") method to the Equal Life Group ("ELG") method.

I&E did not submit testimony regarding the Company's proposal to change its depreciation methodology from ASL to the ELG method. Other parties raised concerns regarding this proposal and recommended it be rejected.[35] I&E shares the concerns raised by the other parties and I&E fully supports the Company's decision to withdraw its proposal as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory certainty which is in the public interest.

Pension/OPEB *(Joint Petition ¶ 51)* – In the Settlement, FirstEnergy agrees to withdraw its proposal for implementation of a mechanism to normalize pension/other post-employment benefits ("OPEB") expense (the "PON Mechanism"). This Settlement

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33 *Id.*
34 I&E St. No. 3-SR, p. 2-3, *citing* FE PA St. No. 4-R, p. 9.
35 *See* OCA St. No. 3.

restricts neither FirstEnergy from proposing any of the pension and/or OPEB mechanisms and claims raised in this proceeding in its future base rate proceedings, nor any position that other parties may choose to take with respect to such proposals in the future.

I&E submitted extensive testimony regarding the Company's OPEB proposals.[36] I&E witness, Christine Wilson, disagreed with the Company's proposed switch in pension and OPEB methods for rate making purposes as the switch in methods overly complicates the determination of proper allowances for ratemaking and makes resulting future claim determinations subject to manipulation if any variables, including but not limited to the future period over which any future net gains or losses are amortized, are changed in the actuarial calculations.[37]

Further, regarding the PON Mechanism, I&E witness Wilson questioned the mechanisms intention to adjust for short term market trends when investments associated with pension and OPEB plans are more long-term in nature.[38] Ms. Wilson offered that yearly cash contributions as determined by an actuary for the Company's pension would take into consideration yearly amounts necessary to address any potential future highs or lows in investments thus removing the need for a PON Mechanism.[39]

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36 I&E St. No. 4, pp. 18-33; I&E St. No. 4-R, pp. 2-6; I&E St. No. 4-SR, pp. 10-19.
37 I&E St. No. 4, p. 18.
38 *Id.*, pp. 28-29.
39 *Id.*, p. 29.

Finally, I&E witness Wilson noted that FirstEnergy has indicated that its pension plan has a funding ratio of approximately 102% and its OPEB plan funded ratio was 101% at the end of 2023[40] concluding, there is no cause for alarm.

Therefore, I&E fully supports the Company's agreement to withdraw its proposal for implementation of a mechanism to normalize pension/other post-employment benefits expense as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory certainty which is in the public interest.

Storm Expense *(Joint Petition ¶¶ 52-54)* – In the Settlement, the Joint Petitioners agree that FirstEnergy will amortize all known and measurable amounts for both extraordinary and non-extraordinary storm expense recorded through December 31, 2023, with no rate base or debt cost treatment for unamortized balances, as follows:

- Extraordinary storm balance starting January 1, 2025, will be $17,019,000 per year for five years, broken down among the Rate Districts as follows: Met-Ed $6,714,000; Penelec $1,635,000; Penn Power $3,990,000; and West Penn $4,679,000.
- The storm reserve balance totaling $189,488,000 as of December 31, 2023, starting in 2025 will be $18,950,000 per year for ten years, broken down among the rate districts as: Met-Ed balance totaling $88,886,000, or $8,889,000 per year; Penelec balance totaling $41,279,000, or $4,128,000

[40] I&E St. No. 4, p. 27, *citing* FE PA Statement No. 4, p. 21.

per year; Penn Power balance totaling $19,465,000, or $1,947,000 per year; and West Penn balance totaling $39,858,000, or $3,986,000 per year.

Further, the annual funding for the storm reserve starting January 1, 2025, will be based on the five-year historical average of actual storm costs totaling $52,802,000, broken down among the Rate Districts as: Met-Ed $25,319,000; Penelec $10,954,000; Penn Power $3,215,000; and West Penn $13,315,000.

Finally, the Joint Petitioners agree the balance of the storm reserve between rate cases shall be capped at two times the annual funding for the storm reserve of $52,802,000. This cap is in addition to the remaining unamortized balances accumulated as of December 31, 2023, any storm reserve activity from 2024, and any extraordinary storm balances.

I&E submitted extensive testimony regarding FirstEnergy's storm expense including routine storm expense, storm reserve accounts, and extraordinary storm deferrals.[41] I&E recognizes that FirstEnergy has proffered an increased commitment to reliability and an emphasis on storm damage repairs and vegetation management.[42] I&E noted that the Company's storm expense fluctuates from year to year due to unpredictable weather conditions.[43] And, as noted by the Company, its proposed five-year average, which I&E accepted, excludes extraordinary storms[44] which ensures no double-recovery of those costs in rates.[45] I&E witness, Ms. Wilson, provided a

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41 I&E St. No. 4, pp. 33-44; I&E St. No. 4-SR, pp. 19-35.
42 FE PA St. No. 1, pp. 7-9. *See also* FE PA St. No. 2, pp. 8-22.
43 I&E St. No. 4, p. 34.
44 *Id.*, *citing* FE PA Exhibit PML-1, p. 41, Adjustment IS-5, Supporting Schedule 1.
45 *Id.*

discussion regarding recovering storm related expenses based on a five-year historic average versus extraordinary storms that cause extraordinary damage and expense and how they relate to using a storm reserve account.[46]

Ultimately, after lengthy settlement negotiations, the Joint Petitioners reached an amicable resolution as set forth in the Joint Petition. I&E fully supports the settled upon terms as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with a workable resolution and regulatory certainty all of which is in the public interest.

COVID-19 Cost Deferral *(Joint Petition ¶ 55)* – In the Settlement, the Joint Petitioners agree that FirstEnergy's revenue increase provided in this Settlement is reflective of the removal of COVID-19 deferral amounts incurred with respect to waived late payment charges and reconnection fees. Further, the remaining deferred COVID-19 costs totaling $21,453,000 will be amortized over five years starting on January 1, 2025 ($4,290,000 per year for five years) with no rate base treatment for the unamortized balance, broken down among the Rate Districts as follows: Met-Ed Rate District $749,000; Penelec Rate District $1,544,000; Penn Power Rate District $580,000; and West Penn Rate District $1,417,000.

I&E witness Christine Wilson submitted testimony regarding the Company's claim for recovery of COVID-19 deferred costs.[47] Ms. Wilson recommended that, in line with her recommended amortization for extraordinary storm deferrals, she recommended

[46] I&E St. No. 4, pp. 37- 44; I&E St. No. 4-SR, pp. 21-35.
[47] I&E St. No. 4, pp. 44-48; I&E St. No. 4-SR, pp. 35-39.

a five-year amortization period that closely aligns with the Company's recent historic filing frequency.[48] Further, she recommended disallowance of any rate base treatment for the unamortized balance as that would be inappropriate for an O&M-related expense.[49] Further, Ms. Wilson recommended disallowance of the Company's request to defer late payment charge waivers and reconnect charge waivers.[50]

Ultimately, after lengthy negotiations, the Joint Petitioners agreed to the COVID-19 deferral Settlement terms set forth in the Joint Petition. I&E fully supports the settled upon terms as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory certainty which is in the public interest.

Verizon Complaint *(Joint Petition ¶ 56)* – In the Settlement, the Joint Petitioners agree that for purposes of this Settlement, FirstEnergy withdraws its claim for rate base and expense treatment associated with its litigation against Verizon. However, FirstEnergy reserves the right to file a future petition for deferral treatment of these costs depending on the outcome of the pending appeals at 42 MAP 2024 and 43 MAP 2024, and any subsequent litigation.

I&E witness Joseph Kubas submitted extensive testimony regarding the Company's claim for the revenue it did not receive as a result of the Commission ruling in favor of Verizon regarding a dispute involving pole attachments.[51] I&E recommended

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48 *Id.*, p. 47; *Id.*, p. 36.
49 *Id.*; *Id.*
50 *Id.*; *Id.*
51 I&E St. No. 3, pp. 6-11; I&E St. No. 3-SR, pp. 3-11.

that both the amortization expense and the rate base amount claims be denied.[52] FirstEnergy noted that an appeal of the Commission's decision was filed in the Commonwealth Court of Pennsylvania at Docket No. 521 CD 2021, and FirstEnergy indicated that it will update its claim if it is successful at the appellate level.[53]

Ultimately, after lengthy negotiations, the Joint Petitioners agreed to the Verizon Complaint Settlement terms set forth in the Joint Petition. I&E fully supports the settled upon terms as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory guidance, all of which is in the public interest.

Refunds to Customers *(Joint Petition ¶ 57)* – FirstEnergy agrees to refund its customers $13.6 million as a one-time fixed bill credit based on customer counts within thirty (30) days of the Commission's entry of a final order in this proceeding. The $13.6 million will be allocated to rate schedules on the basis of 2023 distribution revenues. The total amount was determined by applying a six (6) percent compounded interest which will continue to be calculated until the amount in the regulatory liability is fully refunded to customers. The refund amount is broken down by Rate Districts as follows: (a) approximately $4.4 million for the Met-Ed Rate District; (b) approximately $4.3 million for the Penelec Rate District; (c) approximately $1.2 million for the Penn Power Rate District; and (d) approximately $3.7 million for the West Penn Rate District. FirstEnergy will submit an informational filing to the Commission and supply the same filing to all

[52] *Id.*, pp. 10-11; *Id.*, pp. 5, 10-11.
[53] I&E St. No. 3-SR, p. 3, *citing* FE PA St. No. 1, p. 22.

Parties in this proceeding reporting the actual refunds distributed to customers no more than thirty (30) days after the completion of the refund distribution.

I&E witness Christine Wilson submitted testimony regarding the proposed refunds to customers.[54] I&E generally agreed with the Company's proposal to refund monies identified by FirstEnergy's Board of Directors that includes costs that may have lacked proper documentation or been improperly classified or allocated.[55] Additionally, I&E noted that during a Federal Energy Regulatory Commission audit, the Company identified expenses that were improperly recovered in rates, such as advertising, sports sponsorships, competitive services, and lobbying.[56] Also, I&E noted the Company hired an outside consulting firm to review certain costs deemed non-operating or non-recoverable, resulting in a final report to FirstEnergy in early 2023.[57] Finally, I&E recommended, and FirstEnergy agreed, that FirstEnergy will provide an informational filing to both the Commission and the Parties reporting the actual refunds distributed to customers not more than thirty (30) days after completion of the refund distribution.[58]

I&E supports the settled upon customer refund terms as a full and fair agreement that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with a resolution which provides regulatory certainty and is in the public interest.

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54 I&E St. No. 4, pp. 56-60; I&E St. No. 4, pp. 56-58.
55 I&E St. No. 4, p. 57, *citing* FE PA St. No. 4, p. 37.
56 *Id.*
57 *Id.*, *citing* FE PA St. No. 4, pp. 37-38.
58 I&E St. No. 4, p. 59; I&E St. No. 4-SR, pp. 57-58.

IV. CUSTOMER SERVICE AND UNIVERSAL SERVICE ISSUES *(Joint Petition ¶¶ 58-70)*.

A comprehensive statement-in-support regarding all of the customer service and universal service issues is provided at the end of this Section IV after the terms set forth in the Joint Petition regarding the identified customer service and universal service issues are discussed below.

Customer Service and Call Center *(Joint Petition ¶ 58)* - In the Settlement, FirstEnergy commits to continue maintaining its customer service performance for customer call center, reliability of service, billing, meter reading, and response to customer complaints and disputes at levels consistent with its 5-year historical average as reported to the Commission until the date of its next base rate case filing. To the extent that FirstEnergy's performance does not meet this level, FirstEnergy agrees to meet with the parties, including IBEW Local 777, as requested to discuss those areas of challenge and its plans to improve service levels. FirstEnergy agrees that its call center performance results for answering calls and abandonment rate will not deteriorate during the rate effective year and prior to its filing of its next base rate case.

Further, FirstEnergy will conduct and document routine audits of its call center performance. In addition, the Company will specifically document training provided to temporary contractors prior to handling Pennsylvania customer calls.

FirstEnergy Pennsylvania Customer Assistance Program ("PCAP") *(Joint Petition ¶ 59)* - In the Settlement, the Joint Petitioners agree FirstEnergy will review and adjust its PCAP rates based on the new applicable residential electric distribution base

rates to ensure all PCAP customers are receiving the most advantageous customer assistance program ("CAP") rate available. Further, FirstEnergy will implement all changes to FirstEnergy's PCAP to be approved as part of FirstEnergy's Universal Service and Energy Conservation Plan ("USECP") for 2024-2028 by no later than the effective date of electric distribution base rates established in this proceeding.

Hardship Fund *(Joint Petition ¶ 60)* - In the Settlement, the Joint Petitioners agree FirstEnergy will consult with its Universal Service Advisory Committee ("USAC") and develop a plan to increase voluntary contributions to its Hardship Fund grant within nine (9) months of the Commission's entry of a final order in this proceeding. Further, FirstEnergy agrees to explore additional changes to its Hardship Fund programs as described in greater detail in the Joint Petition. Those changes include, but are not limited to: (i) increasing its annual shareholder hardship matching contribution for grant assistance to $500,000 annually; (ii) making an annual shareholder hardship contribution for grant assistance over and above routine funding levels in the amount of $2,000,000 annually for a three-year period beginning in 2025; and (iii) increasing its maximum Hardship Fund grant to $600.

Low Income Usage Reduction Program ("LIURP") *(Joint Petition ¶ 61)* - In the Settlement, the Joint Petitioners agree First Energy will increase its LIURP annual budget by a percentage equal to any approved increase in residential base distribution rates in this proceeding, allocated proportionally amongst FirstEnergy's Rate Districts as more fully detailed in the Joint Petition. If rollover amounts exceed $1 million for any Rate District, FirstEnergy will host a collaborative meeting within thirty (30) days of the

end of the program year with members of its USAC, interested parties to this proceeding, Commission Bureau of Consumer Services ("BCS") staff. Further, subject to the process for handling roll-over funds in excess of $1 million, FirstEnergy will continue to carryover any unspent LIURP funds from the previous program year and add them to the budget for the following year by rate district. Additionally, FirstEnergy will continue to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FirstEnergy's health and safety budget alone.

Universal Service Administration *(Joint Petition ¶ 62)* - In the Settlement, the Joint Petitioners agree within ninety (90) days of the final order in this proceeding, FE PA will implement a process whereby it will leverage LIHEAP data from the Department of Human Service ("DHS") to meaningfully improve enrollment and retention in PCAP, simplify burdensome paperwork requirements, and reduce unnecessarily duplicative administrative costs as more fully detailed in the Joint Petition. Further, within six (6) months of the final order in this proceeding, the Company will petition the Commission for approval to implement automatic enrollment for LIHEAP recipients that have never previously been enrolled in either PCAP or CAP. Additionally, FirstEnergy will implement a biennial audit process for monitoring and oversight of DEF's administration of programs within six (6) months of the final order in this proceeding.

Confirmed Low-Income Customer Definition *(Joint Petition ¶ 63)* - In the Settlement, the Joint Petitioners agree within (six) 6 months of the Commission's entry of

a final order in this proceeding, FirstEnergy will convene a collaborative of its USAC to discuss its current definition of "confirmed low-income" ("CLI") customers with the commitment to, within twelve (12) months of the Commission's entry of a final order in this proceeding, revise its definition to clearly outline those criteria which would qualify for CLI definitions and the timeframe for which a CLI designation will be retained under the Company's practices and procedures and consistent with 52 Pa. Code § 54.72.

Complaint Handling and Analysis *(Joint Petition ¶ 64)* - In the Settlement, the Joint Petitioners agree within ninety (90) days of the Commission's entry of a final order in this proceeding, FirstEnergy will develop internal protocols for a regular and proper root cause analysis ("RCA") of its complaint trends, both for internal disputes and Commission Bureau of Consumer Services ("BCS") informal complaints that document infractions. This plan will include a written RCA, and report on findings, including identification of trends, evaluation, steps to reform or avoid repeated trends, and internal steps taken to take proper internal enforcement action where needed. Quarterly updates to include results will be provided to the statutory advocates (i.e., I&E, OCA and OSBA) and Intervenor IBEW Local 777 until the Company's next base rate filing.

Practices, Procedures and Notices *(Joint Petition ¶¶ 65-67)* - In the Settlement, the Joint Petitioners agree FirstEnergy will undertake a review of all policies, procedures, and training materials for revision, where appropriate, to ensure that certain items are addressed as more fully set forth in the Joint Petition.

Further, FirstEnergy will amend its tariff regarding cash security deposits to advise that the certain items set forth in the Joint Petition are addressed. Finally, these reviews

and any associated revisions will be completed within twelve (12) months of the Commission's entry of a final order in this proceeding and will be conducted in consultation with the Pa PUC's Bureau of Consumer Services and FirstEnergy's USAC.

Language Access *(Joint Petition ¶ 68)* - In the Settlement, the Joint Petitioners agree beginning no later than March 1, 2025, FirstEnergy will provide its field representatives with a card in English and Spanish that field representatives can share with customers to facilitate a response to questions to confirm whether there is a medical condition in the home, whether a protection from abuse order or other court order with evidence of domestic violence is in effect, or, in winter months (December 1 to March 31), whether the household's income is at or below 250% FPL, thus triggering additional protections at the service location. These cards will be in plain language and will include a phone number consumers can call for direct translation and interpreter services.

Analytic Technologies *(Joint Petition ¶ 69)* - In the Settlement the Joint Petitioners agree FE PA will include a standing topic on its USAC meeting agendas through the filing of its next base rate proceeding related to the possible development and use of speech analytics software, artificial intelligence, and other such technologies to assist with the monitoring of phone calls involving, or potentially involving, universal service programs and other low-income customers. Further, Intervenor IBEW Local 777 shall also be forwarded the USAC meeting agendas and will be considered to be an interested party with respect to the discussions pertaining to Analytic Technologies.

Reconnection Fees *(Joint Petition ¶ 70)* - In the Settlement, the Joint Petitioners agree within six (6) months following the Commission's entry of a final order in this

proceeding in this proceeding, FirstEnergy will begin allowing Hardship Funds to be used for purposes of payment of reconnection fees for all CLI customers. For CAP participants seeking to reconnect service following an involuntary termination, reconnection fees will not be required to be paid upfront as a condition of reconnection and will be added to any remaining pre-program arrearages upon reenrollment in the program.

I&E's comprehensive response to all of the Customer Service and Universal Service Issues is as follows. I&E did not submit testimony regarding FirstEnergy's Customer Service and Universal Service Issues which include: the customer service and call center performance; the FirstEnergy customer assistance program; the hardship fund; the low-income usage reduction program; universal service administration; the confirmed low-income customer definition; a complaint handling analysis; practices, procedures and notices; language access; analytic technologies; and reconnection fees. Nevertheless, I&E shares the concerns of the interested Joint Petitioners. Further, I&E played an active role in the settlement negotiations regarding these issues and monitored the proposals and counter proposals offered by the Parties throughout this proceeding. In consideration of all of the proffered evidence and arguments, I&E does not oppose these settlement term as a full and fair compromise that provides FirstEnergy, the Joint Petitioners and the Commission with regulatory certainty and an amicable resolution of the Customer Service and Universal Service Issues, which is in the public interest.

G. ADDITIONAL PROVISIONS *(Joint Petition ¶¶ 71-73)*.

Reliability and Operations *(Joint Petition ¶ 71)* - In the Settlement, the Joint Petitioners agree that FirstEnergy commits to increase its internal field hires such that it will replace the prior year's attrition level plus ten percent, on a Rate District basis further divided proportionally by local, beginning January 1, 2025, (for 2024 attrition) for a period of five (5) years or until its next base rate proceeding, whichever happens first. Additionally, FirstEnergy agrees to complete a review of its system for opportunities to introduce projects to selectively underground facilities by December 31, 2025. Upon completion of this review, the Company agrees to propose modifications to its LTIIP III plan filed at Docket No. P-2024-3050269 to incorporate select projects identified as opportunities where largest impacts can be delivered. Finally, First Energy commits to a cumulative improvement in reliability that results in a reduction of the weighted average System Average Interruption Duration Index ("SAIDI") by 3.5% and System Average Interruption Frequency Index ("SAIFI") by 2.5% after three (3) years following the effective date of rates implementing the base electric distribution revenue increase provided for in this Settlement as more fully described in the Joint Petition.

I&E did I&E did not submit testimony regarding FirstEnergy's Reliability and Operations issues. Nevertheless, I&E shares the concerns of the interested Joint Petitioners. Further, I&E played an active role in the settlement negotiations regarding these issues and monitored the proposals and counter proposals offered by the Parties throughout this proceeding. In consideration of all of the proffered evidence and arguments, I&E does not oppose these settlement term as a full and fair compromise that

provides FirstEnergy, the Joint Petitioners and the Commission with regulatory certainty and an amicable resolution of the Reliability and Operations issues, which is in the public interest.

Non-Basic Services *(Joint Petition ¶ 72)* - In the Settlement, the Joint Petitioners agree FirstEnergy's web portal will identify that non-basic services and products are "non-basic," are not required to be purchased from FirstEnergy, and that other companies offer these same services. Further, FirstEnergy agrees to educate customers who purchase HomeServe or other non-basic services billed by the Company, about: 1) the definition of non-basic service, 2) the relationship between non-basic and basic services, and 3) related customer protections. Educational materials shall be provided in plain language via marketing materials, FirstEnergy's customer enrollment portal or other appropriate delivery channels best suited to ensure transparency, enhance customer comprehension and consider customer communication preferences. The Company agrees to insert a "non-basic" services label on its customer bills prior to the listing of the products and services purchased by the customer.

Additionally, the Company agrees to provide the proposed language changes/additions to the parties in this case for comment and discussion prior to implementing these changes. Finally, Settlement terms relating to HomeServe should not be interpreted as any party's agreement to or acceptance of the Company's provision of non-basic services or products. In any future proceeding, all Parties expressly reserve the right to take any position they deem appropriate as to the Company's use of HomeServe and/or the provision of non-basic products and services.

I&E did I&E did not submit testimony regarding FirstEnergy's Non-Basic Services issues. Nevertheless, I&E shares the concerns of the interested Joint Petitioners. Further, I&E played an active role in the settlement negotiations regarding these issues and monitored the proposals and counter proposals offered by the Parties throughout this proceeding. In consideration of all of the proffered evidence and arguments, I&E does not oppose these settlement term as a full and fair compromise that provides FirstEnergy, the Joint Petitioners and the Commission with regulatory certainty and an amicable resolution of the Non-Basic Services issues, which is in the public interest.

Electric Vehicle Pilot *(Joint Petition ¶ 73)* – In the Settlement, the Joint Petitioners agree that, for purposes of this Settlement, FirstEnergy withdraws all elements of its EV Pilot. Within twelve (12) months of the Commission's entry of a final order in this proceeding, FirstEnergy will initiate work with interested stakeholders, including Intervenor IBEW Local 777, to (i) develop a new EV distribution rate specifically for public-facing EV chargers, similar to PECO Energy Company's EV-FC Rider, and (ii) seek Commission approval for such a rate in its next general base rate case.

I&E witness Christine Wilson submitted testimony regarding the Company's proposed electric vehicle pilot program.[59] There was significant disagreement among the Parties as to whether any of FirstEnergy's EV proposal should be recommended, and if any, what parts of the proposal would be beneficial to the majority of FirstEnergy ratepayers.[60] Ultimately, after lengthy negotiations, the Joint Petitioners agreed to the EV

[59] I&E St. No. 4, pp. 51-56; I&E St. No. 4-SR, pp. 48-56.
[60] I&E St. No. 4-SR, pp. 48-56.

Pilot Settlement terms set forth in the Joint Petition. I&E fully supports the settled upon terms as a full and fair compromise that provides FirstEnergy, the Joint Petitioners, ratepayers, and the Commission with an amicable resolution and regulatory certainty which is in the public interest.

V. THE SETTLEMENT IS IN THE PUBLIC INTEREST

32. I&E represents that all issues raised in testimony have been satisfactorily resolved through discovery and discussions with the Company or are incorporated or considered in the resolution proposed in the Settlement. This Settlement exemplifies the benefits to be derived from a negotiated approach to resolving what can appear at first blush to be irreconcilable regulatory differences. The Joint Petitioners have carefully discussed and negotiated all issues raised in this proceeding, and specifically those addressed and resolved in this Settlement. Further line-by-line identification of the ultimate resolution of the disputed issues beyond those presented in the Settlement is not necessary as I&E represents that the Settlement maintains the proper balance of the interests of all parties. I&E is satisfied that no further action is necessary and considers its investigation of this rate filing complete.

33. I&E submits that the acceptance of this Settlement limited the need for evidentiary hearings, which would normally compel the extensive devotion of time and expense for the preparation, presentation, and cross-examination of multiple witnesses, the preparation of Main and Reply Briefs, the preparation of Exceptions and Replies, and the potential of filed appeals, all of which yield substantial savings for all parties and ultimately all customers. Moreover, the Settlement provides regulatory certainty with

respect to the disposition of issues and final resolution of this case which all parties agree benefits their discrete interests.

VI. SETTLEMENT CONDITIONS

34. The Settlement is conditioned upon the Commission's approval of all terms without modification. Should the Commission fail to grant such approval or otherwise modify the terms and conditions of the Settlement, it may be withdrawn by the Company, I&E, or any other Joint Petitioner.

35. I&E's agreement to settle this case is made without any admission or prejudice to any position that I&E might adopt during subsequent litigation in the event that the Settlement is rejected by the Commission or otherwise properly withdrawn by any other parties to the Settlement. Further, I&E's agreement to settle this case is made without any admission or prejudice to any position that I&E might adopt during any future proceeding regarding this Company or any other public utility.

36. If the ALJs recommend that the Commission adopt the Settlement as proposed, I&E agrees to waive the filing of Exceptions. However, I&E does not waive its right to file Replies to Exceptions with respect to any modifications to the terms and conditions of the Settlement or any additional matters that may be proposed by the ALJs in their Recommended Decision. I&E also does not waive the right to file Replies in the event any other party files Exceptions.

VII. CONCLUSION

WHEREFORE, the Commission's Bureau of Investigation and Enforcement represents that it supports the *Joint Petition for Approval of Settlement of All Issues* as

being in the public interest and respectfully requests that Administrative Law Judges Katrina L. Dunderdale and Emily I. DeVoe recommend, and the Commission approves, the terms and conditions contained in the Joint Petition without modification.

Respectfully Submitted,



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Dated: September 13, 2024

Appendix M

Appendix M

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, *et al.*	:	
	:	
v.	:	Docket Nos. R-2024-3047068
	:	C-2024-3048327
FirstEnergy Pennsylvania Electric Company	:	

STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
IN SUPPORT OF THE JOINT PETITION FOR
SETTLEMENT OF RATE INVESTIGATION

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September 13, 2024

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The Office of Consumer Advocate (OCA), one of the signatory parties to the Joint Petition for Settlement of Rate Investigation (Settlement), finds the terms and conditions of the Settlement to be in the public interest for the following reasons:

I. INTRODUCTION

On April 2, 2024, FirstEnergy Pennsylvania Electric Company (FirstEnergy or the Company) filed Supplement No. 3 to its Tariff Electric- Pa. P.U.C. No. 1 at Docket No. R-2024-3047068, with the Commission, seeking to increase total distribution revenues by an additional $503.8 million per year, or by 34%. By Order entered April 25, 2024, the Commission suspended the proposed Supplement No. 3 to Tariff Electric Pa. P.U.C. No. 4 until January 1, 2025. The Commission has ordered that an investigation be made to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations in the proposed Supplement No. 3. FirstEnergy is engaged in the business of furnishing electric service to approximately 2.1 million residential, commercial, and industrial customers across 55 counties.

The OCA conducted a thorough investigation into FirstEnergy's request for an increase in annual operating revenues of approximately $502 million per year, or by approximately 34%. On a rate district basis, the Company proposed to increase annual revenues as follows:

Rate District	Total Increase in Annual Distribution Revenues	% Increase
Met-Ed	$146.3 million	28.4% increase
Penelec	$133 million	26% increase
Penn Power	$54.8 million	42.3% increase
West Penn	$169.8 million	39.5% increase

Under the Company's proposal, the total bill for a residential customer using 1,000 kWh per month in each rate district would increase as follows:

Rate District	Current Monthly Bill 1,000 kWh usage	Proposed Monthly Bill 1,000 kWh usage	% Increase
Met-Ed	$188	$205	9.2% increase
Penelec	$201	$221	9.8% increase
Penn Power	$181	$202	11.8% increase
West Penn	$156	$173	10.6% increase

FirstEnergy also proposed an increase in the monthly residential charge for each rate district that would result in the following increases:

Rate District	Current Customer Charge	Proposed Customer Charge	% Increase
Met-Ed	$11.25	$14.50	28.9% increase
Penelec	$11.25	$14.50	28.9% increase
Penn Power	$11.00	$14.50	31.8% increase
West Penn	$7.44	$11.50	54.6% increase

As the OCA demonstrated in the record of this case as set out in its testimony, FirstEnergy's revenue request exceeded the amount of revenue necessary for it to provide safe, reliable and adequate service at just and reasonable rates to its approximately 2.1 million residential, commercial, and industrial customers across 55 counties. Additionally, FirstEnergy's case contained ancillary other proposals, including a proposal to change depreciation methodology from the average service life methodology to the equal life groups methodology and an inequitable rate design proposal that places a greater proportion of the Company's revenue recovery in fixed charges than at present rates, which taken together, would unnecessarily increase customers' rates for accessing essential utility service. Despite the Company's numerous proposals that exacerbated the impact of the proposed rate increase on its customers, FirstEnergy has requested a return on equity (ROE) of 11.3% in an equity rich capital structure.

The OCA opposed the Company's proposed rate increase because it was unjust and unreasonable as originally proposed. Under the terms of the Settlement, FirstEnergy will receive a reasonable revenue increase without creating a significant burden for FirstEnergy's customers.

A. Procedural History

On April 2, 2024, the Company filed its general base rate case seeking to increase total distribution revenues by $503.8 million per year. On April 9, 2024, the Commission's Bureau of Investigation and Enforcement (I&E) filed a Notice of Appearance of Scott Granger. On April 10, 2024, the OCA filed its Formal Complaint and Public Statement. On April 15, 2024, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance for Sharon E. Webb and Rebecca Lyttle. On April 16, 2024, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene and Answer. On April 25, 2024, the Commission suspended the Company's proposed tariff until January 1, 2025. On April 30, 2024, the International Brotherhood of Electrical Workers, AFL-CIO (IBEW Local 777) filed a Notice of Intervention. On May 2, 2024, Walmart, Inc. (Walmart) filed a Petition to Intervene. On May 10, 2024, the Pennsylvania State University (Penn State) filed a Petition to Intervene.

The Commission assigned this proceeding to the Office of Administrative Law Judge and further assigned this proceeding to Administrative Law Judge Katrina L. Dunderdale and during the course of the proceeding Administrative Law Judge Emily DeVoe (collectively, ALJs) was added to the case. On April 25, 2024 ALJ Dunderdale issued a Prehearing Conference Order. A telephonic Prehearing Conference was held on May 2, 2024, where the parties established rules for discovery, and a procedural schedule, among other things.

On June 26, June 27, June 28, July 9, July 10, July 11, July 12, July 16, and July 7, 2024, each day at 1 p.m. and 6 p.m., in-person Public Input Hearings were held in Reading, East Stroudsburg, State College, Erie, Lyndora, Greensburg, and Washington, respectively. The July 16 and 17 Public Input Hearings were held telephonically at 1 p.m. and 6 p.m. each day. At the Public Input Hearings, customers offered testimony regarding their ability to afford FirstEnergy's rates at both current rates and proposed, reliability issues, and FirstEnergy's poor quality of service.

In support of its positions on FirstEnergy's rate filing and consistent with the procedural schedule, on June 25, 2024, the OCA served the following pieces of direct testimony:

- OCA Statement 1, the Direct Testimony of Dante Mugrace;
- OCA Statement 2, the Direct Testimony of Marlon Griffing;
- OCA Statement 3, the Direct Testimony of David Garrett;
- OCA Statement 4, the Direct Testimony of Karl Pavlovic;
- OCA Statement 5, the Direct Testimony of Roger Colton;
- OCA Statement 6, the Direct Testimony of Barbara R. Alexander, and;
- OCA Statement 7, the Direct Testimony of Rao Konidena.

On July 22, 2024, OCA served Rebuttal Testimony by OCA witnesses Pavlovic and OCA witness Alexander, OCA Statements 4R and 6R, respectively. On August 8, 2024, OCA served Surrebuttal Testimonies by OCA witnesses Mugrace, Griffing, Garrett, Pavlovic, Colton, and Konidena. On August 9, 2024, the OCA served the Surrebuttal Testimony of Barbara Alexander. Evidentiary hearings were held telephonically on August 15 and August 19.

Pursuant to the Commission's policy of encouraging settlements that are in the public interest, the Joint Petitioners held numerous settlement discussions. These discussions resulted in

this Joint Petition for Settlement of All Issues (Settlement), which addresses the numerous complex issues raised in these cases. The OCA submits that the Settlement is in the public interest and in the best interest of the Companies' ratepayers and should be approved without modification.

The terms and conditions of the Settlement satisfactorily address issues raised in the OCA's analysis of the Companies' filings. The OCA submits that this Settlement, taken as a whole, is a reasonable compromise in consideration of likely litigation outcomes before the Commission. While the Settlement does not reach all the recommendations proposed by the OCA, the OCA recognizes that the Settlement is a product of compromise. The Commission encourages settlement, and the balance of compromises struck by the settling parties is critical to achieving settlement. Accordingly, the OCA urges the Commission to consider the Settlement as a whole.

In this Statement in Support, the OCA addresses those areas of the Settlement that specifically relate to important issues that the OCA raised in these cases. The OCA would expect that other parties will discuss how the Settlement's terms and conditions address their respective issues and how those parts of the Settlement support the public interest standard required for Commission approval.

For these reasons and those that are discussed in greater detail below, the OCA submits that the Settlement is in the public interest and the best interest of the Companies' ratepayers and should be approved by the Commission without modification.

II. REVENUE REQUIREMENT (Settlement ¶¶ 41, 42, 46).

The parties have agreed on an authorized revenue increase of $225.0 million, to become effective on or before January 1, 2025, for service rendered thereafter. Settlement ¶ 41. The

increase in annual distribution rate revenue is in lieu of the as-filed, overall increase of approximately $502 million. That is, the parties agreed to a revenue increase that is 45% of the increase requested by the Company. This Settlement represents a "black box" approach to the revenue requirement including, among other things, cost of capital issues. Black box settlements avoid the need for protracted disputes over the merits of individual revenue requirement adjustments and avoid the need for a diverse group of stakeholders to attempt to reach a consensus on each of the disputed accounting and ratemaking issues in this matter, as policy and legal positions can differ. As such, the parties have not specified a dollar amount for each issue or adjustment raised in this case. Attempting to reach agreement regarding each adjustment in this proceeding would have likely prevented any settlement from being reached.

Dr. Marlon Griffing presented the OCA's cost of capital testimony. Dr. Griffing's technical analysis using the discounted cash flow (DCF) model and using the capital asset pricing model (CAPM) as a check on the DCF results, found a return on equity (ROE) of 9.48 as being reasonable for FirstEnergy and fair to its ratepayers. OCA St. 2 at 8. Dr. Griffing then adjusted the results of his technical analysis downward by 10 basis points to 9.38 to account for FirstEnergy's poor reliability metrics. *Id*. Dr. Griffing also recommended using a 50/50 capital structure for ratemaking purposes. Dr. Griffing also testified that FirstEnergy's proposed ROE of 11.3 and its proposed capital structure of 53.81% equity and 46.19% debt were both well overstated and unsupported. *Id*. at 45-48.

OCA witness Dante Mugrace presented the OCA's revenue requirement testimony. Mr. Mugrace made numerous adjustments to the Company's proposed rate base and also its proposed expenses. OCA St. 1. In calculating the revenue requirement for each of the FirstEnergy rate districts, Mr. Mugrace relied on Dr. Griffing's cost of capital recommendations, the depreciation

adjustments recommended by OCA witness David Garrett, and also his own recommended rate base and expenses adjustments. OCA St. 1 at 5. Mr. Mugrace recommended an overall revenue increase of approximately $16.9 million, broken down by each rate district as follows: Met-Ed - $4,912,082, Penelec - $4,461,291, Penn Power - $1,838,059 and West Penn - $5,699,172. *Id*.

After review of the Company's rebuttal testimony, and the rebuttal testimonies of the other Parties, Mr. Mugrace revised the OCA's proposed revenue increase for each of the FirstEnergy rate districts, as follows: Met-Ed - $20,673,034, Penelec - $18,775,834, Penn Power - $7,735,675 and West Penn - $23,985,592 for a cumulative total of approximately $71.2 million. OCA St. 1SR at 3.

In settling this issue, the parties agreed to a cumulative revenue increase of $225 million. Settlement ¶ 41. The individual increase for each rate district was agreed to as follows: Met-Ed Rate District - $39,600,000; Penelec Rate District - $57,690,000; Penn Power Rate District - $24,980,000; and West Penn Rate District - $102,730,000. Settlement ¶ 42.

Arriving at a black box settlement number of $225 million represents a significant reduction from the Company's as-filed revenue increase of $502 million and required serious compromises from all parties. The $225 million increase, approximately 45% of the Company's as-filed position, is supported by the evidence and is within a reasonable range of outcomes had this matter been fully litigated. As such, the OCA submits that this Settlement provision is reasonable and in the public interest.

The Settlement also provides for a rate case stay-out provision, in that FirstEnergy agrees to not file another base rate case increase for any of its rate districts that would allow increased rates to go into effect any earlier than January 1, 2027. Settlement ¶ 46. This Settlement provision provides a measure of rate stability for the over 2 million FirstEnergy ratepayers. The

OCA submits that this provision could only be accomplished through a settlement of this case, is reasonable and consistent with the public interest.

III. REVENUE ALLOCATION AND RATE DESIGN (Settlement ¶¶ 43-45).

A. COSS and Revenue Allocation (Settlement ¶ 43)

The Company presented four cost of service studies (COSS), one for each of its rate districts. These COSS were created using the minimum-system method. The minimum-system method assumes a hypothetical distribution system that is designed to connect all customers to the system at very minimal loading levels. OCA St. 4 at 8. This minimum system is then used to assign the costs of plant accounts 364-368, which contain costs associated with the overhead and underground wires, supporting structures, and line transformers that connect the distribution system to meters and other installations at customer premises. *Id*. In assigning these costs, the Company assigns a customer component based on the number of customers in each class, and the remaining costs are assigned based on the demand component of each class. OCA St. 4 at 7. After assigning all costs to each class, the results of the COSS are then used as a guide to allocate the proposed revenue increase to each class. OCA St. 4 at 15-16.

OCA witness Dr. Karl Pavlovic testified that the Company's use of a minimum-system method, where costs are assigned as either customer related or demand related, is unsupported and inconsistent with the principle of cost causation. OCA St. 4 at 9. Dr. Pavlovic testified that the Company's own planning documents confirmed that the distribution system is designed to support peak demand on the system, and that the system is not designed or built merely to connect customers as the minimum-system method supports. OCA St. 4SR at 5. As Dr. Pavlovic testified:

> As a general matter, minimum-size classification of distribution costs increases the costs allocated to rate classes with large numbers of customers and decreases costs allocated to rate classes with small numbers of customers.

OCA St. 4 at 15. Dr. Pavlovic testified that the distribution system costs in question should be allocated only on a demand basis, and not include any customer component. OCA St. 4 at 10. Using the OCA's COSS based only on demand, compared to the Company's customer/demand split creates widely varying results as to the proposed revenue allocation to the various classes. *See* OCA St. 4R at 8-25.

The Parties were able to settle the issue of revenue allocation by arriving at reasonable increases for all customer classes. The exact revenue allocation agreed to for each rate district is presented in the Joint Petition at Appendix E. Settlement ¶ 43. The choice of a COSS and the resulting revenue allocation is one of the most heavily debated issues in a rate case. The Settlement here resolves these issues for each rate district in a fair and reasonable manner for all rate classes that is consistent with principles of cost causation and gradualism. Accordingly, the OCA submits this provision is in the public interest and should be accepted.

B. Residential Customer Charge (Settlement ¶ 44)

In its filing, the Company proposed to increase the customer charge for all residential customers in each of its rate districts, as follows:

Table 18 – Comparison of Current and Proposed Residential Customer Charges

Rate District	Current Customer Charge	Proposed Customer Charge	Percent Increase
Met-Ed	$11.25	$14.50	22.4%
Penelec	$11.25	$14.50	22.4%
Penn Power	$11.00	$14.50	31.8%
West Penn	$7.44	$11.50	54.6%

OCA St. 4 at 38. OCA witness Roger Colton testified that increases to the customer charge fall particularly hard on low-income customers resulting in bill affordability issues. OCA St. 5 at 70-

80. Further, increases to the customer charge provides a disincentive to conservation activities, because the larger fixed charge cannot be reduced through a reduction in usage and mutes the effect of energy efficiency measures. *Id*. OCA witness Dr. Pavlovic also testified that increasing the fixed customer charge fails to send any actionable price signal to customers, as customers have a reduced incentive toward conservation activities and also have less control over their total bill even when usage is reduced. OCA St. 4 at 38-39. Dr. Pavlovic recommended that the customer charges remain unchanged. OCA St. 4 at 39.

In settling this issue, the Parties agreed that the customer charges for Met-Ed, Penn Power and Penelec would remain unchanged. The customer charge for West Penn customers would increase from $7.44 to $9.00. Settlement ¶ 44. This provision is reasonable as the proposed increases for all rate districts were not supported by the record and were inconsistent with the principle of gradualism. The modest increase for West Penn brings that rate district closer to the other FirstEnergy EDCs and is the product of broad compromise among the Parties. The OCA submits that this provision is reasonable, in the public interest and should be accepted.

C. Streetlight Conversion Program (Settlement ¶ 45)

FirstEnergy proposed to replace 85,365 non-LED streetlights across its four rate districts at a rate of approximately 17,000 streetlight conversions per year beginning in 2025. The Streetlight Conversion program would run for approximately five years. OCA St. 4 at 40. FirstEnergy proposed to recover the cost through a regulatory asset to be amortized at a rate of $9,000,000 over five years, for a total cost of approximately $46,702,559. The Company's proposal was that the expenses and costs will be monitored, trued up and applied in the next base rate case. *Id*. The Company claimed that the conversion would benefit ratepayers in that there would be: (1) a reduction in kilowatt-hour consumption due to the greater efficiency of LED

streetlights versus non-LED streetlights, (2) a reduction in carbon dioxide due to lower kilowatt-hour consumption, and (3) a reduction in kW capacity required for FirstEnergy's winter peak. OCA St. 4 at 41.

OCA witness Dr. Pavlovic agreed that there could be ratepayer benefits resulting from the conversion program but testified as to his concerns over the Company's proposed cost recovery mechanism. Dr. Pavlovic explained that under the Company's proposal the regulatory asset would start when new rates went into effect from this rate case, which may not align with when the Company actually incurred these costs. *Id*. at 42. Second, the regulatory asset would not be transparent to ratepayers as to the costs that were being collected. *Id*. Further, one of the main benefits of the conversion program, the reduction in usage and subsequent reduction in energy bills would only accrue only to the benefit of the streetlighting class. *Id*.

Based on these concerns, Dr. Pavlovic recommended that a surcharge mechanism be created instead of the regulatory asset proposed by the Company. The surcharge mechanism would operate as follows:

- An annual regulatory asset recovery would be calculated assuming five years for recovery and based on the net asset value of the non-LED lights to be replaced as of the month prior to inception of the conversion program.
- Two kilowatt-hour surcharges would be calculated and appear as separately identifiable bill items. The first would be based on one third of the annual regulatory asset and applicable only to FirstEnergy's rate district's streetlighting tariff schedules. The second would be based on the remaining two thirds of the annual regulatory asset and applicable to all FirstEnergy's tariff schedules.

- FirstEnergy would monitor and true-up the surcharges on an annual basis.
- The surcharges would expire when the full amount of the regulatory asset has been recovered.

OCA St. 4 at 41-42. This surcharge mechanism would more closely match the costs of the conversion program to the recovery of the costs because costs would not be flowed through the surcharge until they were incurred, would provide transparency as a separate line item on the bill and would more equitably distribute the costs consistent with cost causation principles. *Id*. at 42. Under Dr. Pavlovic's proposal, the two thirds surcharge applicable to all customers would be based on volumetric sales. OCA St. 4SR at 16-17.

The Parties exchanged numerous iterations of the surcharge mechanism. In settlement, the Parties agreed to create the LEDC Rider, where the two thirds surcharge would be allocated to the non-streetlight classes on a Network System Peak Load (NSPL) basis. Settlement ¶ 45. The remaining one-third would be recovered from the streetlighting class consistent with Dr. Pavlovic's proposal. A rate example of the LEDC Rider is attached to the Joint Petition in Appendix F. The OCA submits that the resolution of this issue in the settlement is broadly consistent with the OCA's presentation of the issue in this proceeding and is designed to accomplish the same ends as it is targeted to only recover costs as they are incurred and to assign those costs reasonably on the basis of those classed who benefit. Based on the foregoing reasons, and the compromise reached, the OCA submits that the resolution of this issue is in the public interest and should be approved.

IV. ACCOUNTING (Settlement ¶¶ 50-57)

A. Depreciation (Settlement ¶ 50)

The Settlement provides that FirstEnergy's proposal to change its depreciation methodology to the Equal Life Group is withdrawn. Settlement at ¶ 49. In the Company's initial filing, FirstEnergy presented a claim for annual depreciation based on the equal life group (ELG) depreciation procedure. FE Statement No. 9 at p. 4, line 15. FirstEnergy witness Spanos noted that while "for most plant accounts, the current claim for annual depreciation is based on the straight line method of depreciation, which has been used for almost 25 years, [h]owever, the depreciation procedure has been changed to the equal life group procedure. . . ." *Id.* at lines 13-15.

The OCA opposed FirstEnergy's proposal for several reasons in the direct and surrebuttal testimonies of Mr. David J. Garrett, OCA St. 3 and OCA St. 3SR, respectively. First, the average life group (ALG) procedure is used by analysts and adopted by regulators in the vast majority of jurisdictions and cases. OCA St. 3 at 8. Second, the Company's own currently-approved depreciation rates are based on the ALG procedure. *Id.* Third, the primary catalyst of FirstEnergy's proposed increase to depreciation expense is the proposed switch from the ALG procedure to the ELG procedure proposed by Company witness Mr. Spanos. *Id.*

There are four components, each with several variations, used to determine a depreciation system, which is then used to estimate depreciation rates. These basic components are: (1) a method of allocation, (2) a procedure for applying the method, (3) a technique for applying the depreciation rate; and, (4) a model for analyzing the characteristics of vintage property groups. OCA St. 3 at 6, App. A. Additionally, the selection of the survivor curves to best reflect the life of the assets is an important decision in conducting a depreciation study and requires exercising professional judgment. *Id.* at Apps. B, C; OCA St. 3SR at 8.

OCA witness Garrett used the straight-line method, the ALG procedure, the remaining life technique, and the broad group model. OCA St. 3 at 7. Overall, the ALG procedure equitably spreads the annual depreciation expense on rate base investment over the generations of customers that receive service from the investments (*i.e.*, favors intergenerational equity). OCA St. 3 at 7. The use of the ALG procedure can be used to mitigate the rate increases associated with Pennsylvania utilities' significant rate base investments that have been occurring for several years and will continue to occur. OCA St. 3SR at 3.

Conversely, the ELG procedure assigns more depreciation expense to customers that take service early in the asset's service life and reduces the expense to customers toward the end of the asset's service life and need to be adjusted every year in order for the ELG procedure to produce accurate depreciation rates. OCA St. 3 at 7, OCA St. 3SR at 4. OCA witness Garrett explains that the ELG procedure is "effectively a form of accelerated cost recovery for the utility." OCA St. 3 at 4-5. These accelerated depreciation rates that occur, if ELG procedure is adopted, would continue to burden consumers until FirstEnergy's next rate proceeding. *Id.* at 5.

In Settlement, FirstEnergy ultimately withdrew its proposal to switch depreciation procedure, and the OCA submits this settlement which keeps the ALG depreciation procedure intact is reasonable and in the public interest. Settlement ¶ 50. The OCA reaffirms its testimonial position that the ALG depreciation procedure is the appropriate procedure to support just and reasonable rates for consumers.

B. Pension/OPEB (Settlement ¶ 51)

The Settlement provides that FirstEnergy's proposal to utilize a Pension and Other Post-Retirement Benefits Normalization (PON) mechanism is withdrawn. Settlement ¶ 51. Use of the PON was paired with the Company's proposal to return to the "delayed recognition method" of

recovering pension and OPEB expenses. The Company proposed the PON to address what it viewed as inherent volatility in pension and OPEB expenses brought about by factors outside its control, such as interest rates, asset returns and employee mortality. The Company stated that this presents a risk for customers that the level of expense may be too high, and a risk for the Company that the level of expense included in rates may be too low. The PON would moderate the effects on the Company's income statement from the impact of investment performance of pension and OPEB assets due to market fluctuations beyond the Company's control. FirstEnergy St. 4 at 21-22.

The OCA opposed implementation of the PON mechanism. OCA witness Mugrace agreed with I&E witness Wilson that FirstEnergy should maintain its existing method of pension and OPEB expense recovery based on a ten-year average of actual cash contributions rather than moving to the delayed recognition method. OCA St. 1-SR at 20. Further, Mr. Mugrace pointed out that if the cash contribution method is maintained, there would be no need to institute the PON mechanism. *Id*.

As noted, under the Settlement, the PON proposal is withdrawn. Settlement ¶ 51. The Settlement preserves the right of the Company to propose any of the pension or OPEB terms raised in this proceeding in future base rate proceedings and the ability of other parties to respond to those proposals. Given the OCA's opposition to the PON mechanism, the OCA submits that the Settlement term on this issue produces a reasonable result.

C. Storm Expense (Settlement ¶¶ 52-54)

With respect to FirstEnergy's Storm Expense claims, the Settlement provides that the Company will amortize all known and measurable amounts for ordinary and extraordinary storm expenses that were recorded on its books as of December 31, 2023, with *no rate base or debt*

cost treatment for unamortized balances. Settlement ¶ 52. Amortization will occur over a five-year period. The Settlement specifies the balances to be recovered for both ordinary and extraordinary storm expense beginning January 1, 2025. *Id.* The Settlement further provides that annual funding for the storm reserve account will be based on the five-year historical average of actual storm expenses equal to $52.8 million. Settlement ¶ 53. In addition, in the period between rate cases, the balance of the storm reserve will be capped at two times the annual funding amount. Settlement ¶ 54.

From the OCA's standpoint, the key element of this Settlement term is that there will be no rate base treatment of storm expenses. The Company was seeking to include the unamortized balance of storm expenses in rate base and earn a return on those amounts. The OCA objected to including these unamortized balances in rate base. OCA witness Mugrace took the position that costs related to storm damage are operating expenses, not capital investments. As such, the Company should not be earning a return on these costs *and* recovering the costs through an amortization expense. This would result in the Company recovering more for storm costs than they actually incurred. OCA St. 1 at 17. The Company should only be authorized to recover actual and known operating expenses associated with its repairs of storm-related damages. *Id*.

The Company's agreement to forego rate base treatment for the unamortized storm-related expense balances will avoid the increased cost to customers of including those balances in rate base and is consistent with the OCA's perspective on the proper ratemaking treatment of these balances.

D. <u>COVID-19 Cost Deferral</u> (Settlement ¶ 55)

Among other things, the Settlement term related to the Company's recovery of deferred Covid-19 costs provides that the $21.5 million of such costs will be amortized over five years

with no rate base treatment for the unamortized balance. Similar to its position on rate base treatment for unamortized storm costs, the OCA opposed including unamortized COVID-19 costs in rate base.

OCA witness Mugrace testified that the deferred costs associated with Covid-19 are not the sort of expenditures that the Company should earn a return on. He noted that the costs are extraordinary, temporary in nature and will not remain permanently on the Company's balance sheet like other expenditures that are used in the normal daily operations of a utility. OCA St. 1 at 23. Mr. Mugrace stated that these types of costs should be recovered entirely through expense amortization without rate base inclusion of unamortized balances. *Id.*

The Settlement accomplishes that. As with storm costs, having this term in the Settlement will avoid increased costs to customers and will comport with the OCA's view of the proper ratemaking treatment for the COVID-19 deferral balances.

E. Verizon Complaint (Settlement ¶ 56)

In this proceeding, FirstEnergy proposed to recover its estimated level of pole attachment revenue paid by Verizon. That estimate was reflective of the Commission's determination in a case brought by Verizon challenging FirstEnergy's rates for pole attachments. In a December 2020 Order, the Commission directed that FirstEnergy's pole attachment rates be reduced. Given that ruling and the fact that it is the subject of ongoing appellate litigation, FirstEnergy proposed to record as a regulatory asset the difference between the pole attachment rates the Company had been charging and the new reduced rates ordered by the Commission and to recover that difference as part this case. First Energy St. 1 at 21-22. The Verizon complaint matter is now before the Pennsylvania Supreme Court. OCA St. 1 at 25.

The OCA opposed the recovery of this proposed regulatory asset. OCA witness Mugrace stated that it is highly speculative as to how the Supreme Court will rule on the complaint case and that the rate impact of any refunds that may be ordered is not known. *Id.* Mr. Mugrace recommended disallowance of the entire claim on the basis that it is not known and measurable at this time or possibly even before the end of the FPFTY. *Id.* Mr. Mugrace noted that once the outcome of the litigation with Verizon is more certain, the Company can seek an adjustment in its next base rate case proceeding with respect to the Verizon complaint. *Id.*

The Settlement provides that FirstEnergy will withdraw its claim for recovery of revenue differences associated with its litigation with Verizon. Settlement ¶ 56. The withdrawal effectively achieves the same result recommended by the OCA. The Settlement further provides that the Company can file a future petition for deferral of these costs depending on the outcome of the ongoing litigation. The OCA submits that this is a reasonable resolution of this issue.

F. Refunds (Settlement ¶ 57)

Settlement paragraph 57 provides for a one-time bill credit to customers totaling $13.6 million. Settlement ¶ 57. This refund was proposed by the Company in its initial filing and is the result of reviews the Company performed of certain non-operating or non-recoverable costs that were incorrectly recorded to utility operating accounts. Once the misallocated costs were identified, the Company engaged in a process to determine the effect of these misallocations on the rates of the four FirstEnergy operating companies in Pennsylvania. That process is described in the Direct Testimony of Company witnesses Savage and Ashton. FirstEnergy St. 1 at 19-20; St. 4 at 37-38. The result of that process was that $13.6 million was incorrectly included in rates and charged to the customers of the Pennsylvania operating companies. Hence the proposed refund. Clearly, the OCA supports this provision of the settlement.

V. UNIVERSAL SERVICE AND CUSTOMER ASSISTANCE PROGRAMS (Settlement ¶¶ 58-69).

Affordability for low-income customers is a paramount rate consideration. The Code "seeks to ensure that service remains available to all customers on reasonable terms and conditions." 66 Pa. C.S. § 1402(3). Customer assistance programs should seek to enroll low-income customers as quickly as possible to encourage customers to maintain good payment habits while guaranteeing the servicing utility revenues, minimizing arrears, and reducing termination expenses.

FirstEnergy' bills have increased dramatically over the past several years. Penelec's rates increased from $0.1453/kWh in 2021 to $0.1907 in 2023, while West Penn Power's increased from $0.1036 to $0.1476 in the same time-period. OCA St. 5 at 5. Met-Ed and Penn Power experienced similar rate increases in that time-period. *Id.* Such dramatic increases have a disproportionate impact on low-income customers, occupying greater portions of a customer's income, as utility bill increases have outpaced income growth. *Id.* at 5-8. Both the breadth and depth of unaffordability of electric distribution rates would increase substantially under the Company's current proposal. *Id.* at 8-13.

In addition to recommending the Commission adopt an overall lower revenue requirement increase that will allow the Company to recover its reasonable costs and result in a lower rate increase, the OCA identified several areas where the Company could improve its protections for low-income customers and urges the Commission to adopt these protections to remove service barriers for FirstEnergy' most vulnerable customers. The Settlement addresses some of the key concerns raised by OCA witness Colton.

A. Plain Language Notice (Settlement ¶ 60)

The Commission has a policy statement that promotes the use of plain language. 52 Pa. C.S. § 69.251. The Commission policy statement states provides:

> § 69.251. Plain language—statement of policy.
> (a) *General*. The Commission recommends that public utilities adopt the following guidelines for written material provided to residential customers. Each utility shall designate appropriately trained staff persons to serve as liaisons to the Bureau of Consumer Services regarding this policy statement. Companies shall conduct field tests, use consumer advisory panels or focus groups to prepare plain language materials for Commission review. The Bureau of Consumer Services will selectively review the materials prior to final company publication and mailing to residential customers.
> (1) In preparing information, the utility shall include use of the following:
> (i) Short sentences.
> (ii) Active voice rather than passive voice.
> (iii) Personal pronouns.
> (iv) Definition of necessary terms that are technical and not commonly understood.
> (v) Clear section headings which accurately describe the information that follows.
> (vi) Separate listing of each condition of any agreement, offer or requirement.
> (vii) Commonly understood words.
> (2) The utility shall avoid the following practices:
> (i) Technical, legal or utility terms not commonly understood.
> (ii) Double negatives.
> (iii) Abbreviations not commonly used.
> (iv) Foreign words, except for information aimed at non-English speaking customers, or words with obsolete meanings.
> (b) *Visual guidelines*. In addition to plain language, the Commission recommends that the utilities adopt the following visual guidelines for written materials provided to residential customers:
> (1) Clear section headings which use bold face, italics, underlining or color to set them apart from the rest of the text.
> (2) Ink that sharply contrasts with the paper.
> (3) Spacing and margins which make materials easy to read.
> (4) The use of both upper and lower case letters.
> (5) The use of large typeface, at least 8 to 10 point type.
> (6) Line length shall contain between 50 and 70 characters.

Id.

In testimony, the OCA recommended that customers who have had service disconnected for nonpayment, and who remain disconnected at the time of the Company's Cold Weather

Survey (CWS) undertaken for the Commission, should be provided a written, stand-alone, Plain language notice of their right to enroll in the Company's CAP with an explanation of the advantages of CAP's arrearage forgiveness provisions. OCA St. 5 at 46. OCA witness Colton also recommended that FirstEnergy adopt a procedure under which it will provide a stand-alone plaint language notice to customers found to be without heating service at the time of the Company's Cold Weather Survey of the customer's right to enter into CAP and an explanation of CAP's arrearage forgiveness benefits. *Id.* at 50. OCA witness Colton further recommended that FirstEnergy develop the Plain language notice in collaboration with its Universal Service Advisory Group. *Id.* Moreover, OCA witness Colton recommended that when Confirmed Low-Income customers accrue an unpaid balance of $300, and at each $300 of incremental arrears thereafter, FirstEnergy provide a stand-alone written plain language notice informing those customers of their right to enroll in the Company's CAP, along with an explanation of the advantages of CAP's arrearage forgiveness provisions. *Id.* at 49-50. Additionally, OCA witness Colton recommended that in those instances where FirstEnergy would otherwise request a cash security deposit as set forth in its Tariff, the Company should, as an alternative to that deposit demand, provide a stand-alone written plain language notice informing these customers of their right to enroll in the Company's CAP, along with an explanation of the advantages of CAP's arrearage forgiveness provisions. *Id.* at 54.

OCA witness Colton testified that a substantial number of customers who have had service disconnected during the course of the year remain without heating service at the start of the next winter heating season. OCA St. 5 at 46-48. This lack of access to service could be remedied for income-eligible customers through enrollment in CAP. *Id.* at 47. Providing plain language notice to low-income customers will likely result in an increased understanding of the

availability of assistance to low-income customers who are struggling to pay for vital utility service.

Under the terms of the Settlement, FirstEnergy will initiate the issuance of plain language notices to low-income customers with a past due bill during the winter heating season to let them know that they have a past due bill and outline the assistance that is available to help pay their bill, including but not necessarily limited to the Hardship Fund, CAP, and LIHEAP. Settlement ¶ 60. Providing low-income customers with plain language notice regarding these important assistance programs enhances both the utility's communication with its customers and the low-income customer's knowledge regarding assistance programs. This enhanced communication will help low-income customers understand their options and is in the public interest.

B. Identification of Confirmed Low Income Customers (Settlement ¶ 63)

The Commission's regulations require that any EDC that has "obtained information that would reasonably place the customer in a low-income designation" should consider that customer a "confirmed low-income customer." 52 Pa. C.S. § 54.72. The Commission has made clear the types of information that a customer can use to "reasonably place [them] in a low-income designation." *Id.* The Commission's regulations define a "low-income customer" as follows: "A residential utility customer whose household income is at or below 150% of the Federal poverty guidelines." *Id.* In implementing the waiver of cash security deposits for low-income households, for example, Commission regulations provide that "An applicant is confirmed to be eligible for a customer assistance program by the public utility if the applicant provides income documents or other information attesting to his or her eligibility for state benefits based on household income eligibility requirements that are consistent with those of the public utility's customer assistance programs." 52 Pa. C.S. § 56.32(e).

FirstEnergy currently only considers CAP customers and customers who received LIHEAP cash or crisis grants, and customers with payment arrangements as Confirmed Low Income (CLI) customers. OCA St. 5 at 33. OCA witness Colton recommended that FirstEnergy modify its internal low-income confirmation procedure to include all options available to customers under the Commission's regulations, including self-certification, for all instances, including service disconnection and reconnection, without requiring verification of precise income levels. OCA St. 5 at 35-36. Additionally, OCA witness Colton recommended that FirstEnergy should add to each residential tariff under "Special Provisions," a new paragraph with the following language: "A confirmed low-income residential account, including applicants, will be afforded each protection accorded by tariff or regulation, which tariff or regulation applies to any customer or applicant with household income at or below 150% of the Federal Poverty Level." OCA St. 5 at 36.

Under the terms of the Settlement, within 6 months of a final order in this proceeding, FirstEnergy will convene a collaborative of its USAC to discuss its current definition of CLI customers with the commitment to, within 12 months of a final order of this proceeding, revise its definition to clearly outline those criteria which would qualify for CLI definitions and the timeframe for which a CLI designation will be retained under the Company's practices and procedures and consistent with 52 Pa. Code Section 54.72. Settlement ¶ 63.

Requiring FirstEnergy to convene a collaborative at its next USAC to discuss its current definition of Confirmed Low-Income customers in order to revise its definition and time frame for CLI customer designation is in the public interest. The determination of whether a customer is identified as CLI impacts security deposit requirements and utility assistance program

eligibility. Ensuring that FirstEnergy will convene a collaborative at its next USAC to address this important issue represents a reasonable compromise reached by the parties in Settlement.

C. Security Deposit (Settlement ¶¶ 65-66)

The Commission's regulations prohibit a utility from assessing a security deposit on customers who have income at our below 150% of the federal poverty income guidelines. 52 Pa. C.S. § 56.41(4). In testimony, OCA witness Colton recommended that FirstEnergy should be directed to refund deposits for customers from whom the Company has received "income documents or other information" indicating that the customer has income at or below 150% of the Federal Poverty Level (FPL). OCA St. 5 at 65-66. With a customer having provided the Company with sufficient information to lead FirstEnergy reasonably to find that customer to be low-income, the OCA recommended that the Company should, at a minimum, provide notice to those Confirmed Low-Income customers of the potential for CAP enrollment, along with an explanation of arrearage forgiveness and its advantages as a "rate most advantageous to the patron." OCA St. 5 at 56; 66 Pa. C.S. § 1303.

The OCA further recommended in testimony that FirstEnergy should be ordered to refund any cash security deposit received from, or decline to impose a cash security deposit on, any customer who is currently categorized as "Confirmed Low-Income" or who is enrolled in a Tier 1 payment arrangement. OCA St. 5 at 66. The OCA also recommended that FirstEnergy be directed to include in its tariff, and incorporate into its corresponding practices and procedures, that any customer who has previously posted a cash security deposit, and who is subsequently newly found to be low-income, is entitled to a refund of that deposit at the time they are newly recognized as being low-income. *Id.* at 67. The OCA recommended that FirstEnergy include in its tariff the April 2024 order of the Commission, directing that the Company may apply an

existing security deposit to the account balance only with the customer's informed consent. OCA St. 5 at 67. As part of obtaining this informed consent, the OCA recommended that FirstEnergy must explain to the customer how applying the security deposit to the account balance would impact the customer's monthly bill. *Id.* Lastly, the OCA recommended that, within three months after a final order in this proceeding, FirstEnergy should undertake a review of all customers from whom the Company currently holds deposits to determine whether they qualify for the exemption, and to make necessary refunds. OCA St. 5 at 67. The OCA further noted that FirstEnergy should report the results of this review to BCS as well as to its Universal Service Advisory Group. *Id.*

Under the terms of the Settlement, FirstEnergy will undertake a review of all policies, procedures, and training materials for revision, where appropriate, to ensure that: all guidance regarding the identification of "confirmed low-income" customers to conform with the PUC's regulations for electric distribution utilities, including as related to the waiver and/or refund of security deposits in such instances, and all guidance related to security deposits and the refund thereof. Settlement ¶ 65.d. Moreover, FirstEnergy will amend its tariff regarding cash security deposits to advise that: the Company will not require an applicant or customer to provide a cash deposit when the customer provides information which demonstrates that he or she qualifies as CLI, and; that any customer who has previously posted a cash security deposit, and who is subsequently newly found to be exempt from a deposit demand will be refunded that deposit within 30 days of identifying that customer as CLI. Settlement ¶ 66. Security deposit refunds issued for confirmed low income customers will be made directly to the customer, unless FE PA obtains informed consent to apply the security deposit to the customer's account balance. *Id.*

FirstEnergy's commitment to review all policy, procedures, and training, including in the area of security deposits, is a step in the right direction in ensuring that FirstEnergy is in full compliance with the public utility code and he Commission's regulations. Committing to a tariff amendment regarding cash security deposits to advise that the Company will not require an applicant or customer to provide a cash deposit when the customer provides information which demonstrates that he or she qualifies as CLI, and that any customer who has previously posted a cash security deposit, and who is subsequently newly found to be exempt from a deposit demand will be refunded that deposit within 30 days of identifying that customer as CLI is a significant improvement over the status quo. FirstEnergy's commitment to review all policy, procedures, and training related to the security deposit and its commitment to amend its tariff are in the public interest.

D. Analytic Technologies (Settlement ¶ 69)

Currently, FirstEnergy primarily uses NICE Enlighten AI and NICE CXOne (collectively, NICE) to determine customer pain points during significant call volume spikes or during other market disruptor scenarios. OCA St. 5 at 57-58. While FirstEnergy is changing software providers, FirstEnergy stated that it plans to expand its use of speech analytics in the future. *Id.* at 58.

The OCA recommended that FirstEnergy utilize its current speech analytics software to identify customers who may be payment troubled. OCA St. 5 at 56. OCA witness Colton testified that FirstEnergy should be able to use the software currently employed to review call center conversations, NICE, to identify keywords which might indicate that a customer calling into the call center is payment troubled. *Id.* at 57.

OCA witness Colton testified that speech pattern analytics could also be used to determine whether calls to the FirstEnergy call center are handled properly for purposes of identifying Confirmed Low-Income customers and customers who would benefit from enrollment in the Company's universal service programs. OCA St. 5 at 59-60. Terms, phrases and speech patterns associated with low-income status, payment difficulties, unaffordability, or seeking low-income assistance for energy or other life necessities (e.g., food, housing, medical care) could be identified such that FirstEnergy could search for them to identify universal service calls. *Id.* at 60. Proper handling would include approving delays in collection activities pending applications for and approval of program enrollment; identification in the Company's information technology of Confirmed Low-Income customers; and extending available low-income protections. *Id.*

According to FirstEnergy "FE PA has not had any applicable charges associated with software modifications as it pertains to phrases, terms or other speech patterns searched because new searches are created with each request and there is no cost associated with this." OCA St. 5 at 59; OCA Exh. RDC-5. Therefore, the OCA recommended that FirstEnergy be directed to extend the use of its speech analytics software to assist with the monitoring of phone calls involving, or potentially involving, universal service programs and other low-income customers. OCA St. 5 at 61. The OCA further recommended that FirstEnergy should be directed to involve its USAC in the identification and selection of Low-Income and Universal Service Terms to be detected by the system in order to confirm that phone calls are properly being identified and handled. *Id.* Moreover, the OCA recommended that regular six-month reports on the results of the Speech Analytics reviews should be provided to the USAC. *Id.*

Under the terms of the Settlement, FirstEnergy will include a standing topic on its USAC meeting agendas through the filing of its next base rate proceeding related to the possible development and use of speech analytics software, artificial intelligence, and other such technologies to assist with the monitoring of phone calls involving, or potentially involving, universal service programs and other low-income customers. Settlement ¶ 69. Following the OCA's settlement discussions with the Company, including speech analytics, artificial intelligence, and other such technologies in FirstEnergy's next USAC represents a reasonable compromise regarding a cutting-edge technological issue that can provide benefits to Pennsylvania's ratepayers. This Settlement provision is the result of compromise involving an evolving field of technology. Given the continued improvement in the areas of speech analytics and artificial intelligence, including a standing topic in FirstEnergy's USAC is in the public interest.

VI. RELIABILITY (Settlement ¶ 71).

In its filing the Company proposed a ten-year enhanced vegetation management program at an annual cost of $92,846,000. OCA St. 1 at 45. The Company stated that it is currently spending approximately $100 million annually on vegetation management. The Company stated that the enhanced program would focus on widening existing rights-of-way (ROW), removal of overhanging limbs and brush, and seeking to more proactively target on and off ROW trees. *Id*. at 46. OCA witnesses Rao Konidena and Dante Mugrace both expressed numerous concerns about the Company's proposal. *See* OCA St. 1, OCA St. 7.

Mr. Konidena reviewed each of the rate district's reliability performance over the last several years, based on the SAIFI, SAIDI and CAIDI standards, and found that the FirstEnergy rate districts consistently performed at the bottom or near bottom in every category as compared

to other Pennsylvania EDCs. OCA St. 7 at 24-25. Mr. Konidena also found that for each rate district the number one cause of outages continues to be off-ROW trees. *Id*. at 22. As proposed, the enhanced vegetation management plan includes proactively targeting these off-ROW trees, and yet as Mr. Konidena testified, the Company has no identifiable plan as to how this is going to be accomplished by simply spending more money. *Id*. at 34-35.

Based on the amount of ratepayer dollars already being spent on vegetation management, and the lack of any notable reliability improvements, Mr. Konidena recommended that in conjunction with any increase in this expenses that the Company should look to selective undergrounding of problem circuits. *Id*. at 35-36. Further, Mr. Konidena testified that the Company's proposed ten-year plan should not be approved, as there is no guarantee that reliability will improve nor is there any planned checks along the way to see if the plan is actually working. *Id*. at 40-42. In conjunction with Mr. Mugrace, Mr. Konidena recommended that approximately one half of the proposed budget be authorized in this proceeding, with reporting requirements to the Commission and other stakeholders to measure whether this enhanced plan is providing any benefits to ratepayers in terms of fewer outages and better overall reliability. *Id*.

Mr. Mugrace testified that the Company's actual spending over the last five years' has varied widely, from a high of $125,298,815 to a low of $38,455,690. OCA St. 1 at 47. Mr. Mugrace went on to testify that the current level of spending has not seemed to improve either FirstEnergy's poor reliability metrics or reduced the number of outages. *Id*. at 48. In conjunction with the findings of OCA witness Konidena, the proposed increased level of spending may not produce any better reliability performance, considering the Company's current efforts. *Id*. Based on Mr. Mugrace's and Mr. Konidena's analysis, Mr. Mugrace recommended that the Company

be allowed to include one half of its proposed vegetation management increase, or $46,423,000. Id. at 47.

In order to settle this issue, the expense associated with enhanced vegetation management is included in the overall $225 million revenue increase that the Parties agreed to. In relevant part to the issues raised by the OCA, the Company agreed to the following:

b. FE PA will complete a review of its distribution system for opportunities to introduce projects to selectively underground facilities by December 31, 2025. Upon completion of this review, FE PA agrees to propose modifications to its Long Term Infrastructure Improvement Plan filed at Docket No. P-2024-3050269 ("LTIIP III") to incorporate select projects identified as opportunities where largest impacts can be delivered.

c. FE PA commits to a cumulative improvement in reliability that results in a reduction of the weighted average System Average Interruption Duration Index ("SAIDI") by 3.5% and System Average Interruption Frequency Index ("SAIFI") by 2.5% after three (3) years following the effective date of rates implementing the base electric distribution revenue increase provided for in this Settlement.

d. The improvements to SAIDI and SAIFI contemplated by subparagraph (c) above will be measured using actual year-ended December 31, 2027 performance results as compared to the three-year averages as published in the 2023 PUC Electric Reliability Report results, assuming similar weather for that three-year average time period.

e. Consistent with subparagraphs (c) and (d) above, FE will provide an annual report to the parties detailing its performance improvement data reflected in the same terms as will be measured for compliance, by no later than April 1 each year.

f. If year-end December 31, 2027 performance does not reflect at least 75% achievement of the reliability improvement goals set forth in subparagraph (c) above, the Company will convene a meeting of the Parties to this proceeding following its report due April 1, 2028, in order to (i) discuss the reasons why the reliability improvement goals have not been achieved, and (ii) outline its plan to ensure it remains on track to achieve the stated goals.

Settlement ¶ ¶ 71, b, c, d, e and f.

These provisions of the Settlement address the main issues that the OCA raised regarding the Company's proposed enhanced vegetation management plan, and the current state of the Company's reliability performance. The annual reporting will also give all Parties the ability to measure and track the Company's progress in reducing the number of outages and any progress towards improving its reliability metrics. The OCA submits these commitments are an important step forward for FirstEnergy's customers and should be approved.

VII. CUSTOMER SERVICE ISSUES (Settlement ¶¶ 58, 64, 72)

Public utilities in Pennsylvania are statutorily obligated to provide adequate and reasonable service to its customers. 66 Pa. C.S. § 1501. This approach is further mandated by the statutory guidelines of Section 523 of the Public Utility Code as follows:

> The commission shall consider, in addition to all other relevant evidence of record, the efficiency, effectiveness and adequacy of service of each utility when determining just and reasonable rates under this title. On the basis of the commission's consideration of such evidence, it shall give effect to this section by

> making such adjustments to specific components of the utility's claimed cost of service as it may determine to be proper and appropriate. Any adjustment made under this section shall be made on the basis of specific findings upon evidence of record, which findings shall be set forth explicitly, together with their underlying rationale, in the final order of the commission.

66 Pa. C.S. § 523.

A public utility must justify its rates based on, among other things, its ability to perform its essential quality of service and customer service functions at an adequate and reasonable performance level. OCA St. 6 at 4.

A. Customer Service and Call Center Performance (Settlement ¶ 58)

FirstEnergy measures its customer service performance by using Key Performance Indicator (KPI) metrics. OCA St. 6 at 24-25. FirstEnergy did not meet most of its internal metrics. OCA St. 6 at 24; OCA Exh. BA-4. Based on this information, OCA witness Alexander testified that "it is not possible to claim that FirstEnergy delivers operational excellence." OCA St. 6 at 24. Additionally, there are no KPI metrics that are specifically applicable to FirstEnergy Pennsylvania Electric Co. *Id.*

FirstEnergy's 2022 performance as reported to the Commission was as follows:

- Call Center Service Level (% calls answered in 30 seconds) 81%
- % of Calls Abandoned 7%
- Busy-Out Rate 0.7% (0.8% West Penn)
- % of Bills Not Rendered Each Billing Period 0.01% to 0.04%
- % of Meters Not Read w/in 6 Months 0%
- % of Meters Not Read w/in 12 Months 0%
- % of Company Disputes Not Answered w/in 30 Days 0

OCA St. 6 at 24.

FirstEnergy's responses to the OCA's discovery seeking call center performance data specifically applicable to Pennsylvania customers for the period January 2020 onwards represented a less favorable view of FirstEnergy's customer service performance. OCA St. 6 at 25; OCA Exh. BA-5. FirstEnergy indicated that customer calls are answered by a live agent less than 60% of the time in almost every month in 2022 and 2023. *Id.* When asked about the discrepancy between FirstEnergy's reports to the Commission and its response to the OCA's discovery, FirstEnergy stated that the calculation of call center performance for the Commission includes all self-service calls answered by Interactive Voice Recognition (IVR) and is not calculated as FirstEnergy did in its data response, specifically for customers who select the option to enter the queue to speak to a customer service representative. *Id.* at 25 (internal citations omitted). OCA witness Alexander determined that the data provided by FirstEnergy as internally reported in its response reflected in Exhibit BA-5 is a more realistic presentation of the customer experience and should be relied upon to determine the reasonableness of the Company's customer service performance. *Id.* The performance experienced by customers who select the option to speak to a live customer representative and enter the queue has not been "excellent" or adequate and should be improved as reflected in the early 2024 results. *Id.*

FirstEnergy does not maintain any physical presence or office in Pennsylvania for its over 2 million customers to interact with a customer service representative to discuss rates and charges, billing or service quality questions, negotiate payment plans, or file a dispute. OCA St. 6 at 26. As a result, the call center is the only means of interacting with the Company for routine or complicated concerns about bills, payments, or disputes. *Id.* FirstEnergy's three call centers are in Akron, OH, Fairmont, WV, and Reading, PA. *Id.* As of April 2024, there is a total of 612 full time equivalent staffing for these call centers with only 150 working from the Reading, PA

center. *Id.* While the Company states that it does not rely on third party contractors to operate its call center, over 38% (238 of 619) of those handling calls at these call centers are labeled "contractors" who are not "employees." *Id.* The "contractors" are temporary staff hired through agencies to handle customer calls. *Id.* OCA witness Alexander noted her concern regarding compliance with the Pennsylvania-specific rights and remedies available to residential customers. *Id.* at 26-27.

The reliance on temporary "contractors" for a significant number of individuals to answer the customer calls in a timely manner raised the concern about the qualifications and training of these temporary staff. OCA St. 6 at 27. FirstEnergy claims that contractors are allowed to handle calls from Pennsylvania customers once they pass each stage of training and received a passing score on their assessment for each skill type. *Id.* Based on the voluminous training material received in response to OCA discovery (over 750 pages of materials) OCA witness Alexander testified that "[i]t is not realistic or reasonable to conclude that temporary hires in these call centers are fully trained to handle any of these complex transactions with multiple rights and remedies unique to Pennsylvania without a more rigorous approach." OCA St. 3 at 27.

There was a serious question throughout this proceeding as to whether FirstEnergy has complied with its prior commitment on its call center performance based on the more realistic and reasonable internal calculations. OCA St. 3 at 28. As such, OCA witness Alexander recommended that FirstEnergy be required to maintain its call answering performance results as reflected in its most recent 2024 information as a condition of any rate increase. *Id.* Ms. Alexander further testified that, even if "compliance" with the call center based on Commission reporting definitions is adequate, the lack of documentation of realistic training and supervision for its virtual call center and "contractor" call center staffing should be improved. *Id.* As such,

OCA witness Alexander recommended that FirstEnergy document routine audits of its call centers generally and temporary contractors specifically to document sufficient and realistic training prior to handling Pennsylvania customer calls. *Id.* OCA witness Alexander noted that this concern is heightened by the small staffing level at the Reading, PA office and the obvious reliance on the out of state call centers to handle most Pennsylvania calls that are not routed based on the geographic location of the call center. *Id.*

Under the terms of the Settlement, FirstEnergy commits to continue maintaining its customer service performance for customer call center, reliability of service, billing, meter reading, and response to customer complaints and disputes at levels consistent with its 5-year historical average as reported to the Commission until the date of its next base rate case filing. Settlement ¶ 58.a. To the extent that FirstEnergy's performance does not meet this level, FirstEnergy agrees to meet with the parties as requested to discuss those areas of challenge and its plans to improve service levels. FirstEnergy agrees that its call center performance results for answering calls and abandonment rate will not deteriorate during the rate effective year and prior to its filing of its next base rate case. *Id.*

Additionally, under the terms of the Settlement, FirstEnergy will conduct and document routine audits of its call center performance. Settlement ¶ 58.b. These audits will be performed annually and will focus on call taking performance and quality and compliance with Pennsylvania-specific policies and regulations. In addition, the Company will specifically document training provided to temporary contractors prior to handling Pennsylvania customer calls. *Id.*

The Settlement provisions regarding FirstEnergy's customer service and call center performance are the result of compromise. While the Settlement does not adopt the OCA's

recommendations in their entirety, it provides assurance that call center performance will not deteriorate. Ensuring that customer service and call center performance will not deteriorate from its current levels is in the public interest. Moreover, FirstEnergy's commitment to conduct routine audits of its call center performance and to document these audits will provide both FirstEnergy, and potentially interested stakeholders, with more information regarding how to improve FirstEnergy's customer service. Additionally, FirstEnergy's commitment to specifically document training provided to temporary contactors prior to handling Pennsylvania customer calls is an important step towards ensuring that temporary contractors are in compliance with Pennsylvania's Public Utility Code and the Commission's regulations when interacting directly with customers. These customer service provisions are in the public interest and should be adopted by the Commission.

B. Complaint Handling and Analysis (Settlement ¶ 64)

During the course of the proceeding, FirstEnergy admitted that it does not undertake a root cause analysis of customer complaints or BCS findings. OCA St. 6 at 31. Additionally, FirstEnergy indicated that it had not conducted any analysis of "verified complaints" as reported by the BCS. *Id.*

The 2022 and 2023 UCARE Reports shows the 2022 and 2023 results for EDCs, including each of the Pennsylvania FirstEnergy EDCs:

BCS Categories	2022	2023	Comments
Residential Customer Complaints	Met-Ed: 634 Penelec:618 Penn Power:170 West Penn:752	Met-Ed: 791 Penelec:682 Penn Power:206 West Penn:862	25% increase 10% increase 21% increase 15% increase
Residential Payment Arrangement Requests (PARs)	Met-Ed: 2,494 Penelec:2,769 Penn Power:871 West Penn:2,981	Met-Ed: 3,128 Penelec:3,284 PennPower: 984 WestPenn:3,365	25% increase 19% increase 13% increase 13% increase
% Justified Residential Customer Complaints	Met-Ed: 9.1% Penelec:8.9% Penn Power:6.5% West Penn:9.7%	Met-Ed: 5% Penelec:6% Penn Power:1% West Penn:4%	Improvement
% Justified PARs	Met-Ed: 1.5% Penelec:2.2% Penn Power:2.4% West Penn:1.0%	Met-Ed: 3% Penelec:5% Penn Power:4% West Penn:2%	Increase
Response Time to Complaints and PARs (Days)	Met-Ed: 18.4/7.8 Penelec:18.9/8/8 Penn Power:18.7/9.1 West Penn:18.7/8.3	Met-Ed: 14.8/5.7 Penelec:14.7/5/8 Penn Power:14.6/5/9 West Penn:15.5/5/8	Improvement
Verified Infractions (Chapter 56)	Met-Ed: 81 Penelec:79 Penn Power:19 West Penn:76	Met-Ed: 74 Penelec:99 Penn Power:21 West Penn:66	Mixed Results

OCA St. 6 at 29-30 (citations omitted).

OCA witness Alexander noted that the increase in customer complaints and PARs is a trend that appears to not currently be subjected to FirstEnergy's evaluation or analysis. OCA St. 6 at 30. OCA witness Alexander further testified that the trend in lower "justified" complaints is not matched by the increase in "justified" PARs and that the volume of "verified infractions" does not reflect any substantive change. *Id.* at 30-31.

OCA witness Alexander recommended that FirstEnergy conduct a root cause analysis. OCA St. 6 at 33. A root cause analysis is a fact-based exercise in which the underlying cause or

causes of an undesirable outcome(s) is identified and specific remedial steps are identified and determined to result in systematically correcting or improving the previously identified undesirable result. *Id.* at 31-32. A proper analysis of any "root cause" requires the identification of "symptoms," which are not actual causes but signs of existing problems, and "first level causes," which are the causes that directly lead to a problem; and "higher level causes," which are links in the chain of cause-and-effect relationships that ultimately create the problem. *Id.* OCA witness Alexander noted that a list of customer complaints by category is not a root cause analysis. *Id.* at 31.

Under the terms of the Settlement, within 90 days of a final order in this proceeding, FirstEnergy will develop internal protocols for a regular and proper root cause analysis of its complaint trends, both for internal disputes and BCS informal complaints that document infractions. Settlement ¶ 64. This plan will require a written root cause analysis, and report on findings, including identification of trends, evaluation, steps to reform or avoid repeated trends, and internal steps taken to take proper internal enforcement action where needed. Quarterly updates to include results will be provided to the statutory advocates until the Company's next base rate filing. *Id.*

The Settlement adopts OCA witness Alexander's recommendation that FirstEnergy conduct proper written root cause analysis of its complaint trends, both for internal disputes and BCS informal complaints that document infractions. *See* OCA St. 6 at 33. The Settlement also adopts OCA witness Alexander's recommendation that FirstEnergy's plan should require a root cause analysis and report on findings, including identification of trends, evaluation, steps to reform or avoid repeated trends, and internal steps taken to take proper internal enforcement

action where needed with quarterly updates to stakeholders on the results. *See Id.* These Settlement provisions benefit ratepayers and are in the public interest.

C. Non-Basic Service (Settlement ¶ 72)

FirstEnergy currently markets and includes non-basic services to its customers as "FirstEnergy Products and Services." OCA St. 6 at 37-38. These services include FirstEnergy Repair Plans that are administered by HomeServe: Exterior Water Service Line Protection Plan, Exterior Water Service Line Protection Plan, Exterior Electrical Line Protection Plan, Cooling System Repair Plan, Interior Electrical Line Protection Plan, and Water Heater Repair. *Id.* at 38. FirstEnergy also markets and sells a Surge Assist Plan (administered by "FE Products") that includes a monthly fee that varies by the dollar amount of "protection" selected by the customer. *Id.* FirstEnergy markets FE Quote-Bid (administered by FE Products): Electrical Services, Outdoor and Security Lights, and EV Charger Installation. *Id.* As of June 2024, 210,738 customers were enrolled in one or more of these non-basic programs. *Id.* FirstEnergy's states that its expenses and revenues for these services are recorded below the line and are not included in the revenue requirement for this rate case. *Id.* The Company uses its customer account information to market these services directly. *Id.* There is no contractual entity or affiliated interest that provides these services since FirstEnergy claims that these are "FE-PA's non-basic charges." *Id.*

OCA witness Alexander testified that there is a lack of disclosures in FirstEnergy's bill regarding non-basis charges. OCA St. 3 at 38-39. FirstEnergy's bill lists the customer's services and the telephone number associated with each service. *Id.* at 38. The non-basic charges are not labeled as such or differentiated from regulated distribution charges. *Id.* These charges are listed under "Met-Ed Charges" and there is no separate total for the non-basic charges. *Id.* at 38-39.

There is no information on the bill to explain that these are non-basic charges or that nonpayment of such charges will not be subject to disconnection. *Id.* at 39.

FirstEnergy routinely issues marketing materials to its customers to promote and solicit enrollment in these non-basic products and services. Contrary to statements made in data responses concerning the lack of any contractual relationship between FirstEnergy and any entity that bills non-basic services on its customer bills, FirstEnergy's own marketing material states:

> HomeServe is the contracted party with FirstEnergy and can only act under the express authority of the contract entered into by FirstEnergy and HomeServe. For plans in Pennsylvania, the Pennsylvania PUC regulations permit public utilities to bill customers for charges for other than basic service, which include, among other things, merchandise, appliance repairs, line repairs, and warranty programs and consistent with 52 Pa. Code § 56.13, these charges are displayed as separate line items on FirstEnergy's customers' bills.

OCA St. 6 at 39; OCA Exh. BA-10.

While FirstEnergy does not include non-basic service charges in payments plans, on termination notices "past due 'non-basic services'" charges are grouped with consumption charges on the customer's bill showing the totality of the balances past due. OCA St. 6 at 39. FirstEnergy indicated that, if the customer only has a past due balance for "non-basic services" they will not be terminated. *Id.* at 39-40 (internal citations omitted). FirstEnergy further indicated that unpaid non-basic charges appear on the customer's termination notices for nonpayment of regulated distribution services, a practice that should not be allowed. *Id.* at 40. FirstEnergy also sends letters to customers who are 90 days or more overdue on these service payments and after several communications, the service is cancelled but the remaining unpaid charges will appear on the customer's FirstEnergy bill. *Id.* (internal citations omitted).

OCA witness Alexander recommended that the Commission investigate FirstEnergy's non-basic services program to ensure that there is no subsidy by regulated distribution customers

for these programs and to require significant reforms in how these programs are presented to Pennsylvania customers on customer bills, in marketing materials, on the Company's web portal, and in termination notices. OCA St. 6 at 40. According to OCA witness Alexander, this investigation should also review how FirstEnergy handles customer complaints about non-basic products appearing on their bill or the service they receive. *Id.* OCA witness Alexander further noted that FirstEnergy's customer bill does not include the necessary disclosures. *Id.*

FirstEnergy's web portal promotes non-basic services. These services are accessed from the same web pages that present regulated distribution service information and regulated charges to its customers. OCA St. 6 at 40. Furthermore, the web page that promotes these services does not explain that they are non-basic services. *Id.* FirstEnergy's web portal does not disclose that these programs are "non-basic" and not required to be purchased from FirstEnergy or describe how these charges relate to credit and collection actions for FirstEnergy's regulated services. I*d.* at 40-41. Furthermore, OCA witness Alexander noted that the use of FirstEnergy's regulated service customer lists and billing data to market these unregulated products and services raises additional customer privacy concerns. *Id.* at 41. The intermingling of regulated and unregulated and non-basic services in FirstEnergy's marketing, billing, and customer education activities is a matter of significant concern in light of the obligation of Pennsylvania's EDCs to restructure their operations to eliminate competitively available services and products from their regulated portfolio of services. *Id.*

Under the terms of the Settlement, FirstEnergy's web portal will identify that non-basic services and products are "non-basic", are not required to be purchased from FirstEnergy, and that other companies offer these same services. Settlement ¶ 72.a. Moreover, the Settlement states that FirstEnergy agrees to educate customers who purchase HomeServe or other non-basic

services billed by the Company about: 1) the definition of non-basic service, 2) the relationship between non-basic and basic services, and 3) related customer protections. Educational materials shall be provided in plain language via marketing materials, customer enrollment portal or other appropriate delivery channels best suited to ensure transparency, enhance customer comprehension and considering customer communication preferences. Settlement ¶ 72.b. The Company agrees to insert a "non-basic" services label on its customer bills prior to the listing of the products and services purchased by the customer. Settlement ¶ 72.c. The Company agrees to provide the proposed language changes/additions to the parties in this case for comment and discussion prior to implementing these changes. Settlement ¶ 72.d.

These reforms to FirstEnergy's practices regarding non-basic services are a result of compromise and will provide significant clarifications to FirstEnergy's customers. For the reasons discussed in OCA witness Alexander's testimony, FirstEnergy's current practices regarding non-basic service is potentially misleading. Customers should have a complete understanding of what they are signing up for when they are determining whether to enroll in non-basic services. The provisions related to non-basic service contained in Settlement are a step forward in increasing transparency and are in the public interest.

VIII. Additional Provisions (Settlement ¶ 71).

A. Electric Vehicle Pilot (Settlement ¶ 73)

In its filing, FirstEnergy proposed to spend ratepayer funds on an Electric Vehicle (EV) Pilot program. FirstEnergy St. 8 at 13-17. FirstEnergy's EV Pilot Program included: (1) an EV education platform; (2) grant assistance; (3) dealership EV toolkits, and; (4) a fleet advisory program. *Id.* These EV programs were proposed as budgeted third-party expenses for providing these services and were not provided directly from FirstEnergy. FirstEnergy response to OCA-V-

29. Only the program, promotion and marketing, and full-time employee amounts are FirstEnergy expenses associated with promoting and administering these programs. *Id.*

These programs raised novel concerns about the proper role of the EDC in Pennsylvania's restructured utility market. As an EDC, FirstEnergy does not own or operate generation resources. OCA St. 6 at 10-11. As a distribution company, FirstEnergy's primary responsibility is to safely, efficiently, and affordably operate its distribution service infrastructure to provide reliable service, restore power when there are outages, maintain its poles, wires and substations, and deliver a reasonable level of customer service via its metering, billing, and customer call centers and field operations. *Id.* at 11.

There was no basis for FirstEnergy to assume, as it had in this proceeding, that its regulated rates and services must include incentives and programs designed to enhance a specific use of electricity or promote with ratepayer funds the electrification of transportation. OCA St. 6 at 11. There is no Commission directive or policy that would support the use of ratepayer funds for these purposes. To the contrary, the only rulemaking proceeding that is currently pending before the Commission related to EVs is a proposed policy statement that addresses rate designs for EV charging. FirstEnergy is not proposing an EV rate design in this proceeding. Instead of proposing an EV rate design, FirstEnergy proposed an experimental series of programs without measurable evaluation metrics.

FirstEnergy's proposed EV education platform is unnecessary for the provision of electric distribution service. FirstEnergy's proposed online EV education platform "will allow customers to learn more about EVs, compare various EV models, and see available incentives and rebates that are offered by FE PA and governmental agencies." PAWC St. 8 at 14. Requiring

captive ratepayers to fund these initiatives are not a reflection of the proper role of the electric distribution company to ensure reliable service at reasonable rates. OCA St. 6SR at 8.

FirstEnergy's proposed EV grant assistance program went beyond the function of a public utility. The grant assistance component of the EV program provides financial support for local government entities, school boards, transit authorities, and qualifying non-profit organizations for professional grant applications services. FirstEnergy St. 8 at 14. Services include grant writing, application submission, post award reporting, and compliance monitoring. *Id.* None of these services involve the distribution of electric distribution.

Spending ratepayer funds on FirstEnergy's proposed fleet advisory program would be inappropriate. FirstEnergy's proposed fleet advisory program is intended to aid commercial and municipal fleets with their fleet electrification transition. FirstEnergy St. 8 at 15. Services include feasibility studies, business cases, risk mitigation, cost-benefit analyses, road mapping, and procurement planning. *Id.* Requesting that ratepayers bear the burden of paying for these services is unreasonable.

FirstEnergy's dealership EV toolkit program is also an unreasonable use of ratepayer funds. FirstEnergy's dealership EV toolkit program would use ratepayer funds to pay for kiosks located in car dealerships that will provide remote concierge services to help educate customers with their EV purchases. FirstEnergy St. 8 at 15. According to FirstEnergy, this program will provide customers with an "additional resource for answering questions about their potential or recent EV purchases" including general purchase information, vehicle maintenance, charging information, home charging installation, utility/governmental rebates/incentives, and utility rate programs. *Id.*

In addition to these programs, FirstEnergy proposed an incentive rebate program that would provide ratepayer funds to individual residential customers and businesses to install Level 2 chargers. OCA St. 6 at 10. An additional component will provide ratepayer funded rebates to government agencies and nonprofits to install DC fast chargers. *Id.* The total program allowance will be $2,000,000 annually for the residential rebate component and $2,000,000 annually for the combined non-residential and DC fast charging rebate components. *Id.*

There is a significant suite of federally funded programs currently available to incent consumers to invest in transportation and building electrification through the Inflation Reduction Act and other legislation that are directly applicable to Pennsylvania and FirstEnergy consumers: tax credits and rebates for heat pumps, induction stoves, lawn equipment, and make ready electric panels and rebates and tax credits for purchasing EVs and for EV charging equipment. OCA St. 6 at 15-16. At no point had FirstEnergy provided any evidence that targeting additional ratepayer funded rebates and benefits are either necessary or that its proposals would have a measurable impact beyond the currently available programs funded by federal taxpayers. *Id.* at 16.

Under the terms of the Settlement, FirstEnergy is withdrawing all elements of its EV proposal. Settlement ¶ 74. Increasing ratepayer funding mandates that are not clearly needed or that are not documented as essential and least cost in nature would exacerbate harm to all ratepayers, especially low-income households. OCA witness Alexander testified that "[i]t is widely acknowledged that lower income households use less and pay a higher percentage of their household income for essential energy compared to higher income households." OCA St. 6 at 13. Low and moderate income household should not be forced to shoulder the burden of increased utility costs to fund voluntary load growth programs such as those proposed by FirstEnergy. This

base rate proceeding is not a reasonable means of addressing this statewide issue. The withdrawal of FirstEnergy's EV pilot programs is in the public interest and should be adopted by the Commission.

IX. CONCLUSION

The OCA submits that the terms and conditions of the proposed Settlement of these rate investigations, taken as a whole, represent a fair and reasonable resolution of the issues raised by the OCA in this matter. Therefore, the OCA submits that the Settlements should be approved by the Commission without modification as being in the public interest.

Respectfully Submitted,

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Appendix N

COMMONWEALTH OF PENNSYLVANIA

September 12, 2024

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Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric Company / Docket No. R-2024-3047068

Dear Secretary Chiavetta:

Enclosed please find the Statement in Support of the Joint Petition for Approval of Settlement, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures
cc: Mark Ewen
Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	**Docket Nos. R-2024-3047068**
v.	:	
FirstEnergy Pennsylvania Electric Company	:	

STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR APPROVAL OF SETTLMENT
ON BEHALF OF THE OFFICE OF SMALL BUSINESS ADVOCATE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES, THE HONORABLE KATRINA L. DUNDERDALE AND THE HONORABLE EMILY DEVOE ("ALJs")

I. INTRODUCTION

The Office of the Small Business Advocate ("OSBA") is authorized and directed to represent the interests of thesmall business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50. The OSBA participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Approval of Settlement of All Issues ("*Settlement*"). The OSBA submits this statement in support of the *Settlement*.

II. BACKGROUND

A full recitation of the background and procedural history in this case is set forth in Section II to *Settlement*. As a signatory to the *Settlement*, the OSBA adopts the procedural history outlined in Section II to the *Settlement*.

III. SETTLEMENT

The *Settlement* sets forth a comprehensive list of issues that were resolved through the negotiation process. The following issues were of particular significance to the OSBA when it concluded that the *Settlement* was in the best interests of FE's small business customers.

A. GENERAL

The OSBA participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Approval of Settlement of All Issues ("*Settlement*").

B. REVENUE REQUIRMENT

In First Energy Pennsylvania Electric Company's ("FE") initial filing, it sought a total increase in distribution revenues of $502 million annually across all "Rate Districts" based on data for a fully projected future test year ending December 31, 2025. (*Settlement*, p. 3, ¶ 14). By contrast, the *Settlement* provides FE with an annual increase in electric operating revenues of $225.0 million across all "Rate Districts" (*Settlement*, p. 10, ¶ 41-42).

At a time when all types of utility service are becoming more expensive, and the COVID-19 pandemic continues to impact customers, the significant reduction in the overall revenue increase provided by the *Settlement* will benefit all FE's consumers, including the Company's small business customers.

C. REVENUE ALLOCATION AND RATE DESIGN

Paragraphs 43 through 45 of the Settlement contain provisions related to revenue allocation and rate design.

In its initial filing FE proposed a revenue allocation that would move class cost recovery 10 percent of the way from its current status to toward fully allocated costs. ("OSBA Statement No. 1 at 9, *citing* FE Statement No. 7 at 12). However, as noted by OSBA witness Mr. Ewen in his direct testimony, although the company's proposed allocation moves in the direction of aligning revenues with allocated costs, a 10 percent shift effectively perpetuates significant misalignment between the two measures and would reduce the subsides from/to each rate class by 90 percent in about 175 years. (OSBA Statement No. 1 at 9, *See also* fn. 3).

The most important criterion for setting regulated utility rates is the cost incurred by the utility for providing the service.[1]

For purposes of this Settlement, class revenue allocation will be based on the information provided in the Settlement Petition's Appendix E. This allocation recognizes instances of cost over-recovery and under-recovery for certain rate classes under current rates and makes some progress toward cost-based rates across customer classes.

As a result, the OSBA concludes that the *Settlement* revenue allocation provides a reasonable result and a meaningful benefit to small business customers

D. RATE CASE STAYOUT

As a condition of this Settlement, FE agrees that it will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027. (*Settlement*, p. 11, ¶ 46). This provision provides assurance to small business customers that the Company will not seek to increase rates for a significant period of time. Such assurance that electric rates will not increase for a set period of time provides certainty

[1] The Commonwealth Court affirmed this basic principle, referring to cost of service as the "polestar" criterion. *Lloyd v. Pennsylvania Public Utility Commission*, 904 A.2d 1010, 1020 (Pa. Cmwlth. 2006).

and predictability, which in turn allows small businesses to better budgetand forecast their own financial needs during the stay-out period.

E. DSIC REPORTING

The OSBA took no position on these issues.

F. ACCOUNTING

The OSBA took no position on these issues

G. CUSTOMER SERVICE AND UNIIVERSAL SERVICE ISSUES

The OSBA took no position on these issues.

H. ADDITIONAL PROVISIONS

The OSBA took no position on these issues

IV. CONCLUSION

For the reasons set forth in the *Settlement*, as well as the additional factors that are enumerated in this statement, the OSBA supports the proposed *Settlement* and respectfully requests that the ALJ and the Commission approve the *Settlement* in its entirety.

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Commonwealth of Pennsylvania
Office of Small Business Advocate
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Dated: September 12, 2024

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	**Docket Nos. R-2024-3047068**
	:	**C-2024-3048411**
v.	:	
	:	
FirstEnergy Pennsylvania Electric Company	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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DATE: September 12, 2024

/s/ Rebecca Lyttle
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Appendix O

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3047068
	:	
FirstEnergy Pennsylvania Electric Company	:	
	:	

STATEMENT OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA IN SUPPORT OF THE JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES

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II. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), a signatory party to the Joint Petition for Approval of Settlement (Joint Petition or proposed Settlement), by and through its counsel at the Pennsylvania Utility Law Project, respectfully requests that the terms and conditions contained therein be approved without modification by the Honorable Katrina L. Dunderdale and the Honorable Emily I. DeVoe Administrative Law Judges (ALJs), and the Pennsylvania Public Utility Commission (Commission). For the reasons stated more fully below, CAUSE-PA believes that the terms and conditions of the proposed Settlement are in the public interest and should be approved without modification.

CAUSE-PA intervened in this proceeding to ensure that FirstEnergy Pennsylvania Electric Company's (FE PA or the Company) proposed rates, and terms and conditions of service, are appropriately designed and implemented in a manner which allows all consumers in FE PA's service territory to access safe and affordable electric services in their homes, regardless of income level.

CAUSE-PA made a concerted effort to conduct a thorough investigation and create a detailed record in this proceeding of the issues it believes were most pressing to address in the context of the Commission's determination of whether FE PA's proposed rates, and terms and conditions of service, are just, reasonable, in compliance with applicable laws, regulations, and prevailing public policy. CAUSE-PA submitted detailed written direct and surrebuttal testimony from its subject matter expert, Harry S. Geller, Esq. Mr. Geller, the former Executive Director of the Pennsylvania Utility Law Project and a nationally recognized expert in utility affordability with over five decades of experience representing low income utility consumers, focused his

testimony on the unaffordability of FE PA's proposed rates for low income consumers; the inadequacy of FE PA's universal service programs to provide universally accessible service; and the crucial need for revisions to the policies and procedures of FE PA's universal service programs and the terms and conditions of service. This testimony documented, in substantial detail, the aspects of FE PA's current programs, policies, and procedures which CAUSE-PA asserts must be reformed to achieve reasonable and just rates and terms and conditions of service consistent with all applicable policies, laws, and regulations governing public utilities.

The proposed Settlement reasonably addresses a range of issues raised in CAUSE-PA's testimony, and the recommendations of CAUSE-PA's witness therein. While CAUSE-PA's positions were not fully adopted, the resolution of these issues represents a fair and balanced approach which satisfies the many and varied interests of the Settling parties in a reasonable and just manner. As such, and for the specific reasons discussed in further depth below, CAUSE-PA asserts that the proposed Settlement is in the public interest and should be approved without modification.

III. BACKGROUND

For the purposes of this Statement in Support, CAUSE-PA adopts the background and procedural history set forth in Section I, Paragraphs 1-38 of the proposed Settlement.

IV. SETTLEMENT

A. GENERAL

For the reasons discussed below, CAUSE-PA asserts that the proposed Settlement presents a reasonably balanced resolution to the issues raised in this proceeding. While many of the proposed Settlement provisions are discussed with specificity below, CAUSE-PA's silence with respect to any particular provision does not indicate CAUSE-PA does not agree with that proposed

Settlement provision. CAUSE-PA urges the ALJs and the Commission to approve the proposed Settlement as a whole and without modification.

B. REVENUE REQUIREMENT

On April 2, 2024, FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company") submitted a rate filing, Supplement No. 3 to FE PA's Tariff Electric – Pa. P.U.C. No. 1 ("Supplement No. 3"), seeking a general rate increase of approximately $502 million, or 34%, over existing revenues across all FE PA Rate Districts based on data for a fully projected future test year ending December 31, 2025. On a Rate District basis, FE PA has proposed rates allegedly designed to increase the following annual distribution revenues: Met-Ed Rate District - $146 million (or by 31%); Penelec Rate District - $132 million (or by 28%); Penn Power Rate District - $55 million (or by 43%); and West Penn Rate District - $169 million (or by 40%).[1]

FE PA's proposed rate increase, if approved, would have resulted in a substantial increase in basic living expenses, falling especially hard on low income households who already struggle profoundly to make ends meet. FE PA estimates that between approximately 20.99% and 28.97% of its residential customers are low income, dependent on its Rate Districts.[2] FE PA's proposed rate increase would have caused a substantial increase in basic living expenses for low income households who are already struggling to afford their monthly bills.[3]

The proposed Settlement represents a substantial reduction from FE PA's proposed rate increase. Paragraphs 41 and 42 provide that FE PA will be permitted to increase its distribution rates set in this proceeding to produce increased distribution operating revenue of $225 million based upon the pro forma level of operations for the 12 months ended December 31, 2025: broken

[1] Statement of Reasons at 1-2.
[2] CAUSE-PA St. 1 at 10: 14-17.
[3] Proposed Settlement at Introduction.

down by rate district as follows: Met-Ed - $39,600,000; Penelec - $57,690,000; Penn Power - $24,980,000; and West Penn – $102,730,000.

On balance, the significant reduction in overall rate increase provided for under the proposed Settlement – together with the critical enhancements to FE PA's universal service programs and policies and procedures affecting low income customers discussed below in further detail – will help mitigate the negative effects of the rate increase on FE PA's low income customers. As Mr. Geller explained in his direct testimony in this matter, FE PA's initial rate increase proposal would have severely impacted the financial stability of FE PA's low income customers.[4] FE PA's low income customers already face significant energy burdens, as illustrated by CAUSE-PA Exhibit 1.[5] As a result of this preexisting unaffordability, FE PA's low income customers face disproportionately high rates of involuntary termination for nonpayment; higher arrearage levels; and higher rates of payment trouble compared to residential customers as a whole.[6] If FE PA's proposed rate increase were approved without modification, these already high energy burdens would have increased an additional 1-2% for most households with income at or below the poverty level.[7] If FE PA were permitted to increase its rates as initially proposed, low income customers would experience even greater rates of payment troubles and involuntary terminations, ultimately increasing the risk of consequences to health and safety of low income customers and their households.[8]

[4] CAUSE-PA St. 1 at 12-13.
[5] Id. at 15: 3-9; CAUSE-PA Exhibit 1.
[6] Id. at 16-19.
[7] Id. at 15: 3-9; CAUSE-PA Exhibit 1.
[8] Id. at 16: 4-10.

The proposed Settlement includes several provisions specifically designed to provide enhanced protections for residential customers – helping to ease the acute financial hardship residential customers have experienced over recent years.

C. REVENUE ALLOCATION AND RATE DESIGN

CAUSE-PA did not take a position in this proceeding related to the allocation and Streetlight conversion program issues set forth in Paragraphs 43 and 45 of the proposed Settlement, though we did take a position regarding FE PA's proposed rate design; namely, its proposal to substantially increase the fixed customer charge across all Rate Districts.

FE PA's current customer charges are as follows, per Rate District: Met-Ed -- $11.25; Penelec -- $11.25; Penn Power $11.00; and West Penn – $7.44.[9] Through testimony in this matter, FE PA proposed the following increases to its Customer Charge by rate district: $14.50 for its Met-Ed, Penelec, and Penn Power Rate Districts, and to $11.50 for the West Penn Power Rate District.[10] Mr. Geller explained that these increases would represent an increase in the fixed charge component of residential rates of between 28.89% to 54.57%.[11] Mr. Geller explained that this proposal would undermine the ability of low income customers to control costs through energy efficiency, conservation, and consumption reduction – as well as the regulatory goals of LIURP to help customers control their bills through usage reduction assistance:[12]

> The Commission's LIURP regulations explicitly provide that LIURP is intended to help low income customers to reduce their bills and, in turn, to "decrease the incidence and risk of customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs."[13]

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[9] CAUSE-PA St. 1 at 28, Table 8.
[10] Id.
[11] CAUSE-PA St. 1 at 28: 8-10.
[12] Id. at 28-29.
[13] Id. at 29: 10-13, citing 52 Pa. Code § 58.1 ("The programs are intended to assist low-income customers conserve energy and reduce residential energy bills. The reduction in energy bills should decrease the incidence and risk of

Mr. Geller recommended that FE PA's fixed Customer Charge should not be increased.[14]

Paragraph 44 of the proposed Settlement provides that residential Customer Charges for the Met-Ed, Penelec and Penn Power Rate Districts will remain as is without modification, while the West Penn Residential Customer Charge will be increased to $9.00 per month.

CAUSE-PA asserts that the provisions at Paragraph 44 are reasonable and should be approved. Requiring that FE PA maintain its current customer charges for its Met-Ed, Penelec, and Penn Power Rate Districts, while permitting FE PA to increase its customer charge to $9 for its West Penn Rate District represents a sizable reduction to FE PA's initial proposed customer charge. This proposed Settlement provision will help residential customers maintain a greater ability to control costs through usage reduction compared to FE PA's initial proposal. As Mr. Geller explains, this is particularly important for low income customers who already struggle profoundly to pay for electric service and rely on the ability to offset high bills through conservation efforts.[15] While Mr. Geller's recommendations related to FE PA's customer charge were not adopted in their entirety, we assert that these provisions represent a balanced compromise of the Settling parties' interests. For these reasons, we assert that these provisions are just, reasonable, in the public interest, and should be approved without modification.

D. RATE CASE STAY OUT

Paragraph 46 of the proposed Settlement provides that FE PA will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027, unless in certain cases of Commission Orders or in response to fundamental changes in regulatory

customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs.").

[14] CAUSE-PA St. 1 at 29: 1-6.

[15] Id.

policies or federal tax policies significantly affecting FE PA's rates. In such a filing, all parties would reserve their rights to challenge the basis for such a filing.

CAUSE did not take a position in this proceeding related to the rate stay-out issues set forth in Paragraphs 46 of the proposed Settlement. CAUSE-PA is nevertheless strongly supportive of the provisions contained in Paragraph 46. This provision will help protect FE PA's residential customers from bearing another rate increase prior to January 1, 2027, and is particularly important for low income customers who are already struggling to afford their monthly bills, even before any rate increase is approved.

E. DSIC REPORTING

CAUSE-PA did not take a position in this proceeding related to the DSIC issues set forth in Paragraphs 47-49 of the proposed Settlement.

F. ACCOUNTING

CAUSE-PA did not take a position in this proceeding related to the accounting issues set forth in Paragraphs 50-57 of the proposed Settlement.

G. CUSTOMER SERVICE AND UNIVERSAL SERVICE ISSUES

i. *Customer Service and Call Center*

CAUSE-PA did not take a position in this proceeding related to the Customer Service and Call Center issues set forth in Paragraphs 58 of the proposed Settlement.

ii. *FE PA Customer Assistance Program (PCAP)*

As Mr. Geller explained in his direct testimony in this proceeding, the impact of the rate impact on PCAP customers depends on the PCAP rates which customers receive, and when FE PA's revised PCAP is implemented.[16] Assuming FE PA's Percentage of Income Payment PCAP

[16] CAUSE-PA St. 1 at 23.

design will take effect prior to the effective date of rates in this proceeding, PCAP customers receive actual bill rate options will experience the full financial impact of any approved rate increase until their PCAP rates are adjusted. In addition, PCAP customers who are already receiving a Percentage of Income Payment rate will be initially shielded from the financial impact of the approved rate increase, but only if their total annual PCAP credit is less than the approved maximum PCAP credit limit.[17]

Mr. Geller recommended that FE PA review and adjust PCAP rates based on new applicable residential rates to eliminate any lag between the implementation of any approved rate increase and FE PA's regular PCAP rate adjustments and to help ensure that all PCAP customers are receiving the most advantageous CAP rate available. Mr. Geller further recommended that FE PA timely implement recently approved changes to its universal service programs in light of its proposed rate increase, and that FE PA make adjustments to its maximum PCAP subsidy limits to account for increased rates.[18]

Paragraph 59(a) of the proposed Settlement provides that FE PA will review and adjust its PCAP rates based on the new applicable residential rates to ensure all PCAP customers are receiving the most advantageous CAP rate available. Paragraph 59(b) of the proposed Settlement provides that FE PA will implement all changes to FE PA's PCAP to be approved as part of FE PA's Universal Service and Energy Conservation Plan (USECP) proceeding no later than the effective date of rates.

The provisions contained at Paragraph 59 represent important improvements to PCAP which will help to better insulate PCAP participants from the financial impacts of FE PA's rate increase. Requiring FE PA to review and adjust its PCAP rates based on new applicable residential

[17] CAUSE-PA St. 1 at 23: 8-17.
[18] Id. at 34-35.

rates to ensure that PCAP participants receive the most advantageous rate available will help to ensure that PCAP rates are calculated taking into account rate increases provided for in the proposed Settlement. By requiring FE PA to implement all changes to PCAP approved in its recent USECP no later than the effective date of rates, Paragraph 59 will help align the implementation of PCAP reforms with its proposed increase in rates – helping mitigate some of the increased unaffordability that will follow from any approved increase in FE PA's base rates. While Mr. Geller's recommendations were not adopted in their entirety, we assert that these Settlement provision reasonably balance the varied interests of the Settlement parties, are reasonable, and should be approved without modification.

iii. Hardship Fund

Funding for Hardship Fund

As discussed extensively in Mr. Geller's direct testimony, FE PA's Hardship Fund is not adequately meeting the well-documented need for assistance and is severely underfunded, with many periods over the last several years where grant funding was fully depleted or otherwise unavailable.[19] Mr. Geller also explained that FE PA's voluntary ratepayer contributions have steadily declined over the past decade.[20] Mr. Geller recommended that FE PA increase its annual available hardship funding to $1 million, and that it explore a plan to improve solicitation of voluntary donations from larger commercial and industrial entities within its service territory.[21]

Paragraph 60(a) of the proposed Settlement provides that FE PA will consult with its Universal Service Advisory Committee (USAC) and develop a plan to increase voluntary contributions to its Hardship Fund grant within 9 months of a final order in this proceeding.

[19] CAUSE-PA St. 1 at 37-39.
[20] Id. at 39-40.
[21] Id. at 43: 1-13.

Changes to be explored will include solicitation of donations through e-billing and solicitation of voluntary contributions from the larger commercial and industrial customers.

In addition, Paragraph 60(d) provides that FE PA will increase its annual shareholder hardship matching contribution for grant assistance to $500,000 annually. Paragraph 60(e) provides that FE PA will also make an annual shareholder hardship contribution for grant assistance over routine funding levels in the amount of $2,000,000 annually for a three-year period beginning in 2025.

Paragraph 60(f) of the proposed Settlement provides that, to the extent any unspent funds remain at the end of the program year, those funds will be rolled over and added to the available budget for the following year. Excess hardship funds may be transferred amongst Rate Districts based upon need.

We assert that the provisions contained at Paragraph 60(a, d-f) of the proposed Settlement related to FE PA's hardship funding are reasonable and should be approved. While Mr. Geller's recommendations were not fully adopted, these proposed Settlement provisions will help to meaningfully improve the funding of FE PA's Hardship Fund. By requiring that FE PA develop a path to increase voluntary hardship fund contributions in conjunction with its USAC, the proposed Settlement will help FE PA to develop processes to increase declining voluntary contributions, in line with Mr. Geller's recommendations. Requiring FE PA to provide for a three-year increase to hardship funding will provide FE PA with time to develop and implement a plan to increase voluntary contributions – including contributions from larger commercial and industrial entities within its service territory.[22] Finally, requiring that FE PA rollover unused hardship funding to be added to the following year will help to ensure that FE PA is utilizing available hardship funding

[22] CAUSE-PA St. 1 at 43: 1-14.

to provide grant assistance to low income customers. For these reasons, we assert that the proposed Settlement provisions contained at Paragraph 60(a, d-f) are reasonable, in the public interest, and should be approved.

Hardship Fund Parameters

As discussed, Mr. Geller explained how FE PA's Hardship Fund is not serving the need for assistance amongst low income customers. Mr. Geller explained that the average arrearage held by low income customers regularly exceeds the maximum Hardship Fund grant limit of $500.[23] Mr. Geller also noted concern that PCAP customers are excluded during certain periods throughout the year from receiving a Hardship Fund grant, and that FE PA limits hardship funding during certain times of the year to only customers who have experienced a service termination.[24] Even with monthly rate assistance, PCAP customers face unaffordable monthly bills and barriers to staying connected to services – and often encounter added financial hardships that cause them to fall behind of their PCAP bills.[25] Denying Hardship Funding to PCAP customers exposes these customers to harsh consequences of utility termination.[26] As Mr. Geller discusses extensively in his direct testimony, the loss of essential utility services is a common catalyst to homelessness, and has a significant impact on the ability of vulnerable populations to manage medical conditions – worsening health outcomes for individuals experiencing a range of medical conditions.[27]

Mr. Geller recommended that FE PA: (1) increase its hardship funding, as discussed, to $1 million and improve solicitation of voluntary donations; (2) adopt explicit exemptions to upfront payment requirements; (3) amend seasonal parameters so that, at minimum, customers whose

[23] CAUSE-PA St. 1 at 38.
[24] Id. at 41-42.
[25] Id.
[26] Id.
[27] CAUSE-PA St. 1 at 20-21.

electric service is off or who are at risk of termination can qualify for hardship funding; (4) eliminate any prohibition on PCAP customers receiving a Hardship Fund grant; and (5) increase its maximum grant amount from $500 to $600.[28]

Paragraph 60(b) provides that FE PA will amend its seasonal parameters for the Hardship Fund so that, at minimum, customers whose electric service is off or who are at risk of termination can qualify for a Hardship Fund grant in any month of the year, provided funding is available and the applicant is otherwise eligible.

Paragraph 60(g) provides that FE PA will increase its maximum Hardship Fund grant to $600.

Finally, Paragraph 60(h) provides that, within 90 days of the final order in this proceeding, FE PA will eliminate any prohibitions against PCAP customers receiving a hardship fund grant. FE PA will work with Dollar Energy Fund ("DEF") to update its internal and customer-facing materials to reflect this changed policy without delay.

We assert that the provisions contained at Paragraph 60(b, g, h) of the proposed Settlement are reasonable, in the public interest, and should be approved. While Mr. Geller's recommendations were not fully adopted, these proposed provisions will help to meaningfully improve access to FE PA's Hardship Fund – thereby helping to offset the negative financial impacts of the increased rates on low income households. By increasing the maximum Hardship Fund grant to $600, the proposed Settlement will help to better serve customers who carry higher arrears and face termination as a result of these balances. By requiring FE PA to amend its seasonal parameters for the Hardship Fund so that, at minimum, customers whose electric service is off or who are at risk of termination can qualify for Hardship Fund assistance in any month will help to customers

[28] CAUSE-PA St. 1 at 43-44.

who are at risk of termination qualify for Hardship Fund assistance before they are terminated – preventing many of the harshest consequences to home health, safety, and stability that follow an involuntary termination. Finally, requiring FE PA to eliminate its prohibition of PCAP customers receiving a Hardship Fund grant will provide an important avenue for PCAP customers to access needed grant assistance if they are facing payment troubles and are unable to keep up with their monthly bills. As discussed, PCAP customers often face steep barriers to affording their monthly PCAP bills and staying connected to services, even with the assistance of PCAP. For these reasons, we assert that the provisions contained at Paragraph 60(g, b, h) of the proposed Settlement are reasonable, in the public interest, and should be approved without modification.

Hardship Fund Data Tracking and Outreach

Mr. Geller explained through his testimony in this matter that, compared to the number of low income customers terminated for nonpayment, only small numbers of low income customers have been able to access Hardship Fund assistance.[29] As discussed, Mr. Geller recommended substantial mitigation to connected eligible customers with Hardship Fund grants.

Paragraph 60(c) requires FE PA to initiate the issuance of plain language notices to low income customers with a past due bill during the winter heating season to let them know that they have a past due bill and outline the assistance that is available to help pay their bill, including but not necessarily limited to Hardship Fund, PCAP, and LIHEAP.

Paragraph 60(i) provides that FE PA will implement data tracking for its outreach efforts to the Company's most vulnerable customers, to include:

- PCAP enrollment rates measured against the number of estimated low-income customers in each Rate District;
- Email/web outreach;

[29] CAUSE-PA St. 1 at 37-38.

- Community outreach efforts, including the estimated number of participants and geographic location;
- Applications received; and
- Participation in/hosting of assistance fairs, including the estimated number of participants and geographic location.

Pursuant to Paragraphs 60(j) and (k), FE PA will use best efforts to measure the geographic reach of all outreach efforts to ensure equitable distribution of efforts across its rate districts based on relative need and poverty levels. FE PA will provide annual updates to its USAC regarding these datapoints until its next base rate case filing.

We assert that the provisions contained at Paragraph 60(c) and (i-k) of the proposed Settlement are reasonable, in the public interest, and should be approved. By requiring that FE PA implement data tracking on outreach efforts related to its low income assistance programs, Paragraph 60(i) will help the Commission, parties, and interested stakeholders to better evaluate whether and to what extent FE PA's outreach efforts are affecting PCAP enrollment. By requiring that FE PA use best efforts to measure geographic reach of outreach efforts to ensure equitable distribution of these efforts across Rate Districts based on relative need and poverty level – and report this data to the USAC, Paragraph 60(j) and (k) will help to better target FE PA's outreach efforts related to its universal service programs to ensure that they are targeting areas in which low income customers can reasonably learn about and ultimately enroll in available assistance. Finally, providing plain language notices to low income customers with past-due bills during the winter heating season detailing available assistance will help to identify low income customers before the accrual of unmanageable arrears which lead to service termination.[30] For these reasons, we assert that the provisions contained at Paragraph 60(c) and (i-k) of the proposed Settlement are reasonable, in the public interest, and should be approved without modification.

[30] CAUSE-PA St. 1 at 17-18.

iv. Low Income Usage Reduction Program (LIURP)

LIURP Funding

Mr. Geller explained through testimony in this case that FE PA's LIURP serves only a small portion of those in need of comprehensive energy efficiency and usage reduction assistance.[31] Mr. Geller also explained that FE PA's LIURP is insufficiently funded to meet the need for usage reduction assistance amongst its low income customers, and that FE PA's consistent failure to expend its available budget in face of this substantial need suggests that the program is not sufficiently accessible.[32] Mr. Geller explained that reforms were needed to help address unaffordability for low income customers, particularly if FE PA were permitted to increase its rates of basic electric services:

> For those customers able to receive LIURP services, FE PA's LIURP can and does play an important role in mitigating rate unaffordability for low income customers over the long term, in turn reducing collection costs, improving uncollectible expenses, and decreasing involuntary terminations for nonpayment.[33]

To help improve the reach of LIURP, and offset the disproportionately negative impact of an approved rate increase on high usage low income customers, Mr. Geller recommended that FE PA increase its LIURP budget by a percentage equal to any approved increase in residential rates, allocated proportionally amongst FE PA's Rate Districts.[34]

Paragraph 61(a) of the proposed Settlement provides that FE PA will increase its LIURP annual budget by a percentage equal to any approved increase in residential rates in this proceeding, allocated proportionally amongst FE PA's Rate Districts.

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[31] CAUSE-PA St. 1 at 47-48.
[32] Id. at 48-49.
[33] Id. at 46: 13-18.
[34] Id. at 50: 3-23.

Paragraph 61(b) of the proposed Settlement requires FE PA to continue to carryover any unspent LIURP funds from the previous program year and add them to the budget for the following year by rate district, subject to the modification discussed below and set forth in Paragraph 61(b).

Pursuant to Paragraph 61(a), if rollover amounts exceed $1 million for any rate district, FE PA will host a collaborative meeting within 30 days of the end of the program year with members of its USAC, interested parties to this proceeding, and the Commission's Bureau of Consumer Services staff. At this collaborative, FE PA will identify reasons for the exceedance and outline a plan for how it intends to (1) fully expend the current budget and carry-over amount; and (2) prevent excessive carryover in the new program year. Paragraph 61(a) further provides that all carryover must be spent on LIURP-related services, while reserving FE PA's right to propose reallocation of rollover funding across Rate Districts based on relative need. Finally, Paragraph 61(a) provides that, following the collaborative, FE PA will make a filing with the Commission at its USECP Docket outlining its proposed plan and requesting staff action to approve the plan within 60 days. FE PA is required to serve a copy of its filing on all parties to this proceeding.

CAUSE-PA asserts that the provisions at Paragraph 61(a) and (b) of the proposed Settlement will provide meaningful improvements to FE PA's LIURP, are squarely within the public interest, and should be approved. Requiring that FE PA increase LIURP funding by a percentage equal to the increase in residential rates in this proceeding and allocated proportionally across Rate Districts, will help additional low income customers access usage reduction assistance which can play a critical role in improving household energy efficiency and mitigating rate unaffordability. Providing for a detailed process whereby FE PA is required to rollover unused LIURP funds, and address unspent funds in exceedance of $1 million for any Rate District through a collaborative process resulting in a Commission filing, will help to ensure that FE PA's unspent

funding is being utilized to assist FE PA's low income customers in an appropriate manner, in line with Commission directive.

LIURP Coordination

In addition to the improvements to LIURP recommended by Mr. Geller and discussed above, Mr. Geller also recommended that the Commission require FE PA to improve efforts to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs. In particular, it is essential that FE PA improve coordination efforts given the unique potential presented by additional funding made available through the Inflation Reduction Act (IRA). This additional coordination can help to remediate health, safety, and other home repair issues that prevent LIURP services. Mr. Geller further recommended that FE PA be required to host a series of collaborative meeting with USAC members (as well as local weatherization and home repair program administrators) to identify concrete ways to leverage and coordinate LIURP with home repair and weatherization programs.[35] Mr. Geller also recommended that, within 6 months of the final order in this proceeding, FE PA should provide the Commission and its USAC with a report related to coordination of LIURP services.[36]

Paragraph 61(c) provides that FE PA will continue to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FE PA's health and safety budget alone. This Paragraph further provides that, over the twelve months following a Final Order in this proceeding, FE PA will host a series of collaborative meetings with its USAC, as well

[35] CAUSE-PA St. 1 at 50: 3-23.
[36] Id.

as local weatherization and home repair program administrators across its service territory to identify concrete ways to leverage and coordinate LIURP with home repair and weatherization programs.

Paragraph 61(c) requires FE PA to continue to proactively coordinate delivery of services with other local, state, and federal efficiency, weatherization, and home repair programs that can help remediate health, safety, and other home repair issues that prevent the installation of comprehensive efficiency measures and cannot be resolved through FE PA's health and safety budget alone. Requiring FE PA to coordinate remediation of health, safety, and other home repair issues which prevent LIURP services with other available sources of assistance will help low income customers who would otherwise be denied LIURP services because of these home repair issues to access LIURP. By requiring that FE PA engage in a collaborative process through its USAC (as well as local weatherization/ home repair program administrators), these provisions will help FE PA to receive feedback important to effectively designing policies and procedures related to leveraging and coordination of LIURP services.

In sum, the proposed Settlement provisions at Paragraph 61 reasonably addresses Mr. Geller's recommendations and represent important improvements to FE PA's LIUPR. We assert that these provisions are just, reasonable, in the public interest, and should be approved without modification.

v. *Universal Service Administration*

Use of LIHEAP Data for PCAP Enrollment and Retention

As Mr. Geller explains in his direct testimony, large numbers of FE PA customers who are eligible for PCAP are not enrolled in the program. As of December 2023, 81,479 customers were

enrolled in PCAP, compared to FE PA's 223,818 *confirmed* low income customers.[37] As discussed, FE PA's Hardship Fund and LIURP are also severely undersubscribed compared to need amongst low income customers. In discussing the significant under-enrollment of FE PA's universal service programs, addressed in detail above, Mr. Geller recommended that FE PA adopt several provisions that would assist FE PA to best utilize LIHEAP data from the Department of Human Services (DHS) to improve PCAP enrollment and retention.[38] Mr. Geller noted that FE PA agreed in its recent consolidation proceeding to utilize LIHEAP data to perform PCAP recertification wherever possible.[39] Mr. Geller recommended that FE PA develop a process for utilizing this data to also facilitate auto-enrollment of LIHEAP recipients into PCAP.[40] Mr. Geller specifically recommended that, within 90 days of the final order in this proceeding, FE PA be required to file a Petition to amend its USECP to permit autoenrollment. Further, Mr. Geller recommended that FE PA convene at least one meeting with its USAC to obtain feedback on the Petition before filing.[41]

Paragraphs 62(a) of the proposed Settlement provides that, within 90 days of the final order in this proceeding, FE PA will implement a process to leverage LIHEAP data from the Department of Human Service ("DHS") to meaningfully improve enrollment and retention in PCAP, simplify burdensome paperwork requirements, and reduce unnecessarily duplicative administrative costs. Paragraph 62(a) specifies that FE PA will leverage the LIHEAP data for the purposes of: 1) developing a seamless, concurrent, and immediate process for PCAP enrollments without further application; 2) auto recertification; and 3) outreach to non-participants. Customers will be notified

[37] CAUSE-PA St. 1 at 22: 6-14.
[38] Id. at 56-58.
[39] Id. at 57: 8-15.
[40] Id. at 57-58.
[41] Id.

that LIHEAP data was used for the streamlined application or auto recertification, neither of which will require additional income documentation.

In addition, Paragraph 62(b) of the proposed Settlement requires that FE PA, within 6 months of the final order in this proceeding, petition the Commission for approval to implement automatic enrollment for LIHEAP recipients that have never previously been enrolled in either PCAP or CAP.

We assert that the provisions contained at Paragraphs 62(a) and (b) of the proposed Settlement are reasonable and should be approved. While Mr. Geller's recommendations were not approved in their entirety, nor on his recommended timeline, these proposed Settlement provisions will eventually help to leverage DHS data to improve overall enrollment into PCAP as well as better ensure that PCAP enrollees are not removed from the program for failure to recertify. Improving PCAP enrollment and retention rates helps low income customers access and maintain more affordable rates and, in turn, helps these customers and their households to access and maintain services in their homes. As discussed extensively by Mr. Geller, FE PA's low income customers face significant and disproportionate energy burdens. These high energy burdens result in unaffordable bills, and the accrual of unmanageable arrears which lead to termination of services.[42] Subjecting low income customers to categorically unaffordable bills is likely to result in a corresponding increase in uncollectible expenses which impact all ratepayers.[43] Access to PCAP is essential helping low income customers maintain services in their homes which result in a cascade of consequences for low income customers, their households and their communities. Access to PCAP is also essential to improving disparities in involuntary termination rates and reducing uncollectible expenses which ultimately affect all ratepayers.

[42] CAUSE-PA St. 1 at 15: 1-17.
[43] Id. at 21: 9-15.

Taken together, we assert that these provisions regarding the appropriate use of DHS LIHEAP data to streamline PCAP enrollment and retention are just, reasonable, in the public interest, and should be approved without modification.

Oversight of FE PA's Universal Service Administrator

Through his direct testimony, Mr. Geller raised concerns that DEF's policies and procedures for administration of FE PA's universal service programs improperly restricted program enrollment.[44] Specifically, Mr. Geller indicated that DEF appeared to be imposing requirements related to income verification which are not contemplated within FE PA's USECP, but which impact program eligibility determinations.[45] Mr. Geller also noted that FE PA does not have a formal policy or procedures for monitoring DEF's administration of its programs.[46] Mr. Geller explained that, without regular assessment to ensure proper administration of FE PA's universal service programs, it is impossible to determine whether these programs are operating as intended by FE PA, Commission orders, and in a manner that allows low income customers to enroll in these programs without improper barriers.[47] Regular assessment of universal service program administration is also essential to the Commission's role of overseeing USECP programs, activities, and services – and ensuring that USECPs are operated in an appropriate and cost-effective manner.[48]

Mr. Geller recommended that, within 6 months of the final order in this proceeding, FE PA be required to implement a clear auditing process for reviewing DEF-handled applications and enrollment processes – as well as DEF's policies, procedures, trainings, and internal guidelines

[44] CAUSE-PA St. 1 at 58-59.
[45] Id. at 59: 1-11.
[46] Id. at 58-59.
[47] Id. at 59: 12-19.
[48] See 66 Pa.C.S. §§ 2802(10); 2804(9).

related to administration of FE PA accounts.[49] Mr. Geller recommended that auditing procedures be developed in consultation with FE PA's USAC, and that auditing reports be reviewed every 6 months.[50]

Paragraph 62(c) of the proposed Settlement requires FE PA to implement a biennial audit process for monitoring and oversight of DEF's administration of programs within 6 months of the final order in this proceeding. A review of the components to be audited will be reviewed with FE PA's USAC, where audit results will also be shared when available.

CAUSE-PA asserts that the provisions at Paragraphs 62(c) of the proposed Settlement provide for important improvements to FE PA's oversight of the administration of its universal service programs. Implementing a biennial audit process for monitoring and oversight of DEF's administration of FE PA's universal service program within 6 months of the final order in this proceeding will help to evaluate whether FE PA's universal service programs are being administered in a manner that is accessible and in compliance with FE PA's policies, and applicable Commission regulation and orders.[51] Requiring that audit results be reviewed with FE PA's USAC will also help to ensure that USAC members are receiving important information related to the administration of FE PA's universal service programs. For these reasons, we assert that the provisions of the proposed Settlement are reasonable, in the public interest, and should be approved.

vi. *Confirmed Low-Income Customer Definition*

Through his direct testimony in this matter, Mr. Geller raised concerns that FE PA's current definition of confirmed low income customers was unduly restrictive and out of line with the

[49] CAUSE-PA St. 1 at 60: 1-14.
[50] Id.
[51] 66 Pa. C.S. §§ 2802(10); 2803; 2804(9).

Commission's definition, therefore resulting in significant undercounting of FE PA's low income customers and an chronic underassessment of need.[52] Mr. Geller explained that Section 54.72 of the Commission's regulations categorize confirmed low income customer accounts as "[a]ccounts where the EDC has obtained information that would reasonably place the customer in a low-income designation.".[53] By contrast, FE PA maintains two different internal definitions of CLI customers, each of which are more narrow than the Commission's definition of the term.[54] In 2022, FE PA began removing the "confirmed low income" designation from customer accounts if they have not affirmatively verified income with FE PA within the prior 24 months.[55] Limiting confirmed low income designations to 24 months limits protections available to low income customers, the information that FE PA can provide about low income customers, and FE PA and the Commission's ability to appropriately assess whether FE PA's programs are appropriately designed to serve the need across FE PA's service territory.[56]

Mr. Geller recommended that FE PA be required to expand definition of "confirmed low income customers" consistent with the Commission's regulations, to include any information provided by the customer that reasonably places the customer in a low income category – including the customer's verbal identification.[57]

In addition to the concerns about FE PA's confirmed low income designation, Mr. Geller identified, FE PA terminated service to over 200 confirmed low income customers between January 2022 and March 2024 because they had not properly identified their low income status.[58] While FE PA's expert witness explained through rebuttal that, for any reported CLI terminations

[52] CAUSE-PA St. 1 at 9-10.
[53] Id. at 8: 7-12. 52 Pa. Code § 54.72.
[54] Id. at 8-9.
[55] Id. at 9: 1-3.
[56] See id. at 9; 37, fn 87.
[57] Id. at 66.
[58] Id. at 65: 3-18.

during the winter moratorium, FE PA was made aware of CLI status after termination occurred.[59] Mr. Geller further reasoned through his surrebuttal testimony that FE PA reaching out to low income customers *after* termination – and following the likely severe impact of involuntary termination in the winter months – speaks to the critical need for FE PA to routinely screen and identify low income customers.[60] Mr. Geller recommended, in contemplation of the prohibition on winter terminations which applies to customers with incomes of up to 250% FPL, FE PA be required to develop policies to improve identification of households between 150-250% FPL.[61]

Paragraph 63 of the proposed Settlement provides that, within 6 months of a final order in this proceeding, FE PA will convene a collaborative of its USAC to discuss its current definition of "confirmed low-income" (CLI) customers. Pursuant to this Paragraph, FE PA commits to revise its definition within one year of a final order in this proceeding to clearly outline those criteria which would qualify for CLI definitions and the timeframe for which a CLI designation will be retained under the Company's practices and procedures and consistent with 52 Pa. Code § 54.72.

CAUSE-PA asserts that the provisions at Paragraphs 63 of the proposed Settlement will lead to the adoption and implementation of important improvements to FE PA's policies related to the classification of confirmed low income customers. While Mr. Geller's recommendations regarding FE PA's definition of confirmed low income customers were not adopted in their entirety, requiring FE PA to conform to the Commission's definition of confirmed low income customer will help FE PA to better identify its low income customers and ensure they can access important protections, including protection against winter terminations. Requiring FE PA to clearly outline criteria which would qualify for CLI definitions and the timeframe for retaining CLI definitions

[59] FE PA St. 8-R at 7: 5-16.
[60] CAUSE-PA St. 1-SR at 28.
[61] CAUSE-PA St. 1 at 66.

consistent with Commission regulations at Section 54.72 will help to provide important clarity related to protections afforded to FE PA's CLI customers. These provisions reasonably balance the varied interests of the Settling parties, are reasonable, and should be approved without modification.

vii. Complaint Handling and Analysis

CAUSE-PA did not take a position in this proceeding related to Complaint Handling and Analysis issues set forth in Paragraphs 64 of the proposed Settlement.

viii. Practices, Procedures and Notices

Review of Polices, Procedures, and Training Materials

Through his direct testimony in this matter, Mr. Geller raised concerns that FE PA's notices to residential customers do not accurately reflect medical certificate requirements set forth by statute and Commission regulation.[62] Mr. Geller explained that the plain language of FE PA customer notices communicates that customers "are required to make payment on their accounts, or an equitable arrangement to pay on their accounts, before they are able to access any medical certificates."[63]

Mr. Geller also raised concerns that FE PA is not adequately engaging with limited English proficient (LEP) customers to provide these customers with essential information related to their services.[64] Mr. Geller further explained that FE PA appears to be terminating confirmed low income customers for nonpayment during the winter moratorium.[65] Finally, as more fully discussed below, Mr. Geller explained that FE PA's methods of tracking confirmed low income

[62] CAUSE-PA St. 1 at 60-61.
[63] Id. at 61: 18-26.
[64] Id. at 62: 12 -64: 2.
[65] Id. at 64: 14 – 66: 5.

customers detrimentally impacts the ability of customers to access certain protections, including the exemption of low income customers from collection of security deposits.[66]

To remedy these inadequacies in customer communications, Mr. Geller recommended a number of reforms to FE PA's policies, procedures, and customer notifications. More specifically, Mr. Geller recommended that FE PA undertake a review of all customer communication and notices, and make appropriate revisions to medical certificate language to accurately reflect statutory and regulatory requirements.[67] Mr. Geller also recommended that FE PA be required to revise its definition of confirmed low income customers, and its policies and procedures related to providing confirmed low income customers with winter moratorium protections.[68] Mr. Geller also set forth detailed recommendations to improve FE PA's policies and procedures related to LEP customers and security deposits.[69]

Paragraph 65 of the proposed Settlement provides that FE PA will undertake a review of all policies, procedures, and training materials for revision, where appropriate, to ensure that:

- All language reflects accurate requirements as required by statute, regulation, Commission orders and formal policies, and the Company's tariffs;
- FE PA's field representatives and customer service center representatives are provided with clear and robust directions for how to communicate with LEP customers.
- All customers with income at or below 250% FPL receive protection from termination for nonpayment during the Winter Moratorium as required by statute or regulation and consistent with Commission orders and formal policies;
- All guidance regarding the identification of "confirmed low-income" customers conforms with the PUC's regulations for electric distribution utilities, including as related to the waiver and/or refund of security deposits in such instances;
- All guidance related to security deposits and the refund thereof;

[66] Id. at 67.
[67] CAUSE-PA St. 1 at 62: 1-12.
[68] Id. at 66: 6-26.
[69] Id. at 62-64.

- All customer notices and communications containing references related to medical certificate requirements to ensure they are compliant with all legal requirements, as outlined under Paragraph 65.

The provisions of Paragraph 65 of the proposed Settlement are reasonable and should be approved without modification.

As discussed, Mr. Geller explained that FE PA is not adequately engaging with LEP customers, and recommended reforms so that LEP customers could obtain important information related to their services. Requiring FE PA to revise its policies and procedures so that its field representatives and customer service representatives are provided with clear and robust direction for communicating with LEP customers will help to ensure that FE PA's field and customer service representatives are applying consistent and transparent standards when they encounter LEP customers.

Mr. Geller raised extensive concerns in his direct testimony that FE PA's notices did not accurately reflect payment arrangements requirements for obtaining medical certificates, as discussed above. Requiring FE PA to undertake review and revision of communications related to medical certificates to ensure compliance with legal requirements will help to ensure that FE PA makes appropriate revision to medical certificate requirements in notices and other customer communications in compliance with statutory and regulatory requirements.

As discussed, Mr. Geller raised extensively concerns that FE PA's definition of "confirmed low income" was improperly restrictive and limited the ability of low income customers to be identified and access assistance. In conjunction with the requirements in Paragraph 63 of the proposed Settlement, Paragraph 65 of the proposed Settlement will help to further ensure that FE PA's identification of "confirmed low income" customers conforms with the Commission's regulations. In addition, Paragraph 65 helps to ensure that customers at or below 250% FPL are not improperly terminated for nonpayment during Winter Moratorium. These provisions

reasonably address Mr. Geller's concerns that FE PA improperly terminates low income customers during the Winter Moratorium, as detailed above.

As discussed below, the proposed Settlement also requires FE PA to revise its tariff language to ensure that its policies related to security deposits for low income customers are in compliance with statutory and regulatory requirements. The provisions contained with Paragraph 65 of the proposed Settlement requires that FE PA to undertake review and revision of its security deposit and refund policies will help to ensure that FE PA's policies, procedures, and training materials similarly comport with statutory and regulatory requirements related to security deposits. For these reasons, we assert that these Settlement provisions are reasonable, in the public interest, and should be approved without modification.

Security Deposits Protections, Low Income Customers

Section 56.32(e) of the Commission's regulations prohibits utilities from collecting security deposits from customers who are confirmed to be income eligible for its customer assistance programs.[70] The Commission has issued explicit guidance on this issue and was clear that a low income household does not need to enroll in CAP or another universal service program for the prohibition on security deposits to apply.[71] The Commission also requires both verbal notice of the exemption to be provided to applicants and customers *at the time the security deposit is assessed*, as well as instructions for how the applicant or customer can verify income.[72]

As discussed, Mr. Geller explained that FE PA's methods of tracking confirmed low income customers detrimentally impacts the ability of customers to access certain protections, including

[70] 52 Pa. Code § 56.32(e). CAUSE-PA St. 1 at 67.
[71] Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C.S. Ch. 14, L-2015-2508421, Final Rulemaking Order, Attach. One at 48 (Feb. 28, 2019). CAUSE-PA St. 1 at 67.
[72] Id; 52 Pa. Code §§ 56.36, 56.286. CAUSE-PA St. 1 at 67.

the exemption of low income customers from collection of security deposits.[73] Mr. Geller recommended that FE PA revise its definition and identification of confirmed low income customers, and apply security deposit exemptions in all circumstances where a customer has indicated low income status.[74] Mr. Geller further recommended that FE PA be required to develop an automated process to immediately refund all security deposits to confirmed low income customers.[75]

Paragraph 66 of the proposed Settlement provides that FirstEnergy will amend its tariff regarding cash security deposits to advise that (a) FE PA will not require applicants/customers to provide cash deposits when they provide information demonstrating that they qualify as a confirmed low income customers; and (b) any customer who previously posted a cash security deposit, and subsequently found exempt from a deposit demand, will be refunded that deposit within 30 days of identifying the customer as confirmed low income. These provisions at Paragraph 66(b) further provide that these refunds will be made directly to the customer, unless FE PA obtains informed consent to apply the security deposit to the customer's account balance. Finally, Paragraph 67 provides that the associated review and revision will be completed within 12 months of the final order in this proceeding, and will be conducted in consultation with the Commission's Bureau of Consumer Services (BCS) and FE PA's USAC.

We assert that the provisions contained in Paragraphs 66-67 of the proposed Settlement represent important improvements to FE PA's policies and procedures related to waiver and return of security deposits for low income customers, and should be approved. These provisions provide important clarity related to FE PA's policies and procedures for exempting and returning security

[73] CAUSE-PA St. 1 at 67.
[74] Id. at 68: 7-12.
[75] Id. at 68: 7-12.

deposits to its low income customers. Requiring FE PA to obtain informed consent before applying security deposits to account balances will help to ensure that FE PA's low income customers are able to make an informed decision whether deposits are refunded or applied to their accounts. Finally, requiring FE PA to make revisions associated with these provisions in consultation with BCS and FE PA's USAC will help FE PA to obtain important feedback related to whether their policy revision are appropriate, and in compliance with statute, regulation, and Commission directives.[76] For these reasons, we assert that the provisions contained in Paragraphs 66-67 of the proposed Settlement are reasonable, in the public interest, and should be approved without modification.

ix. *Language Access*

Through his direct testimony, Mr. Geller raised concerns that FE PA's customers with Limited English Proficiency (LEP) are not provided with sufficient and accessible information by field representatives.[77] In particular, Mr. Geller noted that FE PA's training materials do not detail how field representatives should communicate with LEP customers, the availability of translation or interpretation services, or how they provide adequate information to ensure that LEP customers can learn about imminent terminations, and their right and protections related to the same.[78]

Mr. Geller recommended that FE PA be directed to undertake a full review of its policies, procedures, and attendant training materials, to ensure that FE PA's field representatives are provided with clear and robust directions for how to communicate with LEP customers.[79] Mr. Geller recommended that these revisions include, whenever a field representative is not fluent in

[76] 52 Pa. Code § 56.32(e). Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C.S. Ch. 14, L-2015-2508421, Final Rulemaking Order, Attach. One at 48 (Feb. 28, 2019). 52 Pa. Code §§ 56.36, 56.286. CAUSE-PA St. 1 at 67.
[77] CAUSE-PA St. 1 at 62-63.
[78] Id.
[79] CAUSE-PA St. 1 at 64: 4-12.

a customer's preferred language, how the field representative can access telephonic interpretational services utilized by FE PA.[80]

Paragraph 68 of the proposed Settlement requires that FE PA, beginning no later than March 1, 2025, provide its field representatives with a card in English and Spanish that field representatives can share with customers to facilitate a response to questions to confirm whether there is a medical condition in the home, whether a protection from abuse order or other court order with evidence of domestic violence is in effect, or in winter months (i.e. from December 1 to March 31) whether the household's income is at or below 250% FPL – thereby triggering additional protections at the service location. These cards will be in plain language and will include a phone number consumers can call for direct translation and interpreter services.

CAUSE-PA asserts that these provisions of the proposed Settlement represent a compromise that reasonably balances the varied interests of the Settling parties. While Mr. Geller's recommendations were not adopted in their entirety, these provisions will require FE PA to provide its field representatives with new tools to communicate with Limited-English Proficient (LEP) customers in the field. Requiring that FE PA provide its field representatives with cards in English and Spanish which they can provide to customers will help LEP customers to better learn about their rights and protections related to service termination, and how to access direct translation and interpretation services to discuss their accounts. These provisions also provide important clarity to FE PA's current policies and procedures related to field representative interaction with LEP customers, as discussed above. For these reasons, these proposed Settlement provisions are reasonable, in the public interest, and should be approved without modification.

[80] Id.

x. *Analytic Technologies*

CAUSE-PA did not take a position in this proceeding related to the Analytic Technology issues set forth in Paragraphs 69 of the proposed Settlement.

xi. *Reconnection Fees*

Pursuant to the requirements in the Joint Petition of FE PA's predecessor Companies for Approval of Their Involuntary Remote Disconnect Procedures, at Docket Nos. P-2019-3013979, et al, Paragraph 35.n., FE PA agreed to perform an analysis of the changes in costs as a result of performing remote terminations and reconnections and propose an appropriate reconnect fee based on actual costs during its next base rate proceeding.[81] FE PA initially proposed a reconnection fee across its Rate Districts of $15.[82] Mr. Geller opposed FE PA's proposal and explained that confirmed low income and PCAP customers are terminated for nonpayment at far greater rates compared to residential customers as a whole.[83] FE PA's low income customers are subsequently able to reconnect to services at far lower rates compared to residential customers as a whole.[84] FE PA's reconnection fees pose substantial and punitive barriers for low income customers to reestablish service.[85] Mr. Geller recommended that FE PA be required to waive reconnection fees for all confirmed low income customers.[86]

Paragraph 70 of the proposed Settlement provides that, within 6 months following approval of a final order in this proceeding, FE PA will begin allowing hardship funds to be used for purposes of payment of reconnection fees for all confirmed low income customers. This Paragraph further provides that, for PCAP participants seeking to reconnect service following an involuntary

[81] CAUSE-PA St. 1 at 68-69.
[82] Id. at 69: 5-11.
[83] Id. at 69-70.
[84] Id. at 70: 1-8.
[85] Id. at 70-71.
[86] Id. at 71: 3-14.

termination, reconnection fees will not be required to be paid upfront as a condition of reconnection and will be added to any remaining pre-program arrearages upon reenrollment in the program. Finally, this Paragraph provides that any associated tariff revisions pursuant to the Paragraph will be completed within 12 months of the Commission's entry of a final order in this proceeding.

The proposed Settlement provisions at Paragraph 70 reasonably balance the interests and positions of the Settling parties in this proceeding. Requiring that FE PA be required to accept hardship funding for the purposes of paying reconnection fees for confirmed low income customers, and waiving reconnection fees for PCAP customers by instead adding these fees as deferred arrears on reenrollment, will help low income customers to reconnect to services without facing restrictive barrier posed by reconnection fees. These provisions reasonably address Mr. Geller's concerns, in light of the positions of the other parties to this proceeding. We therefore assert that these provisions are reasonable, in the public interest, and should be approved without modification.

H. ADDITIONAL PROVISIONS

xii. *Reliability and Operations*

CAUSE-PA did not take a position in this proceeding related to the Reliability and Operations issues set forth in Paragraphs 71 of the proposed Settlement.

xiii. *Non-Basic Services*

CAUSE-PA did not take a position in this proceeding related to the Non-Basic Service issues set forth in Paragraphs 72 of the proposed Settlement. CAUSE-PA is nevertheless supportive of the provisions contained in Paragraph 72 of the proposed Settlement. These provisions are important to ensuring that non-basic service charges are clearly labeled as such, and accounted for separately to ensure nonpayment of these charges does not form the basis of involuntary termination. As such

we assert that these provisions are just, reasonable, in the public interest, and should be approved without modification.

xiv. Electric Vehicle (EV) Pilot

Through his testimony in this matter, Mr. Geller raised significant concerns that FE PA's proposed Electric Vehicle (EV) proposals did not adequately consider and account for the significant barriers to EV adoption faced by low income families and their communities.[87] Mr. Geller recommended that, if the EV pilot was approved, confirmed low income customers should be excluded from paying the costs of the EV Pilot.[88] Mr. Geller also recommended that FE PA be required to devote at least 50% of the fleet and public transportation incentives to entities situated in or that primarily serve environmental justice (EJ) communities.[89]

Paragraph 73 provides that FE is withdrawing all elements of its EV proposal. Paragraph 73 requires, within 12 months of the final order in this proceeding, FE PA to initiate work with interested stakeholders to develop a new EV distribution rate specifically for public-facing EV chargers (similar to PECO Energy Company's EV-FC Rider), and to seek Commission approval for such a rate in its next general base rate case.

We assert that the provisions contained in Paragraph 73 of the proposed Settlement provide important changes to FE PA's initial proposal, in light of the concerns raised by Mr. Geller and other parties to this proceeding. In conjunction with withdrawing FE PA's EV proposal in this matter, the proposed Settlement sets forth a process for FE PA to engage with stakeholders to develop a new EV distribution rate related to public-facing EV chargers. While Mr. Geller did not take a specific position related to EV distribution rates in this proceeding, we assert that this

[87] CAUSE-PA St. 1 at 74-76.
[88] Id. at 76-77.
[89] Id. at 76-77.

stakeholder process will provide a forum where stakeholders can discuss EV rate issues with the Company and ensure future proposals are more equitable and responsive to the needs of various communities and stakeholders. For these reasons, we assert that the provisions contained at Paragraph 73 of the proposed Settlement are reasonable, in the public interest, and should be approved without modification.

V. THE SETTLEMENT IS IN THE PUBLIC INTEREST

The Commission's regulations lend unambiguous support for settlements, and declare: "It is the policy of the Commission to encourage settlements."[90] The Commission has also set explicit policy guiding settlement of a major rate case, explaining in its codified statement of policy that "the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding."[91] Settlements are preferred, at least in part, because they "lessen the time and expense that Parties must expend litigating a case and, at the same time, conserve resources."[92] In reviewing whether to approve a proposed settlement, the Commission must determine whether the terms and conditions are in the public interest based on a preponderance of the evidence "showing a likelihood or probability of public benefits that need not be quantified or guaranteed."[93] Historically, the Commission has defined the public interest as inclusive of ratepayers, shareholders, and the regulated community at large.[94] Of course, proposed settlement terms must also be consistent with applicable law.[95]

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[90] 52 Pa. Code § 5.231.
[91] 52 Pa. Code § 69.401.
[92] See Commonwealth of Pa. et al. v. IDT Energy, Inc., Docket No. C-2014-2427657, at 35-37 (Tentative Order entered June 30, 2016).
[93] See id. (quoting Popowsky v. Pa. PUC, 594 Pa. 583, 937 A.2d at 1040 (2007)).
[94] See id. (citing Pa. PUC v. Bell Atlantic Pennsylvania, Inc., Docket No. R-00953409 (Order entered Sept. 29, 1995)).
[95] See id. (citing Dauphin County Indus. Dev. Auth. v. Pa. PUC, 2015 Pa. Commw. LEXIS 381 (Sept. 9, 2015)).

The proposed Settlement was achieved by the Joint Petitioners after a searching investigation of FE PA's filings. The Joint Petitioners engaged in extensive informal and formal discovery to investigate FE PA's filings and proposals and submitted lengthy testimony in this proceeding that covered a range of critical issues regarding FE PA's rates and attendant policies, procedures, and programs governing the delivery of critical service to hundreds of thousands of Pennsylvanians across FE PA's service territory. The proposed Settlement was developed after extensive negotiation and consideration by the Joint Petitioners.

CAUSE-PA asserts that the proposed Settlement is in the public interest. The proposed Settlement represents a balanced compromise of the issues raised by the Settling parties and amicably resolves a substantial number of issues raised in this proceeding, thereby avoiding additional costly litigation on these issues.[96] The proposed Settlement is consistent with Commission rules and practice encouraging settlements, set forth in 52 Pa. Code §§ 5.231, 69.391, 69.401-69.406, and is supported by substantial record evidence.[97] For these reasons, and the reasons set forth throughout this Statement in Support, CAUSE-PA submits the proposed Settlement is just, reasonable, in the public interest, and should be approved without modification.

VI. SETTLEMENT CONDITIONS

In Paragraphs 78 to 84, the proposed Settlement sets forth several additional terms and conditions related to the proposed Settlement that ensure that Settling parties retain certain right and obligations related to the proposed Settlement. Paragraph 81 provides that, any issues not specifically addressed in these settlement terms are not deemed as accepted or rejected as part of this black box settlement. The proposed Settlement shall not be construed as approval of any Joint

[96] Id.
[97] Id.

Petitioner's position on any issue, except to the extent required to effectuate the terms and agreements of the proposed Settlement.

Paragraph 82 provides that each term and condition set forth in this Joint Petition, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.

Paragraphs 78-84 of the proposed Settlement provides that, unless otherwise expressly indicated, all terms and conditions contained herein shall take effect upon issuance of a final order in this proceeding, without the need or requirement for additional Commission review or approval.

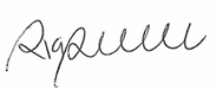
Taken together, the additional terms and conditions set forth in the proposed Settlement represent a balanced compromise of the interests of the Joint Petitioners and set forth additional rights and obligations of the Joint Petitioners in a fair and reasonable manner that is in the public interest and should be approved. These additional proposed Settlement conditions help to preserve unresolved issues of concern for resolution in future cases and set forth important rules of construction that will help to improve clarity and improve alignment in future enforcement of proposed Settlement provisions.

VII. CONCLUSION

The proposed Settlement was achieved by the Joint Petitioners after an extensive investigation of FE PA's filing and negotiations amongst the parties. CAUSE-PA asserts that the proposed Settlement is a reasonable resolution to a variety of complex issues, is in the public interest, and should be approved. Acceptance of the proposed Settlement avoids the necessity of further administrative and possible appellate proceedings about the settled issues – which would

have been undertaken at a substantial cost to the Joint Petitioners. Accordingly, CAUSE-PA respectfully requests that ALJ Dunderdale, ALJ DeVoe, and the Commission approve the proposed Settlement without modification.

Respectfully submitted,
Counsel for CAUSE-PA



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Appendix P

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	DOCKET NO. R-2024-3047068
v.	:	C-2024-3048673
	:	
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY	:	

STATEMENT IN SUPPORT OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS

The Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively referred to herein as "the Large User Groups"), by and through their counsel, submit this Statement in Support ("Statement") of the Joint Petition for Approval of Settlement of All Issues ("Joint Petition" or "Settlement"), filed in the above-captioned proceedings with the Pennsylvania Public Utility Commission ("PUC" or "Commission"). The Joint Petition reflects a settlement among all active parties with respect to all issues and concerns raised in FirstEnergy Pennsylvania's ("FE PA" or "Company") Supplement No. 3 to FE PA's Tariff Electric – Pa. P.U.C. No. 1 ("Supplement No. 3), which sought a base rate increase, pursuant to 66 Pa. C.S. Section 1308 of the Public Utility Code, of approximately $502 million across all FE PA Rate Districts.

As a result of settlement discussions, FE PA, the Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Large User Groups, the International Brotherhood of Electric Workers Local

459 ("IBEW Local 459"), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"), the UWUA System Local 102 ("UWUA 102"), Walmart, Inc. ("Walmart"), and the Pennsylvania State University ("PSU") (collectively, "Joint Petitioners" or "Parties") hereby file this Settlement and respectfully request that Administrative Law Judge Katrina L. Dunderdale ("ALJ Dunderdale") and Administrative Law Judge Emily I. DeVoe ("ALJ DeVoe") (collectively, "the ALJs") and the Commission approve FE PA's distribution base rate increase filing subject to the terms and conditions of the Settlement.

The Large User Groups offer this Statement in Support to further demonstrate that the Settlement is in the public interest and should be approved without modification.

I. BACKGROUND

1. On April 2, 2024, FE PA filed Supplement No. 3, inclusive of responses to filing requirements and standard data requests, supporting direct testimony, and exhibits with the PUC ("2024 Base Rate Case"). In Supplement No. 3, the Company sought a base rate increase of approximately $502 million annually across all FE PA Rate Districts. Specifically, FE PA proposed rates designed to increase annual distribution revenues as follows: Met-Ed Rate District - $146 million; Penelec Rate District - $132 million; Penn Power Rate District - $55 million; and West Penn Rate District - $169 million. Supplement No. 3 also contained non-substantive revisions to the language of certain Rules and Regulations, rate schedules, and riders.

2. On April 24, 2024, the Large User Groups submitted a Joint Complaint in response to FE PA's 2024 Base Rate Case, as the Large User Groups are some of FE PA's largest customers. Specifically, MEIUG members purchase service from the Met-Ed Rate District primarily under Rate Schedules GP and TP. PICA members purchase service from the Penelec Rate District primarily under Rate Schedules GP and TP. WPPII members purchase service from the West Penn

Rate District primary under Rate Schedules GP/TP and 46. As such, the Large User Groups were concerned that the distribution rates paid by members, as well as the terms and conditions of service offered to members, would be adversely impacted as a result of FE PA's 2024 Base Rate Case.

3. A Prehearing Conference was held on May 2, 2024, at which time various procedural matters were discussed and a litigation schedule was established. Pursuant to that schedule, the Large User Groups submitted Large User Groups Statement No. 1, Direct Testimony of Brian C. Andrews; Large User Groups Statement No. 1S, Supplemental Direct Testimony of Brian C. Andrews; Large User Groups Statement No. 1R, Rebuttal Testimony of Brian C. Andrews; and Large User Groups Statement No. 1SR, Surrebuttal Testimony of Brian C. Andrews.

4. The focus of the Large User Groups' Direct, Supplement, Rebuttal, and Surrebuttal Testimony was to assess FE PA's proposed revenue allocations within the Met-Ed, Penelec, and West Penn Rate Districts, as well as the allocation and collection of costs related to FE PA's proposed Streetlighting Conversion Program.

5. Evidentiary hearings were held on August 15 and 19, 2024, at which time a Joint Stipulation for the admission of all pre-served testimony and exhibits was submitted.

6. On August 22, 2024, counsel for FE PA informed the ALJs that a unanimous settlement of all issues had been reached.

7. The ALJs directed the Joint Petitioners to submit the Joint Petition and accompanying Statements in Support by September 13, 2024.

II. STATEMENT IN SUPPORT

8. The Commission has a strong policy favoring settlements. As set forth in the PUC's regulations, "[t]he Commission encourages parties to seek negotiated settlements of contested

proceedings in lieu of incurring the time, expense and uncertainty of litigation." 52 Pa. Code § 69.391; *see also* 52 Pa. Code § 5.231. Consistent with the Commission's Policy, the Joint Petitioners engaged in negotiations to resolve the issues raised by various parties. These ongoing discussions produced the foregoing Settlement.

9. The Joint Petitioners agree that approval of the proposed Settlement is in the best interests of the Parties involved, as the Joint Petition reflects a carefully balanced compromise of the Joint Petitioners' positions on various issues. In other words, the Joint Petition is in the public interest.

10. The Joint Petitioners agree that FE PA's electric distribution base rate increase filing should be approved, including those tariff changes included in and specifically identified in Appendix A of the Joint Petition, subject to the terms and conditions of the Settlement as set forth in the Joint Petition. Specifically, the Joint Petition provides for the following:

a. FE PA shall be permitted to submit a revised tariff supplement that is designed to produce an overall, annual electric distribution revenue increase of $225 million, to become effective on January 1, 2025, in lieu of FE PA's originally filed request of $502 million.

b. FE PA's class revenue allocation will be based upon Appendix E of the Joint Petition, as compared to FE PA's as-filed proposed revenue allocation.

c. FE PA will create a Rider for its Streetlighting Conversion Program, the costs of which will be allocated among the customer classes by Network System Peak Load ("NSPL") and charged on a cents/kwh basis for Residential and Commercial customer classes and a dollars/kw basis for

Industrial customer classes. FE PA has removed the expense of this program from its overall annual electric distribution revenue increase.

d. FE PA agrees that it will not file another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027.

e. FE PA agrees to refund customers $13.6 million as a one-time fixed bill credit based on customer counts within thirty days of the Commission's entry of a final order in this proceeding. The $13.6 million will be allocated to rate schedules on the basis of 2023 distribution revenues.

11. The Joint Petition is in the public interest for the following reasons:

a. As a result of the Joint Petition, expenses incurred by the Joint Petitioners and the Commission for completing this proceeding will be less than they would have been if the proceeding had been fully litigated.

b. Uncertainties regarding further expenses associated with possible appeals from the Final Order of the Commission are avoided as a result of the Joint Petition.

c. The Settlement increases FE PA's overall rate increase by $225 million, which is approximately 45% of the Company's original request.

d. The Joint Petition provides a just and reasonable means by which to allocate the resulting increase among the Companies' customer classes in a manner that generally moves the customer classes closer to their cost to serve while also recognizing the need for gradualism and minimize rate shock.

e. The Joint Petition provides a transparent collection of FE PA's proposed Streetlighting Conversion Program costs through a surcharge, while also ensuring a just and reasonable rate allocation and collection of these costs.

f. The Joint Petition reflects a compromise on all sides presented without prejudice to any position any Joint Petitioner may have advanced so far in this proceeding. Similarly, the Joint Petition is presented without prejudice to any position any party may advance in future proceedings involving FE PA.

12. In addition, the Joint Petition specifically satisfy the concerns of the Large User Groups in the following ways:

a. Through negotiations, the Joint Petitioners were able to compromise their competing litigation positions to arrive at a Settlement revenue increase that is approximately 55% less than FE PA's overall requested increase. See Joint Petition § 41.

b. On a Rate District basis, the Met-Ed Rate District will receive an increase that is 73% less than FE PA's original request; the Penelec Rate District will receive an increase that is 56% less than FE PA's original request; and the West Penn Rate District will receive an increase that is 40% less than FE PA's original request. See Joint Petition, § 42. This Rate District-specific increase is within the range proposed by the parties while also providing a significantly lower rate increase than FE PA's original request.

c. As part of this proceeding, FE PA proposed to allocate its total revenue and costs to each of the retail customer classes based upon a class Cost of

Service Study ("COSS"). The various parties, including the Large User Groups, took differing positions on revenue allocation; however, the parties were able to achieve consensus as set forth in Appendix E to the Settlement. See Joint Petition, § 43; see also Joint Petition, Appendix E. Appendix E takes into consideration the various litigation positions of the Parties and achieves a just and reasonable increase for the various customer classes.

d. The revenue allocation addresses concerns regarding the proposed rate increases for Rates GP, TP, and 46 on the Met-Ed, Penelec, and West Penn Rate Districts, which are the rate schedules under which the Large User Groups' members receive service. Specifically, for the Met-Ed Rate District, Rates GP and TP will receive 8.2% and 8.3% increases, respectively. For the Penelec Rate District, Rates GP and TP will receive approximately 12% increases. For the West Penn Rate District, Rate GP/TP will receive a 25.7% increase while Rate 46 will receive a 25.5% increase. Accordingly, the Large User Groups support the Joint Petition as providing for a reasonable resolution of revenue allocation. Id.

e. Although FE PA originally proposed to recover costs for its Streetlighting Conversion Program through a regulatory asset subject to true-up, pursuant to the Settlement, FE PA will create a Rider for this Program. See Joint Petition, § 45. The Large User Groups support this change in collection to allow for greater transparency with respect to these costs.

f. Just as importantly, the costs of the Streetlighting Conversion Program will be allocated among the customers classes by Network System Peak Load

("NSPL") and charged on a cents/kWh basis for Residential and Commercial customer classes and on a dollars/Kw basis for Industrial customer classes. See Joint Petition, § 45. Because this provision ensures an appropriate cost allocation and collection of these costs, the Large User Groups supports the Joint Petition.

g. Moreover, as part of the Settlement, FE PA has removed the expense of the Streetlighting Conversion Program from the overall annual electric distribution revenue increase set forth in this Settlement. See Joint Petition, § 45. The Large User Groups submit that this removal is appropriate and important for purposes of the Settlement.

h. As a condition of the Settlement, FE PA agrees not to file for another general base rate increase for any of its Rate Districts for new rates to be effective prior to January 1, 2027. *See* Joint Petition, § 46. The Large User Groups support this condition, as it provides customers with two years of distribution rate stability.

13. The Large User Groups support the foregoing Joint Petition because it is in the public interest; however, in the event that the Joint Petition is rejected by the ALJs or the Commission, the Large User Groups will resume their litigation position, which differs from the terms of the Joint Petition.

14. As set forth above, the Large User Groups submit that the Settlement is in the public interest and adheres to Commission policies promoting negotiated settlements. The Settlement was achieved after numerous settlement discussions. Although the Joint Petitioners have invested time and resources in the negotiation of the Joint Petition, this process has allowed the parties, and

the Commission, to avoid expending the substantial resources that would have been required to fully litigate this proceeding while still reaching a just, reasonable, and non-discriminatory result. Joint Petitioners have thus reached an amicable solution to this dispute as embodied in the Settlement. Approval of the Settlement will permit the Commission and Joint Petitioners to avoid incurring the additional time, expense, and uncertainty of further litigation of a number of major issues in this proceeding. *See* 52 Pa. Code § 69.391.

III. CONCLUSION

WHEREFORE, MEIUG, PICA, and WPPII respectfully request that the ALJs and the Commission approve, without modification, the Joint Petition for Approval of Settlement of All Issues filed in the above-captioned proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: September 13, 2024

Appendix Q

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	R-2024-3047068
Office of Consumer Advocate	:	C-2024-3048327
Office of Small Business Advocate	:	C-2024-3048411
Annette Martin	:	C-2024-3048409
Met-Ed Industrial Users Group, et al.	:	C-2024-3048673
Donald Ellenberger	:	C-2024-3048783
Pennsylvania State University	:	C-2024-3048958
Connie Dunmyer	:	C-2024-3049013
Mark Bowers	:	C-2024-3049014
Amy Stutzman	:	C-2024-3049016
Amy Stutzman	:	C-2024-3049017
Hattie Coates	:	C-2024-3049021
John J. Dolan	:	C-2024-3049128
Utility Workers Union of America Local 102	:	C-2024-3049235
David R. VanNorman, Jr.	:	C-2024-3049599
Roland Hoffman	:	C-2024-3049608
David Hoffman	:	C-2024-3049661
Judith A. Garofolo	:	C-2024-3049665
Elaine Kitts	:	C-2024-3049679
Ryan Gandelman	:	C-2024-3049683
Beth Gandelman	:	C-2024-3049774
Charles E. Schwering	:	C-2024-3049805
John Piccinic	:	C-2024-3049957
Henry Barzilay	:	C-2024-3049999
Stanley and Lois LaFuria	:	C-2024-3050000
Albert Dilworth	:	C-2024-3050001
Jackie Stoner	:	C-2024-3050413
	:	
v.	:	
	:	
FirstEnergy Pennsylvania Electric Company	:	

STATEMENT OF
THE PENNSYLVANIA STATE UNIVERSITY
IN SUPPORT OF THE
JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES

The Pennsylvania State University ("PSU" or "Penn State") submits this Statement in Support of the Joint Petition for Approval of Settlement of All Issues ("Joint Petition" or

"Settlement") filed by FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company"), the Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Large Users Group,[1] the International Brotherhood of Electrical Workers Local 459 ("IBEW Local 459"), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777"), the UWUA System Local 102 ("UWUA 102"), Walmart, Inc. ("Walmart"), and PSU, parties to the above-captioned proceeding (collectively, "Joint Petitioners").

As indicated in the Joint Petition, the proposed Settlement has been agreed to or unopposed by all active parties in this proceeding.[2] Accordingly, and as discussed more fully below, PSU offers its support for the Settlement terms related to the issues in which PSU participated in this proceeding. Specifically, the revenue allocation agreed to and set forth in Paragraph 42 and Appendix E of the Joint Petition. Accordingly, PSU requests that the presiding Administrative Law Judges Katrina L. Dunderdale ("ALJ Dunderdale") and Emily I. DeVoe ("ALJ Devoe") (collectively, "ALJs") and the Pennsylvania Public Utility Commission ("Commission") grant the Joint Petition and approve the Settlement as submitted, without modification.

I. INTRODUCTION

1. PSU incorporates by reference the background contained in Section II of the Joint Petition.[3]

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[1] The Large Users Group is comprised of the Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), and West Penn Power Industrial Interveners ("WPPII").

[2] A number of individuals filed *pro se* formal complaints opposing the proposed rate increase. None of these complainants were active parties in this proceeding.

[3] *See*, Joint Petition ¶¶ 1-37.

2. PSU generally supports Commission approval of the Settlement and its terms, without modification. The Joint Petitioners were able to resolve their differences via settlement terms that represent a reasonable compromise of the various parties' positions in a manner which is reasonable, in the public interest, and fully resolves all issues among them. The Settlement, taken as a whole, is in the public interest and should be approved by the Commission.

3. PSU supports Commission approval of the proposed revenue allocation and rate design, without modification. Settlement on revenue allocation and rate design was achieved after extensive scrutiny of FE PA's filing (and data in support thereof), analysis of voluminous interrogatories, the significant testimony and varying positions concerning rate allocation and rate design, and subsequent extensive negotiations representing give and take by the settling parties. The Joint Petitioners were able to come to just and reasonable rates within the broad array of litigation positions of the parties. The Settlement, taken as a whole, is in the public interest and should be approved by the Commission.

II. STANDARDS FOR APPROVAL OF SETTLEMENT

4. In order to accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. Pub. Util. Comm'n v. C.S. Water and Sewer Assoc.*, 74 Pa. PUC 767 (1991); *Pa. Pub. Util. Comm'n v. Philadelphia Electric Co.*, 60 Pa. PUC 1 (1985).

5. Additionally, Commission policy "encourage[s] settlements." 52 Pa. Code § 5.321(a). Settlements lessen the time and expense the parties must expend litigating a case and at the same time conserves the resources of the Commission. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. 52 Pa. Code § 69.401.

III. SPECIFIC SETTLEMENT TERMS

A. REVENUE REQUIREMENT

6. PSU has no specific comments on the revenue requirements terms contained in the Settlement.

B. ALTERNATIVE RATEMAKING

7. PSU has no specific comments on the alternative ratemaking terms contained in the Settlement.

C. REVENUE ALLOCATION

8. The agreed upon revenue allocation of the increase of $225.0 million across all rate districts is set forth in Appendix E. The rate revenue increase distributed to the West Penn Rate District, of which PSU is part of, is $102,730,000.[4]

9. The revenue allocation settlement is a compromise between gradualism and achieving rates designed to provide the full cost of service for each rate class. FE PA's as-filed revenue allocation, which sought to move all classes 10% towards the system rate of return ("ROR"), would have resulted in some rate classes subsidizing other rate class's costs.[5] Conversely, PSU's proposed revenue allocation would have moved all customer classes towards the system ROR and thus better aligns with cost causation principles and would not result in one rate class subsidizing another rate class's costs.[6]

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4 *See also* Settlement ¶ 41.

5 PSU St. 1 at 6:8-12.

6 PSU St. 1 at 7:7-8.

10. Ultimately, allocation of a rate increase must be based on cost of service,[7] which entails a collection of wide-ranging and subjective judgments.[8] No party to this litigation purely relied on the unadulterated results of one specific cost of service study, but instead, while using a study or studies as a basis, takes the study and makes adjustments to come to a conclusion which in that parties' judgment is just and reasonable. Unsurprisingly, in large part, the selection of study, implementation and execution thereof, and "judgment" for adjustments reflect the allocation that is most beneficial to the class of customers that each party represents.[9]

11. The Settlement presents a revenue allocation that is within the range of likely litigated outcomes in this proceeding, but also recognizes principles of gradualism.[10]

12. Each rate district receives an increase that is below 1.5 times the system average increase, which is consistent with principles of gradualism. *Pa. Pub. Util. Comm'n, et al. v. Columbia Gas of Pa., Inc.* Docket Nos. R-2020-3018835, *et al*., 2021 WL 757073, at *138 (Opinion and Order entered Feb. 19, 2021) ("The record indicates that although there are no definitive rules for determining what kind of rate increase would violate the principles of gradualism, limiting the maximum average rate increase for any particular class to 1.5 to 2.0 times the system average increase is one common metric that has been used by experts in the Commonwealth.").

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7 *Lloyd v. Pa. Pub. Util. Comm'n*, 904 A.2d 1010, 1015 (Pa. Cmwlth. 2006).

8 *Pa. Pub. Util. Comm'n v. Pa. Power and Light Co.*, Docket Nos. R-842651, *et al.*, 1985 WL 1205434, at *84 (Opinion and Order entered Apr. 25, 1985).

9 The Company and I&E do not represent specific classes of ratepayers.

10 *See Pennsylvania Pub. Util. Comm'n v. Columbia Gas of Pennsylvania, Inc.*, Docket Nos. R-2022-3031211, *et al.*, 2022 WL 17717176, at *62 ("To the contrary, we approve the Parties' efforts at reaching a reasonable and just resolution of the allocation of revenues based upon their agreement that is within the range of possible outcomes argued by the Parties and supported by their respective experts' testimony.").

13. As such, the rate allocation and design are within the range of litigated outcomes supported by the expert testimony of each parties' witnesses, is based upon substantial evidence, and is the result of compromise on varying opinions and judgments based on the wide range of ratemaking principles accepted by the Commission and set forth by the parties on record.

14. Viewed in its entirety, the Settlement fairly and equitably resolves the issues impacting FE PA's rate districts and represents a fair balance of the interests of FE PA and its customers. Moreover, the Settlement eliminates the need for extensive and costly litigation before the Commission, which is ultimately borne by ratepayers. Furthermore, the Settlement provides regulatory certainty with respect to the disposition of issues, which benefits all parties.

15. Thus, PSU is generally supportive of the agreed-upon revenue allocation.

D. ENERGY EFFICIENCY AND CONSERVATION ("EE&C")

16. PSU has no specific comments on the energy efficiency and conservation terms contained in the Settlement.

E. UNIVERSAL SERVICE

17. PSU has no specific comments on the universal service terms contained in the Settlement.

F. OTHER ISSUES

18. PSU has no specific comments on the other issues terms contained in the Settlement.

V. CONCLUSION

PSU Supports the Joint Petition because the Settlement is without prejudice or admission to any position any party, including PSU, may take in any subsequent or different proceeding. In addition, the Settlement will enable the parties to avoid the expenditure of significant additional time and expense that would have been necessary to fully litigate this proceeding to a conclusion. This will result in significant savings to all parties, as well as to the Company's customers.

PSU submits the Settlement is in the public interest and requests that the Commission approve the same as presented in the Joint Petition for Settlement.

Respectfully submitted,

/s/ Whitney E. Snyder

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Counsel for The Pennsylvania State University

Dated: September 13, 2024

Appendix R

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3047068
	:	
FirstEnergy Pennsylvania Electric Company	:	

WALMART INC.'S
STATEMENT IN SUPPORT OF THE JOINT PETITION
FOR APPROVAL OF SETTLEMENT OF ALL ISSUES

Walmart Inc. ("Walmart"), by counsel, hereby submits this Statement in Support of the Joint Petition for Approval of Settlement of All Issues ("Settlement") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") by the parties in the above-referenced proceeding, and asserts that the terms of the Settlement are just and reasonable and that approval of the Settlement is in the public interest.

A. RELEVANT BACKGROUND

1. On April 2, 2024, FirstEnergy Pennsylvania Electric Company ("FE PA" or "Company") filed with the Commission Supplement No. 3 to the Company's Tariff Electric – Pa. P.U.C. No. 1 ("Filing"), representing a request for an annual general increase in the Company's electric distribution rates of approximately $502 million, or 34 percent, across all "Rate Districts." FE PA proposed the rates be effective June 1, 2024. The Company also requested a return on equity ("ROE") of 11.30 percent. The effective date of new rates was suspended until January 1, 2025, by Order of the Commission issued on April 25, 2024.

2. On May 2, 2024, Walmart filed a Petition to Intervene to participate in this proceeding. As indicated in its Petition to Intervene, Walmart is a national retailer with 116

Supercenters, 19 Discount Stores, 24 Sam's Clubs, 6 Distribution Centers, and 4 Fulfillment Centers in the Commonwealth of Pennsylvania. Walmart has 83 retail units, 5 distribution centers, and related facilities in the Company's service territory and purchases more than 295.5 million kWh annually from FE PA's operating entities, pursuant to Rate Schedule General Service-Large Demand (GSLD). As such, the cost of electricity comprises a significant portion of the operating costs of Walmart's various retail and distribution locations, and Walmart intervened in this proceeding in order to address its concerns with the potential impact of FE PA's proposed base rate increase.

3. To that end, on June 25, 2024, Walmart submitted the Direct Testimony of Lisa V. Perry, Director, Utility Partnerships – Regulatory, addressing certain aspects of the Company's requested base rate increase that presented significant concern to Walmart. These issues included the potential impact on customers of FE PA's proposed revenue requirement increase, the proposed allocation of any revenue increase among and between the Company's various rate classes, the Company's proposed rate design for the GSLD rate customers, and Walmart's recommendation that the Company be required to offer a tariff specifically for public electric vehicle ("EV") charging. *See generally* Walmart Statement No. 1.

B. STATEMENT IN SUPPORT OF THE SETTLEMENT

4. As stated in 52 Pa. Code § 5.231, "[i]t is the policy of the Commission to encourage settlements." In keeping with this policy, the parties in this case, including Walmart, engaged in numerous discussions on the many issues presented in the course of litigation. These negotiations ultimately produced the Settlement presented in this proceeding. The settling parties agree that this Settlement is in their best interests and in the best interests of the Pennsylvania public.

5. Walmart specifically supports the Settlement on the following grounds, pertaining to issues expressly raised in Walmart's case-in-chief:

a. The Settlement results in a significant decrease in the overall revenue levels requested by FE PA, from the Company's proposed $502 million increase to a reduced amount of $225 million. Settlement, ¶ 41. This reflects a significant compromise among the various parties' litigation positions, which Walmart believes will provide the Company with adequate going-forward revenues while also substantially mitigating the upcoming changes to all customers' rates. In addition, the Settlement provides for a base rate case filing stay-out for FE PA's electric rates through January 1, 2027, which provides an additional benefit of temporary rate stability to the Company's customers. *Id.* at ¶ 46.

b. The Settlement produces an allocation of revenues between the various rate classes that produces a fair and equitable resolution of this significant issue of disagreement among numerous parties. *Id.* at ¶ 43. The Settlement allocation does not reflect any specific, unjustified, or discriminatory benefit to any single class of ratepayers, and while alternative allocations could have been achieved in concert with various parties' different proposals through further litigation, Walmart is satisfied that the Settlement will produce generally just and reasonable cost-based allocations for the limited time period until the Company's next rate case filing.

c. The Settlement provides for a stakeholder process after the conclusion of this proceeding to explore development of a new EV distribution rate

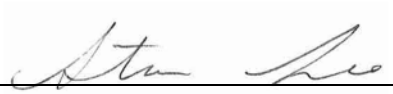
specifically for public-facing EV chargers for inclusion in the Company's next general distribution base rate case. *Id.* at ¶ 73. This is a significant Settlement term for Walmart that it recommended in its testimony and should contribute to advancing transportation electrification in the Commonwealth.

6. As stated above, the Settlement achieved by the parties in this case is the result of amicable negotiations and compromise by numerous parties with diverse interests. Accordingly, Walmart believes that the Settlement produces a non-discriminatory result that is in the public interest and advances the Commission's policy favoring settlements.

WHEREFORE, Walmart Inc. respectfully requests that Administrative Law Judge Katrina L. Dunderdale, Administrative Law Judge Emily I. DeVoe, and the Pennsylvania Public Utility Commission approve Joint Petition for Approval of Settlement of All Issues filed by the parties in this proceeding, without modification.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Counsel to Walmart Inc.

Dated: September 13, 2024

Appendix S

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric Company	Docket No. R-2024-3047068

INTERVENOR LOCAL 777 OF THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO'S STATEMENT IN SUPPORT OF THE JOINT PETITION FOR SETTLEMENT

Intervenor Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Local 777" or "Union") hereby submits this Statement in Support of the Joint Petition for Settlement, and respectfully requests the Settlement be approved by Administrative Law Judges Katrina L. Dunderdale ("ALJ Dunderdale") and Emily I. DeVoe ("ALJ DeVoe") (collectively, "ALJs") and adopted by the Pennsylvania Public Utility Commission ("Commission"). IBEW Local 777 believes the proposed Settlement is in the public interest for the reasons explained below.

I. INTRODUCTION

On April 30, 2024, IBEW Local 777 filed its Petition to Intervene in the above-captioned rate case. On May 2, 2024, IBEW Local 777 participated in the telephonic prehearing conference at which the ALJs and parties agreed to a litigation schedule.

Between May 2, 2024, and August 9, 2024, IBEW Local 777 served three sets of Interrogatories and one set of Requests for Production on FE PA, and submitted Direct, Rebuttal, and Surrebuttal Pre-Filed Testimony of its witness and Business Manager, Daulph Kline. On August 15 and 19, IBEW Local 777 participated in the Evidentiary Hearing, including vigorous cross-examination of several FirstEnergy Pennsylvania Electric Company ("FE PA") witnesses.

Settlement discussions among the parties were held before and after the Evidentiary Hearing. After multiple exchanges and compromises with FE PA, IBEW Local 777 finds the Settlement in the public interest and urges its approval by the ALJs and Commission.

II. SETTLEMENT TERMS

"The Commission encourages parties in contested on-the-record proceedings to settle cases." *Pa. Pub. Util. Comm'n v. PECO Energy Company—Electric Div.*, Docket No. R-2021-3024601, at 29 (Recommended Decision entered October 12, 2021, adopted by Commission November 18, 2021) (citing 52 Pa. Code § 5.231). A settlement, by definition, is a compromise of the positions that the parties have held. While not every issue is of equal concern to every party, on balance, these compromises "arguably foster[] and promote[] the public interest." *Id.* at 30.

Specifically, IBEW Local 777 submitted testimony and discovery, cross-examined witnesses, and reached compromises on the following settlement terms, which it would like to highlight for the ALJs and Commission's consideration:

a. Customer Service and Call Center (¶ 57)

The Settlement provides that FE PA will maintain its customer service performance

for customer call center, reliability of service, billing, meter reading, and response to customer complaints and disputes at levels consistent with its 5-year historic average, and to meet with parties, including IBEW Local 777, as requested and to the extent that FE PA's performance fall below expected levels.

As further explained in the Direct Testimony of IBEW Local 777's Witness Daulph Kline, IBEW Local 777 is the exclusive bargaining representative of ninety-seven (97) customer service representatives ("CSRs") employed by First Energy Service Company ("FESC") at its Call Center located at 2800 Pottsville Pike, Reading, Pennsylvania 19605-2459. In June 2024, IBEW Local 777 and FE PA negotiated a gradual wage increase for the CSRs. This wage increase is intended to bring wage parity to the CSRs at the Reading, PA Call Center, which has historically trailed behind the wages at FESC's Ohio and West Virginia Call Centers. These wages are critical to ensuring FESC has the ability to recruit and retain CSRs, which has been an ongoing issue for the last decade as more and more of this call center work is contracted out of the state. IBEW Local 777 submits that Pennsylvania-employees are the best to field Pennsylvania-customers' needs, and that keeping this work (and related taxes) in-state is the best interest of FE PA customers and will show measurable improvement in its call center performance metrics.

Given IBEW Local 777's investment in call center performance, FE PA agreed to meet with the Local as requested and to the extent that call center performance dipped below its 5-year historic average levels. This compromise is reflected in paragraph 57(a) of the Settlement, where FE PA commits to meet with the parties, including Intervenor IBEW Local 777, to discuss challenges to its customer service performance and its plans to

improve service levels. IBEW Local 777 believes this is a fair compromise to address customer service performance and is in the public interest.

b. Complaint Handling and Analysis (¶ 63)

In paragraph 63, the Settlement provides that within ninety (90) days of the Commission's entry of a final order in this proceeding, FE PA will develop internal protocols for a regular and proper root cause analysis ("RCA") of its complaint trends and will submit quarterly updates to statutory advocates and IBEW Local 777 until FE PA's next base rate filing. IBEW Local 777 submits that the RCA along with the mandatory reporting requirement is reasonable and in the public interest.

c. Analytic Technologies (¶ 67)

In paragraph 67 of the Settlement, FE PA commits to including a standing topic on its USAC meeting agendas through the filing of its next electric distribution rate proceeding related to the possible development and use of speech analytics software, artificial intelligence, and other such technologies to assist with the monitoring of phone call involving, or potentially involving, universal service programs and other low-income customers. As previously discussed, IBEW Local 777, in its capacity as the exclusive bargaining agent for nearly 100 CRSs within the FE PA footprint, is uniquely positioned to provide insight and practical considerations for the gradual adoption and implementation of analytic technologies, and as such, it is in the public interest that IBEW Local 777 be part of that conversation. To that end, the Settlement provides that IBEW Local 777 will receive USAC meeting agendas and will be considered an interested party with respect to discussions pertaining to Analytic Technologies. IBEW Local 777 submits that paragraph

67 is reasonable and in the public interest.

d. Reliability and Operations (¶ 69)

The Settlement provides that FE PA will increase its internal field hires such that it will replace the prior year's attrition level plus ten percent, on a Rate District basis further divided proportionally by local, beginning January 1, 2025 (for 2024 attrition) for a period of five (5) years or until its next base rate proceeding, whichever happens first. This provision, while still woefully inadequate, is a step in the right direction in addressing FE PA's overreliance on expensive contract labor.

As further explained in Daulph Kline's pre-filed testimony, contractor crews are an expensive, inefficient, and over-utilized source of labor within the FE PA footprint. Contractor crews routinely overstaff their crews, sending between three to five additional men per crew than FE PA crews, and thus charge a correspondingly higher rate to complete the exact same job. Contractors also maintain office space and full-time employees at FE PA's building—rent free—to complete oversight, engineering, and administrative tasks. Furthermore, contractors are held to less stringent training and certification standards than FE PA employees, making them a suboptimal source of labor.

The compromise found in paragraph 69 of the Settlement is a first step in addressing FE PA's overreliance on contracted labor by increasing FE PA's internal workforce. Once at sufficient levels, FE PA can transition more of its labor projects to internal crews, passing significant cost-savings onto ratepayers. As such, IBEW Local 777 submits that this provision is in the public interest and encourages its approval by the ALJs and Commission.

e. Electric Vehicles (¶ 71)

Paragraph 71 of the Settlement provides that FE PA will withdraw all elements of its EV Pilot and will initiate work with interested stakeholders, including IBEW Local 777, to (i) develop a new EV distribution rate for public-facing EV chargers, similar to PECO's Energy Company's EV-FC Rider, and (ii) seek Commission approval for such a rate in its next general base rate case. Based on IBEW Local 777's review of the testimony, discovery, and discussions with interested parties, IBEW Local 777 finds this provision reasonable and in the public interest.

f. Other Provisions in the Settlement

The Settlement includes other provisions not addressed by IBEW Local 777 in this Statement. IBEW Local 777 reviewed the full Settlement and submits that on balance, the Settlement is reasonable and in the public interest.

III. CONCLUSION

Based on its review of the complete Settlement, IBEW Local 777 finds the Settlement to be reasonable and in the public interest, and for that reason, submits the Settlement for approval by the ALJs and Commission.

Respectfully submitted,

O'BRIEN, BELLAND & BUSHINSKY, LLC
LUBIN & ENOCH, P.C.

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Appendix T

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September 4, 2024

The Honorable Katrina L. Dunderdale
The Honorable Emily DeVoe
Administrative Law Judges
Pennsylvania Public Utilities Commission
Suite 220, Piatt Place
301 Fifth Avenue
Pittsburgh PA 15222

Re: Pennsylvania Public Utilities Commission v. FirstEnergy
Docket No. R-2024-3047068

Dear Your Honors:

I represent the IBEW Local 459, an intervenor in the above referenced rate case. Please accept the following statement in support of the settlement on behalf of Local 459.

The IBEW Local 459 represents electrical linemen who work for FirstEnergy. Local 459 intervened in this case due to concerns over significant manpower shortages at FirstEnergy, and particularly the shortage of qualified linemen. This manpower shortage negatively impacts electric distribution reliability, service, and safety, and results in FirstEnergy's costly reliance on expensive outside contractors. The settlement provides a firm commitment by FirstEnergy to increase its internal workforce numbers over a five-year period or until the next rate case. This commitment serves the public interest as an increased workforce will help improve reliability, service and safety. It will also help reduce the company's reliance on expensive outside contractors. In light of the above, IBEW Local 459 fully supports the settlement and respectfully encourages your honors to grant the Joint Petition for Approval of Settlement of All issues.

Thank you for your consideration.

Sincerely,

Brian T. Kadlubek
Counsel for IBEW Local 459

Appendix U

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Attorneys-at-Law

Joseph J. Pass
Edward H. Walter
James A. Welker
Joseph Santino Pass*
Steven E. Winslow
Patrick K. Lemon

*also licensed in Ohio

of counsel
Joseph M. Burns**

**licensed in Illinois

Ben Paul Jubelirer (1904–1983)
Frank P. G. Intrieri (1942–1976)

September 3, 2024

The Honorable Katrina L. Dunderdale
The Honorable Emily DeVoe
Administrative Law Judges
Pennsylvania Public Utility Commission
Suite 220, Piatt Place
301 Fifth Avenue
Pittsburgh, PA 15222

Re: Pennsylvania Public Utility Commission v. First Energy
Docket No. R – 2024-3047068
UWUA System Local 102 Statement in Support of Settlement

Dear Judge Dunderdale and Judge Devoe:

UWUA System Local 102 ("UWUA 102") submits this letter as its statement in support of settlement.

In the settlement, First Energy firmly commits to growing the internal workforce by replacing year over year attrition plus 10% each year for a period of five (5) years or until the next rate proceeding. As such, the settlement serves the public interest in myriad respects. First, increasing the size of its qualified internal workforce will improve safety for the public at large and the hardworking men and women who work for First Energy. For instance, infrastructure will be maintained and safely installed, and employees will be safer on the job. Second, it will also improve service reliability as a larger workforce will be able to more readily respond to issues that arise as well as ensuring proper installation, maintenance, and servicing of new and existing infrastructure. Third, a larger internal workforce will necessarily reduce and curtail First Energy's utilization of expensive, and frequently, less qualified outside contractors. A less expensive, more

qualified workforce benefits the rate-paying public because it keeps labor costs at a fair and reasonable level. Fourth, increasing staffing levels will alleviate some of the strain and demands placed on the existing workforce who the public depends upon for critical infrastructure.

For these reasons, the Union respectfully requests that your honors approve the settlement and grant the parties' Joint Petition for Approval of Settlement of All Issues. Thank you for your time and consideration in this matter.

Sincerely,



Patrick K. Lemon
Counsel for UWUA Local 102